1201 N. Gower Street

Case Number: ENV-2023-1540-SCEA

Project Location: 1201 North Gower Street and 6121 West Lexington Avenue, Los Angeles, CA 90038

Community Plan Area: Hollywood

Council District: 13 – Hugo Soto-Martinez

Project Description: The Project Site is currently developed with two multi-family residential buildings (Building 1 with 28 dwelling units and Building 2 with 44 dwelling units) and two parking garage structures (Garage Buildings) with 51 parking spaces. The Project includes the demolition and removal of the two Garage Buildings and Building 1 (and its 28 dwelling units) from the Project Site and maintenance of Building 2 and development of a 180,155-square-foot addition to Building 2 that would include 108 multi-family residential units, of which 16 units (i.e., 15 percent of the base density) would be set aside for Very Low Income households and 2 replacement units would be set aside for Low Income households. The new building addition would be eight aboveground levels over one subterranean level, inclusive of six levels of residential uses over two levels of aboveground parking. The subterranean level would be used for storage. The addition would reach a maximum building height of 95 feet. The mix of the unit types includes 49 one-bedroom units, 33 two-bedroom units, and 26 three-bedroom units. The Project would include 10,181 square feet of open space. Additionally, the Project would include 99 vehicle parking spaces including 10 electric-vehicle charging stations. Further, the Project would include 79 long-term bicycle parking spaces and 8 short-term bicycle parking spaces. Construction would occur over approximately 28 months and would require the export of approximately 6,770 cubic yards of soil. The requested entitlements are as follows:

- A Density Bonus pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.25 and Government Code Section 65915 with three off-menu incentives and five waivers of development standards for a project setting aside 15 percent of its base units (16 units) for Very Low Income households and providing 2 Low Income replacement housing units as follows:
    - A by-right density bonus pursuant to AB 2334 to permit up to a 50 percent increase in density;
    - A by-right parking reduction pursuant to AB 2097 to permit zero required parking spaces for each residential unit;
    - An off-menu incentive pursuant to LAMC Section 12.22 A.25(g)(3) to permit parking stall widths of 8 feet, 6 inches without a 10-inch increase where obstructions occur on either side of the longer dimension per LAMC Section 12.21 A.5(a)1(ii);
    - An off-menu incentive pursuant to LAMC Section 12.22 A25(g)(3) to permit vehicle ingress and egress along a designated Collector roadway as otherwise not allowed per Los Angeles Department of Transportation (LADOT) Driveway Design Section V A 1;s

- An off-menu incentive pursuant to LAMC Section 12.22 A.25(g)(3) to permit 10,181 square feet of open space in lieu of the otherwise required 13,575 square feet;
- A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit a maximum floor area ratio (FAR) of 3.12:1 in lieu of the otherwise permitted 3:1 FAR;
- A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit a maximum building height of 95 feet in lieu of the otherwise permitted 30 to 45 feet;
- A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit an easterly side yard setback of zero feet in lieu of the otherwise required 11 feet;
- A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit a westerly side yard setback of zero feet in lieu of the otherwise required 20 feet; and
- A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit a rear yard setback of 5 feet in lieu of the otherwise required 15 feet.

PREPARED FOR:	PREPARED BY:	APPLICANT:
City of Los Angeles Department of City Planning	CAJA Environmental Services 9410 Topanga Canyon Boulevard Chatsworth, CA 91311	CLG Gower LLC 10600 Santa Monica Boulevard Los Angeles, CA 90025

\\\

SEPTEMBER 2023

INITIAL STUDY

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1 INTRODUCTION

This Sustainable Communities Environmental Assessment (SCEA) has been prepared pursuant to Section 21155.2 of the California Public Resources Code.

1.1 PROJECT DESCRIPTION SUMMARY

The Project Site is currently developed with two multi-family residential buildings (Building 1 with 28 dwelling units and Building 2 with 44 dwelling units) and two parking garage structures (Garage Buildings) with 51 parking spaces. The Project includes the demolition and removal of the two Garage Buildings and Building 1 (and its 28 dwelling units) from the Project Site and maintenance of Building 2 and development of a 180,155-square-foot addition to Building 2 that would include 108 multi-family residential units, of which 16 units (i.e., 15 percent of the base density) would be set aside for Very Low Income households and 2 replacement units would be set aside for Low Income households. The new building addition would be eight aboveground levels over one subterranean level, inclusive of six levels of residential uses over two levels of aboveground parking. The subterranean level would be used for storage. The addition would reach a maximum building height of 95 feet. The mix of the unit types includes 49 one-bedroom units, 33 two-bedroom units, and 26 three-bedroom units. The Project would include 10,181 square feet of open space. Additionally, the Project would include 99 vehicle parking spaces including 10 electric-vehicle charging stations. Further, the Project would include 79 long-term bicycle parking spaces and 8 short-term bicycle parking spaces. Construction would occur over approximately 28 months and would require the export of approximately 6,770 cubic yards of soil. The requested entitlements are as follows:

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    - An off-menu incentive pursuant to LAMC Section 12.22 A.25(g)(3) to permit parking stall widths of 8 feet, 6 inches without a 10-inch increase where obstructions occur on either side of the longer dimension per LAMC Section 12.21 A.5(a)1(ii);

- An off-menu incentive pursuant to LAMC Section 12.22 A25(g)(3) to permit vehicle ingress and egress along a designated Collector roadway as otherwise not allowed per Los Angeles Department of Transportation (LADOT) Driveway Design Section V A 1;

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- A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit an easterly side yard setback of zero feet in lieu of the otherwise required 11 feet;

- A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit a westerly side yard setback of zero feet in lieu of the otherwise required 20 feet; and

- A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit a rear yard setback of 5 feet in lieu of the otherwise required 15 feet.

Additionally, pursuant to various sections of the LAMC, the Applicant will request approvals and permits from various City Department (and other municipal agencies) for Project construction actions including, but not limited to tree removal, demolition, excavation, shoring, grading, foundation, and building and tenant improvements.

Lead Agency: City of Los Angeles Department of City Planning
200 North Spring Street, Room 763
Los Angeles, CA 90012

City Staff Contact: More Song, City Planner
(213) 978-1319
more.song@lacity.org

Project Applicant: CLG Gower LLC
10600 Santa Monica Boulevard
Los Angeles, CA 90025

1.2 BACKGROUND INFORMATION ON SENATE BILL 375 AND THE SCEA

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

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

SB 375 allows the City of Los Angeles (City), acting as lead agency, to prepare a SCEA as the environmental CEQA clearance for "transit priority projects" (as described below) that are consistent with SCAG's 2020-2045 RTP/SCS.

1.3 TRANSIT PRIORITY PROJECT CRITERIA

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

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2016-2040 RTP/SCS and 2020-2045 RTP/SCS;

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

3. Provides a minimum net density of at least 20 units per acre; and

4. Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

1.4 SCEA PROCESS AND STREAMLINING PROVISIONS

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

1. An initial study shall be prepared for a SCEA to identify all significant impacts or potentially significant impacts, except for the following:

    a. Growth-inducing impacts, and

    b. Project-specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network.[1]

2. The initial study shall identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be cumulatively considerable.

3. The SCEA shall contain mitigation measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.

4. A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA.

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

5. The SCEA may be approved by the lead agency after the lead agency's legislative body or designee conducts a public hearing, reviews comments received, and finds the following:

    a. All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed, and

    b. With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:

        i. Changes or alternations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.

        ii. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

6. The lead agency's decision to review and approve a TPP with a SCEA shall be reviewed under the substantial evidence standard.

1.5 REQUIRED FINDINGS

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

- The Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the area of the Project Site in the 2020-2045 RTP/SCS prepared by SCAG, which is the MPO for the City. Refer to page 3-1 in Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis) for additional information on the Project's consistency with this finding.

- The State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted SCAG's determination that the sustainable communities strategy adopted by SCAG in the 2020-2045 RTP/SCS would, if implemented, achieve the greenhouse gas emissions reduction targets.

- The Project qualifies as a transit priority project pursuant to Public Resources Code Section 21155 in that the Project contains more than 50 percent residential use; provides a minimum net density greater than 20 units an acre; and is within one-half mile of a major transit stop located at the intersection of Sunset Boulevard and

Vine Street and high-quality transit corridors (i.e., Sunset Boulevard and Vine Street).

- The Project is a residential or mixed-use project as defined by Public Resources Code Section 21159.28(d).
- The Project incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior environmental reports and adopted findings made pursuant to Public Resources Code Section 21081, including the 2020-2045 RTP/SCS Program Environmental Impact Report (Program EIR). Refer to Section 4 (RTP/SCS Mitigation Measures) for a discussion of the applicability of SCAG mitigation measures.
- All potentially significant or significant effects required to be identified and analyzed pursuant to the California Environmental Quality Act (CEQA) in an initial study have been identified and analyzed in an initial study. Refer to Section 5 (Sustainable Communities Environmental Impact Analysis).
- As outlined in detail in Section 5 (Sustainable Communities Environmental Impact Analysis) changes or alterations have been required in or incorporated into the Project that avoid or mitigate the significant effects to a level of less than significant. The specific impact areas for which mitigation measures have been identified include Cultural Resources (archaeological resources), Geology and Soils (paleontological resources), Noise (construction noise and construction vibration), and Tribal Cultural Resources.

1.6 ORGANIZATION OF THE SCEA

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

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

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

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

Section 4. Applicability of Mitigation Measures from Prior EIRs: This section identifies all of the mitigation measures contained in the Mitigation Monitoring and

Reporting Program (MMRP) for SCAG's 2020-2045 RTP/SCS Program EIR and a discussion of the applicability of the mitigation measures to the Project.

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

Section 6. Preparers of the SCEA: This section identifies the parties involved in the preparation of the SCEA.

Appendices: Includes various documents, technical reports, and information used in the preparation of the SCEA and can be found in the case file for ENV-2023-1540-SCEA.

2 PROJECT DESCRIPTION

2.1 ENVIRONMENTAL SETTING

The 39,602-square-foot (0.9-acre) Project Site is located at 1201 N. Gower Street and 6121 W. Lexington Avenue in the Hollywood Community Plan area of the City of Los Angeles (City). The Assessor Parcel Number (APN) for the Project Site is 5534-004-001. The Project Site is bounded by multi-family residential uses on the north, Lexington Avenue on the south, Lodi Place on the west, and Gower Street on the east. The regional context for the Project Site is shown in Figure 2-1. The boundaries of the Project Site are shown in Figure 2-2.

The Project Site is currently developed with an apartment complex. As shown in Figure 2-3, the northern portion of the Project Site is developed with two one-story parking garages (Garage Buildings), which include a total of 51 vehicle parking spaces. To the south of the Garage Buildings, the Project Site is developed with two multi-family residential buildings (Building 1 and Building 2). Building 1 contains 28 dwelling units while Building 2 contains a total of 44 dwelling units (28 dwelling units in the eastern wing and 16 dwelling units in the southern wing).

No trees or protected shrubs are located on the Project Site.[1] Four street trees are located along Gower Street adjacent to the Project Site. These trees include two magnolias (*Magnolia grandiflora*), one ficus (*Ficus nidita*), and one camphor (*Cinnomomum camphora*). None of these trees are considered a "protected tree" as defined by the City.[2]

The Project Site is zoned R3-1 (Multiple Dwelling Zone, Height District 1) and R3-1XL (Multiple Dwelling Zone, Height District 1XL with a General Plan land use designation of Medium Residential (refer to Figures 2-4 and 2-5, respectively). The Project Site is also located within the boundaries of the following:

- ZI-2374 State Enterprise Zone: Los Angeles
- ZI-2452 Transport Priority Area in the City of Los Angeles
- ZI-2488 Redevelopment Project Area: Hollywood

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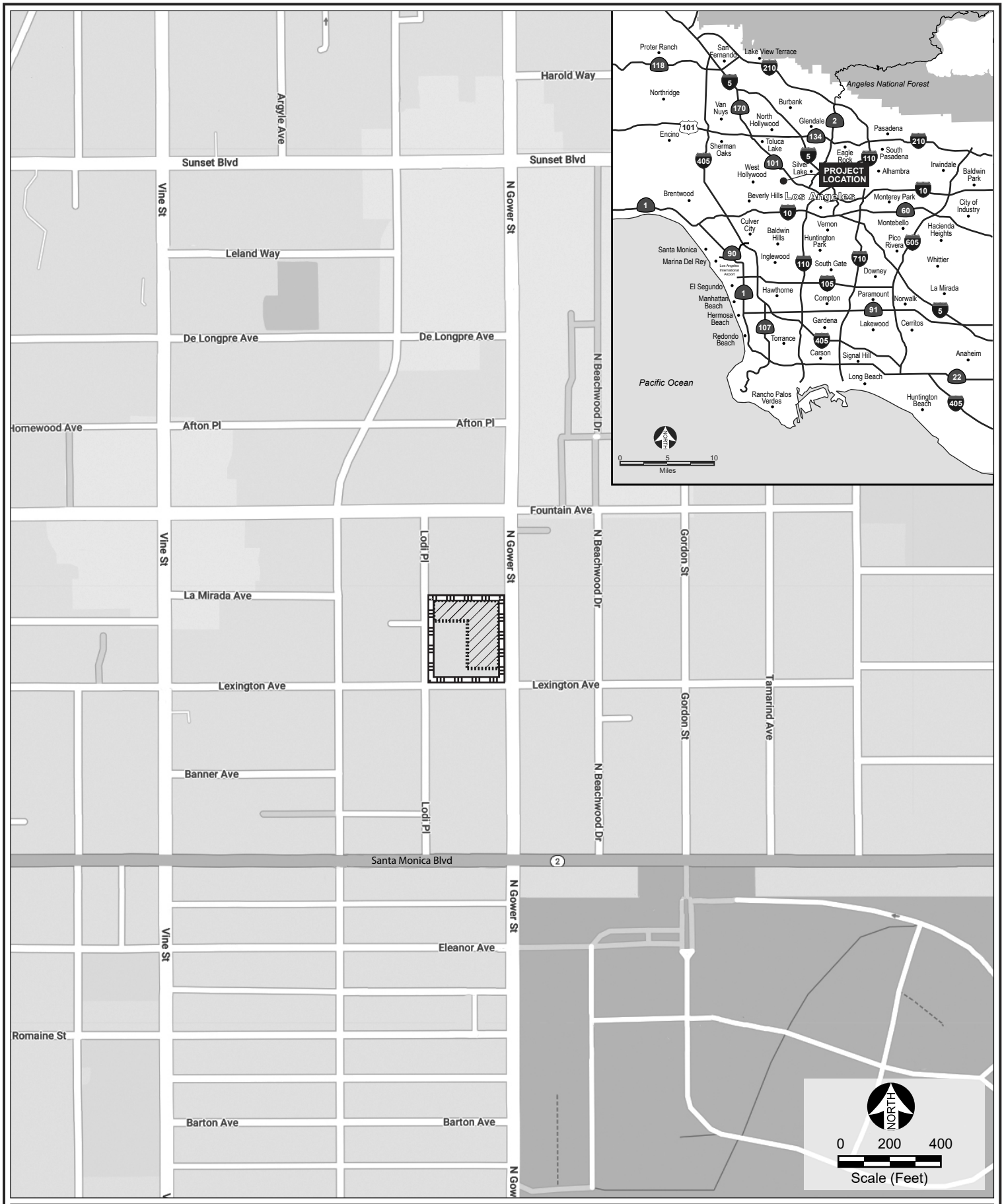
1 *Protected Tree and Shrub Report, Leonard Markowitz, April 20, 2022. Refer to Appendix A. Protected trees and shrubs as defined by the City include oak trees (Quercus spp.) and Southern California black walnut trees (Juglans californica), western sycamore trees (Platanus racemosa), California bay trees (Umbellularia californica), Mexican elderberry shrubs (Sambucus Mexicana), and toyon (Heteromeles arbutifolia).*

2 *Ibid.*



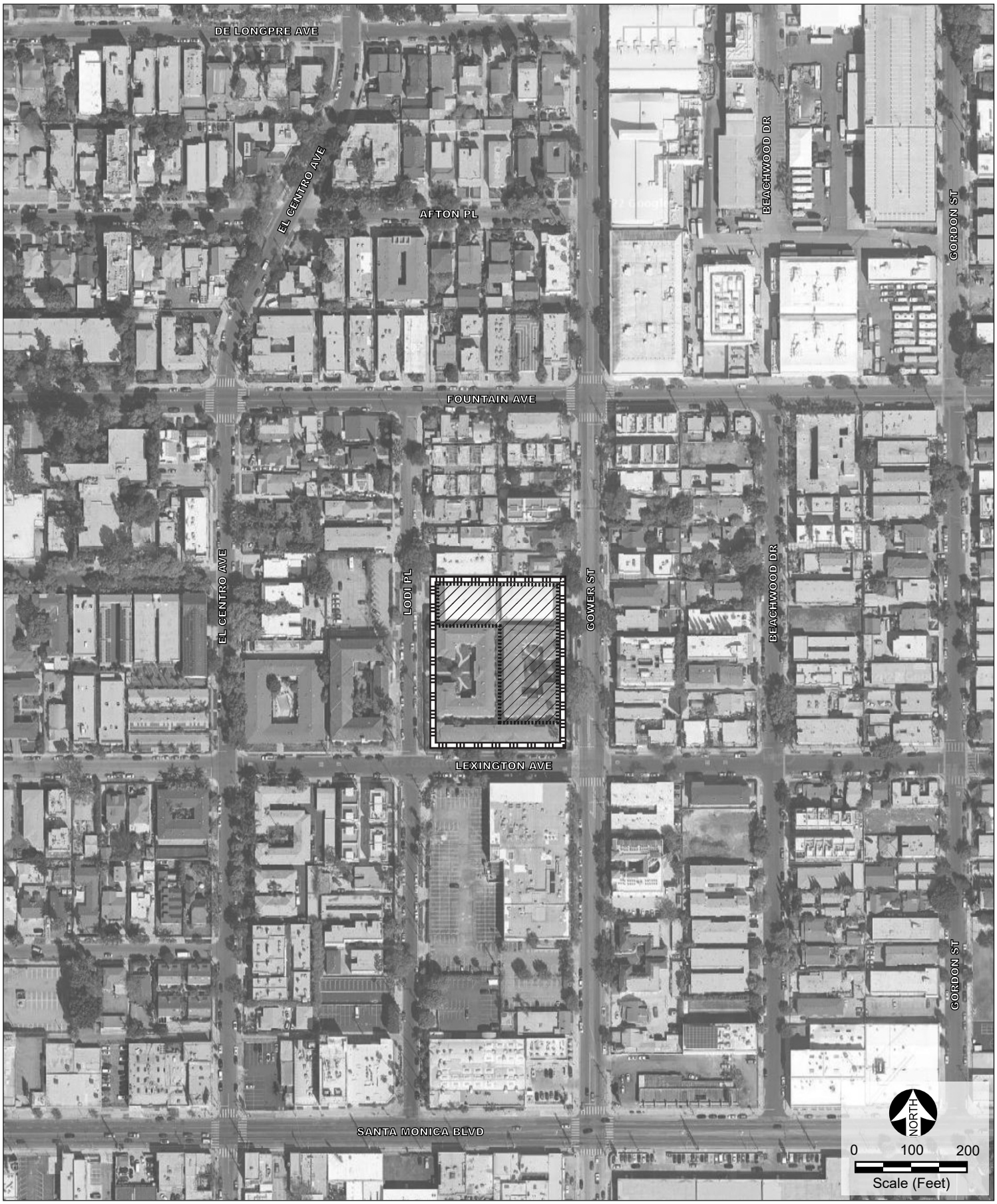
Legend

Gower Gardens Apartment Complex

Project Site

Source: Google Maps 2022.

Figure 2-1
Regional Location Map



Legend

Gower Gardens Apartment Complex

Project Site

Source: Google Maps 2022.

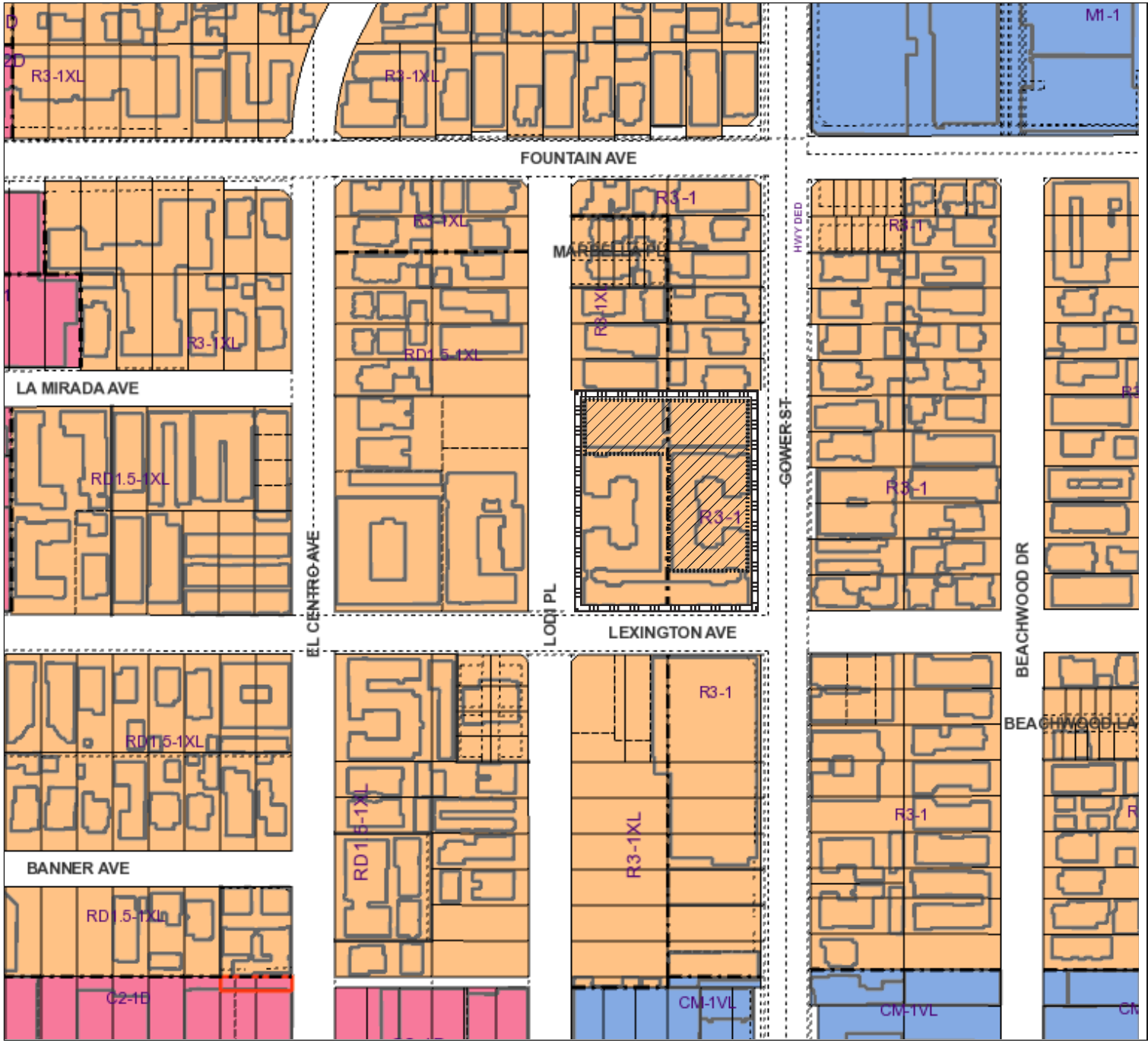
Figure 2-2
Aerial Map

Legend

- Gower Gardens Apartment Complex
- Project Site
- Garages
- Building 1
- Building 2

NORTH

Figure 2-3
Existing Project Site Buildings



Legend

GENERALIZED ZONING

- OS, GW
- A, RA
- RE, RS, R1, RU, RZ, RW1
- R2, RD, RMP, RW2, R3, RAS, R4, R5, PVSP
- CR, C1, C1.5, C2, C4, C5, CW, WC, ADP, LASED, CEC, USC, PPSP, MU, NMU
- CM, MR, CCS, UV, UI, UC, M1, M2, LAX, M3, SL, HJ, HR, NI
- P, PB
- PF

Gower Gardens Apartment Complex

Project Site

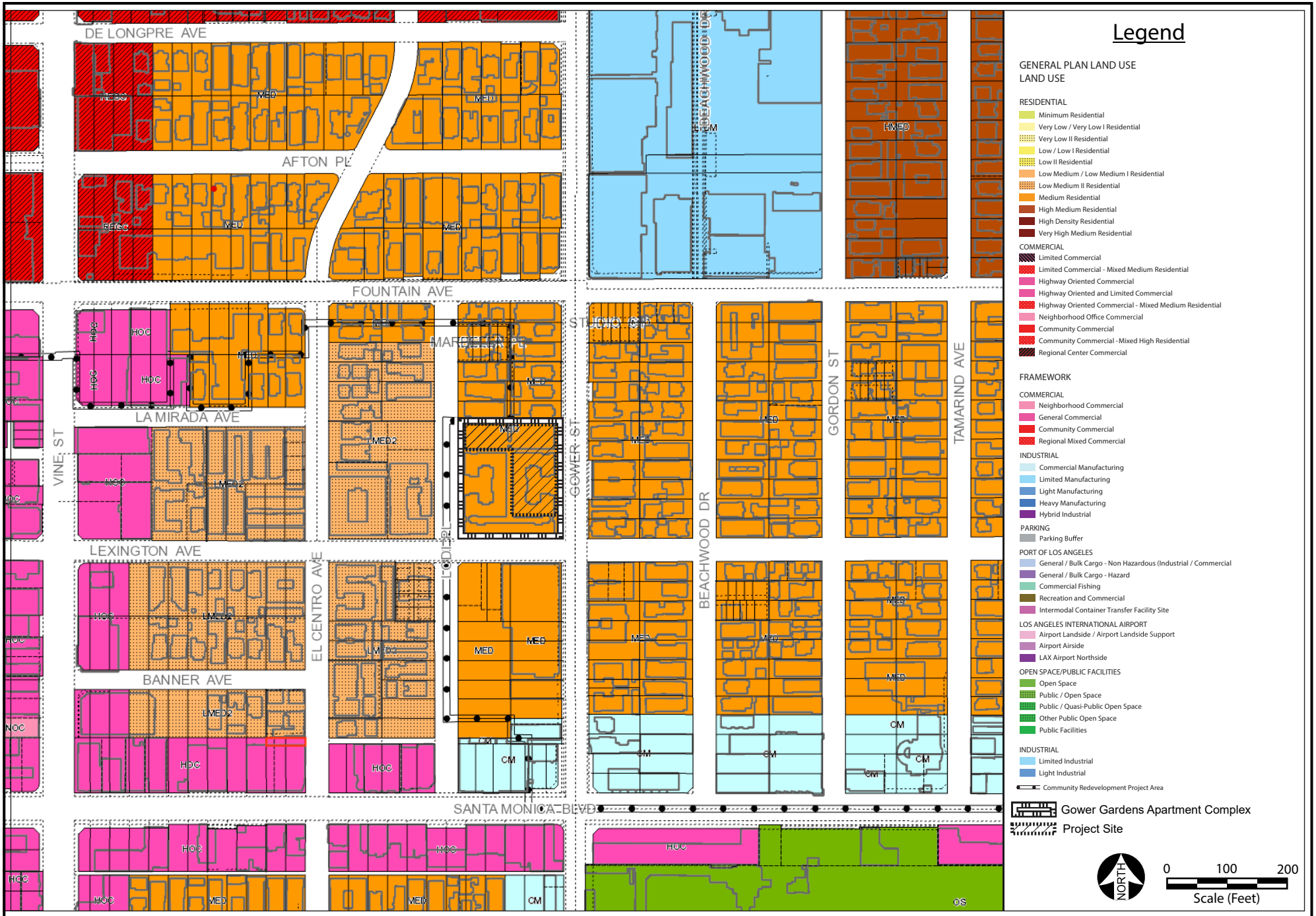
NORTH

0 100 200

Scale (Feet)

Figure 2-4
Existing Zoning

Source: Los Angeles City Planning Department: http://zimas.lacity.org/, accessed June 29, 2022.



Source: Los Angeles City Planning Department: http://zimas.lacity.org/, accessed June 29, 2022.

Figure 2-5
Existing Land Use Designation

The greater Project Site area is highly urbanized with surrounding parcels consisting largely of multi-family residential uses. Commercial uses, including (but not limited to) production studios, offices, restaurants, retail, and institutional interspersed throughout the Project Site area. The Project Site is located 0.1 miles north of the Santa Monica Boulevard corridor and 0.3 miles south of the Sunset Boulevard corridor, both of which are a source of employment, shopping, and entertainment, and access to other regional resources.

2.2 DESCRIPTION OF THE PROJECT

The Project includes the demolition and removal of the two Garage Buildings (containing 51 vehicle parking spaces) and Building 1 (containing 28 dwelling units) from the Project Site and the development of a 180,155-square-foot addition to Building 2 that would include 108 multi-family residential units, of which 16 units (i.e., 15 percent of the base dwelling units) would be set aside for Very Low Income households and 2 replacement units would be set aside for Low Income households. The building addition would be eight stories over one subterranean level (reaching a maximum building height of 95 feet), inclusive of six levels of residential uses, over two levels of aboveground parking. The subterranean level would be used for storage. The mix of the unit types includes 49 one-bedroom units, 33 two-bedroom units, and 26 three-bedroom units. Project plans are shown in Figures 2-6 through 2-25.

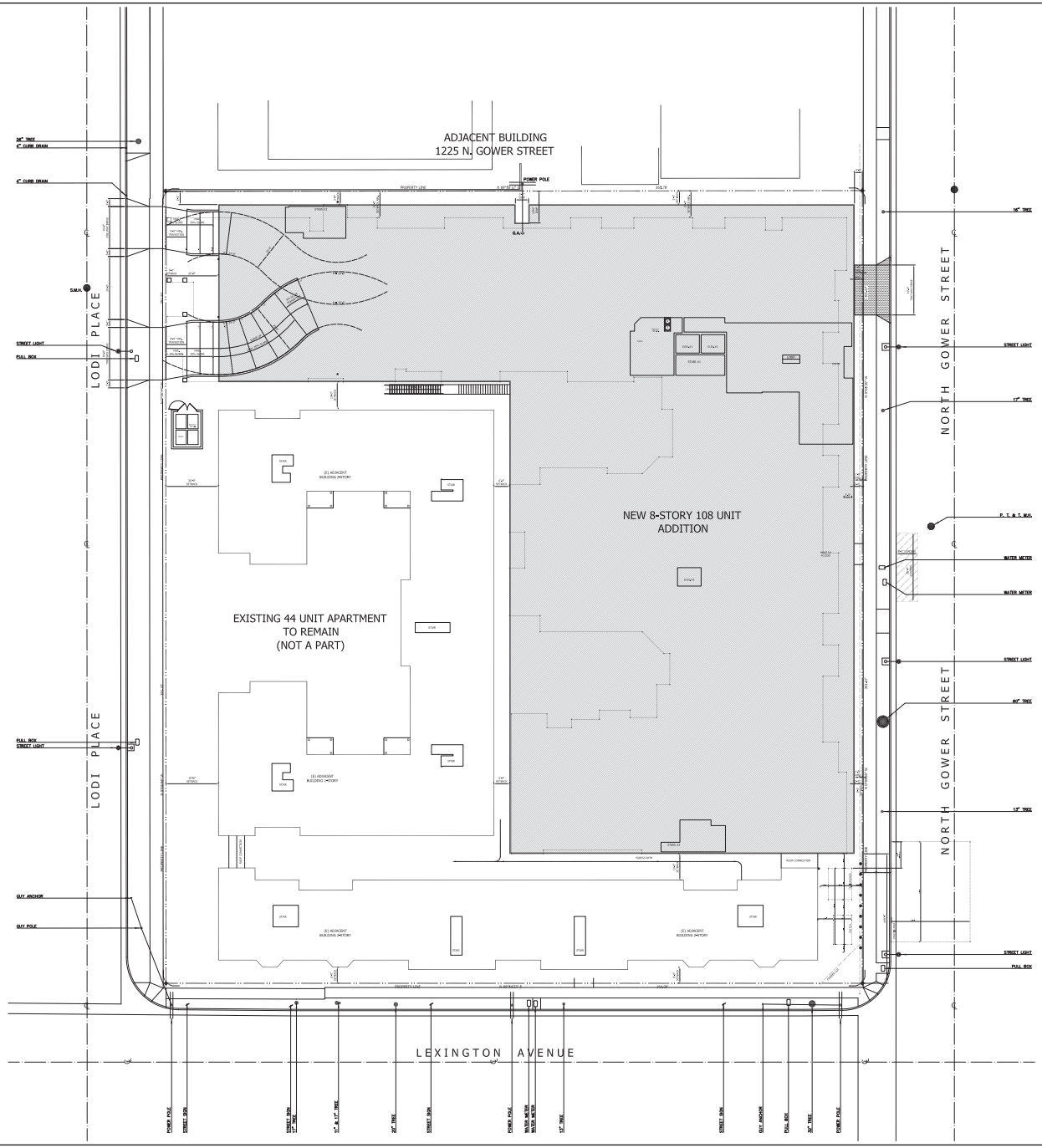
<u>Open Space</u>

As discussed in more detail later in this section under the subheading “2.3 Requested Entitlements,” the Applicant is requesting a Density Bonus approval including an off-menu incentive to allow for a reduction in the amount of open space required under the Los Angeles Municipal Code (LAMC) Section 12.21 G.2 from 13,575 square feet (refer to Table 2-1) to 10,181 square feet (refer to Table 2-2).

<u>Parking and Access</u>

As stated previously, vehicle parking would be provided in two aboveground levels. Pursuant to Assembly Bill (AB) 2097, the Project is required to provide zero vehicle parking spaces. However, the Project would include 99 vehicle parking spaces, including 10 spaces with electric-vehicle charging stations (EV parking).

Vehicle access to the Project would be provided via three driveways. One-way driveways would be provided at each northern corner of the building addition, and a two-way driveway would be provided just south of the one-way driveway located at the northwestern corner of the building addition.



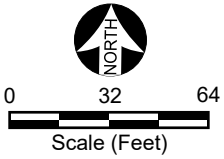
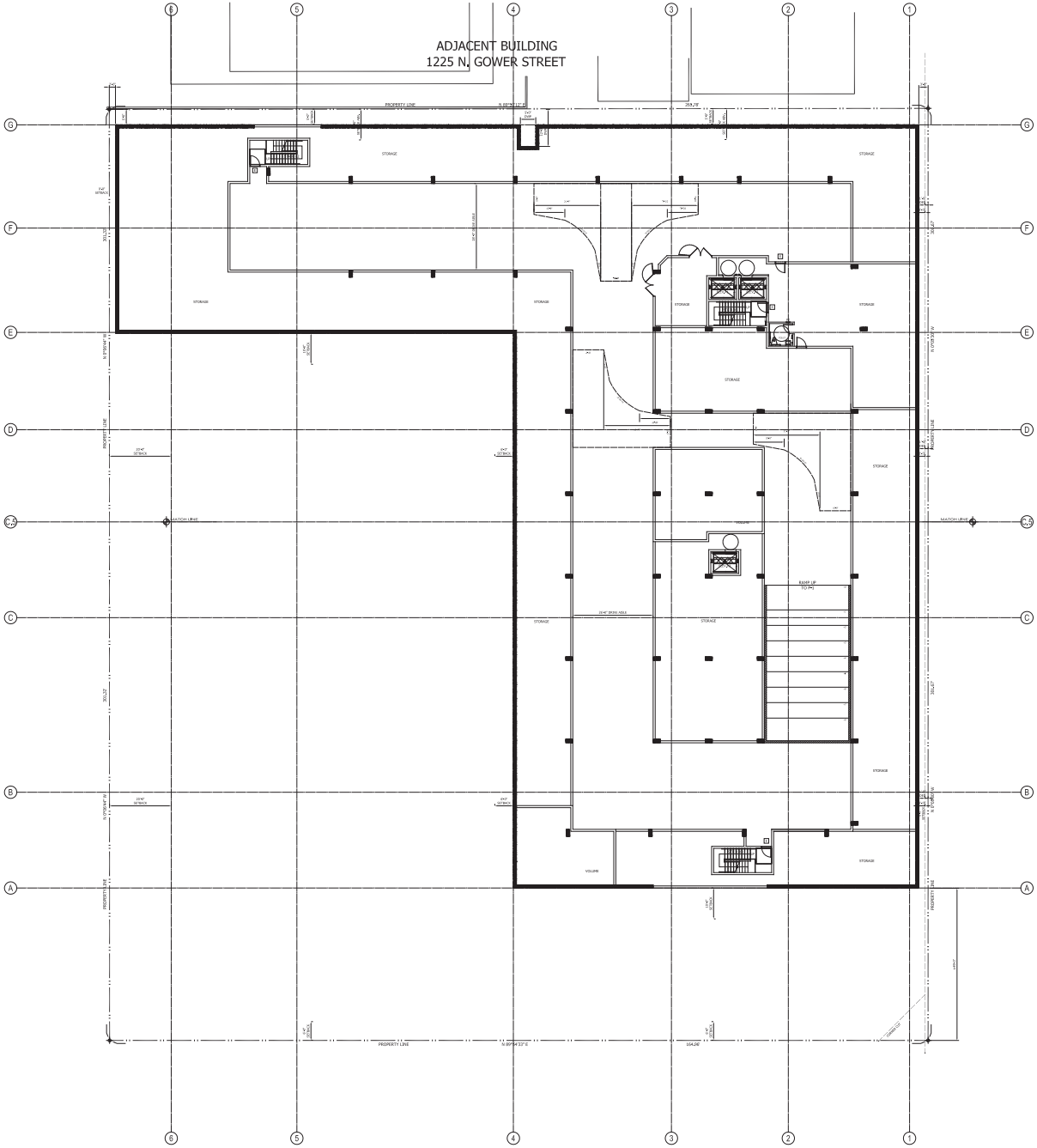


Figure 2-6
Site Plan

Source: PK Architecture, 2023.



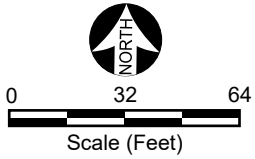
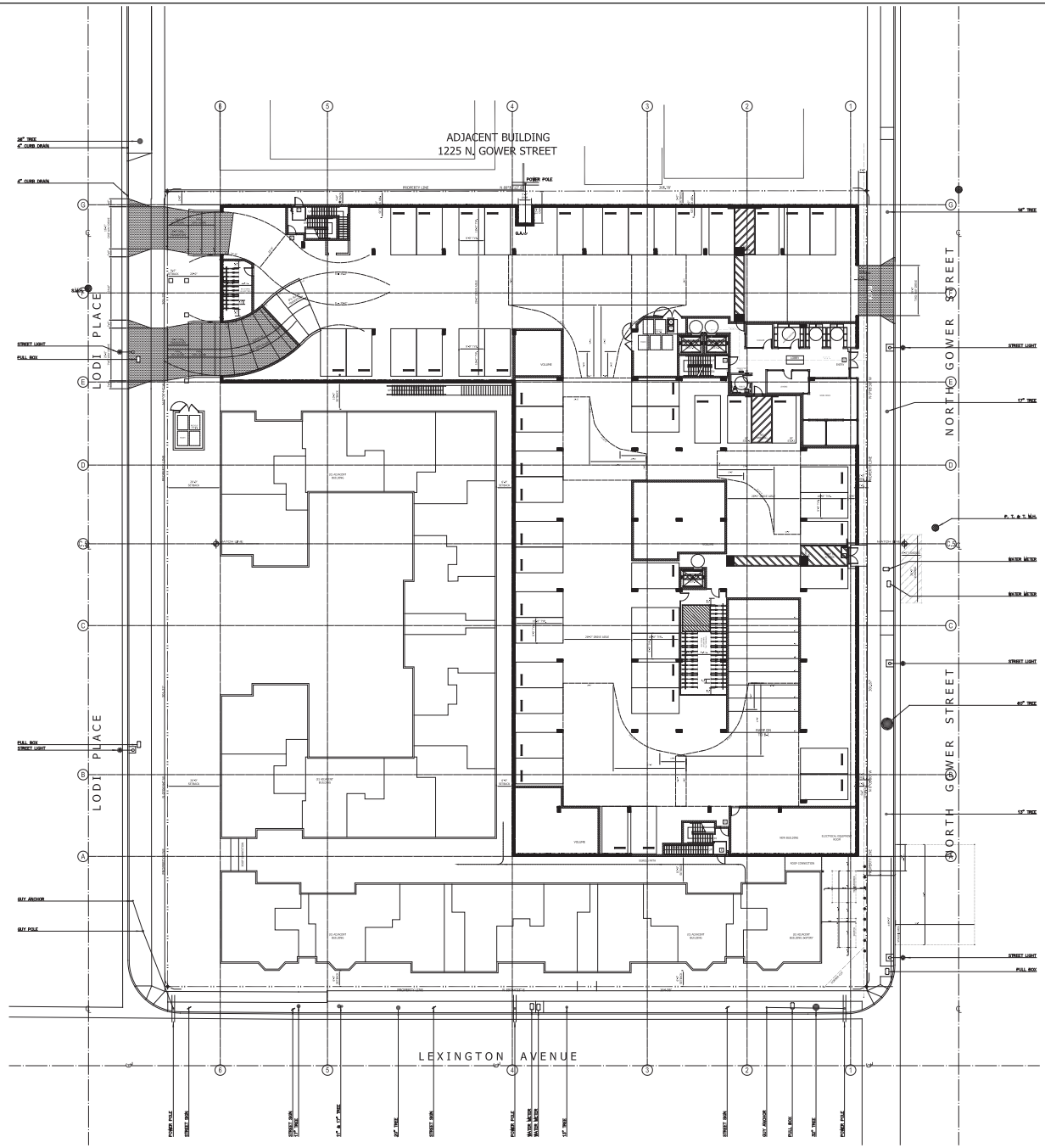


Figure 2-7
Level B1

Source: PK Architecture, 2023.



0 32 64
Scale (Feet)

Figure 2-8
Level P1

Source: PK Architecture, 2023.

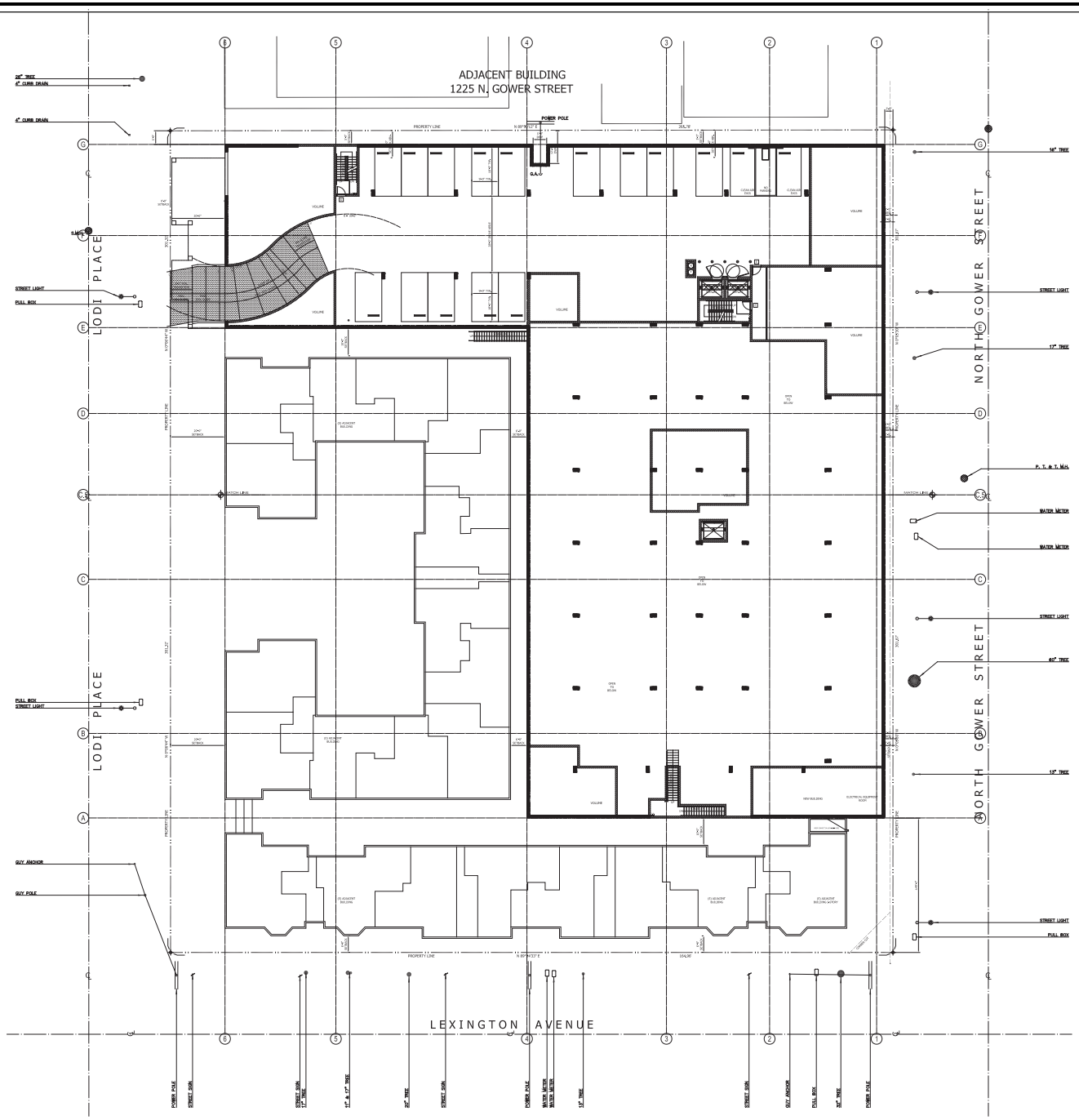
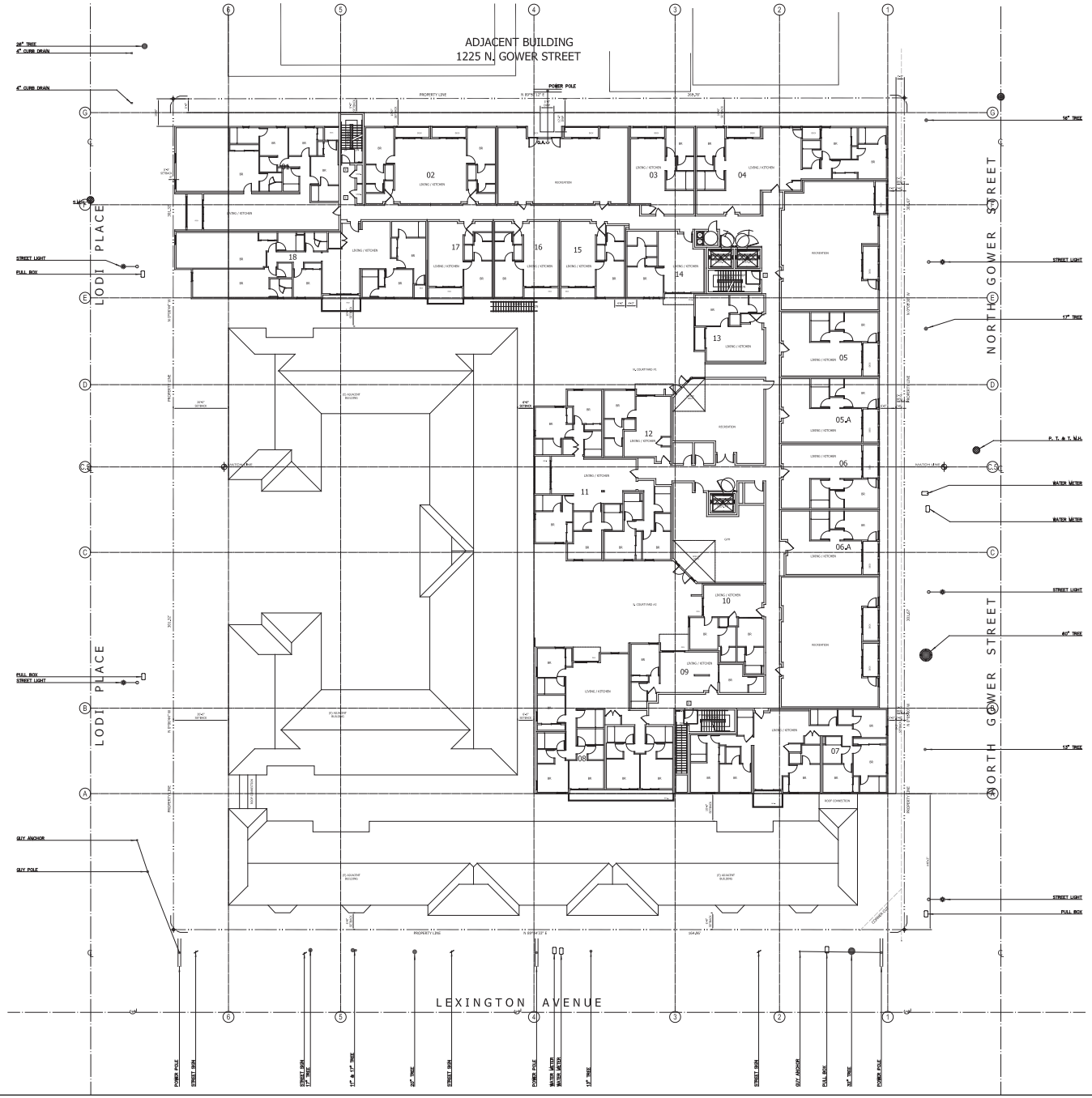


Figure 2-9
Level P2

Source: PK Architecture, 2023.



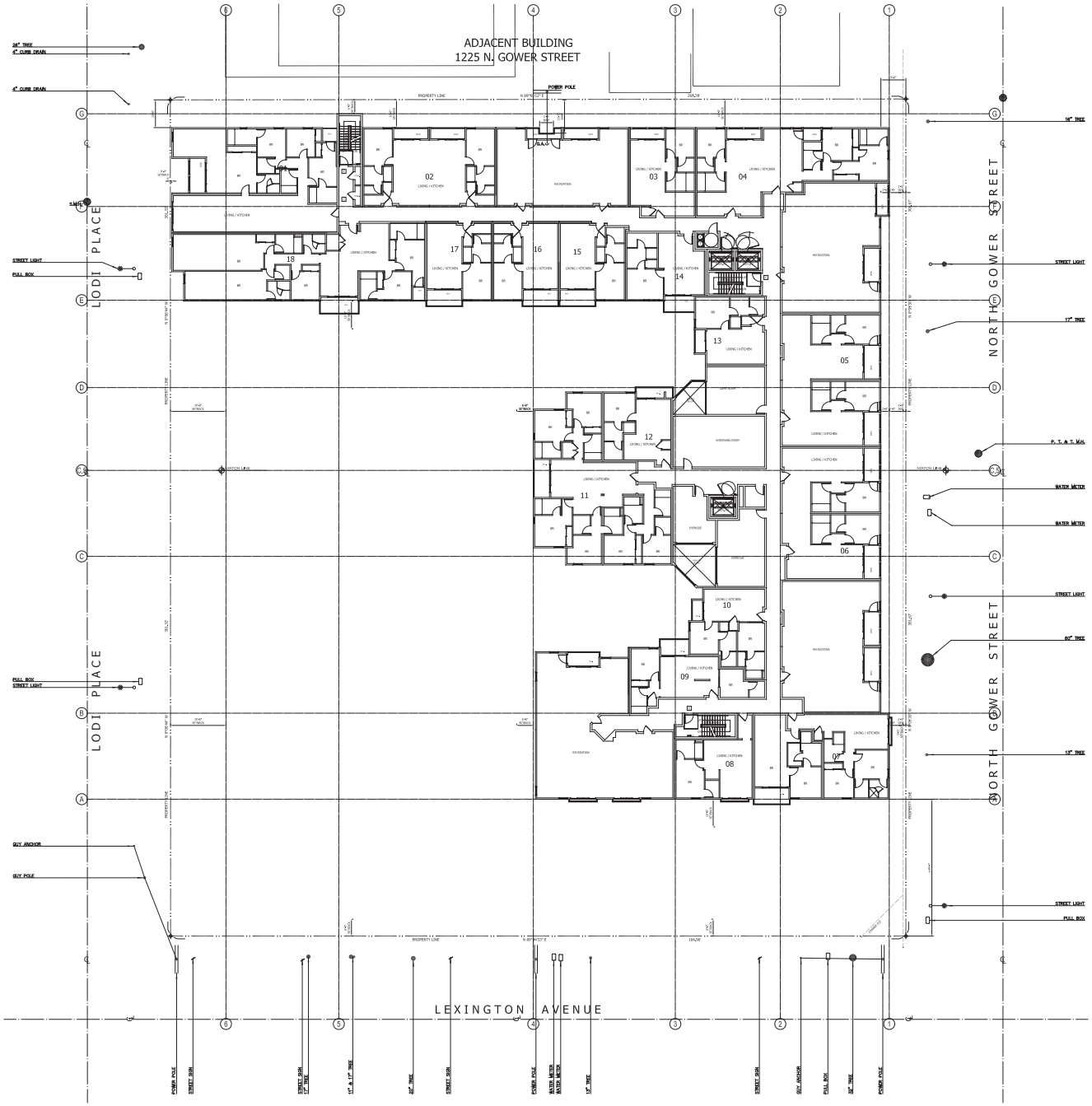
NORTH

0 32 64

Scale (Feet)

Figure 2-10
Level 03

Source: PK Architecture, 2023.



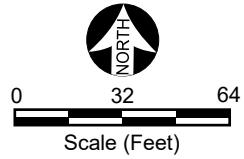
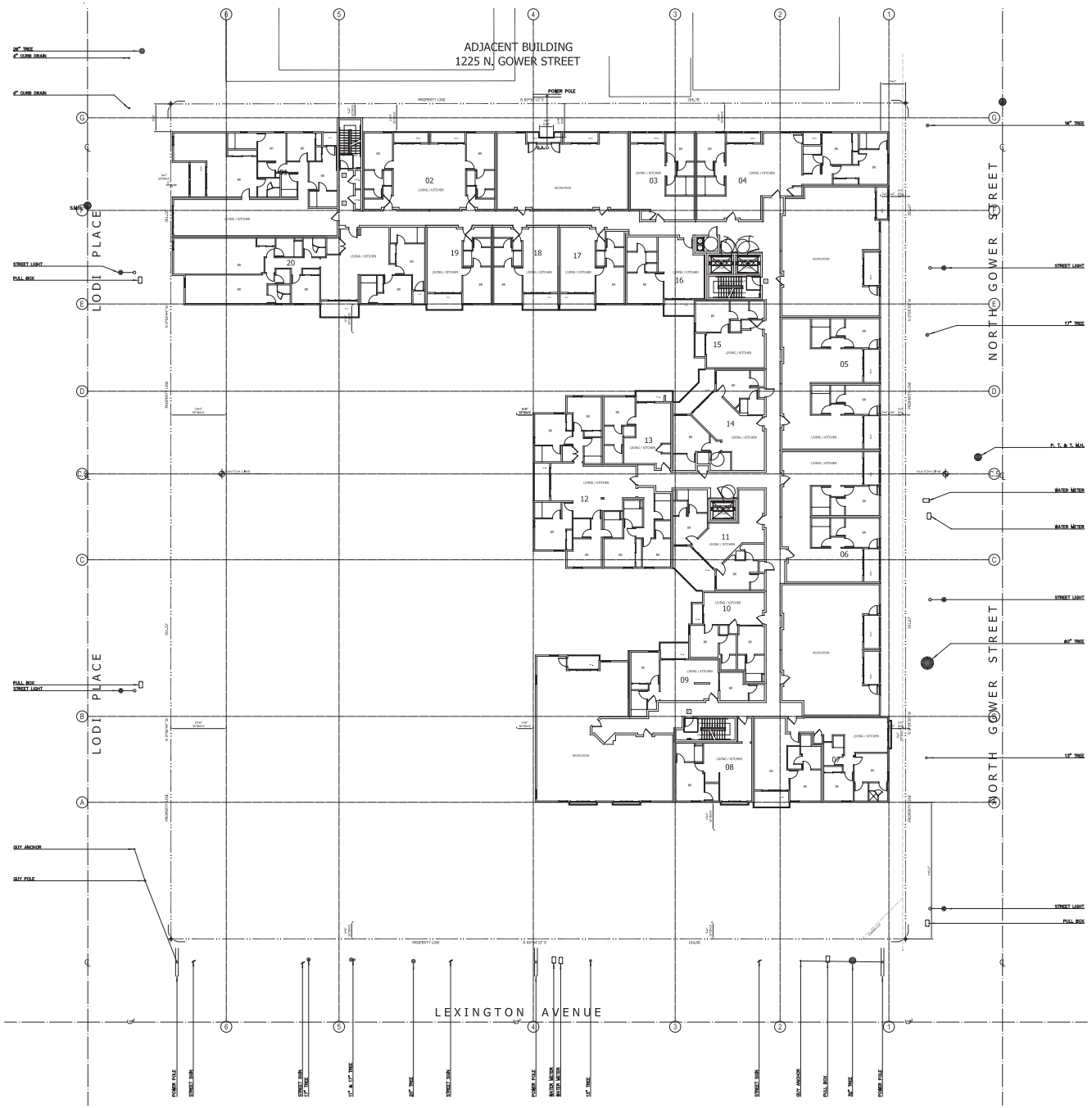


Figure 2-11
Level 04

Source: PK Architecture, 2023.



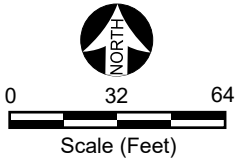
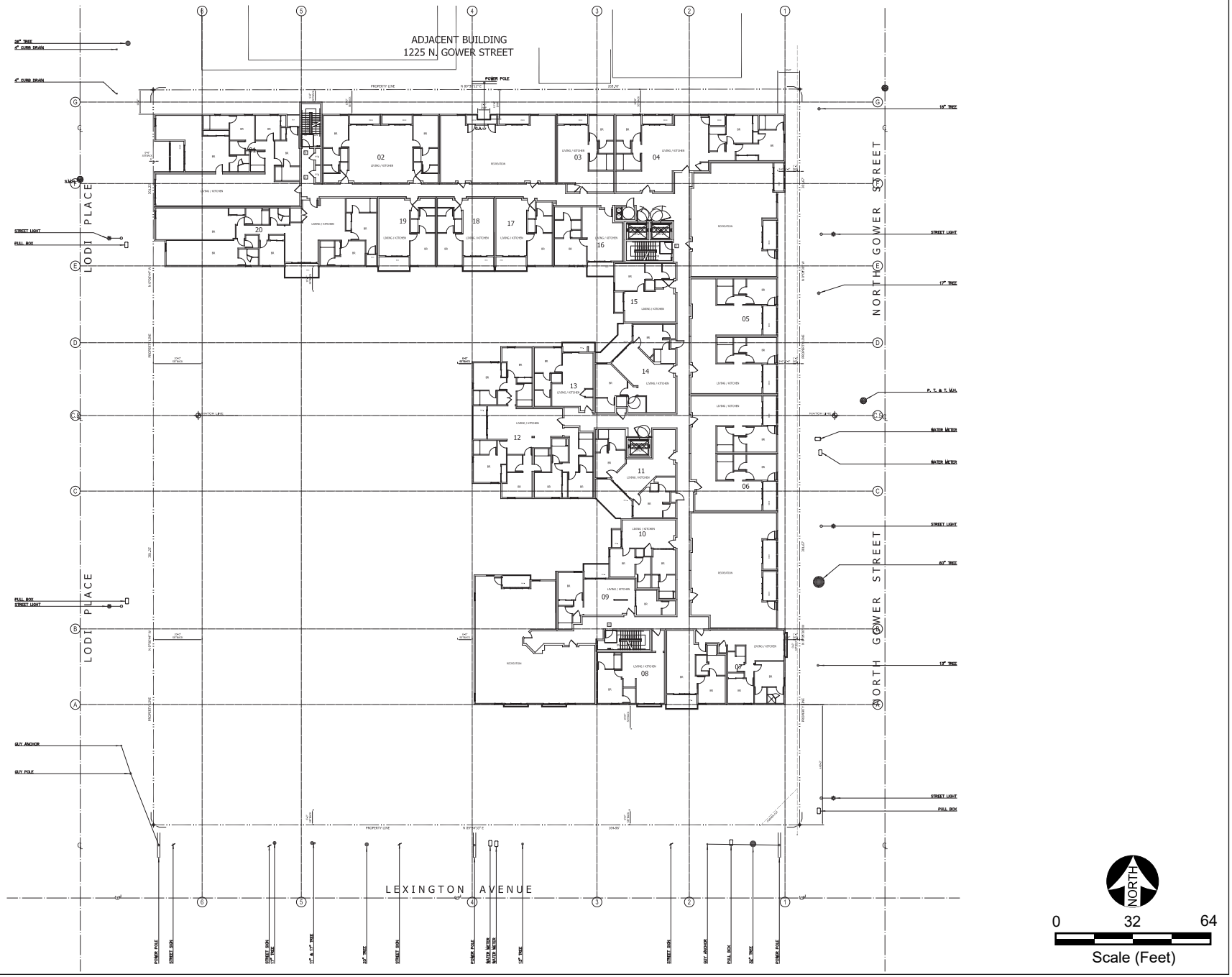


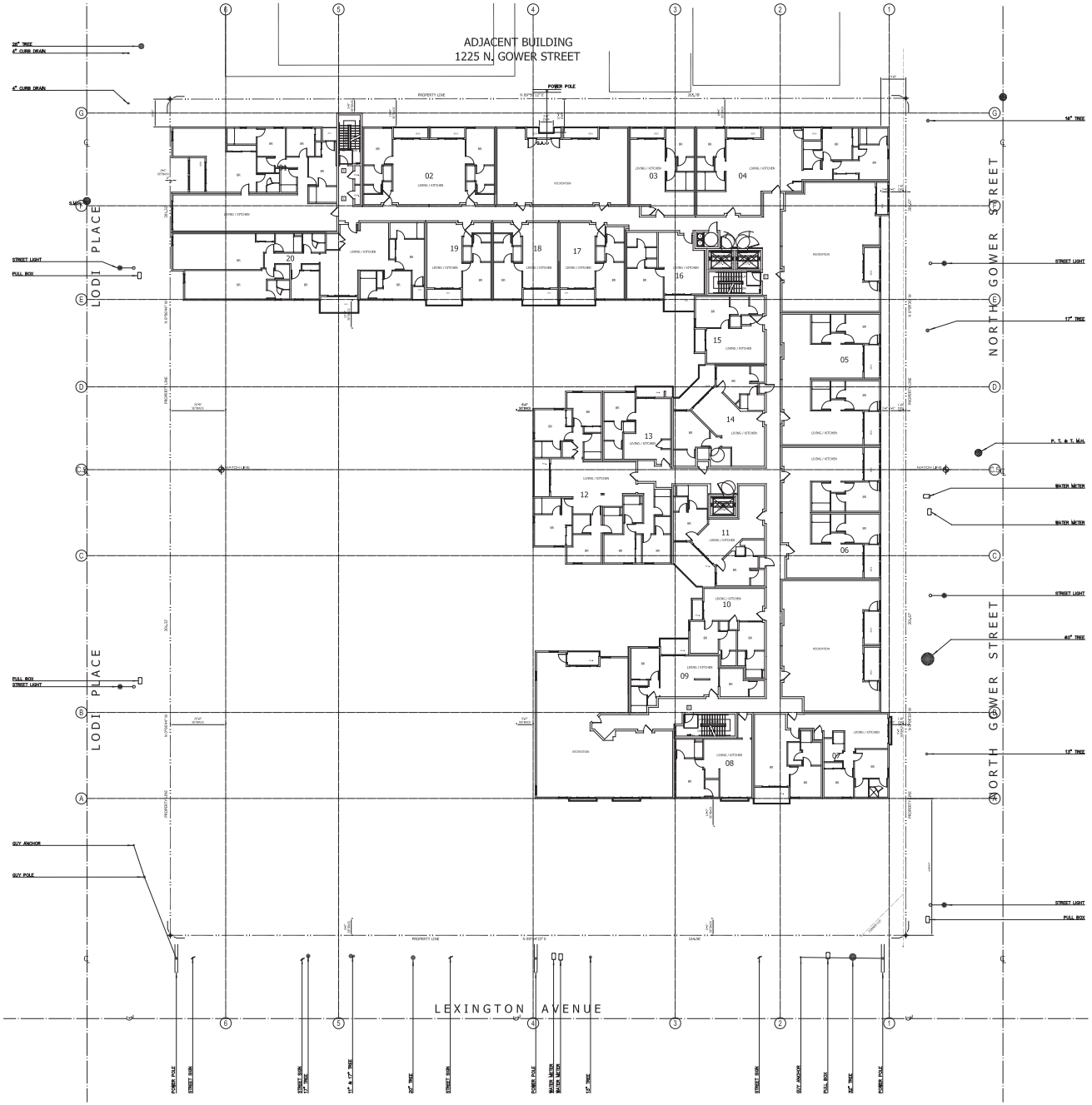
Figure 2-12
Level 05

Source: PK Architecture, 2023.



Source: PK Architecture, 2023.

Figure 2-13
Level 06



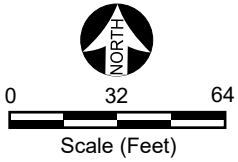


Figure 2-14
Level 07

Source: PK Architecture, 2023.

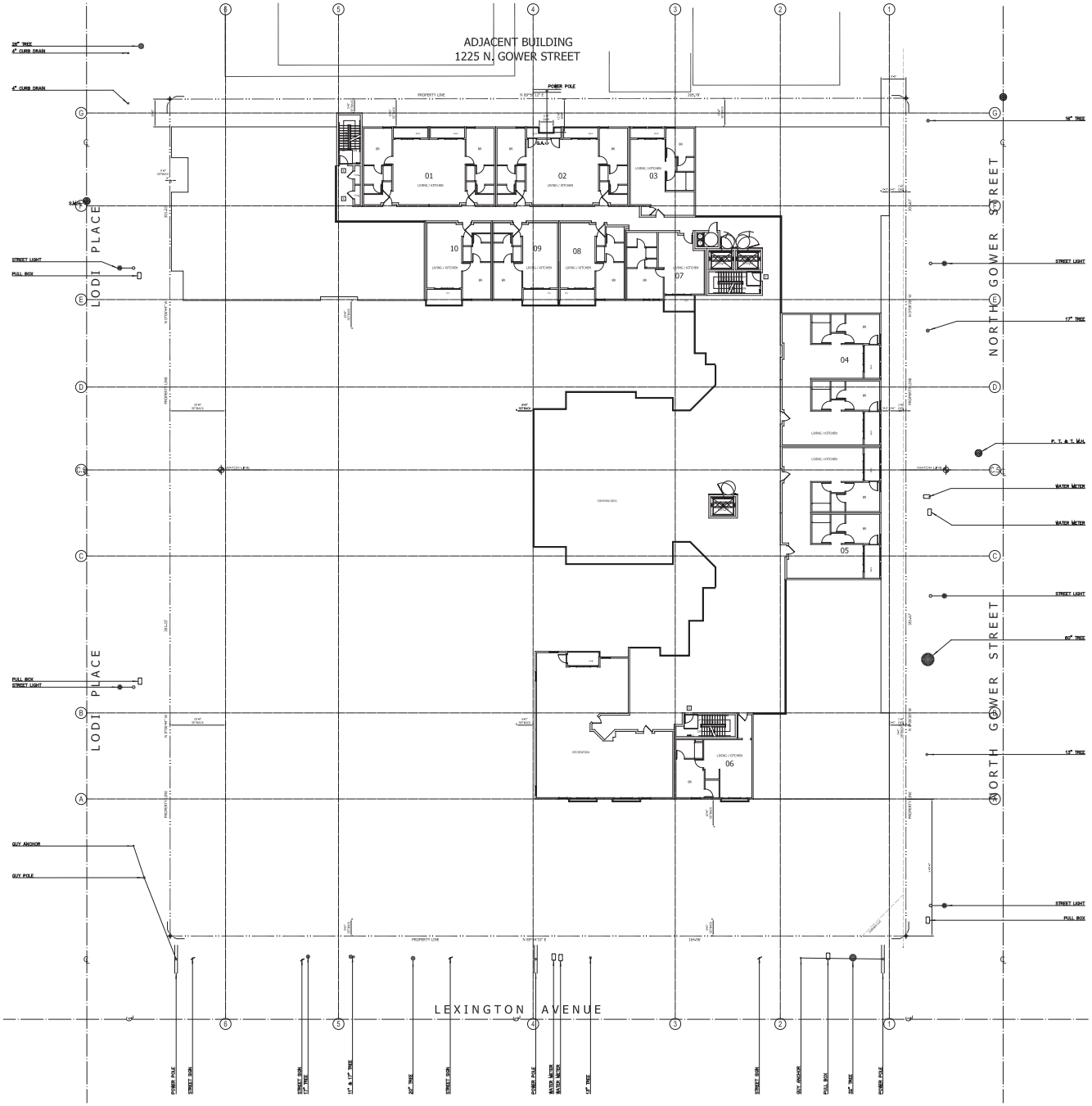
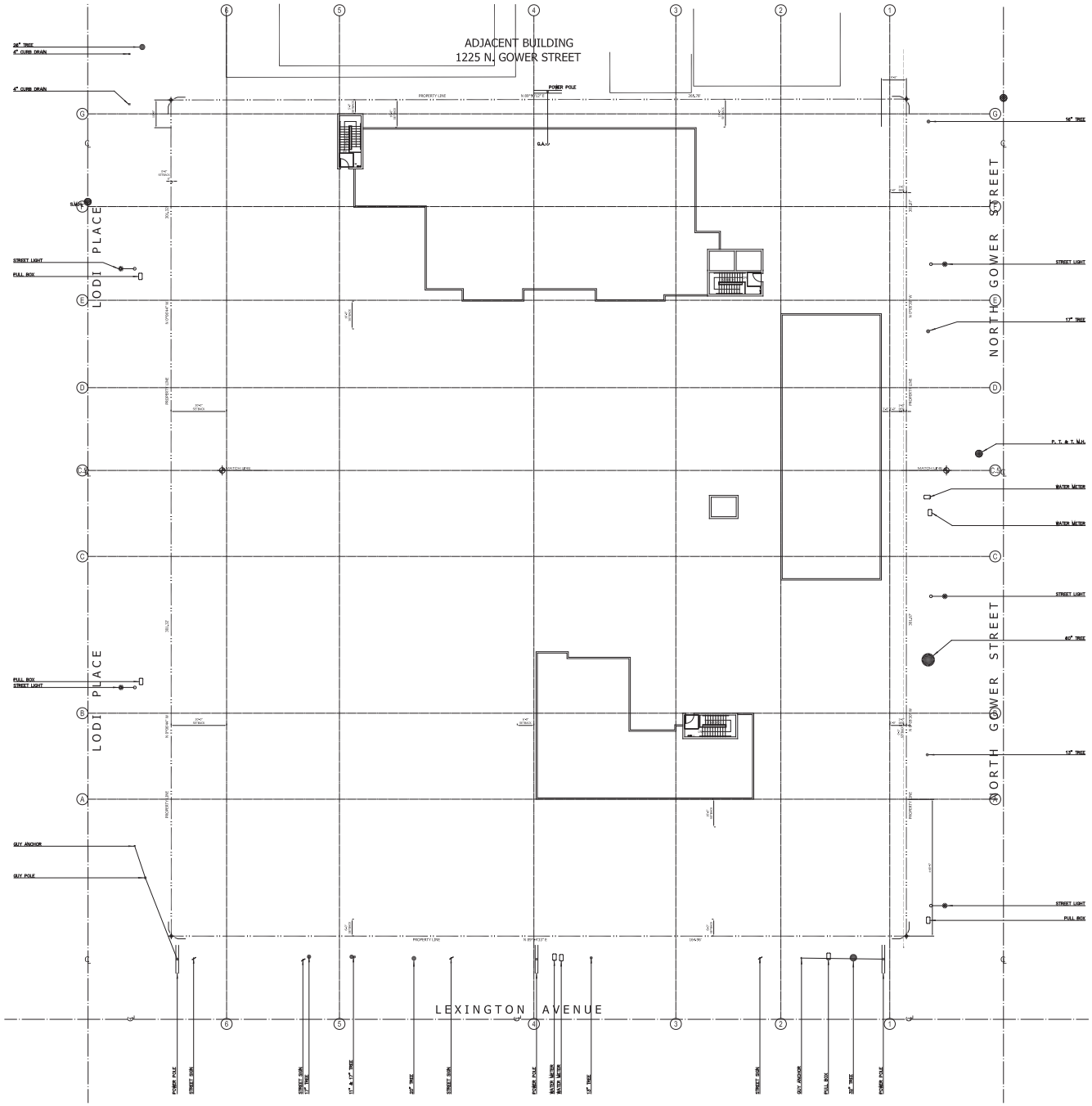


Figure 2-15
Level 08

Source: PK Architecture, 2023.



0 32 64
Scale (Feet)

Figure 2-16
Level 09

Source: PK Architecture, 2023.

Source: PK Architecture, 2023.

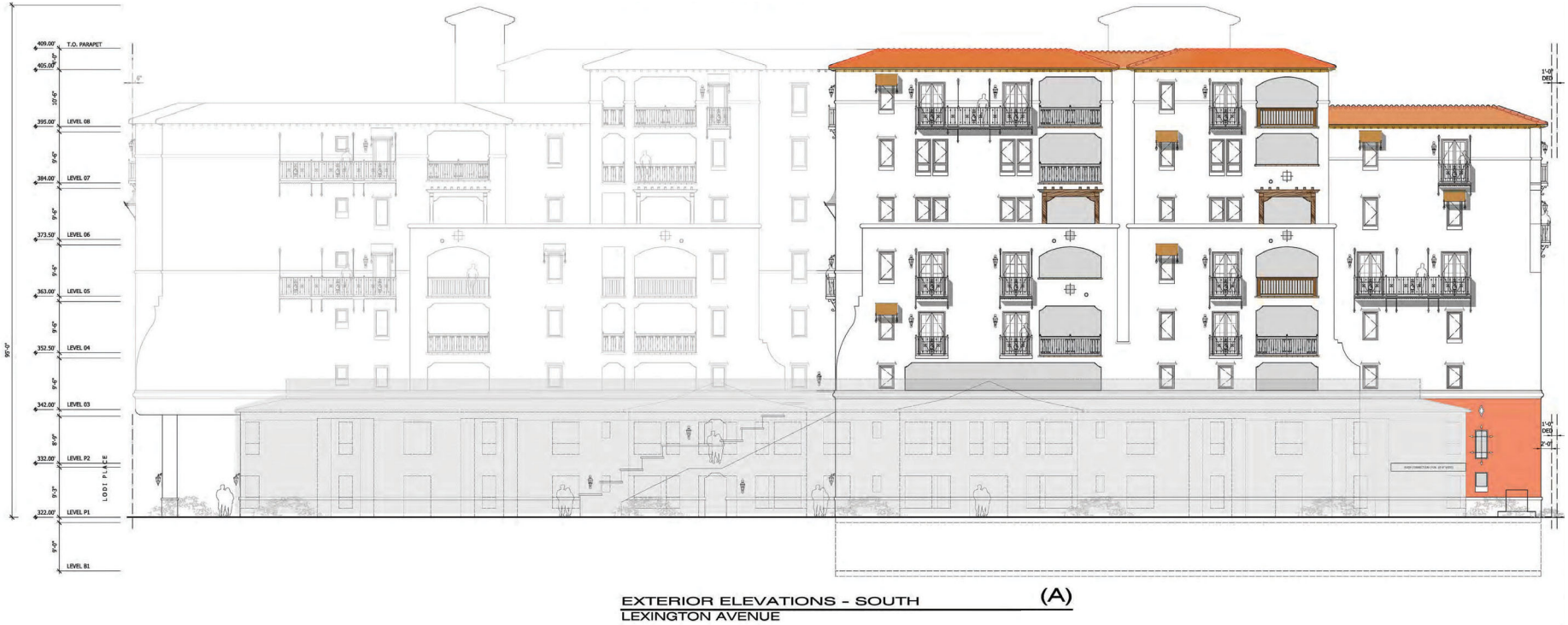
Figure 2-17
Exterior Elevations – East

EXTERIOR ELEVATIONS - WEST (D)
LODI PLACE

EXTERIOR ELEVATIONS - NORTH (C)
ADJACENT PROPERTY

Source: PK Architecture, 2023.

Figure 2-18
Exterior Elevations – West and North



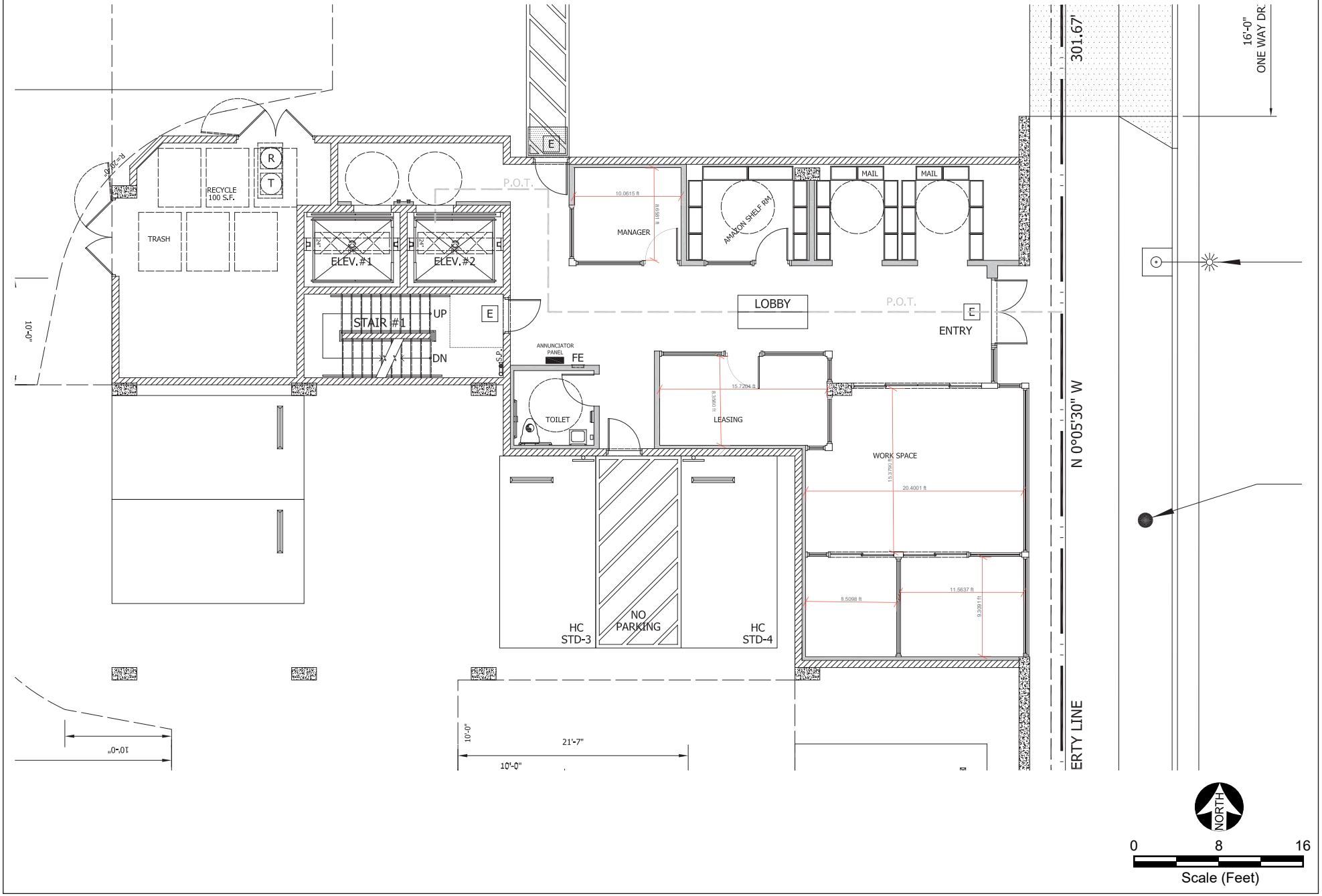
Source: PK Architecture, 2023.

Figure 2-19
Exterior Elevations – South

BUILDING SECTION (01)

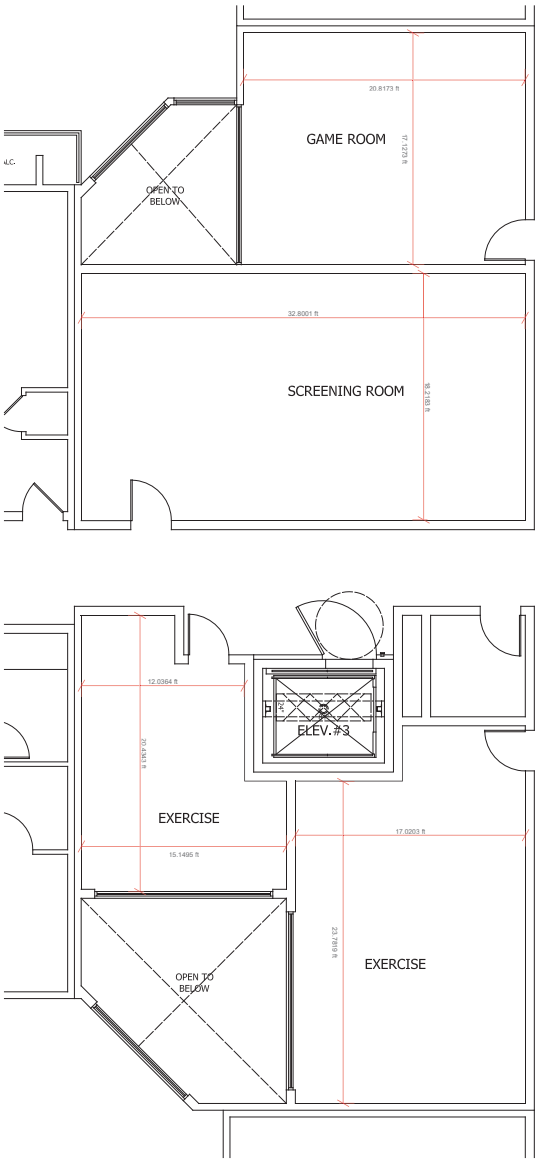
Source: PK Architecture, 2023.

Figure 2-20
Building Section

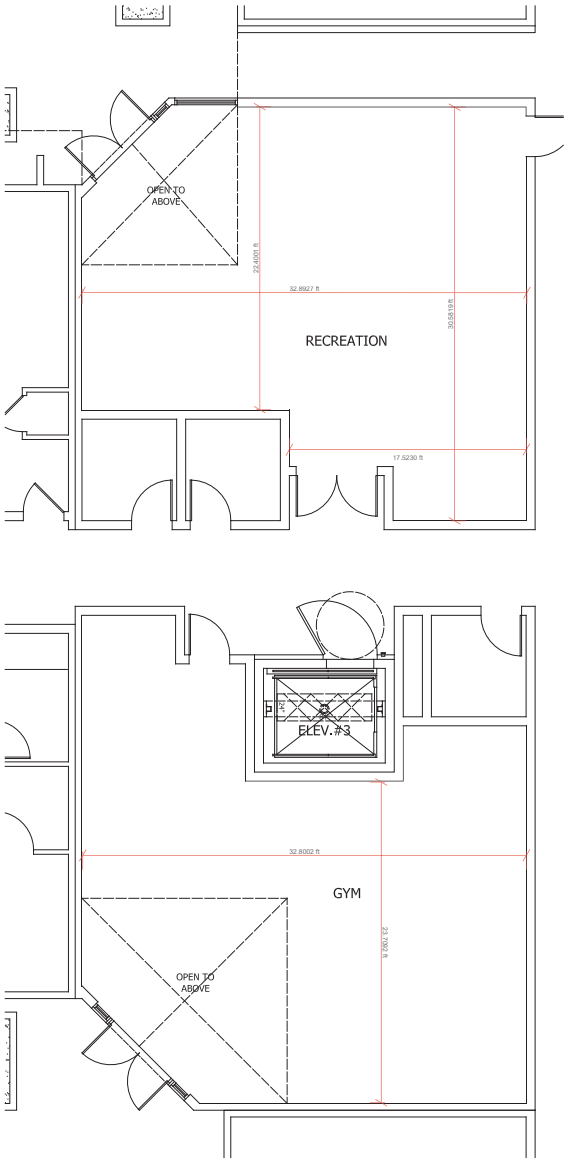


Source: PK Architecture, 2023.

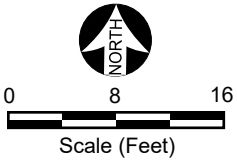
Figure 2-21
Level P1 – Floor Plan



LEVEL 04 - FLOOR PLAN - B

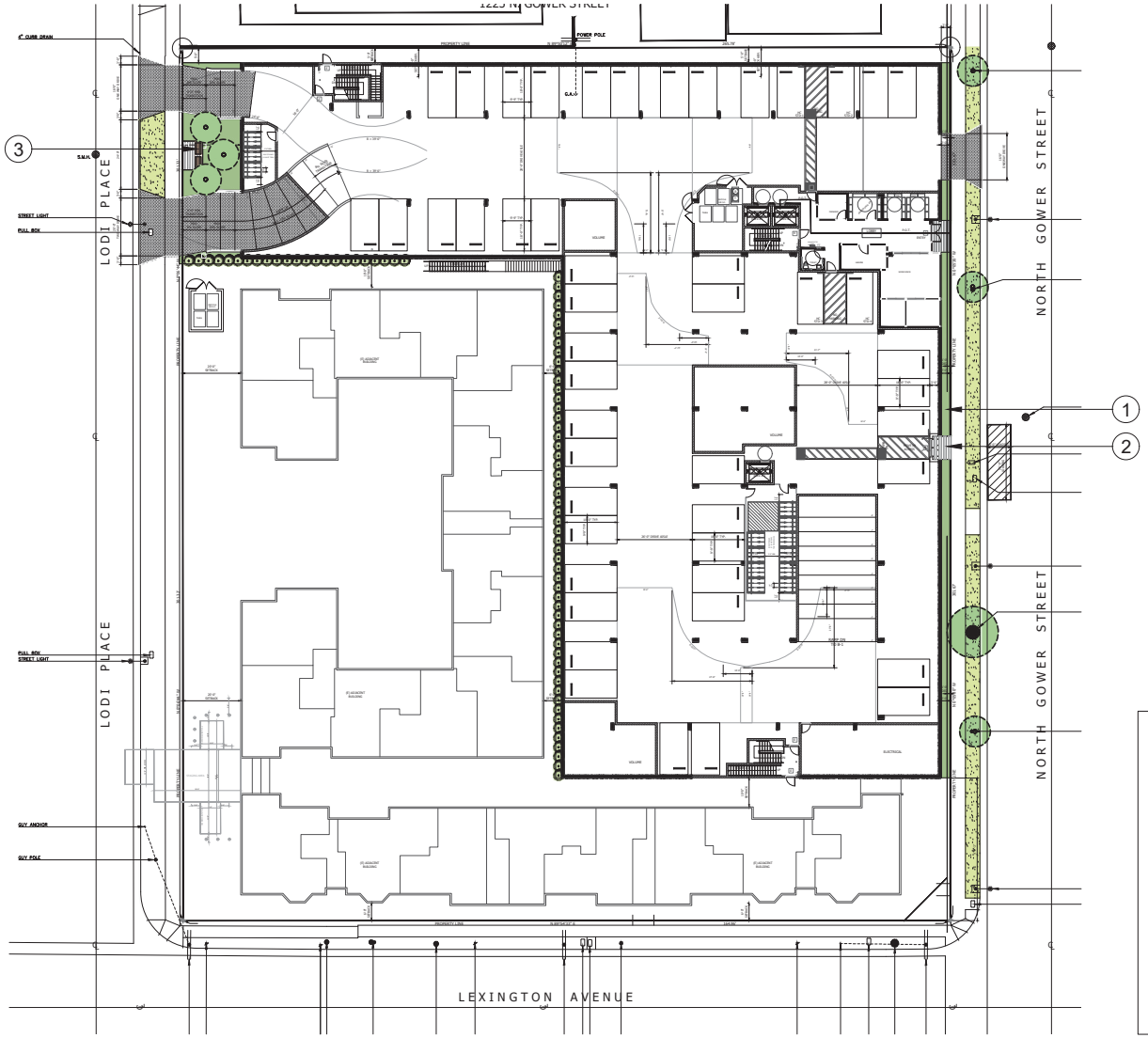


LEVEL 03 - FLOOR PLAN - A



Source: PK Architecture, 2023.

Figure 2-22
Levels 03 and 04 – Floor Plans A and B

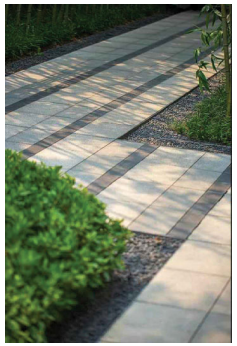


1 PRELIMINARY LANDSCAPE PLAN-LEVEL P1

0 40' 80'

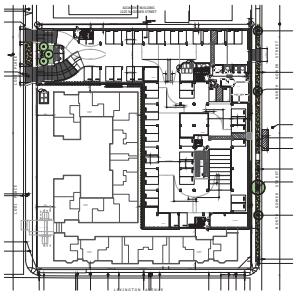
Scale: 1" = 40'-0"

2. STAINED COLORED CONCRETE PAVING



3. PREFAB WOOD BENCH

GIANT TIMBER BAMBOO



KEY MAP

KEY NOTES

1. OUTDOOR PLANTING

COMMON OPEN SPACE CALCULATION

(N) NEW PROVIDED OPEN SPACE:

ROOF DECK:	2,033 SF
S. COURTYARD:	1,435 SF
N. COURTYARD:	1,830 SF
3RD FLOOR REC:	788 SF
3RD FLOOR GYM:	745 SF
TOTAL	6,831 SF

LANDSCAPE REQUIRED@COMMON OPEN SPACE: 1,708 SF(25%)

LANDSCAPE PROVIDED@COMMON OPEN SPACE:

COMMON DECK:	1,349 SF
S. COURTYARD:	958 SF
N. COURTYARD:	477 SF
TOTAL	2,784 SF(41%)

TREE CALCULATION

TREE REQUIRED FOR EVERY 4 DWELLING UNITS: 27 TREES

NUMBER OF TREE PROPOSED:

GROUND FLOOR:	7 EA
COMMON DECK:	20 EA
TOTAL	27 EA

PAVING LEGEND

- STAINED COLORED CONCRETE PAVING
- CONCRETE PAVING
- LANDSCAPE AREA
- NEW LAWN

PLANTING LEGEND

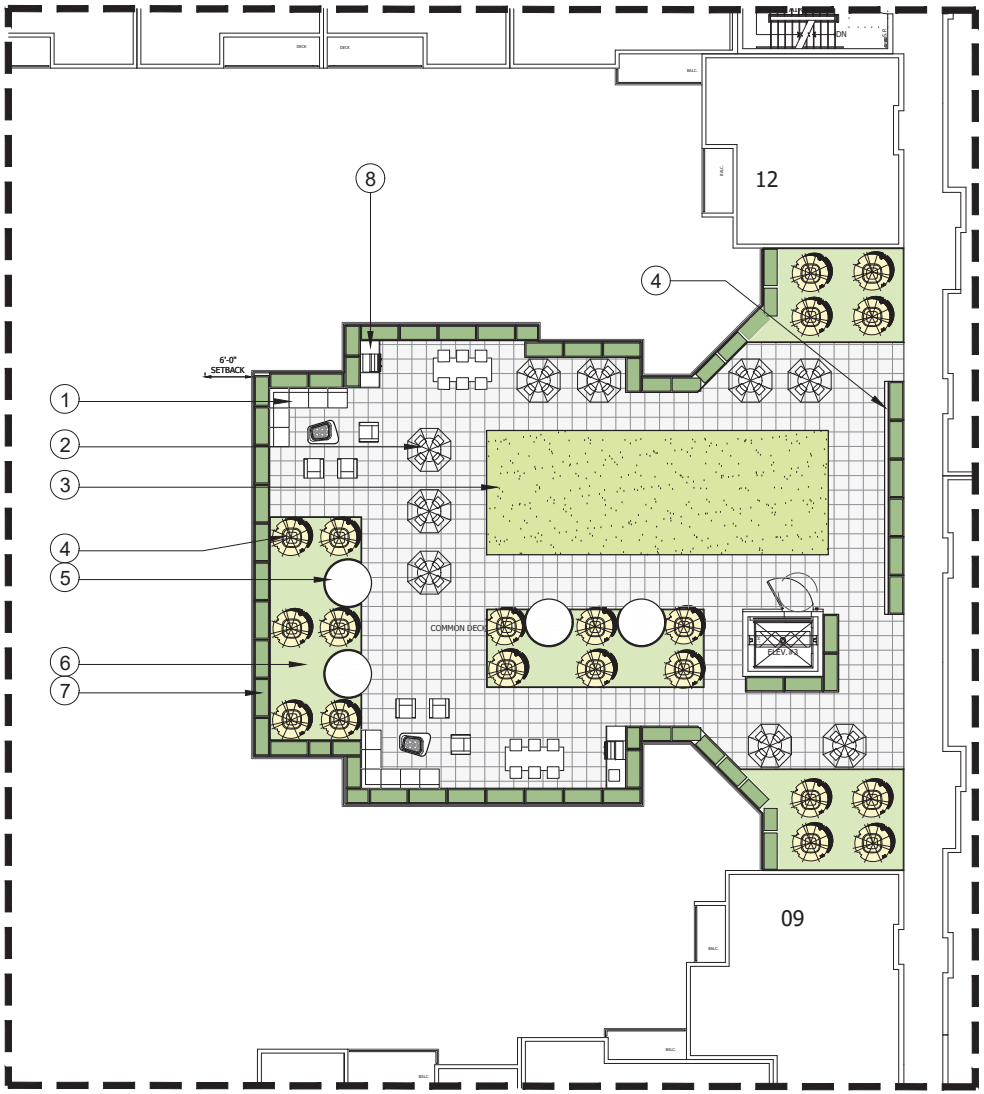
TREES	SIZE & QUAN.
GIANT TIMBER BAMBOO BAMBUSA OLDHAMII	15 GALLEN
EXISTING STREET TREE	

1201 N. GOWER ST, LOS ANGELES, CA.

PROJECT #: 22260 02/23/2023

Source: SQLA Inc Landscape Architects, 2023.

Figure 2-23
Preliminary Landscape Plan – Level P1



1 PRELIMINARY LANDSCAPE PLAN-LEVEL 8

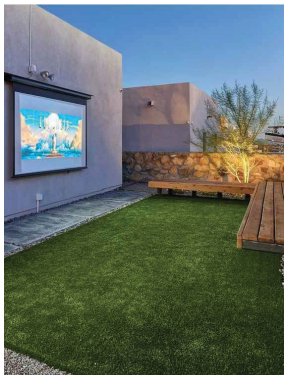
0 8' 16' 32'

Scale: 1/16" = 1'-0"

N

7. FIBERGRASS PLANTER

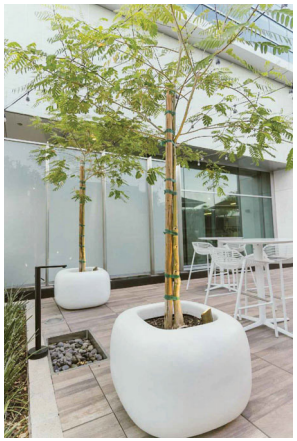
8. BBQ



PAVING LEGEND

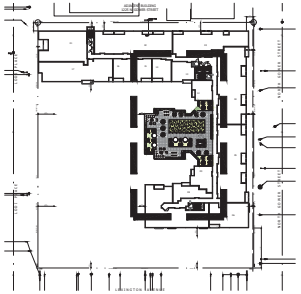
- PEDESTAL PAVER BY TILE TECH
- CONCRETE PAVING
- LANDSCAPE AREA
- SYNTHETIC GRASS

4. SQUARO PLANTER



5. NEST DAY BED

6. ROOF PLANTING



KEY MAP

KEY NOTES

1. OUTDOOR LOUNGE W/ FIREPIT

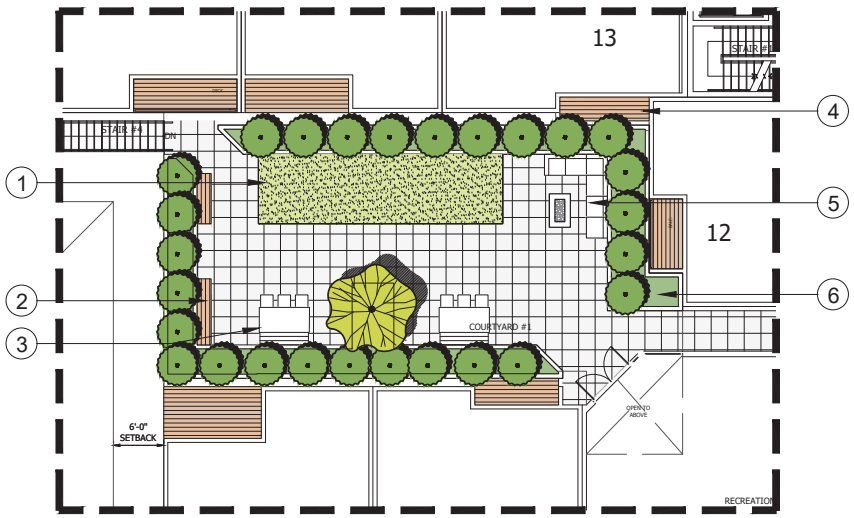
2. OUTDOOR SEATING W/ UMBRELLA
3. SYNTHETIC GRASS

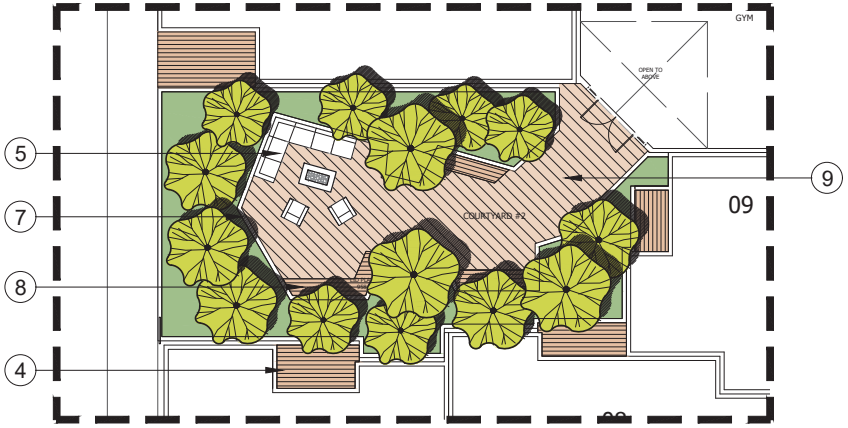
1201 N. GOWER ST, LOS ANGELES, CA.

PROJECT #: 22260 02/23/2023

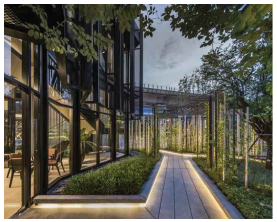
Source: SQLA Inc. Landscape Architects, 2023.

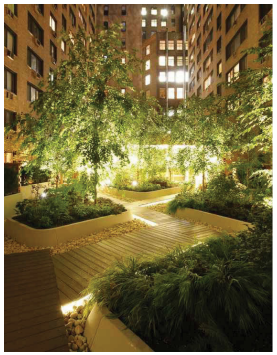
Figure 2-24
Preliminary Landscape Plan – Level 8





9. FOREST ATRIUM



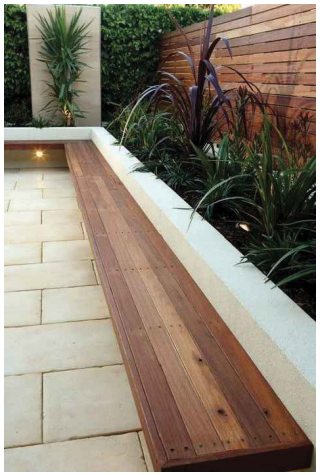


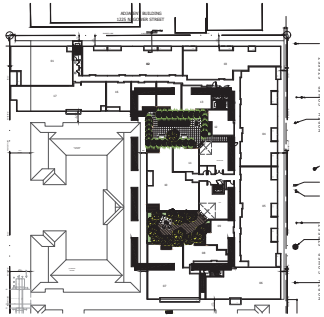
5. OUTDOOR LOUNGE W/ FIREPIT

6. ROOF PLANTING

7. 30"H PLANTER WALL

8. CUSTOMIZED BUILT-IN WOOD BENCH





KEY MAP

KEY NOTES

1. SYNTHETIC GRASS

2.WOOD BENCH

3. OUTDOOR DINING TABLE SET

4. PATIO

PAVING LEGEND

- PEDESTAL PAVER BY TILE TECH
- IPE WOOD TILE OVER PEDESTAL BY TILE TECH
- CONCRETE PAVING
- LANDSCAPE AREA
- SYNTHETIC GRASS
- BUILDING

1 LANDSCAPE PLAN ENLARGEMENT - LEVEL3 COURTYARD

N

0 8' 16' 32'

Scale: 1/16" = 1'-0"

1201 N. GOWER ST, LOS ANGELES, CA.

PROJECT #: 22260 02/23/2023

Source: SQLA Inc. Landscape Architects, 2023.

Figure 2-25
Landscape Plan Enlargement – Level 3 Courtyard

Table 2-1
Open Space Requirements

Unit Type	Number of Units	LAMC Section 12.21 G.2 Open Space Requirement[1]	Size
1 Bedroom	49	100 sf/unit	4,900 sf
2 Bedroom	33	125 sf/unit	4,125 sf
3 Bedroom	54	175 sf/unit	4,550 sf
		LAMC Section 12.21 G.2 Requirement	**13,575 sf**
		(Less 25% Off-Menu Incentive)	***(3,394 sf)***
		Total Required	***10,181 sf***

LAMC = Los Angeles Municipal Code *sf = square feet*

[1] *The LAMC's open space requirements for a residential development with more than 6 units are as follows:*

Units with fewer than 3 habitable rooms = 100 sf/unit
Units with 3 habitable rooms = 125 sf/unit
Units with more than 3 habitable rooms = 175 sf/unit

"Habitable room" as defined by the City for the purposes of calculating open space requirements generally includes bedrooms and living rooms and excludes kitchens, hallways, bathrooms, and closets.

Table 2-2
Project Open Space

Type	Size
Roof Deck	2,033 sf
South Courtyard	1,435 sf
North Courtyard	1,830 sf
Third Floor Recreation Room	788 sf
Third Floor Gym	745 sf
Private Decks	3,350
Total	***10,181 sf***

sf = square feet

Source: pk architecture, February 27, 2023.

Bicycle Parking

The Project would provide bicycle parking for the proposed 108 new dwelling units . As shown in Table 2-3, the Project would be required to provide and would provide a minimum of 79 long-term bicycle parking spaces and 8 short-term bicycle parking spaces, which would be provided by the Project.

Table 2-3
Bicycle Parking Requirements

Units	Number of Units	LAMC Section 12.21 A.16(a)(1)(i) Requirement	Number of Spaces
Long-Term Spaces Required			
Units 1-25	25	1.0 space/unit	25
Units 26-100	75	1.0 space/1.5 units	50
Units 101-200	6	1.0 space/2.0 units	4
		Total Required Long Term	**79**
Short-Term Spaces Required			
Units 1-25	25	1.0 space/10 units	2.5
Units 26-100	75	1.0 space/15 units	5.0
Units 101-200	6	1.0 space/20 units	0
		Total Required Short Term	**8[1]**

[1] *Rounded to 8.0 from 7.5.*

Source: pk architecture, February 27, 2023.

Architectural Design

The architecture of the building would reflect the Spanish Colonial Revival style and would incorporate features such as a terracotta clay tile roof, white plaster walls, soft arches, dark framed windows, and wrought iron.

Sustainability Features

The building would be designed and constructed to meet the City's Green Building Code requirements. Some of the sustainability features that would be incorporated into the Project include but are not limited to the following:

- Rooftop solar panels
- Double-paned windows
- Efficient heating systems
- LED lighting
- Energy Star-rated appliances
- Smart-home systems with automatic thermostat control
- Low-flow plumbing fixtures
- Electric-vehicle charging stations

Security Features

The building would be equipped with security features including the following:

- Access control systems

- Security gates
- Surveillance cameras
- Window sensors
- Smoke and carbon monoxide detectors
- Security lighting
- Fire doors
- Fire extinguishers
- Sprinkler systems
- On-site manned security

Lighting

Exterior lighting would include building fixtures and pedestrian-scale lighting along pathways, both for security and wayfinding purposes. All Project lighting would be designed to minimize light trespass from the Project Site and would comply with all LAMC requirements. All new street and pedestrian lighting within the public right-of-way would comply with applicable City regulations and would require approval from the Bureau of Street Lighting in order to maintain appropriate and safe lighting levels on sidewalks and roadways while minimizing light and glare on adjacent properties.

Landscaping

The Project includes 2,784 square feet of landscaping, including 1,349 square feet on the roof deck, 958 square feet in the south courtyard, and 477 square feet in the north courtyard. Landscaping would include a combination pavement, pavers, synthetic grass, shrubs and 27 trees.

Tree Removal and Replacement

As stated previously, there are no trees or protected shrubs on the Project Site. The four street trees located on Gower Street adjacent to the Project Site would be removed and replaced in accordance with the City's tree replacement requirements.

Project Design Features

The Project would incorporate the following Project Design Feature (PDF):

PDF-1: The Project will not use pile drivers during the construction phase.

Estimated Construction Schedule

The estimated construction phase for the proposed mixed-use building and associated on-site infrastructure is shown in Table 2-4. The Project's construction phase is estimated to occur over a 28-month period.

Table 2-4
Estimated Project Construction Schedule

Phase	Estimated Duration	Notes
Demolition	Weeks 1-6	Removal of 9,240 square feet of building floor area and 10,880 square feet of asphalt/concrete parking lot hauled 25 miles to landfill in 16-cubic-yard capacity trucks.
Grading	Weeks 7-11	Approximately 6,770 cubic yards of soil (including swell factors for topsoil and dry clay) hauled 25 miles to landfill in 16-cubic-yard capacity trucks.
Trenching	Weeks 12-17	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Weeks 18-108	Footings and foundation work, framing, welding, installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Weeks 114-118	Paving of driveways and parking lot surfaces.
Architectural Coating	Weeks 109-113	Application of interior and exterior coatings and sealants.

Haul Route

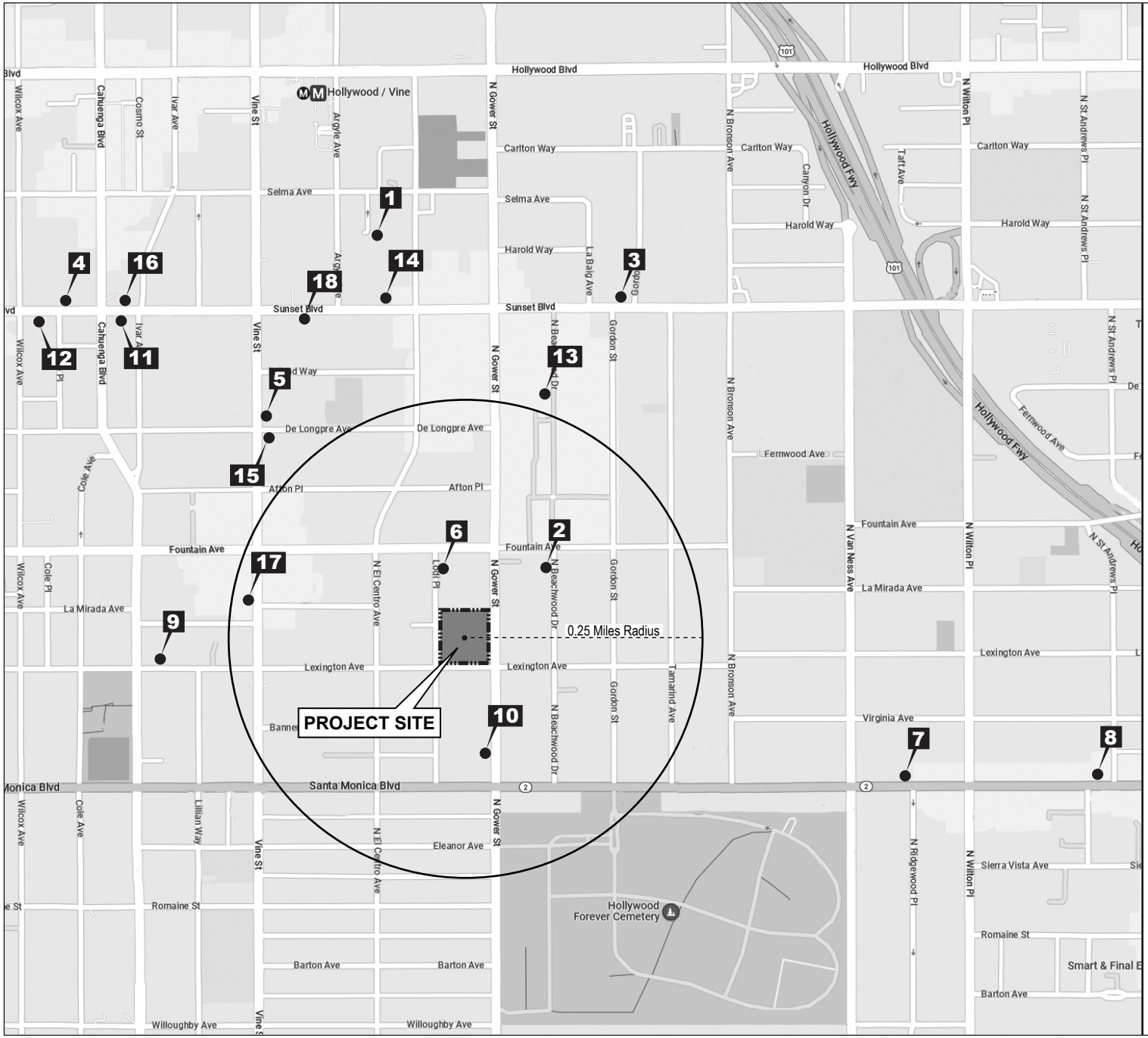
As noted in Table 2-4, the Project would require the export and recycling/disposal of approximately 20,120 square feet of debris during the demolition phase and approximately 6,770 cubic yards of soil during the grading phase. To access a regional facility north of the Project Site area, haul trucks would exit the site onto either northbound Lodi Place or Gower Street, traveling to eastbound Sunset Boulevard to northbound Interstate 101. To access a regional facility south of the Project Site area, haul trucks would exit the site onto either southbound Lodi Place or Gower Street, traveling to eastbound Santa Monica Boulevard to southbound Interstate 101.

2.3 RELATED PROJECTS

Table 2-5 identifies 18 reasonably foreseeable related projects located within 0.5 miles of the Project Site that have been considered in the cumulative analyses in Section 5 (Sustainable Communities Environmental Impact Analysis) of this SCEA. The locations of the related projects are shown in Figure 2-26.

Table 2-5
Related Projects

Map No.	Location	Land Use	Size
1	1546 Argyle Avenue	Market Apartments	26,102 sf 276 units
2	1255 N. Beachwood Drive	Condominiums	6 units
3	6007 Sunset Boulevard	Apartments Retail	109 units 14,657 sf
4	6445 Sunset Boulevard	Hotel Restaurant	12,500 sf 189 units
5	1400 N. Vine Street	Apartments Retail	189 units 16,000 sf
6	1248 Lodi Place	Single-Family	10 units
7	5731 Santa Monica Boulevard	Office	180,073 sf
8	5601 Santa Monica Boulevard	Soundstage Production Office Creative Office Retail	110,838 sf 50,000 sf 348,432 sf 5,803 sf
9	1200 Cahuenga Boulevard	Office	74,760 sf
10	1121-1149 N. Gower Street	Apartments	169 units
11	6400 Sunset Boulevard	Apartments Restaurant	200 units 7,000 sf
12	6450 Sunset Boulevard	Office Restaurant	431,032 sf 14,186 sf
13	6050 Sunset Boulevard	Sunset Gower Studio	628,000 sf
14	6201 Sunset Boulevard	Palladium Residences Commercial	731 units 24,000 sf
15	1360 Vine Street	Condominiums Market Retail Restaurant	55,000 sf 5,000 sf 8,988 sf
16	6409 Sunset Boulevard	Hotel Retail	275 rooms 1,900 sf
17	1235 Vine Street	Office Commercial	109,190 sf 7,960 sf
18	6266 Sunset Boulevard	Apartments Retail	150 units 13,130 sf
Source: Overland Traffic Consultants, Inc. Refer to Appendix I.			



Legend

1	1546 Argyle Avenue Market Apartments
2	1255 N. Beachwood Drive Condominiums
3	6007 Sunset Boulevard Apartments, Retail
4	6445 Sunset Boulevard Hotel, Restaurant
5	1400 N. Vine Street Apartments, Retail
6	1248 Lodi Place Single-Family
7	5731 Santa Monica Boulevard Office
8	5601 Santa Monica Boulevard Soundstage, Production Office, Creative Office Retail
9	1200 Cahuenga Boulevard Office
10	1121-1149 N. Gower Street Apartments
11	6400 Sunset Boulevard Apartments, Restaurant
12	6450 Sunset Boulevard Office, Restaurant
13	6050 Sunset Boulevard Sunset Gower Studio
14	6201 Sunset Boulevard Palladium Residences, Commercial
15	1360 Vine Street Condominiums,Market, Retail Restaurant
16	6409 Sunset Boulevard Hotel, Retail
17	1235 Vine Street Office, Commercial
18	6266 Sunset Boulevard Apartments, Retail

NORTH

0 500 1000

Scale (Feet)

Source: Google Maps 2023.

Figure 2-26
Related Projects Map

2.4 REQUESTED ENTITLEMENTS

To allow for implementation of the Project, the Applicant is requesting the following entitlements:

- A Density Bonus pursuant to Los Angeles Municipal Code (LAMC) Section 12.22 A.25 and Government Code Section 65915 with three off-menu incentives and five waivers of development standards for a project setting aside 15 percent of its base units (16 units) for Very Low Income households and providing 2 Low Income replacement housing units as follows:
    - A by-right density bonus pursuant to AB 2334 to permit up to a 50 percent increase in density;
    - A by-right parking reduction pursuant to AB 2097 to permit zero required parking spaces for each residential unit;
    - An off-menu incentive pursuant to LAMC Section 12.22 A.25(g)(3) to permit parking stall widths of 8 feet, 6 inches without a 10-inch increase where obstructions occur on either side of the longer dimension per LAMC Section 12.21 A.5(a)1(ii);
    - An off-menu incentive pursuant to LAMC Section 12.22 A.25(g)(3) to permit vehicle ingress and egress along a designated Collector roadway as otherwise not allowed per Los Angeles Department of Transportation (LADOT) Driveway Design Section V A 1;
    - An off-menu incentive pursuant to LAMC Section 12.22 A.25(g)(3) to permit 10,181 square feet of open space in lieu of the otherwise required 13,575 square feet;
    - A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit increased floor area ratio (FAR) of 3.12:1 in lieu of the otherwise permitted 3:1 FAR;
    - A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit increased building height of 95 feet in lieu of the otherwise permitted 30 to 45 feet;
    - A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit an easterly side yard setback of zero feet in lieu of the otherwise required 11 feet;
    - A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit a westerly side yard setback of zero feet in lieu of the otherwise required 20 feet; and

- A waiver of development standards pursuant to LAMC Section 12.22 A.25(g)(3) to permit a rear yard setback of 5 feet in lieu of the otherwise required 15 feet.

Additionally, pursuant to various sections of the City's Code, the Applicant will request approvals and permits from various City Department (and other municipal agencies) for Project construction actions including, but not limited to tree removal, demolition, excavation, shoring, grading, foundation, building and tenant improvements, and haul route approval.

3 SCEA CRITERIA AND TRANSIT PRIORITY PROJECT CONSISTENCY ANALYSIS

3.1 PROJECT CONSISTENCY WITH THE TRANSIT PRIORITY PROJECT CRITERIA

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

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the California Air Resources Board (CARB) has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented achieve the greenhouse gas (GHG) emissions reduction targets established by CARB;

2. Is a TPP in that the project meets the following criteria:

    a. Contains at least 50 percent residential use, based on total building square footage and if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;

    b. Provides a minimum net density of at least 20 units per acre; and

    c. Is located within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan/sustainable communities strategy (RTP/SCS).

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

The Southern California Association of Government's (SCAG) 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) includes strategies for accommodating projected population, household, and employment growth

in the SCAG region by 2045 as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related GHG emissions reductions through increasing transportation choices with reduced dependence on automobiles and an increase in growth in walkable, mixed-use communities and High Quality Transit Areas (HQTAs). The strategies encourage growth near destinations and mobility options, promote diverse housing choices, leverage technology innovations, support implementation of sustainability policies, and promote a green region. As a Land Use Tool, the 2020-2045 RTP/SCS identifies Priority Growth Areas (PGAs) throughout the SCAG region where 2020-2045 RTP/SCS strategies can be fully realized. These PGAs include Job Centers, TPAs, HQTAs, Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence. These PGAs account for only 4 percent of the region's total land area, but the implementation of SCAG's growth strategies will help these areas accommodate an estimated 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2020 and 2045. This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the region's resource areas.

- Job Centers: Areas with denser employment than their surroundings. The 2020-2045 RTP/SCS prioritizes employment growth and residential growth in existing Job Centers in order to leverage existing density and infrastructure. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced.

- TPAs: Areas within one-half mile of a major transit stop that is existing or planned. According to the 2020-2045 RTP/SCS, focusing on regional growth in areas with planned or existing transit stops is key to achieving equity, economic, and environmental goals. Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands. Growth within TPAs supports strategies outlined in the 2020-2045 RTP/SCS for preserving natural lands and farmlands and alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation.

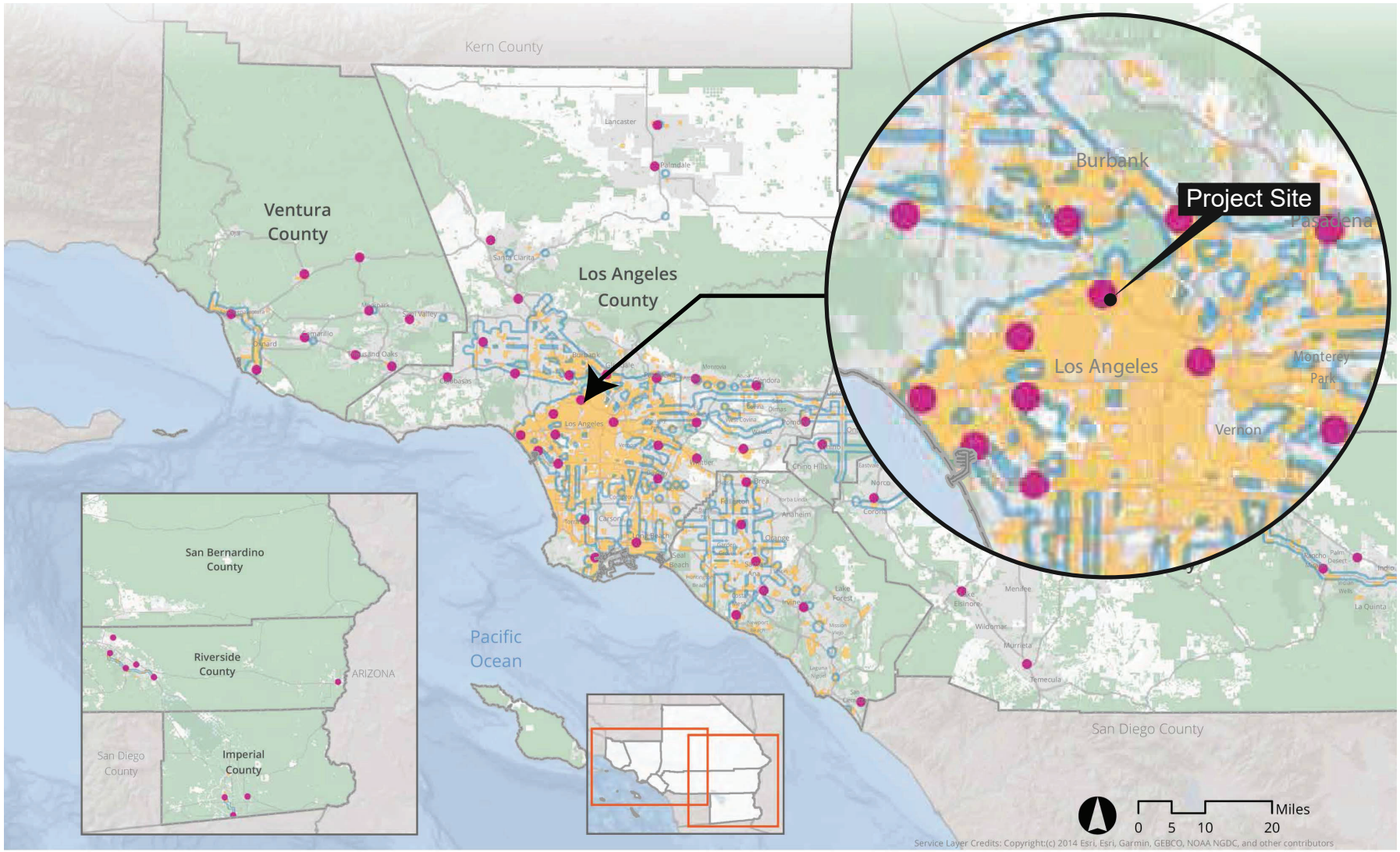
- HQTAs: Areas within one-half mile from major transit stops and high-quality transit corridors. New developments should be context-sensitive, responding to the existing physical conditions of the surrounding area. Sensitively designed Transit Oriented Developments (TODs) can preserve existing development patterns and neighborhood character while providing a balance of housing choices.

- NMAs: Areas that focus on creating, improving, restoring and enhancing safe and convenient connections to schools, shopping, services, places of worship, parks, greenways and other destinations. NMAs have robust residential to non-residential

land use connections, high roadway intersection densities and low-to-moderate traffic speeds. NMAs can encourage safer, multimodal, short trips in existing and planned neighborhoods and reduce reliance on single occupancy vehicles. NMAs support the principles of center focused placemaking. Fundamental to neighborhood scale mobility in urban, suburban and rural settings is encouraging "walkability," active transportation and short, shared vehicular trips on a connected network through increased density, mixed land uses, neighborhood design, enhanced destination accessibility and reduced distance to transit. Targeting future growth in these areas has inherent benefits to Southern California residents – providing access to "walkable" and destination-rich neighborhoods to more people in the future.

- Livable Corridors: Livable Corridor land-use strategies include the development of mixed-use retail centers at key nodes along corridors, increasing neighborhood-oriented retail at more intersections, applying a "Complete Streets" approach to roadway improvements and zoning that allows for the replacement of underperforming auto-oriented strip retail between nodes with higher density residential and employment. Livable Corridors also encourage increased density at nodes along key corridors, and redevelopment of single-story, under-performing retail with well-designed, higher density housing and employment centers.

The 2020-2045 RTP/SCS identifies these PGAs on Exhibits 3.4 through 3.10, which are included in this SCEA as Figures 3-1 through 3-7. As shown in the figures, the Project Site is located near a Job Center; within the boundaries of a TPA, an HQTA, and an NMA; and along a Livable Corridor. (The Project Site is not within a Sphere of Influence.) The Project would be consistent with the general use designation, density, and building intensity set forth in the 2020-2045 RTP/SCS for each of these PGAs in that the Project includes the development of 108 multi-family housing units (including 16 units set aside for Very Low Income households and 2 replacement units set aside for Low Income households) an infill site near transit and sources of employment, shopping, and entertainment, leveraging existing density and infrastructure and reducing the length of vehicle trips for residents and employees.



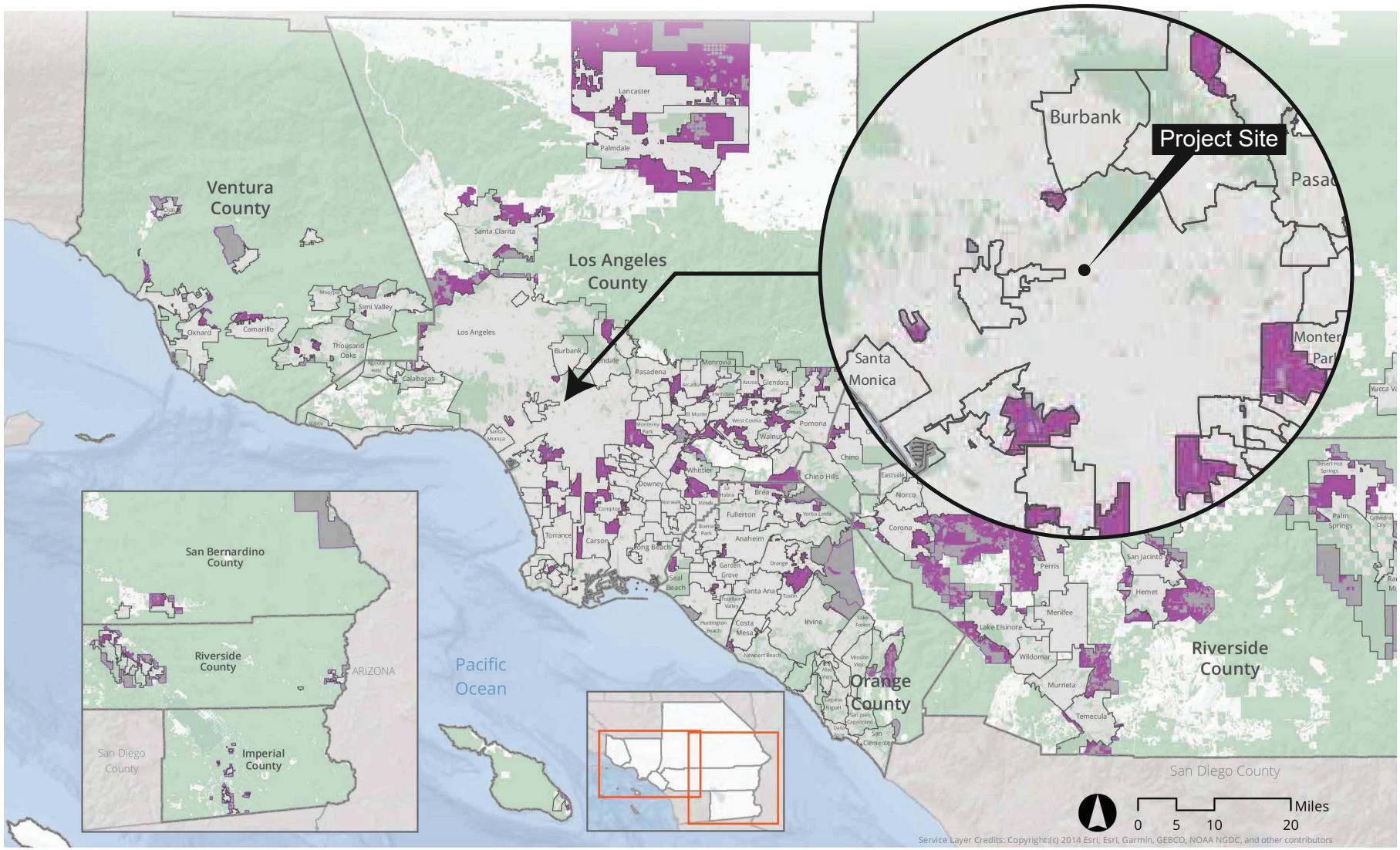
Priority Growth Areas vs. Regional Growth Constraints

- Job Center
- Neighborhood Mobility Areas
- High Quality Transit Area
- Regional Growth Constraints

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

Source: CalBRACE, California Department of Conservation, CPAD, CCED, County Transportation Commissions, NOAA Coastal Services Center, SCAG, 2019

Figure 3-1
Priority Growth Areas & Growth Constraints

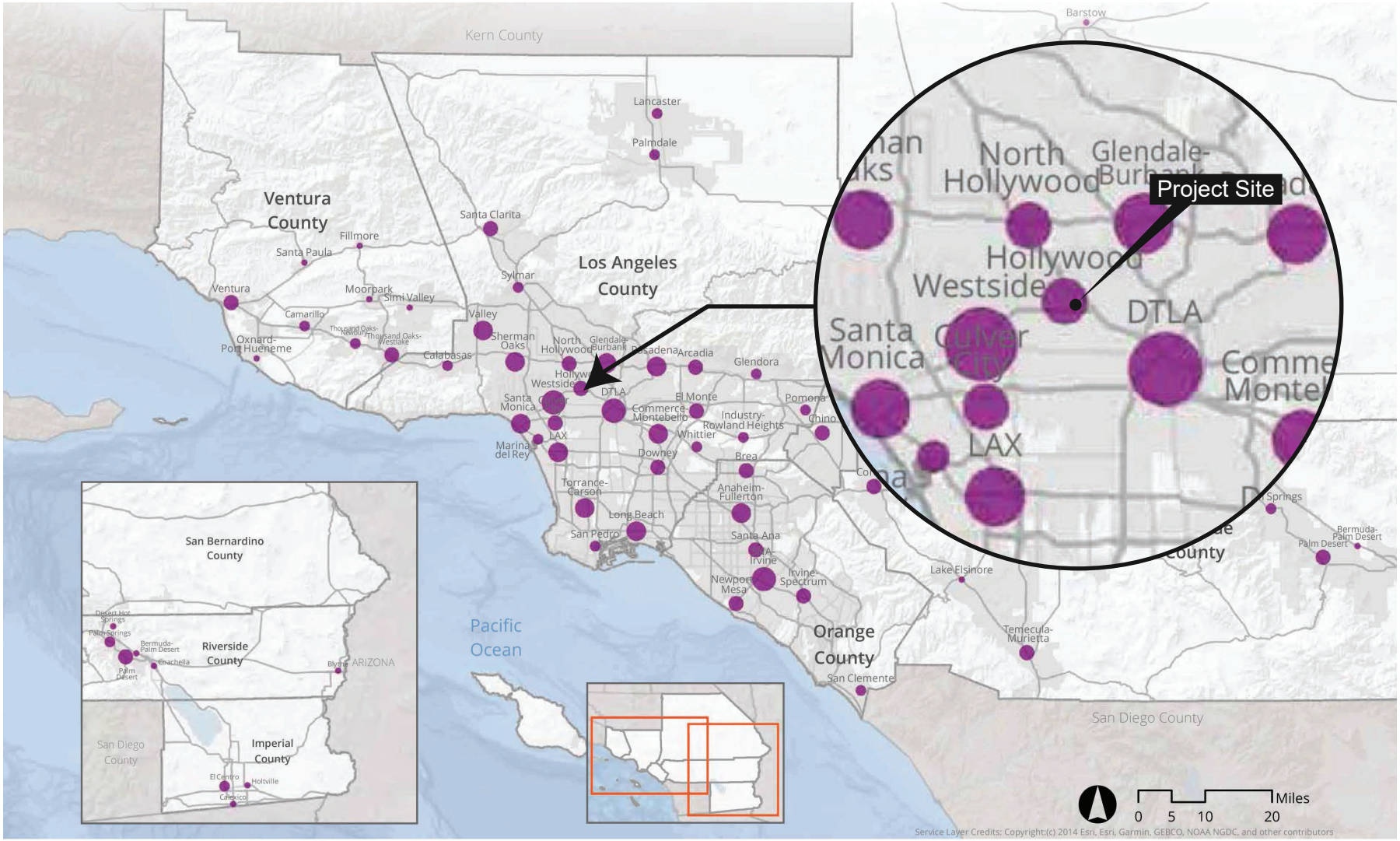


County Boundaries
City Boundaries
Sphere of Influence
Regional Growth Constraints

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

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

Figure 3-2
Priority Growth Areas - Spheres of Influence



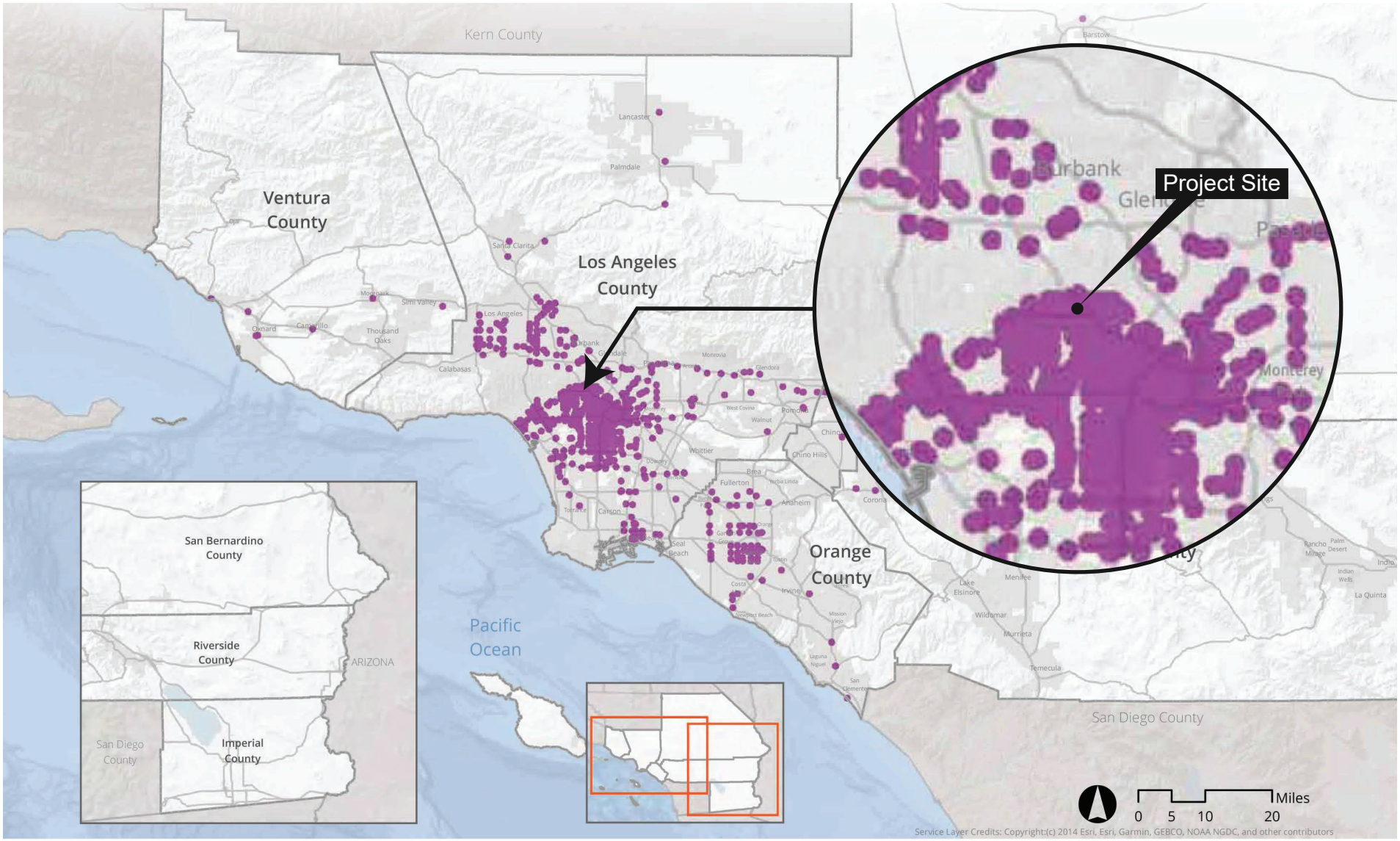
SCAG Region Proposed 2020 RTP/SCS Job Centers (Total Employment)

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

Source: SCAG, 2019

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

Figure 3-3
Priority Growth Area - Job Centers



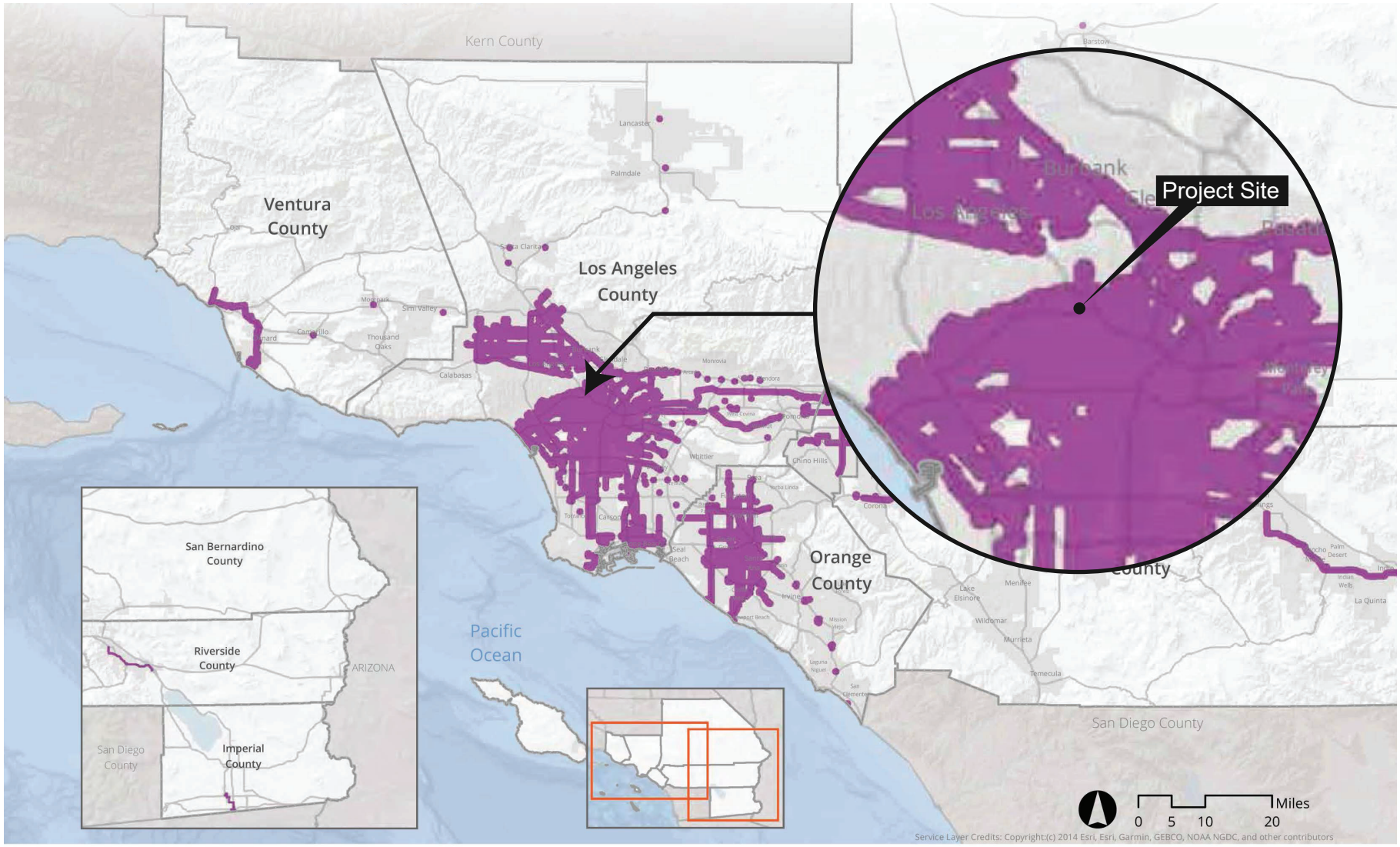
Transit Priority Areas (2045)

TPA

Source: County Transportation Commissions, SCAG, 2019

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

Figure 3-4
Priority Growth Area - Transit Priority Areas



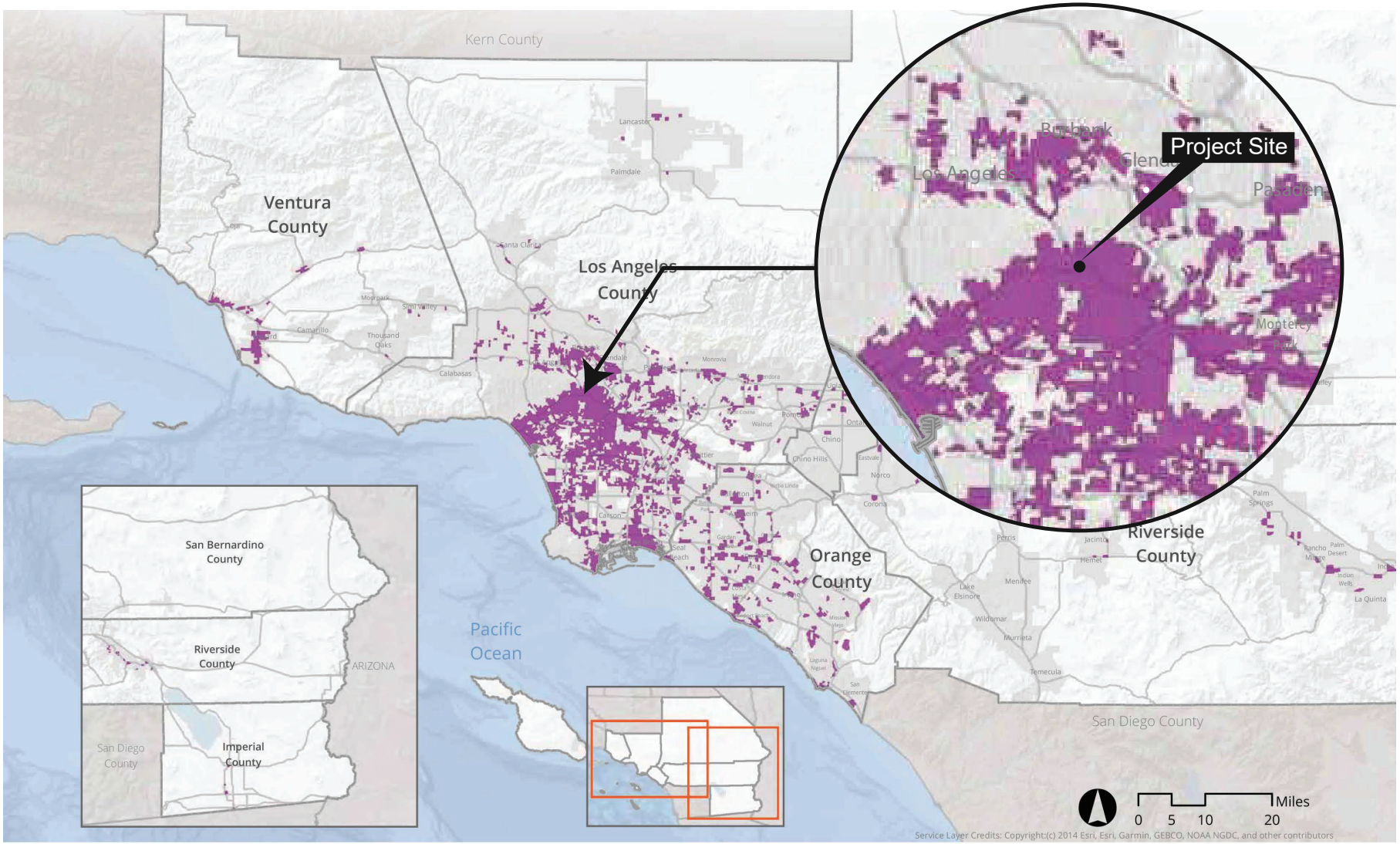
High Quality Transit Areas (2045)

HQTA

Source: County Transportation Commissions, SCAG, 2019

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

Figure 3-5
Priority Growth Area - High Quality Transit Areas



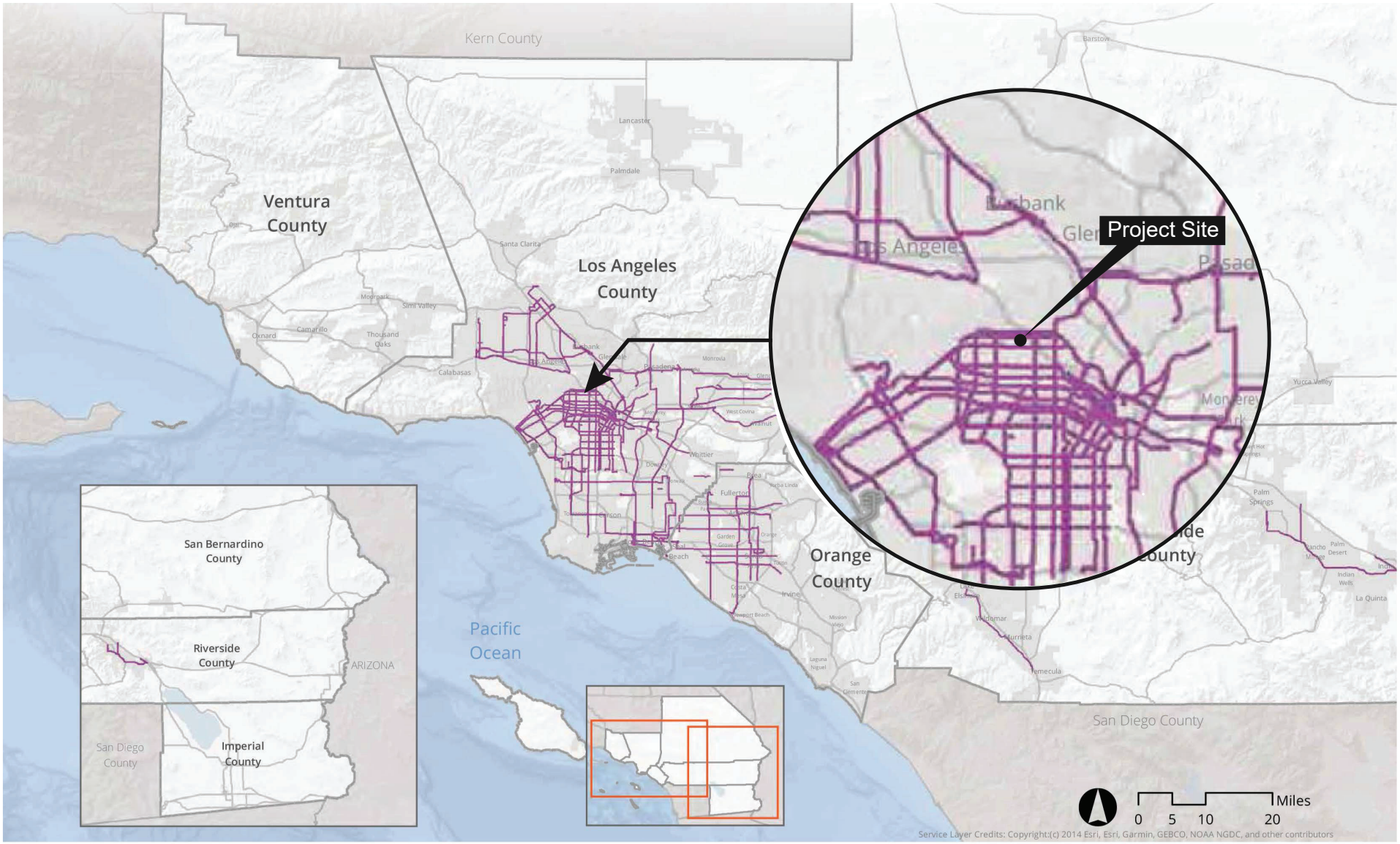
Neighborhood Mobility Areas (NMA)

NMA

Source: SCAG, 2019

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

Figure 3-6
Priority Growth Area - Neighborhood Mobility Areas



Livable Corridors

Livable Corridors

Source: SCAG 2019

Figure 3-7
Priority Growth Area - Livable Corridors

Consistent with the land use policies for TPAs, the Project would constitute compact, focused infill development in an established community with access to high-quality transportation. Given the urban nature of the Project Site area, Project residents would be able to walk and bike to work and to shop. In addition, the Project Site's location near robust transit opportunities including Metro B line, Metro Next Gen Local Route 4, Metro NextGen Local Route 210, LADOT DASH Hollywood, and LADOT DASH Hollywood/Wilshire would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking.

Consistent with the 2020-2045 RTP/SCS's general use designation, density, and building intensity for NMAs and Livable Corridors, the Project would develop new multi-family residential uses in a destination-rich area with robust residential to non-residential land use connections and high roadway intersection densities. The Project would increase density in close proximity to the Santa Monica Boulevard and Sunset Boulevard corridors. The Project would also encourage "walkability" by locating new housing near existing retail, transit, and employment and improving pedestrian sidewalks around the Project Site frontages, allowing better access to the surrounding area. Further, the Project would include 79 long-term bicycle parking stalls and 8 short-term bicycle parking stalls, which would encourage bicycling as a form of exercise and transportation.

This type of transit-oriented residential development helps to reduce dependence on automobile travel and to reduce associated mobile-source GHG emissions. Thus, the Project is consistent with SCAG's land use strategies related to reducing GHG emissions by encouraging growth near destinations and mobility options. As such, the Project would be consistent with the land use, density, and intensity of development specified in the 2020-2045 RTP/SCS for projects near Job Centers and in TPAs, HQTAs, NMAs, and along Livable Corridors.

The Project is Consistent with Applicable RTP/SCS Policies Specified for the Project Area.

As discussed below in Table 3-1, the Project would be consistent with applicable goals, guiding principles, and strategies of SCAG's 2020-2045 RTP/SCS.

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

Goals, Guiding Principles, and Strategies	Consistency Assessment
Goal 1 Encourage regional economic prosperity and global competitiveness.	**Not Applicable/Consistent.** This goal is directed towards SCAG and the City and does not apply to the Project. However, the Project would construct housing near sources of employment and shopping in an existing urban area, supporting the regional economic prosperity and global competitiveness of Southern California. The Project would also locate market-rate and affordable housing near Job Centers identified by SCAG (refer to Figure 3-3).
Goal 2 Improve mobility, accessibility, reliability, and travel safety for people and goods.	**Consistent.** The Project Site is located in a highly urbanized area of the City, near the Santa Monica Boulevard and Sunset Boulevard corridors, which are developed with sources of employment, shopping, and entertainment. The Project Site area is served by multiple bus lines, including Metro B line, Metro Next Gen Local Route 4, Metro NextGen Local Route 210, LADOT DASH Hollywood, and LADOT DASH Hollywood/Wilshire. The Project Site is also located within HQTA as defined by SCAG (refer to Figure 3-5) and a TPA as defined by SB 743, each of which supports transit opportunities and promotes a walkable environment. The Project is an infill development that includes demolition and removal of a portion of the existing residential use on the Project Site and development of the site with an eight-story, 108-unit multi-family residential building. Sixteen of the multi-family residential units would be restricted to Very Low Income households

Table 3-1 Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles	
Goals, Guiding Principles, and Strategies	**Consistency Assessment**
	and 2 units would be set aside for Low Income households. Additionally, the Project would include a total of 87 bicycle parking spaces (79 long-term spaces and 8 short-term spaces), which would support cycling as a form of transportation. The Project would allow for accessible and reliable modes of travel for the Project residents as an inherent aspect of the Project Site's proximity to sources of transit and the Project's inclusion of bicycle parking spaces. The Project would ensure safe travel at and near the Project Site by improving the public sidewalks adjacent to Project Site and ensuring safe vehicular and pedestrian access. In addition, the Project would include lighting of pedestrian pathways adjacent to the Project Site to allow for safe travel. Furthermore, the Project would be required to coordinate with the Department of Building and Safety and the Los Angeles Fire Department to ensure that all access points, driveways, and parking areas would not create a design hazard to local roadways. Therefore, the Project would allow for mobility, accessibility, reliability, and travel safety for people and goods.
Goal 3 Enhance the preservation, security, and resilience of the regional transportation system.	**Not Applicable.** This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 4 Increase person and goods movement and travel choices within the transportation system.	**Consistent.** The Project would construct market-rate and affordable housing units in a walkable urban neighborhood near existing sources of employment, shopping, and entertainment. The Project would include 79 long-term bicycle parking spaces and 8 short-term parking

Table 3-1 Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles	
Goals, Guiding Principles, and Strategies	**Consistency Assessment**
	spaces. The Project Site is in close proximity to robust transit, including Metro B line, Metro Next Gen Local Route 4, Metro NextGen Local Route 210, LADOT DASH Hollywood, and LADOT DASH Hollywood/Wilshire. Thus, the Project would increase personal mobility and provide increased travel choices to residents.
Goal 5 Reduce greenhouse gas emissions and improve air quality.	**Consistent.** The Project would add market-rate and affordable housing in a highly urbanized area of the City, near the Santa Monica Boulevard and Sunset Boulevard corridors, which are developed with sources of employment, shopping, and entertainment. Project residents would be able to walk and bike to work, shopping, and entertainment. In addition, the Project Site area is served by multiple bus lines, including Metro B line, Metro Next Gen Local Route 4, Metro NextGen Local Route 210, LADOT DASH Hollywood, and LADOT DASH Hollywood/Wilshire. The Project Site is also located within HQTA as defined by SCAG (refer to Figure 3-5) and a TPA as defined by SB 743, each of which supports transit opportunities and promotes a walkable environment. The Project includes development of the Project Site with an eight-story, 108-unit multi-family residential building. The Project would include a total of 87 bicycle parking spaces (79 long-term spaces and 8 short-term spaces) and pedestrian improvements on and adjacent to the Project Site. By siting housing in a transit-rich area that includes many resources, the Project would thereby contribute to an overall reduction in VMT and associated GHG emissions.

Table 3-1 Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles	
Goals, Guiding Principles, and Strategies	**Consistency Assessment**
Goal 6 Support healthy and equitable communities.	**Consistent.** The Project would construct market-rate and affordable housing units near sources of employment, shopping, and entertainment. Of the 108 proposed dwelling units, 16 of the units would be reserved for Very Low Income households. The Project would include 79 long-term bicycle parking spaces and 8 short-term parking spaces. The Project Site is in close proximity to robust transit, including Metro B line, Metro Next Gen Local Route 4, Metro NextGen Local Route 210, LADOT DASH Hollywood, and LADOT DASH Hollywood/Wilshire. Given the urban nature of the Project Site area, Project residents would be able to walk and bike to work and to shop. By developing new affordable housing and facilitating alternatives to driving, the Project would support healthy and equitable communities.
Goal 7 Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**Consistent.** The Project includes development of residential units on an infill site in an urbanized area of the City that is near several sources of transit. Also, the Project includes pedestrian improvements and a total of 87 bicycle parking spaces. This type of transit-oriented residential project helps to reduce dependence on automobile travel and to reduce mobile-source GHG emissions.
Goal 8 Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**Not Applicable.** This goal is directed toward SCAG and other jurisdictions that are responsible for developing, maintaining, and improving the regional transportation system.
Goal 9 Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**Consistent.** The Project includes development of the Project Site with a residential building with 108 dwelling units, 16 of which would be restricted to Very Low Income households, and 2 replacement units would be set aside for

Table 3-1 Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles	
Goals, Guiding Principles, and Strategies	**Consistency Assessment**
	Low Income households. The unit types would consist of a mix of three- and four-bedroom units. Also, the Project includes a total of 87 bicycle parking spaces, which would support cycling as a form of transportation. The Project Site area is served by Metro B line, Metro Next Gen Local Route 4, Metro NextGen Local Route 210, LADOT DASH Hollywood, and LADOT DASH Hollywood/Wilshire. Thus, the Project would provide a variety of housing typologies, with bicycle parking, near transit lines.
Goal 10 Promote conservation of natural and agricultural lands and restoration of habitats.	**Consistent.** The Project is an infill development that would not affect any natural or agricultural lands or restoration of habitats.
Guiding Principle 1 Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 2 Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 3 Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing and implementing growth strategies.
Guiding Principle 4 Encourage RTP/SCS investments and strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that are responsible for developing, maintaining, and improving the regional transportation system.
Guiding Principle 5 Encourage transportation investments that will result in improved air	**Not Applicable.** This principle is directed toward SCAG and other

Table 3-1 Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles	
Goals, Guiding Principles, and Strategies	**Consistency Assessment**
quality and public health, and reduced greenhouse gas emissions.	jurisdictions/agencies that have control over transportation investments.
Guiding Principle 6 Monitor progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies.	**Not Applicable.** This principle is directed toward SCAG that has the responsibility of monitoring the progress of the 2020-2045 RTP/SCS.
Guiding Principle 7 Regionally, transportation investments should reflect best-known science regarding climate change vulnerability, in order to design for long term resilience.	**Not Applicable.** This principle is directed toward SCAG and other jurisdictions/agencies that have control over transportation investments.
Focus Growth Near Destinations & Mobility Options	
Strategy: Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	**Consistent.** The Project would construct market-rate and affordable housing units on an infill site that is located near the Santa Monica Boulevard and Sunset Boulevard corridors, which are developed with sources of and provide access to employment, education, shopping, and entertainment destinations. The Project Site area is served by multiple bus lines, including Metro B line, Metro Next Gen Local Route 4, Metro NextGen Local Route 210, LADOT DASH Hollywood, and LADOT DASH Hollywood/Wilshire. The Project Site is also located within HQTA as defined by SCAG (refer to Figure 3-5) and a TPA as defined by SB 743, each of which supports transit opportunities and promotes a walkable environment. Additionally, the Project would include a total of 87 bicycle parking spaces (79 long-term spaces and 8 short-term spaces), which would support cycling as a form of transportation.
Strategy: Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets.	**Consistent.** The Project would construct market-rate and affordable housing units on an infill site that is located near the Santa Monica Boulevard and Sunset Boulevard corridors, which are developed with sources of and provide access to employment centers (refer to Figure 3-3). The Project Site area is served by multiple

Table 3-1 Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles	
Goals, Guiding Principles, and Strategies	**Consistency Assessment**
	bus lines, including Metro B line, Metro Next Gen Local Route 4, Metro NextGen Local Route 210, LADOT DASH Hollywood, and LADOT DASH Hollywood/Wilshire. The Project Site is also located within HQTA as defined by SCAG (refer to Figure 3-5) and a TPA as defined by SB 743, each of which supports transit opportunities and promotes a walkable environment. Additionally, the Project would include a total of 87 bicycle parking spaces (79 long-term spaces and 8 short-term spaces), which would support cycling as a form of transportation. By placing housing within proximity to employment and by allowing for alternative modes of transportation (such as transit, walking, and cycling), the Project contributes to the City's jobs/housing balance.
Strategy: Plan for growth near transit investments and support implementation of first/last mile strategies.	**Consistent.** The Project includes development of market-rate and affordable housing on an infill site in an urbanized area of the City that is near several sources of transit, including Metro B line, Metro Next Gen Local Route 4, Metro NextGen Local Route 210, LADOT DASH Hollywood, and LADOT DASH Hollywood/Wilshire. Also, the Project includes pedestrian improvements and 87 bicycle parking spaces. The Project's inclusion of pedestrian amenities and bicycle parking would support implementation of first/last mile strategies for people traveling to and from the Project Site.
Strategy: Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.	**Not Applicable.** The Project does not include the redevelopment of retail uses.
Strategy: Prioritize infill and redevelopment of underutilized land to accommodate new	**Consistent.** The Project includes development of market-rate and affordable housing on an infill site in an

Table 3-1 Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles	
Goals, Guiding Principles, and Strategies	**Consistency Assessment**
growth, increase amenities and connectivity in existing neighborhoods.	urbanized area of the City that is near several sources of transit, including Metro B line, Metro Next Gen Local Route 4, Metro NextGen Local Route 210, LADOT DASH Hollywood, and LADOT DASH Hollywood/Wilshire. Also, the Project includes pedestrian improvements and 87 bicycle parking spaces, both of which would increase connectivity to the surrounding neighborhood.
Strategy: Encourage design and transportation options that reduce the reliance on and number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	**Consistent.** The Project includes development of residential units on an infill site in an urbanized area of the City that is near several sources of transit. Also, the Project includes pedestrian improvements and a total of 87 bicycle parking spaces. This type of transit-oriented residential development helps to reduce dependence on solo automobile travel.
Strategy: Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g., shared parking or smart parking).	**Consistent.** The Project would include less than one vehicle parking space per unit (a total of 99 spaces). Additionally, the Project would include 10 EV charging stations.
Promote Diverse Housing Choices	
Strategy: Preserve and rehabilitate affordable housing and prevent displacement.	**Consistent:** The Project would include removal of 28 existing dwelling units and replacement of those units with 108 dwelling units that would include 16 units set aside for Very Low Income households and 2 replacements units set aside for Low Income households.
Strategy: Identify funding opportunities for new workforce and affordable housing development.	**Not Applicable/Consistent.** This strategy is directed toward jurisdictions/agencies with interest in alternative/affordable housing opportunities. However, the Project would include 16 units set aside for Very Low Income households and 2 replacements units set aside for Low Income households.

Table 3-1 Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles	
Goals, Guiding Principles, and Strategies	**Consistency Assessment**
Strategy: Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.	**Not Applicable.** This strategy is directed to jurisdictions/agencies that can create incentives and have control over regulations related to accessory dwellings.
Strategy: Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.	**Not Applicable.** This strategy is directed to jurisdictions/agencies that can create incentives and have control over regulations related to housing.
Leverage Technology Innovations	
Strategy: Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking/drop-off space.	**Consistent**. The Project would provide 87 bicycle parking spaces and 10 electric-vehicle charging stations.
Strategy: Improve access to services through technology—such as telework and telemedicine as well as other incentives such as a "mobility wallet," an app-based system for storing transit and other multi-modal payments.	**Not Applicable.** The Project would have no involvement in providing online services or telework. However, the Project would not inhibit the implementation of this strategy.
Strategy: Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	**Not Applicable.** The Project has no authority to develop sources of power.
Support Implementation of Sustainability Policies	
Strategy: Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.	**Not Applicable.** This strategy is directed toward SCAG and other jurisdictions/agencies. However, as outlined in this table, the Project is the type of development that would reduce GHG emissions.
Strategy: Support statewide legislation that reduces barriers to new construction and that incentivizes development near transit corridors and stations.	**Not Applicable.** This strategy is directed toward SCAG and other jurisdictions/agencies. However, as outlined in this table, the Project includes new construction near existing transit sources.
Strategy: Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities	**Not Applicable.** This strategy is directed toward SCAG and other jurisdictions/agencies.

Table 3-1 Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles	
Goals, Guiding Principles, and Strategies	**Consistency Assessment**
(CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.	
Strategy: Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies.	**Not Applicable.** This strategy is directed toward SCAG and other jurisdictions/agencies.
Strategy: Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.	**Not Applicable.** This strategy is directed toward SCAG and other jurisdictions/agencies.
Strategy: Continue to support long range planning efforts by local jurisdictions.	**Not Applicable.** This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Provide educational opportunities to local decisions makers and staff on new tools, best practices and policies related to implementing the Sustainable Communities Strategy.	**Not Applicable.** This strategy is directed at SCAG and other jurisdictions/agencies.
Promote a Green Region	
Strategy: Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	**Not Applicable.** This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	**Not Applicable.** This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Integrate local food production into the regional landscape.	**Not Applicable.** This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Promote more resource efficient development focused on conservation, recycling and reclamation.	**Not Applicable.** This strategy is directed at SCAG and other jurisdictions/agencies.
Strategy: Preserve, enhance and restore regional wildlife connectivity.	**Consistent.** The Project is an infill development in an urbanized area and would not interfere with regional wildlife connectivity.
Strategy: Reduce consumption of resource areas, including agricultural land.	**Consistent.** The Project is an infill development in an urbanized area would not affect any agricultural land.
Strategy: Identify ways to improve access to public park space.	**Consistent.** The Project is an infill development in an urbanized area would not interfere with access to public park

Table 3-1 Consistency with the 2020-2045 RTP/SCS: Goals and Guiding Principles	
Goals, Guiding Principles, and Strategies	**Consistency Assessment**
	space.
Source: 2020-2045 RTP/SCS, finally adopted September 3, 2020.	

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

The Project includes 100 percent residential use. As such, the Project would be consistent with this criterion.

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

The Project Site is approximately 2.51 acres in size. The Project includes development of 108 dwelling units. As such, the Project would provide approximately 43 dwelling units per acre. As such, the Project would be consistent with this criterion.

Consistency with TPP Criterion #2(c) – The Project Site is located within one-half mile of a major transit stop or a high quality transit corridor included in the 2020-2045 RTP/SCS.

PRC Section 21064.3 defines "major transit stop" as a site containing any of the following:

(a) An existing rail or bus rapid transit station.
(b) A ferry terminal served by either a bus or rail transit service.
(c) The intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

PRC Section 21155 (b) states that a "major transit stop" is defined in PRC Section 21064.3, except that, for purposes of Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

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

The Project Site is located approximately 0.3 miles from the intersection of Santa Monica Boulevard and Vine Street, which provides stops for Metro NextGen Local Route 4 (10-minute peak-hour headways) and Metro NextGen Local Route 210 (10- and 12-minute peak-hour headways), respectively, thereby qualifying this intersection as a major transit stop and Santa Monica Boulevard and Vine Street as high-quality transit corridors. As

such, the Project is within one-half mile of both a major transit stop and a high-quality transit corridor and therefore, is consistent with this criterion.

4 MITIGATION MEASURES FROM PRIOR EIRS

4.1 INCORPORATION OF APPLICABLE MITIGATION MEASURES FROM PRIOR EIRS

Public Resources Code (PRC) Section 21155.2 requires that a Transit Priority Project (TPP) also incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Prior EIRs applicable to the Project include SCAG's 2016-2040 RTP/SCS and 2020-2045 RTP/SCS Program EIRs.

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

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

To comply with PRC Section 21155.2, the City of Los Angeles (City) has reviewed all mitigation measures contained in the SCAG MMRP (refer to Table 4-1) and determined their applicability to the Project. For each such mitigation measure, the City considered whether to incorporate the mitigation measure from SCAG's Program EIR or whether an equally effective existing City mitigation measure, or other City regulation or federal, state, or regional regulation would supersede SCAG's mitigation measures. A discussion of the City's applicability determination is found on Table 4-1.

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

Impacts and Mitigation Measure	Applicability to the Project
AESTHETICS	
Impact AES-1 Potential for the Plan to have a substantial adverse effect on a scenic vista **PMM AES-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. d) Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. e) Retain or replace trees bordering highways, so that clear-cutting is not evident. f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity; h) Use see-through safety barrier designs (e.g., railings rather than walls)	**No mitigation applies**. PRC Section 21099, enacted by Senate Bill 743, provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2452 indicates that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact shall not be considered a significant impact for infill projects within Transit Priority Areas (TPAs) pursuant to CEQA. The Project includes development of a residential building with 108 dwelling units (including 16 dwelling units set aside for Very Low Income households) and 2 replacement units set aside for Low Income households within a City-designated TPA and within a SCAG-designated High Quality Transit Area (HQTA) and TPA. As such, the Project's aesthetic impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. Thus, incorporation of this mitigation measure into the Project is not required.
Impact AES-2 Potential to substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway See PMM AES-1 above.	**No mitigation applies.** See discussion of the applicability of PMM AES-1 above.

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

Impacts and Mitigation Measure	Applicability to the Project
Impact AES-3 Potential to substantially degrade the existing visual character or quality of public views (public views are those that are experienced from publicly accessible vantage points). In an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality **PMM AES-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. d) Design projects consistent with design guidelines of applicable general plans. e) Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows: - use transparent panels to preserve views where sound walls would block views from residences;	**No mitigation applies**. See discussion of the applicability of PMM AES-1 above.

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

Impacts and Mitigation Measure	Applicability to the Project
- use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; - construct sound walls of materials whose color and texture complements the surrounding landscape and development; g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation	
Impact AES-4 Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area **PMM AES-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances. c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	**No mitigation applies**. See discussion of the applicability of PMM AES-1 above.

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

Impacts and Mitigation Measure	Applicability to the Project
AGRICULTURAL RESOURCES	
Impact AG-1 Potential for the Plan to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use **PMM AG-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential. b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. c) Maintain and expand agricultural land protections such as urban growth boundaries. d) Provide for mitigation fees to support a mitigation bank1 that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access. f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.	**No mitigation applies.** The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important Farmland category.[1] Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use. Thus, incorporation of this mitigation measure into the Project is not required.
Impact AG-2 Potential for the Plan to conflict with existing zoning for agricultural use, or a Williamson Act contract	**No mitigation applies.** The Project Site is not zoned for agricultural use, and the site is not under Williamson Act contract.[2] Therefore, the Project

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

[2] *Ibid.*

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

Impacts and Mitigation Measure	Applicability to the Project
PMM AG-2: Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts. b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.	would not conflict with existing zoning for agricultural use, or a Williamson Act contract. Thus, application of this mitigation measure to the Project is not required.
Impact AG-3 Potential for the Plan to conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)) **PMM AG-3:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources**.**	**No mitigation applies.** Neither the Project Site nor the surrounding area is zoned for forest land, timberland, or Timberland Production. As such, the Project would not result in any conflicts any zoning related to forest land, timberland, or Timberland Production zoning. The Project Site is located in an urbanized area of the City and is currently developed with residential uses. Thus, incorporation of this mitigation measure is not required.
Impact AG-4 Potential for the Plan to result in the loss of forest land or conversion of forest land to non-forest use See PMM AG-3 above.	**No mitigation applies.** See discussion of the applicability of PMM AG-3 above.
Impact AG-5 Potential for the Plan to involve other changes in the existing environment which, due to their location or nature, could result in conversion	**No mitigation applies.** Because the Project Site is currently not used for any agricultural uses and is not forest land, no agricultural use or forest land would be converted. The Project Site is located in an urbanized area

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

Impacts and Mitigation Measure	Applicability to the Project
of Farmland, to non-agricultural use or conversion of forest land to non-forest use **PMM AG-4:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land. b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management. c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted. **PMM AG-5:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be responsible for acquiring easements on nearby agricultural land and/or financially	of the City and is currently developed with residential uses. Thus, incorporation of this mitigation measure is not required.

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

Impacts and Mitigation Measure	Applicability to the Project
compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.	
AIR QUALITY	
Impact AQ-1 Conflict with or obstruct implementation of the applicable air quality plan No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact AQ-2 Potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation **PMM AQ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize land disturbance. b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. c) Cover trucks when hauling dirt. d) Stabilize the surface of dirt piles if not removed immediately. e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. f) Minimize unnecessary vehicular and machinery activities. g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road	**No mitigation applies.** The analysis of the Project's potential air quality impacts in Section 5 (Sustainable Communities Environmental Analysis) concluded that the Project would not generate pollutant emissions in excess of applicable significance thresholds and would not have the potential to violate any air quality standard or contribute substantially to an existing or projected air quality violation. No significant impacts related to this issue have been identified, and no mitigation measures are required. Thus, incorporation of this mitigation measure is not required.

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

Impacts and Mitigation Measure	Applicability to the Project
(portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. k) Ensure that all construction equipment is properly tuned and maintained. l) Minimize idling time to 5 minutes—saves fuel and reduces emissions. m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. o) Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts. p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. q) Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in	

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

Impacts and Mitigation Measure	Applicability to the Project
compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction, unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible. r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects. t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs. u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors). v) As applicable for airport projects, the following measures should be considered: a. Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines. b. Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. c. Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum.	

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Impacts and Mitigation Measure	Applicability to the Project
w) As applicable for port projects, the following measures should be considered: a. Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE). b. Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. c. Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. d. Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. e. Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. f. Encourage the participation in the Green Ship Incentives. g. Offer incentives to encourage the use of on-dock rail. x) As applicable for rail projects, the following measures should be considered: a. Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards. y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit. z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters. a. Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air	

Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside. b. Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued. c. Disclose the potential increase in energy costs for running the HVAC system to prospective residents. d. Provide information to residents on where MERV filters can be purchased. e. Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units. f. Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time. g. Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units. h. Set criteria for assessing progress in installing and replacing the enhanced filtration units; and i. Develop a process for evaluating the effectiveness of the enhanced filtration units. aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.	
Impact AQ-3 Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard See PMM AQ-1 above.	**No additional mitigation applies.** See discussion of the applicability of PMM AQ-1 above.
Impact AQ-4 Expose sensitive receptors to substantial pollutant concentrations See PMM AQ-1 above.	**No additional mitigation applies.** See discussion of the applicability of PMM AQ-1 above.
Impact AQ-5 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.

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Impacts and Mitigation Measure	Applicability to the Project
BIOLOGICAL RESOURCES	
Impact BIO-1 Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or US Fish and Wildlife Service **PMM BIO-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: i. Impact minimization strategies ii. ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery efforts v. Habitat restoration vi. Establishment of conservation easements	**No mitigation applies**. The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with regulatory requirements that are equal to or more effective than PMM BIO-1. The Project Site is located in an urbanized and developed area of the City and is currently developed with an apartment complex. While the Project Site does contain ornamental landscaping, the Project Site does not contain any habitat for protected species. There are four street trees located along Gower Street adjacent to the Project Site that would be removed and replaced in accordance with the City's tree replacement requirements. These trees include two magnolias (*Magnolia grandiflora*), one ficus (*Ficus nidita*), and one camphor (*Cinnomomum camphora*). None of the trees is considered a "protected tree or shrub," as defined by the City.[3] However, these trees could potentially provide nesting sites for migratory birds. Thus, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15th to August 15th) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations would ensure impacts related to nesting birds would be less than significant. Thus, application of this mitigation measure to the Project is not required.

[3] *Protected trees and shrubs as defined by the City include oak trees (Quercus spp.) and Southern California black walnut trees (Juglans californica), western sycamore trees (Platanus racemosa), California bay trees (Umbellularia californica), Mexican elderberry shrubs (Sambucus Mexicana), and toyon (Heteromeles arbutifolia).*

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Impacts and Mitigation Measure	Applicability to the Project
vii. Permanent dedication of in-kind habitat c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species. e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources. f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation. g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact. h) Appoint a qualified biologist to monitor implementation of mitigation measures. i) Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. j) Develop an invasive species control plan associated with project construction. k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife. l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance. m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.	
Impact BIO-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans,	**No mitigation applies.** The Project Site is located in an urbanized area of the City and has previously been developed. No riparian habitat or other

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Impacts and Mitigation Measure	Applicability to the Project
policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service **PMM BIO-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA. b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code. d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds. e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season. f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities.	sensitive natural communities are located on the Project Site. Therefore, development of the Project would not result in adverse effects to any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service. Thus, application of this mitigation measure to the Project is not required.

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Impacts and Mitigation Measure	Applicability to the Project
g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required. i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities. j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures. k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased. l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects. m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan. n) Install fencing and/or mark sensitive habitat to be avoided during construction activities. o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist. p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist. q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging	

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Impacts and Mitigation Measure	Applicability to the Project
growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
Impact BIO-3 Have a substantial adverse effect on State or Federally Protected Wetlands (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption or other means **PMM BIO-3**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency. a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible. b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters Of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW. c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are	**No mitigation applies.** The Project Site is not located on protected wetlands or water features that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers or any other public agencies and/or Lead Agencies. Thus, application of this mitigation measure to the Project is not required.

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Impacts and Mitigation Measure	Applicability to the Project
encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: -- Permittee-responsible mitigation -- Contribution of in-kind in-lieu fees -- Use of in-kind mitigation bank credits -- Where avoidance is determined to be infeasible, and d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities: -- Avoidance -- Impact Minimization -- On-site alternatives -- Off-site alternatives e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.	
Impact BIO-4 Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites **PMM BIO-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	**No mitigation applies.** The Project Site is located in an urbanized and developed area of the City. The Project Site is currently improved with multi-family residential buildings associated with an apartment complex. The Project Site is not part of a migratory wildlife corridor or native wildlife nursery. Therefore, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. Thus, application of this mitigation measure to the Project is not required.

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

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Impacts and Mitigation Measure	Applicability to the Project
l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches. m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation. n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in MM-BIO-1(b), where applicable: -- Wildlife movement buffer zones -- Corridor realignment -- Appropriately spaced breaks in center barriers -- Stream rerouting -- Culverts -- Creation of artificial movement corridors such as freeway under- or overpasses -- Other comparable measures p) Where the lead agency has identified that an RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. q) Incorporate applicable and appropriate guidance (e.g., FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants.	
Impact BIO-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the

Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
PMM BIO-5: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist. c) If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist. d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or	Project would be required to comply with regulatory requirements that are equal to or more effective than PMM BIO-5. There are four street trees located along Gower Street adjacent to the Project Site that would be removed and replaced in accordance with the City's tree replacement requirements. These trees include two magnolias (*Magnolia grandiflora*), one ficus (*Ficus nidita*), and one camphor (*Cinnomomum camphora*). None of the trees is considered a "protected tree or shrub," as defined by the City. The Applicant would be required to plant replacement trees on or adjacent to the Project Sites in conformance with the City's Urban Forestry Division requirements for Project landscaping and tree replacement and planting. As such, the Project would not have the potential to conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance. Thus, incorporation of the mitigation measure is not required.

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Impacts and Mitigation Measure	Applicability to the Project
use of equipment with an open flame occur near or within the protected perimeter of any protected tree. f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist. h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: -- Avoidance strategies -- Contribution of in-lieu fees -- Planting of replacement trees -- Re-landscaping areas with native vegetation post-construction -- Other comparable measures developed in consultation with local agency and certified arborist.	

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Impacts and Mitigation Measure	Applicability to the Project
Impact BIO-6 Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. **PMM BIO-6:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs. b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP. c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in SMM-BIO-2, where applicable.	**No mitigation applies.** The Project Site is not subject to any provisions of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Furthermore, the Project Site is not within or adjacent to an existing Significant Ecological Area. Thus, incorporation of the mitigation measure is not required.
CULTURAL RESOURCES	
Impact 3.5-1 Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5 **PMM CULT-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified.	**No mitigation applies.** A *Historical Resources Assessment* was prepared for the Project that determined that the Project would not result in any significant impacts on any significant historical resources. Refer to Appendix C and Section 5 (Sustainable Communities Environmental Impact Analysis). Regarding archaeological resources, the City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar measures that are equal to or more effective than PMM CULT-1. The South Central Coast Information Center (SCCIC) conducted a records search for the Project Site and a half-mile radius around the Site. The records search was completed November 15, 2022. The search identified one

Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center. c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: -- Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. -- Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and construction activities and be provided to the Lead Agency for review and approval.	archaeological resource known to exist within 0.25 miles radius of the Project Site and did not identify any known prehistoric or historic resources on the Project Site. Given that at least one resource is known to exist in the Project Site area, the Project Applicant would be required to comply with Mitigation Measure CULT-1, listed below and as identified in Section 5 (Sustainable Communities Environmental Impact Analysis), that would ensure the Project would not cause an adverse change in the significance of a historical archaeological resource. **CULT-1: Inadvertent Discovery of Archaeological Resources** • If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt (activities may continue on the remainder of the site) and: o The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact; o The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and o The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report. • Project development activities in the vicinity of the discovery sit may resume once copies of the archaeological survey, study or report are submitted to: SCCIC Department of Anthropology McCarthy Hall 477

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Impacts and Mitigation Measure	Applicability to the Project
e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency. f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified. g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys. i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique	CSU Fullerton 800 North State College Boulevard Fullerton, CA 92834 • Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered. • A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit.

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Impacts and Mitigation Measure	Applicability to the Project
through Phase II testing, and avoidance is not possible, appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe. j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS. k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If	

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Impacts and Mitigation Measure	Applicability to the Project
the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated. l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant, its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.	
Impact 3.5-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5 See PMM CULT-1 above.	**No mitigation applies.** See discussion of the applicability of PMM CULT-1 above.
Impact 3.5-3 Disturb human remains, including those interred outside of dedicated cemeteries **PMM CULT-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional: -- Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with existing regulatory requirements that are equal to or more effective than PMM CULT-2. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. No known human remains exist at the Project Site. In the event that unknown human remains were encountered at the site, the Applicant would be required to comply with the State's Health and Safety Code Section 7050.5, which provides that in the event of discovery or recognition of any human remains at the Project Sites, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her

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Impacts and Mitigation Measure	Applicability to the Project
excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available. -- If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.	authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). Thus, application of this mitigation measure to the Project is not required.
ENERGY	
Impact ENR-1: Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact ENR-2: Conflict with or obstruct a state or local plan for renewable energy or energy efficiency No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
GEOLOGY AND SOILS	
Impact GEO-1 Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42; (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.

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Impacts and Mitigation Measure	Applicability to the Project
No mitigation measures required.	
Impact GEO-2 Result in substantial soil erosion or the loss of topsoil **PMM GEO-1**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM-GEO-1. The Applicant would be required to implement the provisions of the South Coast Air Quality Management District's (SCAQMD) Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Applicant would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to any ground-disturbing activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if ground-disturbing activities occur during a rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during ground-disturbing activities. Additionally, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil

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Impacts and Mitigation Measure	Applicability to the Project
project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.	surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil. Thus, application of this mitigation measure to the Project is not required.
Impact GEO-3 Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact GEO-4 Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property No mitigation measures required	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact GEO-5 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 mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact GEO-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature **PMM GEO-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. b) Obtain review by a qualified paleontologist (e.g., who meets the SVP standards for a Principal Investigator or Project Paleontologist or the	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar measures that are equal to or more effective than PMM GEO-2. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. A records search was conducted with the Los Angeles County Natural History Museum to determine the likelihood for unique paleontological resources to occur at the Project Sites (refer to Appendix E). The records search revealed that no vertebrate fossil localities have been identified at the Project Site, but fossil localities have been identified nearby within the same sedimentary deposits that occur at the Project Site. Therefore, the Project Applicant would be required to comply with Mitigation Measure GEO-1 listed below to ensure that Project impacts related to the inadvertent discovery of paleontological resources would be less than significant. Thus, incorporation of PMM GEO-2 is not required. **GEO-1** If paleontological resources are encountered, the Applicant would be required to notify the Building Safety

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Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface. c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources. d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible: 1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. 2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP. 3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. 4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a	Division immediately, and all work within 50 feet of the potential discovery shall until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project Site. (Work may continue outside the 50-foot buffer area.) The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, state, and local guidelines, including those set forth in PRC Section 5097.5.

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Impacts and Mitigation Measure	Applicability to the Project
paleontological monitor to be present during ground disturbance in these areas. e) Avoid routes and project designs that would permanently alter unique geological features. f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.	
GREENHOUSE GAS EMISSIONS	
Impact GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment **PMM GHG-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including: i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit.	**No mitigation applies.** As discussed in detail in Section 5 (Sustainable Communities Environmental Impact Analysis), the Project's generation of GHG emissions would not be considered cumulatively considerable, as the Project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing GHG emissions. Thus, incorporation of this mitigation measure into the Project is not required. Moreover, pursuant to PRC Section 21159.28(a), a SCEA prepared for a residential or mixed-use development that is consistent with the RTP/SCS, such as the Project, need not analyze or discuss project-specific or cumulative GHG emissions impacts from mobile source emissions generated by cars and light-duty trucks.

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ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment. v. Use high-efficiency lighting and cooking devices. vi. Incorporate passive solar design. vii. Use high-reflectivity building materials and multiple glazing. viii. Prohibit gas-powered landscape maintenance equipment. ix. Install electric vehicle charging stations. x. Reduce wood burning stoves or fireplaces. xi. Provide bike lanes accessibility and parking at residential developments. b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. c) Include off-site measures to mitigate a project's emissions. d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: i. Use energy and fuel-efficient vehicles and equipment; ii. Deployment of zero- and/or near zero emission technologies; iii. Use lighting systems that are energy efficient, such as LED technology; iv. Use the minimum feasible amount of GHG-emitting construction materials; v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;	

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Impacts and Mitigation Measure	Applicability to the Project
vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy; viii. Incorporate design measures to reduce water consumption; ix. Use lighter-colored pavement where feasible; x. Recycle construction debris to maximum extent feasible; xi. Plant shade trees in or near construction projects where feasible; and xii. Solicit bids that include concepts listed above. e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following: i. Promote transit-active transportation coordinated strategies; ii. Increase bicycle carrying capacity on transit and rail vehicles; iii. Improve or increase access to transit; iv. Increase access to common goods and services, such as groceries, schools, and day care; v. Incorporate affordable housing into the project; vi. Incorporate the neighborhood electric vehicle network; vii. Orient the project toward transit, bicycle and pedestrian facilities; viii. Improve pedestrian or bicycle networks, or transit service; ix. Provide traffic calming measures; x. Provide bicycle parking; xi. Limit or eliminate park supply; xii. Unbundle parking costs; xiii. Provide parking cash-out programs; xiv. Implement or provide access to commute reduction program; f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network; g) Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and	

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Impacts and Mitigation Measure	Applicability to the Project
h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that: i. Provide car-sharing, bike sharing, and ride-sharing programs; ii. Provide transit passes; iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle; v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; vi. Provide employee transportation coordinators at employment sites; vii. Provide a guaranteed ride home service to users of non-auto modes. i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles; j) Land use siting and design measures that reduce GHG emissions, including: i. Developing on infill and brownfields sites; ii. Building compact and mixed-use developments near transit; iii. Retaining on-site mature trees and vegetation, and planting new canopy trees; iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.	

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Impacts and Mitigation Measure	Applicability to the Project
k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.	
Impact GHG-2 Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases See PMM GHG-1 above.	**No mitigation applies.** See discussion of the applicability of PMM GHG-1 above.
HAZARDS AND HAZARDOUS MATERIALS	
Impact HAZ-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials **PMM HAZ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate. c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM HAZ-1. The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a residential development (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with Project would be required to comply with all applicable federal, state, and local regulations governing such activities that would prevent any potential significant impacts. The Project's residential use would use common types of cleaning products, paint, petroleum products, etc. and would not require the routine transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Thus, application of this mitigation measure to the Project is not required.

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protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following: -- The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. -- The location of such hazardous materials. -- An emergency response plan including employee training information. -- A plan that describes the way these materials are handled, transported and disposed. d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. e) Avoid overtopping construction equipment fuel gas tanks. f) Properly contain and remove grease and oils during routine maintenance of construction equipment. g) Properly dispose of discarded containers of fuels and other chemicals. h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible. i) Identify and implement more stringent tank car safety standards. j) Improve rail transportation route analysis, and modification of routes based on that analysis. k) Use the best available inspection equipment and protocols and implement positive train control. l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size. m) Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments. n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident. o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.	

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Impacts and Mitigation Measure	Applicability to the Project
p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training. q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.	
Impact HAZ-2 Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment **PMM HAZ-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following: a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment; b) More stringent tank car safety standards; c) Improved rail transportation route analysis, and modification of routes based on that analysis; d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control; e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size; f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments; g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident; h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response	**No mitigation applies.** The Project does not include the shipment of flammable liquids and other hazardous materials and does not include any rail transportation. Thus, incorporation of this mitigation measure is not required.

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Impacts and Mitigation Measure	Applicability to the Project
agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.	
Impact HAZ-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school **PMM HAZ-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.	**No mitigation applies.** No schools are located within 0.25 miles of the Project Site. The school closest to the Project Site is the Hollywood Elementary School, located approximately 0.4 miles southeast of the Project Site. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Thus, application of this mitigation measure is not required.
Impact HAZ-4 Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment **PMM HAZ-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of	**No mitigation applies.** The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5.[4] Thus, the Project would not create a hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Thus, application of this mitigation measure is not required.

[4] *Department of Toxic Substance Control, https://www.envirostor.dtsc.ca.gov/public/map/?myaddress, accessed July 5, 2022.*

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

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Impacts and Mitigation Measure	Applicability to the Project
are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations,	

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Impacts and Mitigation Measure	Applicability to the Project
Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915- 25919.7; and other local regulations. n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
Impact HAZ-5 For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area See PMM NOISE-1, below.	**No mitigation applies.** The Project Site is not located approximately two miles northeast of an airport. The airport closest to the Project Site is the Burbank Airport located approximately 8.6 miles northwest of the site. As such, the Project would not result in a safety hazard or excessive noise for people residing or working in the project area. Thus, incorporation of this mitigation measure is not required.
Impact HAZ-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan **PMM HAZ-5:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	**No mitigation applies.** The City has determined that this mitigation measure does not apply to the Project, because the mitigation measure is directed toward municipalities with control over transportation/circulation, conveyance of emergency information, and evaluation of emergency routes. Additionally, the Project would be required to submit a construction management plan to LADOT for review and approval and would be required to comply with any and all requirements identified by LADOT as a result of the review process, all of which would ensure that the Project would not interfere or impair any emergency plan. Thus, application of this mitigation measure is not required.

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Impacts and Mitigation Measure	Applicability to the Project
a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions. b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks; c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.	
Impact HAZ-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires See Impact WF-2, below.	**No mitigation applies.** See discussion of the applicability of PMM WF-1 below.
HYDROLOGY AND WATER QUALITY	
Impact HYD-1 Potential to violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality **PMM HYD-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings.	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM HYD-1. The Project would be required to comply with existing regulatory requirements pertaining to water quality standards and waste discharge requirements during construction and operation, as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB) and the City. The Project would comply with Los Angeles Municipal Code (LAMC) Chapter IX, Division 70, which addresses erosion control during grading, excavations, and fills. Project construction activities would require grading, excavation, and foundation permits or approvals from the City, which would include requirements and standards designed to limit erosion. The Project would also be designed to comply with the City's Low Impact Development (LID) Ordinance. Prior to the issuance of grading permits, the Applicant would submit a LID Plan to the City's Bureau of Sanitation (LASAN) Watershed Protection Division for review and approval. The LID Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook. The Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements and

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Impacts and Mitigation Measure	Applicability to the Project
f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.	minimize soil erosion and sedimentation from entering the storm drains during the construction period. During operation the Project would be required to comply with the City's LID Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires replace or creates more than 500 square feet of impervious area. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the runoff volume produced by the 85th percentile storm event in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Site as compared to the current conditions. Compliance with the LID Plan and Stormwater and Urban Runoff Pollution Control Ordinance, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality. Consistent with the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 181,899 and No. 183,833), the Project would be required to adhere to City discharge requirements and would implement BMPs meant to reduce stormwater pollution during demolition, grading, and construction activities. Thus, application of this mitigation measure to the Project is not required.
Impact HYD-2 Potential to substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin	**No mitigation applies.** The Project Site is currently developed with an apartment complex. In its existing condition, the Project Site is almost completely developed with impervious surface, including buildings and

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Impacts and Mitigation Measure	Applicability to the Project
PMM HYD-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoid designs that require continual dewatering where feasible. For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. b) Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize new impervious surfaces, including the use of in-lieu fees and off-site mitigation. c) Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface. d) Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	paved areas. While some of the stormwater that encounters the site is absorbed in grassy areas on the site, the majority of the stormwater that encounters the site is directed to the City's local storm drain system. The Project Site is not a source of groundwater recharge. In the Project's post-development stage, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features to allow for infiltration and to control stormwater flows from the Project Site to the City's storm drain system. Potable water would be provided to the Project from the Los Angeles Department of Water and Power's (LADWP) existing water supply sources. Thus, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Therefore, no Project impacts related to groundwater recharge would occur. Thus, application of this mitigation measure to the Project is not required.
Impact HYD-3a Substantially alter the existing drainage pattern of the site or area, including through the alteration of course of a stream or river through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on-or off-site See PMM HYD-1 above.	**No mitigation applies.** See discussion of the applicability of PMM HYD-1 above.
Impact HYD-3b Substantially alter the existing drainage pattern of the site or area, including through the alteration of course of a stream or river through the addition of impervious surfaces, in a manner which would substantially increase the rate or amount of flooding on- or off-site See PMM HYD-1 and PMM HYD-2 above.	**No mitigation applies.** See discussion of the applicability of PMM HYD-1 and PMM HYD-2 above.

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

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Impacts and Mitigation Measure	Applicability to the Project
physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Facilitate good design for land use projects that build upon and improve existing circulation patterns b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by: -- Selecting alignments within or adjacent to existing public rights of way. -- Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. -- Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: -- Alignment shifts to minimize the area affected. -- Reduction of the proposed right-of-way take to minimize the overall area of impact. -- Provisions for bicycle, pedestrian, and vehicle access across improved roadways.	
Impact LU-2 Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect **PMM LU-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is	**No mitigation applies.** As discussed in Section 5 (Sustainable Communities Environmental Impact Analysis), the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect, and no mitigation measures are required. Thus, incorporation of this mitigation measure into the Project is not required.

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identified modify the transportation or land use project to eliminate the conflict; or determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.	
MINERAL RESOURCES	
Impact MIN-1 Potential to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state **PMM MIN-1**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures such as: 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. 3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that	**No mitigation applies.** The Project Site is located in an urbanized part of the City. There are no known mineral resources on the Project Site or in the vicinity. Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Thus, application of this mitigation measure to the Project is not required.

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Impacts and Mitigation Measure	Applicability to the Project
minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.	
Impact MIN-2 Potential to result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan See PMM MIN-1 above.	**No mitigation applies.** See discussion of the applicability of PMM MIN-1 above.
NOISE	
Impact NOISE-1 Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies **PMM NOISE-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Install temporary noise barriers during construction. b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.	**Mitigation applies.** The City has determined that relevant portions of PMM NOISE-1 shall apply and shall be tailored to specifically address Project-specific impacts. **NOISE-1:** The Project shall incorporate the following applicable measure from the 2020-2045 RTP/SCS Mitigation Measure "PMM NOISE-1" to reduce the impact of construction-related noise on on-site and off-site receptors: • Temporary noise barriers shall be installed along the perimeter of the Project Site along the northern property line, the property line along Lodi Place where construction would face, and along Building 2's frontage with the construction site. The barrier shall achieve at least a 6.2 dBA L_{eq} reduction at off-site sensitive receptors (not including Building 2) and a 14.5 dBA L_{eq} reduction at Building 2. The supporting structure shall be engineered and erected in order to comply with Los Angeles Municipal Code noise requirements, including those set forth in Chapter XI, Article 2 of the Los Angeles Municipal Code.

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Impacts and Mitigation Measure	Applicability to the Project
f) Designate an on-site construction complaint and enforcement manager for the project. g) Ensure that construction equipment is properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned. l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant. m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses. n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the	

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

Impacts and Mitigation Measure	Applicability to the Project
standards for ambient noise levels established by the noise element of the general plan or noise ordinance. o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. q) Use of portable barriers in the vicinity of sensitive receptors during construction. r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets) and implement if such measures are feasible and would noticeably reduce noise impacts. s) Monitor the effectiveness of noise attenuation measures by taking noise measurements. t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities. u) Construct sound reducing barriers between noise sources and noise-sensitive land uses. v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.	
Impact NOISE-2 Generation of excessive groundborne vibration or groundborne noise levels	**No mitigation applies.** As discussed in Section 5 (Sustainable Communities Environmental Impact Analysis), the Project would not

Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
PMM NOISE-2: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation. e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps). f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.	result in any significant impacts related to groundborne noise levels. Thus, incorporation of this mitigation measure is not required.
Impact NOISE-3 For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels See PMM NOISE-1 above	**No mitigation applies.** The Project Site is not located within the boundaries of an airport land use plan and is not located within two miles of an airport. The airport closest to the Project Site is the Burbank Airport located approximately 8.6 miles to the northwest. As a result, the Project would not expose people residing or working in the project area to excessive noise levels from aircraft. No potential impacts would occur, and no mitigation is required.

Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
POPULATION AND HOUSING	
Impact POP-1 Induce a substantial unplanned population growth to areas of the region either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., by extending roads and other infrastructure) No project-level mitigation measures were identified for this issue.	**No mitigation applies.** No project-level mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact POP-2 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere. **PMM POP-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. b) Prioritize the use existing ROWs, wherever feasible. c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction. d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable). e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.	**No mitigation applies.** The Project includes the demolition and removal of the two Garage Buildings and Building 1 (containing 28 dwelling units) from the Project Site and the development of a 216,259-square-foot addition to Building 2 that would include 108 multi-family residential units, of which 16 units (i.e., 15 percent of the base dwelling units) would be set aside for Very Low Income households and 2 replacement units would be set aside for Low Income households. As only 9 of the existing units are currently occupied, the Project would not displace a substantial number of existing people or housing. In addition, prior to construction of the Project, the Project Applicant would pay monetary relocation assistance to residents and provide ample time to obtain new housing in accordance with the Ellis Act. Additionally, the Project would add a net increase in housing units at the Project Site that could be rented by the current residents once the Project is complete. The Project would not require the construction of replacement housing for the residents. As such, the Project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere, and no impacts related to this issue would occur. Thus, application of this mitigation measure to the Project is not required.
PUBLIC SERVICES	
Impact PSF-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered fire protection facilities, need for new or physically altered fire protection facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives	**No mitigation applies.** See discussion of the applicability of PMM PSP-1 below. The City has determined that existing regulations would apply to the Project that are equal to or more effective than PMM PSP-1. The Project would be subject to compliance with fire protection design standards, as

Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
See PMM PSP-1 below.	necessary, per the California Building Code, California Fire Code, LAMC, and the Los Angeles Fire Department (LAFD), to ensure adequate fire protection. In addition, the City requires that plans for building construction, fire flow requirements, fire protection devices (e.g., sprinklers and alarms), fire hydrants and spacing, and fire access (including ingress/egress), turning radii, driveway width, and grading would be prepared for review and approval by the LAFD. The Project would not result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD, such that it would require the construction of a new fire station. Thus, application of this mitigation measure to the Project is not required.
Impact PSP-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered police facilities, need for new or physically altered police facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives **PMM PSP-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any required additional construction of buildings is incorporated into the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts. • Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to	**No mitigation applies.** The City has determined that existing regulations would apply to the Project that are equal to or more effective than PMM PSP-1. In accordance with existing City regulations, the Project would implement appropriate temporary security features during construction (such as installing chain link fencing and security lighting around the Project Site). Further, during operation, the Project would provide perimeter lighting to provide increased visibility and security, parking access control, and residential units access control. These measures would provide defensible spaces designed to reduce opportunity crime and ensure safety and security. Therefore, the Project is not anticipated to generate a demand for additional police protection services that could exceed the Los Angeles Police Department's (LAPD) capability to serve the Project Site. As such, the Project would not require the addition of a new police facility or the expansion, consolidation, or relocation of an existing police station to maintain service ratios. Thus, application of this mitigation measure to the Project is not required.

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Impacts and Mitigation Measure	Applicability to the Project
work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.	
Impact PSS-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered education facilities, need for new or physically altered education facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives **PMM PSS-1**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.	**No mitigation applies.** The City has determined that this mitigation measure does not apply to the Project, because the Project would be required to comply with similar existing regulations that are equal to or more effective than PMM PSS-1. The Project Applicant would be required to pay developer fees to the local school district as required by law and which considered full and complete mitigation, pursuant to Senate Bill (SB) 50 and California Government Code Section 65995. Thus, application of this mitigation measure to the Project is not required.
Impact PSL-1 Result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, need for new or physically altered library facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives **PMM PSL-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.	**No mitigation applies.** The Project Site is located in an urbanized area of the City that is already served by several existing libraries, including: Frances Howard Goldwyn-Hollywood Regional Branch Library, John C. Fremont Branch Library, Vista Branch Library, Lous B. Mayer Library, and Cahuenga Branch Library. While the Project's residential population could result in an increased demand for library services, the Project would not create the need for new or altered library facilities. Thus, incorporation of this mitigation measure is not required.
RECREATION	

Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
Impact REC-1 Potential to increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated **PMM REC-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: i. Increasing the accessibility to natural areas for outdoor recreation ii. Utilizing “green” development techniques iii. Promoting water-efficient land use and development iv. Encouraging multiple uses, such as the joint use of schools v. Including trail systems and trail segments in General Plan recreation standards.	**No mitigation applies.** Several existing parks are located in the Project Site area. Additionally, the Project includes open space and recreational facilities in accordance with the LAMC. Further, in accordance with Ordinance 184,505, the Applicant shall be required to dedicate land or to pay a fee for the purpose of developing park and recreational facilities to mitigate the Project’s demand for parks and recreational facilities. Through compliance with City requirements, the Project would not cause the need for new or altered parks and recreational services, the construction of which could result in significant environmental impacts. Thus, incorporation of this mitigation measure is not required.
Impact REC-2 Result in substantial adverse physical impacts associated with the provision of new or physically altered park facilities, need for new or physically altered park facilities, the construction of which could cause significant environmental impacts in order to maintain acceptable service ratios, or other performance objectives	**No mitigation applies.** See discussion of the applicability of PMM REC-1, PMM AQ-2, and PMM NOISE-1 above.

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Impacts and Mitigation Measure	Applicability to the Project
Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment See PMM REC-1, PMM AQ-2, and PMM NOISE-1 above.	
TRANSPORTATION	
Impact TRA-1 Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact TRA-2 Conflict or be inconsistent with CEQA Guidelines section 15064.3(b) **PMM TRA-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Transportation demand management (TDM) strategies should be incorporated into individual land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways: -- include TDM mitigation requirements for new developments; -- incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; -- provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing;	**No mitigation applies.** A Vehicle Miles Traveled (VMT) analysis was conducted for the Project as part of the *Transportation Assessment*, prepared by Overland Traffic Consultants, Inc., dated August 2022 (refer to Appendix I). The Project's VMT impacts were assessed, based on the Los Angeles Department of Transportation's (LADOT) VMT Calculator tool. The Project Site is located in the Central Area Planning Commission (APC) area, which has an average household VMT of 6.0 per capita. As discussed in the *Transportation Assessment*, the Project would have a daily household VMT of 4.1 per capita. Thus, the Project's VMT would fall below LADOT's threshold for the Central APC. Furthermore, no potential significant impacts related to any other transportation-related issues have been identified, and no mitigation measures are required. Thus, application of this mitigation measure to the Project is not required.

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Impacts and Mitigation Measure	Applicability to the Project
-- implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; -- develop TDM-specific performance measures to evaluate project-specific and system-wide performance; -- incorporate TDM performance measures in the decision-making process for identifying transportation investments; -- implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and -- set aside funding for TDM initiatives. -- The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.	
Impact TRA-3 Substantially increase hazards due to geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) No mitigation measures required.	**No mitigation applies.** No mitigation measures related to this issue were identified, and no mitigation measures apply to the Project.
Impact TRA-4 Result in inadequate emergency access ***Impact WF-1 Substantially impair an adopted emergency response plan or emergency evacuation plan*** **PMM TRA-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM TRA-2. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department, Bureau of Engineering, and LAFD standards and requirements for design and construction. Also, prior to issuance of a building permit, the Project Applicant would be required to submit parking and driveway plans to the Bureau of Engineering, LAFD, and LADOT for approval to ensure that the Project complies with code-required emergency access and would not impair an adopted emergency response plan or emergency evacuation plan. Thus, application of this mitigation measure to the Project is not required.

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Impacts and Mitigation Measure	Applicability to the Project
permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: -- Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. -- Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. -- Scheduling of truck trips outside of peak morning and evening commute hours. -- Limiting of lane closures during peak hours to the extent possible. -- Usage of haul routes minimizing truck traffic on local roadways to the extent possible. -- Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. -- Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. -- Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. -- Storage of construction materials only in designated areas. -- Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. -- Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency	

Table 4-1
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Impacts and Mitigation Measure	Applicability to the Project
responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. -- Enhance emergency preparedness awareness among public agencies and with the public at large.	
TRIBAL CULTURAL RESOURCES	
Impact TCR-1 Cause a substantial adverse change in the significance of a tribal cultural resource defined in Public Resources Code section 21074 that is: ***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*** See PMM CULT-1 above. **PMM TCR-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria; b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the	**No mitigation applies.** The Project's demolition of the existing improvements on the Project Site would not involve the demolition of any historic resources. As discussed in detail in response to Checklist Question V(a) (Cultural Resources – Historic Resources), no significant historical resources are located on the Project Site. Also, the Project would not impact any offsite historical resources. The result of the Sacred Lands File (SLF) search conducted through the NAHC was negative.[5] However, the Project would include ground-disturbing activities and any unknown resources could be encountered during the Project's construction phase. In accordance with PMM TCR-1, which notes that "a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources…," the City has identified Mitigation Measure TCR-1 to ensure that the Project would not result in any significant impacts related to unknown tribal cultural resources. **TCR-1 Inadvertent discovery of tribal cultural resources** In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below: • Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities

[5] *Native American Heritage Commission, Andrew Green, Cultural Resources Analyst, correspondence, August 31, 2022. Refer to Appendix J.*

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Impacts and Mitigation Measure	Applicability to the Project
resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource; c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.	and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1290. • If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources. • The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible. • The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City. • If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation. • The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.

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Impacts and Mitigation Measure	Applicability to the Project
	• Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.
UTILITIES AND SERVICE SYSTEMS	
Impact USSW-1 Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals ***Impact USSW-2 Comply with federal, state, and local management and reduction statues and regulations related to solid waste*** **PMM USSW-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following: a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. b) Inclusion of a waste management plan that promotes maximum C&D diversion. c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse of existing structure and shell in renovation projects.	**No mitigation applies.** The City has determined that this mitigation measure does not need to be incorporated into the Project, because the Project would be required to comply with similar regulations that are equal to or more effective than PMM USSW-2. Specifically, at the State level, the California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939) seeks to improve solid waste disposal management with respect to (1) source reduction, (2) recycling and composting, and (3) environmentally safe transformation and land disposal. AB 939 mandates jurisdictions to meet a diversion goal of 25 percent by 1995 and 50 percent by 2000. Pursuant to AB 939, each County is required to prepare and administer a Countrywide Integrated Waste Management Plan (ColWMP), pursuant to which landfill disposal needs and capacity are continually evaluated as part of the preparation of the ColWMP Annual Report that examines future landfill disposal needs over the next 15-year planning horizon. The most recent ColWMP (the 2019 Annual Report for Los Angeles County) states that no solid waste disposal capacity shortfall is anticipated within the next 15 years under current conditions.[6] The CiSWMPP is a long-range policy plan adopted in 1993 to provide direction for the solid waste management. The objective of the CiSWMPP is to promote source reduction or recycling for a minimum of 50 percent of the City's waste by 2000, or as soon as possible thereafter, and 70 percent of the waste by 2020.

[6] *County of Los Angeles Department of Public Works, ColWMP 2019 Annual Report, December 2019, page 37.*

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

Impacts and Mitigation Measure	Applicability to the Project
e) Development of indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities. g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required. h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target. i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices. j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. l) Integrate reuse and recycling into residential industrial, institutional and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the	The Plan's goal has also been surpassed by the City, which achieved a diversion rate of 76.4 percent in 2012.[7] The City also adopted the Recovering Energy, Natural Resources and Economic Benefit from Waste for Los Angeles (RENEW LA) in 2006, which has the primary objective of achieving a zero waste goal through reducing, reusing, recycling, or converting the resources currently going to disposal. The Project would be required to reduce the total estimated waste output through established City recycling programs and would also be subject to the City's Recycling Space Allocation Ordinance (Ordinance No. 171,687), which establishes requirements for the inclusion of recycling areas or rooms within development projects. In addition, in compliance with existing City standards and regulations, the Project would be required to recycle construction and demolition (C&D) waste to the maximum extent possible pursuant to Ordinance No. 181,519 (Citywide Construction and Demolition Waste Recycling Ordinance) that requires all mixed C&D waste generated within City limits to be taken to City-certified C&D waste processors. Compliance with these regulations would ensure that construction waste is recycled and disposed of properly. Overall, compliance with existing regulations would ensure that the Project's waste disposal needs are reduced and can be sufficiently met by local landfills, thereby achieving consistency with this mitigation measure. Project construction waste would be hauled by permitted haulers and taken only to City-certified C&D processing facilities that are monitored for compliance with existing regulations. Project-generated C&D waste would represent a very small portion of the waste disposal capacity in the region. In addition, waste generated by the Project would be subject to State and local recycling and waste diversion strategies and policies including the City's Zero Waste Plan goal of achieving a 90 percent solid waste

[7] *LASAN, Recycling, 2021, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r?_adf.ctrl-state=auguwdldg_5&_afrLoop=10870014375826670#!., accessed March 2021.*

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

Impacts and Mitigation Measure	Applicability to the Project
types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.	diversion rate by 2025. Thus, application of this mitigation measure to the Project is not required.
Impact USWW-1 Require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects See PMM HYD-1 above. **PMM USWW-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.	**No mitigation applies.** The analysis of the Project's potential impacts related to wastewater treatment in Section 5 (Sustainable Communities Environmental Analysis) concluded that the Project's estimated wastewater generation of approximately 18,840 gallons per day could be accommodated by the existing remaining daily treatment capacity of the Hyperion Treatment Plant. Additionally, the Project would be required to comply with the Los Angeles County Department of Public Works Hydrology Manual for designing and hydrology and drainage infrastructure. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm even and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The Project would be required by the City to control stormwater runoff from the Project Site to meet these requirements. The Project would not require or result in the relocation or construction of new or expanded wastewater treatment or storm drainage facilities, the construction or relocation of which could cause significant environmental effects. No significant impacts related to these issues have been identified, and no mitigation measures are required. Thus, incorporation of this mitigation measure is not required.
Impact USWW-2 Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments See PMM USWW-1 above	**No mitigation applies.** See discussion of the applicability of PMM USWW-1 above.
Impact USWS-1 Require or result in the relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects	**No mitigation applies.** The Project would connect to the existing water conveyance infrastructure near the Project Site that includes a 4-inch line in Lodi Place, a 6-inch line in Lexington Avenue, and an 18-inch line in

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

Impacts and Mitigation Measure	Applicability to the Project
PMM USWS-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non-potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.	Gower Street. As discussed in Section 5 (Sustainable Communities Environmental Analysis), the Project would consume approximately 18,840 gallons of water per day. According to Los Angeles Department of Water and Power's (LADWP) 2020 Urban Water Management Plan (2020 UWMP), the City has sufficient water supply to meet a total projected water demand through to the year 2045, in a Normal Wet Year, a Single Dry Year, and Multiple Dry Years. As such, the City can provide the needed water from its existing system pursuant of the provisions in 2020 UWMP. Additionally, the Project would be required to comply with water conservation measures outlined in the City's Green Building Code that are similar to or more effective than the measures outlined in PMM USWS-1. The Project would not require new water infrastructure or supply to meet the demand from the Project. Thus, application of this mitigation measure to the Project is not required.
Impact USWS-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years See PMM USWS-1 above.	**No mitigation applies.** See discussion of the applicability of PMM USWS-1 above.
WILDFIRE	
Impact WF-2 Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire	**No mitigation applies.** The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, incorporation of this mitigation measure is not required.

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

Impacts and Mitigation Measure	Applicability to the Project
Impact HAZ-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires **PMM WF-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition. b) Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place. c) Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary. d) Improve, and educate regarding, local emergency communications and notifications with residents and businesses. e) Enforce defensible space regulations to keep overgrown and unmanaged vegetation, accumulations of trash and other flammable material away from structures. f) Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place.	
Impact WF-3 Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment See PMM HAZ-4 above. **PMM WF-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible.	**No mitigation applies.** The Project Site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Thus, incorporation of this mitigation measure is not required.

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

Impacts and Mitigation Measure	Applicability to the Project
Such measures may include the following or other comparable measures identified by the Lead Agency: a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to: -- Submit a fire protection plan including the designation of fire watch staff; -- Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities; -- Locate construction and maintenance equipment in designated "safe areas" such that they do not discharge combustible materials; and -- Designate trained fire watch staff during project construction to reduce risk of fire hazards.	
Impact WF-4 Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes See PMM WF-1, PMM WF-2, PMM HYD-1 and PMM HAZ-4 above.	**No mitigation applies.** See discussion of the applicability of PMM WF-1, PMM WF-2, PMM HYD-1 and PMM HAZ-4 above.
Source: SCAG, 2020-2045 RTP/SCS Final EIR, Mitigation Monitoring and Reporting Program, adopted May 2020.	

5 SUSTAINABLE COMMUNITIES ENVIRONMENTAL IMPACT ANALYSIS

I. AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099 would the project:				
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c. In 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?	☐	☐	☐	☒

In 2013, the State of California enacted Senate Bill 743 (SB 743), which made several changes to the California Environmental Quality Action (CEQA) for projects located in areas served by transit. Specifically, Public Resources Code (PRC) Section 21099 provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” PRC Section 21099 defines a “transit priority area” as an area within 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 or applicable regional transportation plan.” PRC Section 21064.3 defines “major transit stop” as the following:

(a) An existing rail or bus rapid transit station.
(b) A ferry terminal served by either a bus or rail transit service.
(c) The intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

PRC Section 21155 (b) states that a "major transit stop" is defined in PRC Section 21064.3, except that, for purposes of Section 21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds set forth by the City.

On February 10, 2016, the City issued Zoning Information File No. 2452 to clarify the locations of transit priority areas within the City, which restate that aesthetic impacts shall not be considered a significant impact on the environment under the provisions of SB 743. Specifically, Zoning Information File No. 2452 states that impacts to visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact, as defined by the City, shall not be considered an impact for infill projects within transit priority areas pursuant to CEQA. As shown on the City's Zone Information and Map Access System (ZIMAS) website, the Project Site is located in a transit priority area. Thus, the Project's aesthetic (and parking) impacts are not considered significant impacts on the environment pursuant to PRC Section 21099. No further assessment of the Project's aesthetics impacts is required. However, an assessment of the Project's aesthetics impacts is provided below for informational purposes only.

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

No Impact. The Project Site is located in a highly urbanized area of the City that is developed with a mix of residential and commercial uses. Views in the vicinity of the Project Site and/or that include the Project Site are limited to those of existing development. Any views that might be considered scenic (such as those of mountain ranges, the ocean, or Downtown skyline) are not readily available from the Project Site area due to distance and intervening development. As such, the proposed development of the Project Site would not have a substantial adverse effect on a scenic vista. Pursuant to PRC Section 21099, the Project's aesthetics impacts would not be significant.

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

No Impact. The Project Site is not located within view from a state scenic highway. Thus, the Project would not damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings, within a state scenic highway. Pursuant to PRC Section 21099, the Project's aesthetics impacts would not be significant.

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?

No Impact. The Project Site is zoned R3-1 (Multiple Dwelling Zone, Height District 1) and R3-1XL (Multiple Dwelling Zone, Height District 1XL with a General Plan land use designation of Medium Residential. The proposed uses are allowed under the existing zoning and land use designation for the site. The proposed building would contain approximately 216,259 square feet of floor area and would reach a maximum building height of 95 feet. The massing, height, and setbacks of the Project would comply with those allowed under the existing zoning for the site as well as the provisions of State density bonus law. In addition, the Project would be required to undergo Site Plan Review to ensure consistency with all applicable City standards. Thus, the Project would not conflict with applicable zoning or other regulations governing scenic quality. Pursuant to PRC Section 21099, the Project's aesthetics impacts would not be significant.

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

No Impact. The Project Site is located in a highly urbanized area of the City that is developed with a mix of residential and commercial uses and utility and roadway infrastructure. The Project Site itself is developed with an apartment complex. All existing development on and surrounding the Project Site includes sources of existing light and glare, typical of an urban area. The Project would include interior and exterior lighting that complies with the Los Angeles Municipal Code (LAMC) provision that requires minimizing the effect of the new sources of lighting. Specifically, LAMC Section 91.0117(a) requires that no exterior light source may cause more than two foot-candles (21.5 lx) of lighting intensity or generate direct glare onto exterior glazed windows or glass doors; elevated habitable porch, deck, or balcony; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units. Consequently, no substantial changes in nighttime illumination would occur that would adversely affect nighttime views in the area and prevent spillover lighting. Also, the Project would use non-reflective glass. Thus, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the

area. Pursuant to PRC Section 21099, the Project's aesthetics impacts would not be significant.

Cumulative Impacts

There are 18 related projects in the vicinity of the Project Site (refer to Appendix G in the *Transportation Assessment* prepared for the Project, included in Appendix J). The three related projects within visual proximity of the Project Site (2, 6, and 10) are transit-priority projects in designated transit-priority areas and similar to the Project, pursuant to PRC Section 21099, aesthetics (and parking) impacts associated with these related projects would not be significant.[1] The other related projects include infill development in highly urbanized areas and are not within visual proximity of the Project Site due to intervening development. None of these related projects shares scenic resources in common with the Project. Additionally, none of these related projects is visible from a scenic highway. The degree to which these related projects would comply with regulations governing scenic quality would be considered on a project-by-project basis by their respective lead agencies, and the related projects would be required to comply with applicable design standards as enforced by the lead agencies. Because the related projects are infill development in a highly urbanized area, the potential increase in light and glare would be negligible, as the related projects would replace existing uses with existing sources of light and glare and would be required to comply with existing regulations related to lighting and low-glare building materials. No significant cumulative aesthetics impacts would occur.

[1] *It should be noted that Related Project #6 is already constructed and is operational.*

II. AGRICULTURE AND FORESTRY RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
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. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important Farmland category.[2] Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

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

No Impact. The Project Site is not zoned for agricultural use, and the site is not under Williamson Act contract.[3] Therefore, the Project would not 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))?

No Impact. The Project Site is not zoned as forest land or timberland, nor does the site contain any forest land or timberland. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Site does not contain any forest land. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Site and surrounding area are developed with urban land uses. No agricultural uses are located on the Project Site or within the area. Therefore, no impacts related to this issue would occur.

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

3 *Ibid.*

Cumulative Impacts

The 18 related projects listed in Appendix G in the *Transportation Assessment* prepared for the Project, included in Appendix J are located in highly urban areas. Neither the Project Site nor any of the related projects' sites are used or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

III. AIR QUALITY

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

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

The analysis provided below is primarily based on technical data prepared by DKA (refer to Appendix B).

Environmental Setting

Regulatory Framework

Federal

Clean Air Act

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

and by the air quality management districts and air pollution control districts at the regional and local levels.

The CAA governs the establishment, review, and revision, as appropriate, of the National Ambient Air Quality Standards (NAAQS), which provide protection for the nation's public health and the environment. NAAQS are based on quantitative characterizations of exposures and associated risks to human health and the environment. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress towards attainment and the incorporation of additional sanctions for failure to attain or to meet interim milestones. NAAQS have been established for seven major air pollutants: carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), $PM_{2.5}$ (particulate matter, 2.5 microns), PM_{10} (particulate matter, 10 microns), sulfur dioxide (SO_2), and lead (Pb).

The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are shown in Table III-1. USEPA has classified the Los Angeles County portion of the South Coast Air Basin (Basin) as a nonattainment area for O_3, $PM_{2.5}$, and Pb.

CAA Title II pertains to mobile sources, such as cars, trucks, buses, and planes. Reformulated gasoline and automobile pollution control devices are examples of the mechanisms the USEPA uses to regulate mobile air emission sources. The provisions of Title II have resulted in tailpipe emission standards for vehicles, which have been strengthened in recent years to improve air quality. For example, the standards for NO_X emissions have been lowered substantially and the specification requirements for cleaner-burning gasoline are more stringent.

The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California. Automobiles sold in California must meet stricter emission standards established by CARB. USEPA adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines (e.g., diesel-powered construction equipment) by integrating engine and fuel controls as a system to gain the greatest emission reductions.

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

Pollutant	Averaging Period	California		Federal	
		Standard	Attainment Status	Standard	Attainment Status
Ozone – O_3	1-hour	0.09 ppm (180 µg/m^3)	Non-attainment	-	-
	8-hour	0.070 ppm (137 µg/m^3)	Non-attainment	0.070 ppm (137 µg/m^3)	Non-attainment
Respirable Particulate Matter – PM_{10}	24-hour	50 µg/m^3	Non-attainment	150 µg/m^3	Attainment
	Annual Arithmetic Mean	20 µg/m^3	Non-attainment	-	-
Fine Particulate Matter – $PM_{2.5}$	24-hour	-	-	35 µg/m^3	Non-attainment
	Annual Arithmetic Mean	12 µg/m^3	Non-attainment	12 µg/m^3	Non-attainment
Carbon Monoxide – CO	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Attainment
	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Attainment
Nitrogen Dioxide – NO_2	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Attainment
	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Attainment
Sulfur Dioxide – SO_2	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
	24-hour	0.04 ppm (105 µg/m^3)	Attainment	-	-
Lead – Pb	30-day average	1.5 µg/m^3	Attainment	-	-
	Calendar Quarter	-	-	0.15 µg/m^3	Non-attainment

Source: Source: CARB, Ambient Air Quality Standards, and attainment status, 2020 (www.arb.ca.gov/desig/adm/adm.htm).

The first federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased in from 1996 to 2000. On August 27, 1998, USEPA introduced Tier 1 standards for equipment under 37 kW (50

horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. The Tier 1 through 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts). Tier 3 standards for NO_x and hydrocarbon are similar in stringency to the 2004 standards for highway engines. However, Tier 3 standards for particulate matter were never adopted. On May 11, 2004, USEPA signed the final rule introducing Tier 4 emission standards, which were phased in between 2008 and 2015. The Tier 4 standards require that emissions of particulate matter and NO_x be further reduced by about 90 percent. Such emission reductions are achieved through the use of control technologies—including advanced exhaust gas after-treatment.

State

California Clear Air Act

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the CCAA. In California the CCAA is administered by CARB at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS. CAAQS are generally more stringent than their corresponding NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CAAQS define clean air: they represent the maximum amount of a pollutant averaged over a specified period of time that can be present in outdoor air without any harmful effects on people or the environment.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS thresholds have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a state standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a state standard and are not used as a basis for designating areas as nonattainment. Under the CCAA, the non-desert Los Angeles County portion of the Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The state standards and attainment/non-attainment are also shown in Table III-1.

Toxic Air Contaminant Identification and Control Act

The Toxic Air Contaminant Identification and Control Act also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and

Assessment Act program to include in the prioritization of compounds. CARB identified particulate emissions from diesel-fueled engines (diesel PM) TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which led to the risk management phase of the program. For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Diesel Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. The Board approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific Statewide regulations designed to further reduce diesel PM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art technology requirements or emission standards to reduce diesel PM emissions. Breathing hydrogen sulfide (H_2S) at levels above the state standard could result in exposure to a disagreeable rotten egg odor. The State does not regulate other odors.

California Air Toxics Program

The California Air Toxics Program was established in 1983 when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air.[4] In the risk identification step, CARB and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified, or “listed,” as a TAC in California. Since inception of the program, a number of such substances have been listed, including benzene, chloroform, formaldehyde, and particulate emissions from diesel-fueled engines, among others.5 In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants as TACs.

In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of airborne toxic control measures (ATCMs), both for mobile and stationary sources. In 2004, CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel PM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways,

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4 *California Air Resources Board, California Air Toxics Program, www.arb.ca.gov/toxics/toxics.htm, last reviewed by CARB September 24, 2015.*

5 *California Air Resources Board, Toxic Air Contaminant Identification List, www.arb.ca.gov/toxics/id/taclist.htm, last reviewed by CARB July 18, 2011.*

regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time.

In addition to limiting exhaust from idling trucks, CARB adopted regulations on July 26, 2007, for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles to reduce emissions by installation of diesel particulate filters and encouraging the replacement of older, dirtier engines with newer emission-controlled models. In April 2021, CARB proposed a 2020 Mobile Source Strategy that seeks to move California to 100 percent zero-emission off-road equipment by 2035.

Assembly Bill 2588 Air Toxics "Hot Spots" Program

The AB 1807 program is supplemented by the AB 2588 Air Toxics "Hot Spots" program, which was established by the California Legislature in 1987. Under this program, facilities are required to report their air toxics emissions, assess health risks, and notify nearby residents and workers of significant risks if present. In 1992, the AB 2588 program was amended by Senate Bill (SB) 1731 to require facilities that pose a significant health risk to the community to reduce their risk through implementation of a risk management plan.

Air Quality and Land Use Handbook: A Community Health Perspective

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

Air Quality and Land Use Handbook

CARB published the *Air Quality and Land Use Handbook* (CARB Handbook) on April 28, 2005, to serve as a general guide for considering health effects associated with siting sensitive receptors proximate to sources of TAC emissions. The recommendations provided therein are voluntary and do not constitute a requirement or mandate for either land use agencies or local air districts. The goal of the guidance document is to protect sensitive receptors, such as children, the elderly, acutely ill, and chronically ill persons, from exposure to TAC emissions. Some examples of CARB's siting recommendations include the following: (1) avoid siting sensitive receptors within 500 feet of a freeway, urban road with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day; (2) avoid siting sensitive receptors within 1,000 feet of a distribution center (that

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

accommodates more than 100 trucks per day, more than 40 trucks with operating transport refrigeration units per day, or where transport refrigeration unit operations exceed 300 hours per week); and (3) avoid siting sensitive receptors within 300 feet of any dry cleaning operation using perchloroethylene and within 500 feet of operations with two or more machines.

California Code of Regulations

The California Code of Regulations (CCR) is the official compilation and publication of regulations adopted, amended, or repealed by state agencies pursuant to the Administrative Procedure Act. The CCR includes regulations that pertain to air quality emissions. Specifically, Section 2485 in CCR Title 13 states that the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) used during construction shall be limited to five minutes at any location. In addition, Section 93115 in CCR Title 17 states that operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

Regional

South Coast Air Quality Management District

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

- Rule 401 Visible Emissions: This rule prohibits air discharge that results in a plume that is as dark as or darker than what is designed as No. 1 Ringelmann Chart by the United States Bureau of Mines for an aggregate of three minutes in any one hour.

- Rule 402 Nuisance: This rule prohibits the discharge of “such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of people or the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- Rule 403 Fugitive Dust: This rule mandates that projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by

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

2022 Air Quality Management Plan

SCAQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022, updating the region's air quality attainment plan to address the "extreme" ozone non-attainment status for the Basin and the severe ozone non-attainment for the Coachella Valley Basin by laying a path for attainment by 2037. This includes reducing NOx emissions by 67 percent more than required by adopted rules and regulations in 2037. The AQMP calls on strengthening many stationary source controls and addressing new sources like wildfires, but still concludes that the region will not meet air quality standards without a significant shift to zero emission technologies and significant federal action. The 2022 AQMP relies on the growth assumptions in SCAG's 2020-2045 RTP/SCS.

Multiple Air Toxics Exposure Study V

To date, the most comprehensive study on air toxics in the Basin is the Multiple Air Toxics Exposure Study V (released in August 2021).[7] The report included refinements in aircraft and recreational boating emissions and diesel conversion factors. The report finds a Basin average cancer risk of 455 in a million (population-weighted, multi-pathway), which represents a decrease of 54 percent compared to the number in MATES IV (2012) (page ES-13). The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by a computer modeling study in which the SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. About 88 percent of the risk is attributed to emissions associated with mobile sources, with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating facilities (page ES-12). The results indicate that diesel PM is the largest contributor to air toxics risk, accounting on average for about 50 percent of the total risk (Figure ES-2).

Southern California Association of Governments

SCAG is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements, including the Transportation Conformity Rule and other applicable federal, state, and air district laws and regulations. As the federally designated Metropolitan Planning Organization (MPO)

[7] *South Coast Air Quality Management District, MATES-V Study. https://www.aqmd.gov/home/air-quality/air-quality-studies/health-studies/mates-v.*

for the six-county Southern California region, SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. In addition, SCAG is a co-producer, with the SCAQMD, of the transportation strategy and transportation control measure sections of the AQMP for the Basin.

SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) on April 7, 2016.[8,9] The 2016–2040 RTP/SCS is the transportation and land use component of the region's air quality plan. It recognized that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, it drew a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. While it has since been updated as described in the next paragraph, it remains the transportation plan that is in the applicable air quality plan for the region (i.e., the 2016 Air Quality Management Plan).

SCAG adopted the 2020–2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS) on September 23, 2020.[10] The 2020-2045 RTP/SCS aims to address the transportation and air quality impacts of 3.7 million additional residents, 1.6 additional households, and 1.6 million additional jobs from 2016 to 2045. The 2020-2045 RTP/SCS calls for $639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The 2020-2045 RTP/SCS accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The regional plan projects several benefits, including the following:

- Decreasing drive-along work commutes by 3 percent
- Reducing per capita VMT by 5 percent and vehicle hours traveled per capita by 9 percent
- Increasing transit commuting by 2 percent
- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually
- Reducing greenfield development by 29 percent by focusing on smart growth

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8 *Southern California Association of Governments, Final 2016–2040 RTP/SCS.*

9 *California Air Resources Board, Executive Order G-16-066, SCAG 2016 SCS ARB Acceptance of GHG Quantification Determination, June 2016.*

10 *Ibid.*

- Locating six more percent household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.
- Locating 15 percent more jobs in HQTAs
- Reducing $PM_{2.5}$ emissions by 4.1 percent
- Reducing greenhouse gas (GHG) emissions by 19 percent by 2035

Local

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element identifies policies and strategies for advancing the City's clean air goals. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. The Air Quality Element includes the following six key goals:

Goal 1: Good air quality in an environment of continued population growth and healthy economic structure.

Goal 2: Less reliance on single-occupant vehicles with fewer commute and non-work trips.

Goal 3: Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand management techniques.

Goal 4: Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation, and air quality.

Goal 5: Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting.

Goal 6: Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Clean Up Green Up Ordinance

The City adopted a Clean Up Green Up Ordinance (Ordinance Number 184,245) on April 13, 2016, which among other provisions, includes provisions related to ventilation system filter efficiency in mechanically ventilated buildings. This ordinance added Sections 95.314.3 and 99.04.504.6 to the Los Angeles Municipal Code (LAMC) and amended Section 99.05.504.5.3 to implement building standards and requirements to address cumulative health impacts resulting from incompatible land use patterns.

California Environmental Quality Act

In accordance with CEQA requirements, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The City uses the SCAQMD's *CEQA Air Quality Handbook* and SCAQMD's supplemental online guidance/information for the environmental review of development proposals within its jurisdiction.

Land Use Compatibility

In November 2012, the Los Angeles City Planning Commission (CPC) issued an advisory notice (Zoning Information 2427) regarding the siting of sensitive land uses within 1,000 feet of freeways. The CPC deemed 1,000 feet to be a conservative distance to evaluate projects that house populations considered to be more at-risk from the negative effects of air pollution caused by freeway proximity. The CPC advised that applicants of projects requiring discretionary approval, located within 1,000 feet of a freeway and contemplating residential units and other sensitive uses (e.g., hospitals, schools, retirement homes) perform a Health Risk Assessment (HRA). The Project Site is 2,800 feet southwest of the southbound mainline of the Hollywood Freeway (US-101).

On April 12, 2018, the City updated its guidance on siting land uses near freeways, resulting in an updated Advisory Notice effective September 17, 2018 requiring all proposed projects within 1,000 feet of a freeway adhere to the Citywide Design Guidelines, including those that address freeway proximity. It also recommended that projects consider avoiding location of sensitive uses like schools, day care facilities, and senior care centers in such projects, locate open space areas as far from the freeway, locate non-habitable uses (e.g., parking structures) nearest the freeway, and screen project sites with substantial vegetation and/or a wall barrier. Requirements for preparing HRAs were removed.

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is measured by the ambient air concentrations of seven pollutants that have been identified by the USEPA due to their potentially harmful effects on public health and the environment. These "criteria air pollutants" include carbon monoxide, ground-level ozone, nitrogen dioxide, sulfur dioxide, particulate matter ten microns or less in diameter, particulate matter 2.5 microns or less in diameter, and lead. The descriptions of each criteria air pollutant and their health effects discussed below are based on information provided by the USEPA and the SCAQMD.[11,12]

Carbon Monoxide – CO

CO is a colorless and odorless gas that is released when something is burned. Outdoors, the greatest sources of CO are cars, trucks, and other vehicles or machinery that burn fossil fuels. Unvented kerosene and gas space heaters, leaking chimneys and furnaces, and gas stoves can release CO and affect air quality indoors. Breathing air with elevated concentrations of CO reduces the amount of oxygen that can be transported via the bloodstream and can lead to weakened heart contractions; as a result, CO inhalation can be particularly harmful to people with chronic heart disease. At moderate concentrations, CO inhalation can cause nausea, dizziness, and headaches. High concentrations of CO may be fatal; however, such conditions are not likely to occur outdoors.

Ozone – O_3

O_3 is a colorless gas that is formed when VOCs and NO_X undergo slow photochemical reactions in the presence of ultraviolet sunlight. The greatest source of VOC and NO_X emissions is automobile exhaust. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperatures are favorable to its formation. Elevated levels of O_3 irritate the lungs and airways and may cause throat and chest pain, as well as coughing, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to the scarring of lung tissue and reduced lung efficiency.

Nitrogen Dioxide – NO_2

NO_2 is primarily a byproduct of fossil fuel combustion and is therefore emitted by automobiles, power plants, and industrial facilities. The principal form of nitrogen oxide produced by fossil fuel combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and

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

12 *SCAQMD, Final 2012 Air Quality Management Plan, February 2013.*

results in reduced visibility and a brownish-red cast to the atmosphere. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat and increase susceptibility to respiratory infections, especially in people with asthma. Longer exposures to elevated concentrations of NO_2 may even contribute to the development of asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

Sulfur Dioxide – SO_2

Sulfur oxides (SO_X) are compounds of sulfur and oxygen molecules. SO_2 is the pre-dominant form found in the lower atmosphere and is a product of burning sulfur or sulfur-containing materials. Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. SO_2 may aggravate lung diseases, especially bronchitis. It also constricts breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. SO_2 may cause wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposure to both pollutants leads to higher rates of respiratory illnesses.

Particulate Matter – PM_{10} and $PM_{2.5}$

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

Lead – Pb

Airborne lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting and other metal processing activities are the primary sources of lead emissions. The lead effects most commonly encountered in current populations are neurological effects in children and cardiovascular effects in adults (e.g., high blood pressure and heart disease). Infants and young children are especially sensitive to even low levels of lead, which may contribute to behavioral problems, learning deficits, and lowered IQ.

State-Only Criteria Pollutants

Visibility-Reducing Particles

Deterioration of visibility is one of the most obvious manifestations of air pollution and plays a major role in the public's perception of air quality. Visibility reduction from air pollution is often due to the presence of sulfur and NO_x, as well as PM.

Sulfates (SO_4^{2-})

Sulfates are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized during the combustion process and subsequently converted to sulfate compounds in the atmosphere. Effects of sulfate exposure at levels above the standard include a decrease in ventilatory function, aggravation of asthmatic symptoms, and an increased risk of cardiopulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to the fact that they are usually acidic, can harm ecosystems and damage materials and property.

Hydrogen Sulfide (H_2S)

H_2S is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation. Breathing H_2S at levels above the state standard could result in exposure to a very disagreeable odor.

Vinyl Chloride

Vinyl chloride is a colorless, flammable gas at ambient temperature and pressure. It is also highly toxic and is classified as a known carcinogen by the American Conference of Governmental Industrial Hygienists and the International Agency for Research on Cancer. At room temperature, vinyl chloride is a gas with a sickly-sweet odor that is easily condensed. However, it is stored at cooler temperatures as a liquid. Due to the hazardous nature of vinyl chloride to human health, there are no end products that use vinyl chloride in its monomer form. Vinyl chloride is a chemical intermediate, not a final product. It is an important industrial chemical chiefly used to produce polyvinyl chloride (PVC). The process involves vinyl chloride liquid fed to polymerization reactors where it is converted from a monomer to a polymer PVC. The final product of the polymerization process is PVC in either a flake or pellet form. Billions of pounds of PVC are sold on the global market each year. From its flake or pellet form, PVC is sold to companies that heat and mold the PVC into end products such as PVC pipe and bottles. Vinyl chloride emissions are historically associated primarily with landfills.

Toxic Air Contaminants – TACs

TACs refer to a diverse group of “non-criteria” air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above, but because their effects tend to be local rather than regional. As discussed earlier, CARB and OEHHA

determine if a substance should be formally identified, or "listed," as a TAC in California. A complete list of these substances is maintained on CARB's website.[13]

One key TAC is diesel particulate matter (diesel PM), which is emitted in diesel engine exhaust. Released in 2021 by the SCAQMD, the Multiple Air Toxics Exposure Study V (MATES V) determined that about 88 percent of the carcinogenic risk from air toxics in the Basin is attributable to mobile source emissions. Of the three carcinogenic TACs that constitute the majority of the known health risk from motor vehicle traffic – diesel PM from primarily trucks, and benzene and 1,3-butadiene from passenger vehicles – diesel PM is responsible for the greatest potential cancer risk from vehicle traffic.[14] Overall, diesel PM was found to account for, on average, about 50 percent of the air toxics risk in the Basin.[15] In addition to its carcinogenic potential, diesel PM also may contribute to increased respiratory and cardiovascular hospitalizations, worsened asthma and other respiratory symptoms, decreased lung function in children, and premature death for people already with heart or lung disease. Those most vulnerable to the non-cancer health effects of diesel PM are children whose lungs are still developing and the elderly who may have other chronic health problems.[16]

Volatile Organic Compounds – VOCs

VOCs are typically formed from the combustion of fuels and/or released through the evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants, though there are no VOC-specific ambient air quality standards. Once emitted, VOCs can mix in the air with other pollutants (e.g., NO_X, CO, SO_2, etc.) and contribute to the formation of photochemical smog.

Existing Conditions

As noted previously, the Project is located within the 6,745-square-mile Basin that includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. Air quality within the Basin is influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, and industry. These sources in addition to the topography and climate of Southern California combine to make the Basin an area of high air pollution potential. Particularly, ambient pollution concentrations recorded in the Los Angeles County portion of the Basin are among the highest in the four counties comprising the Basin. The USEPA has classified Los Angeles County as a nonattainment area for O_3, $PM_{2.5}$, and lead, meaning that the Basin does not meet NAAQS for these pollutants. Additionally, this portion of the Basin also does not meet CAAQS for O_3, PM_{10}, and $PM_{2.5}$. Table III-1 summarizes CAAQS and

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

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

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

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

NAAQS and the attainment status for Los Angeles County with respect to each criteria pollutant.

Air Quality Monitoring Data

The SCAQMD monitors air quality conditions at 38 source receptor areas (SRA) throughout the Basin. The Project Site is located in SCAQMD's Central Los Angeles receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. Table III-2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2018 through 2020. The one-hour State standard for O_3 was exceeded 16 times during this three-year period, including fourteen times in 2020. The federal standard was exceeded 28 times in that same period. In addition, the daily State standard for PM_{10} was exceeded 58 times, with a substantial reduction in exceedances in 2019. The daily federal standard for $PM_{2.5}$ was exceeded six times. CO and NO_2 levels did not exceed the CAAQS from 2018 to 2020 for 1-hour (and 8-hour for CO).

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. Generally speaking, sensitive land uses, or sensitive receptors, are those where sensitive individuals are most likely to spend time. Individuals most susceptible to poor air quality include children, the elderly, athletes, and those with cardiovascular and chronic respiratory diseases. As a result, land uses sensitive to air quality may include schools (i.e., elementary schools or high schools), childcare centers, parks and playgrounds, long-term health care facilities, rehabilitation facilities, convalescent facilities, retirement facilities, residences, and athletic facilities. For the purposes of CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. The SCAQMD does not consider commercial and industrial facilities to be sensitive receptors because employees do not typically remain onsite at such facilities for 24 hours but are present for shorter periods (such as eight-hour shifts). However, the SCAQMD suggests that LSTs based on shorter averaging periods, such as the NO_2 and CO LSTs, may also be applied to receptors such as commercial and industrial facilities since it is reasonable to assume that workers at these sites may be present for up to eight hours.[17]

[17] *SCAQMD, Final Localized Significance Threshold Methodology, June 2003. Revised July 2008.*

Table III-2
Ambient Air Quality Data

Pollutants and State and Federal Standards	Maximum Concentrations and Frequencies of State/Federal Standards Exceedance		
	2018	2019	2020
Ozone – O_3			
Maximum 1-hour Concentration (ppm)	0.098	0.080	0.185
Days > 0.09 ppm (State 1-hour standard)	2	0	14
Days > 0.070 ppm (Federal 8-hour standard)	4	2	22
Carbon Monoxide – CO			
Maximum 1-hour Concentration (ppm)	2.0	2.0	1.9
Days > 20 ppm (State 1-hour standard)	0	0	0
Maximum 8-hour Concentration (ppm)	1.7	1.6	1.5
Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide – NO_2			
Maximum 1-hour Concentration (ppm)	0.0701	0.0697	0.0618
Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}			
Maximum 24-hour Concentration (µm/m^3)	81	62	77
Days > 50 µg/m^3 (State 24-hour standard)	31	3	24
$PM_{2.5}$			
Maximum 24-hour Concentration (µg/m^3)	49.2	43.5	47.3
Days > 35 µg/m^3 (Federal 24-hour standard)	3	1	2
Sulfur Dioxide – SO_2			
Maximum 24-hour Concentration (ppb)	17.9	10.0	3.8
Days > 0.04 ppm (State 24-hour standard)	0	0	0
Lead - Pb			
Maximum Monthly Average Concentration (µg/m^3)	N/A	N/A	N/A
Maximum 3-Month Rolling Averages (µg/m^3)	N/A	N/A	N/A

N/A = data not available *ppm = parts per million of air, by volume*
µg/m^3 = micrograms per cubic meter
Source: SCAQMD Historical Data By Year, www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed September 20, 2022.

Sensitive receptors in the vicinity of the Project include, but are not limited to, the following:

- Residences, 1233-1235 North Gower Street; 5 feet north of the Project Site

- Residences, 1232 Lodi Place; 5 feet north of the Project Site
- Residences, North Gower Street (east side); 80 feet east of the Project Site
- Residences, 1239 Lodi Place (west side); 100 feet northwest of the Project Site
- Residences, 1154 North Gower Street; 130 feet southeast of the Project Site
- Residences, 6130 Lexington Avenue; 240 feet southwest of the Project Site

Sensitive receptors that are located at greater distances from the Project Site than the previously identified receptors would experience lesser impacts.

Existing Project Site Emissions

Pollutant emissions associated with existing uses on the Project Site are shown in Table III-3.

Table III-3
Existing Daily Operations Emissions

Emissions Source	Emissions (pounds/day)					
	VOC	NO_x	CO	SO_x	PM_{10}	$PM_{2.5}$
Area	1.4	<0.1	4.1	<0.1	<0.1	<0.1
Energy	<0.1	0.4	0.2	<0.1	<0.1	<0.1
Mobile Sources	1.1	0.9	8.2	<0.1	0.5	0.1
Net Regional Total	**2.9**	**1.3**	**12.4**	**<0.1**	**0.6**	**0.1**
Source: DKA, 2022. Based on CalEEMod 2022.1 model runs. Refer to Appendix B.						

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

No Impact. The analysis below assesses the Project's consistency with the SCAQMD's 2022 AQMP and SCAG's latest 2020-2045 RTP/SCS. As noted previously, the 2022 AQMP's projections for achieving state and federal air quality goals are based on population, housing, and employment trend assumptions in the 2020-2045 RTP/SCS that are largely based on growth forecasts from local governments like the City and thus, a project is consistent with the 2022 AQMP, in part, if the project is consistent with the population, housing, and employment assumptions and smart growth policies that were used in the formation of the AQMP.

The Project's development would not exceed the growth assumptions of the 2020-2045 RTP/SCS, as discussed in response to Checklist topic XIV [Population and Housing]).

The Project Site is currently developed with an apartment complex. The northern portion of the Project Site is developed with two one-story parking garages (Garage Buildings),

which include a total of 51 vehicle parking spaces. The middle portion of the Project Site is developed with two multi-family residential buildings (Building 1 and Building 2). Building 1 contains 28 dwelling units, while Building 2 contains a total of 44 dwelling units (28 dwelling units in the eastern wing and 16 dwelling units in the southern wing). The Project includes demolition and removal of the two Garage Buildings and Building 1 (containing 28 dwelling units) from the Project Site and development of a 216,259-square-foot addition to Building 2 that would include 108 multi-family residential units, of which 16 units (i.e., 15 percent of the base dwelling units) would be set aside for Very Low Income households and 2 replacement units would be set aside for Low Income households. Based on *Transportation Assessment* prepared for the Project (refer to Appendix J), the Project would add a residential population of approximately 357 people to the Project Site.

As discussed in detail in response to Checklist Question XIV(b) (Population and Housing – Unplanned Growth), the Project's residential population and number of housing units would represent less than one percent of the forecasted growth between 2022 and 2025 (Project buildout year) and 2025 and 2045. Thus, the Project's population and housing growth would fall within the forecasted growth for the City. Thus, growth associated with the Project has been accounted for in the current AQMP.

The Project Site is zoned R3-1 (Multiple Dwelling Zone, Height District 1) and R3-1XL (Multiple Dwelling Zone, Height District 1XL with a General Plan land use designation of Medium Residential. The Project's proposed uses are allowed under the site's existing zoning and land use designation. As such, 2020-2050 RTP/SCS assumptions about population and employment growth in the City accommodate the Project's land uses on this site. The 2020-2045 RTP/SCS (as well as its previous iteration) assumes a significant increase in multi-family housing built in infill locations near bus corridors and other transit infrastructure, in some cases even outpacing what is currently anticipated by local general plans. Development of the Project would be consistent with this land use pattern and smart growth policies to increase housing density within HQTAs. Not only would the Project be located within an HQTA but would also contribute to SCAG's goals of encouraging growth of walkable and mixed-use communities with ready access to transit infrastructure and employment. The Project Site's location would provide abundant opportunity for Project residents to reduce vehicle trips, specifically vehicle miles traveled (VMT).

In addition to the 2022 AQMP and 2020-2045 RTP/SCS, the City of Los Angeles General Plan Air Quality Element also identifies policies and strategies for advancing the City's clean air goals. As shown in Table III-4, the Project would be consistent with the applicable policies of the Air Quality Element.

Table III-4
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
Policy 1.3.1 – Minimize particulate emissions from construction sites.	**Consistent:** The Project would minimize particulate emissions during construction through implementation of best construction practices and/or SCAQMD rules.
Policy 1.3.2 – Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Consistent:** The Project would not include the development of any unpaved roads or parking lots.
Policy 2.1.1 – Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent:** The Project's proximity to high-quality transit options and its inclusion of 87 bicycle parking spaces would encourage the reduction of vehicle trips and VMT. A detailed analysis of the Project's VMT impacts is included in Appendix J and discussed in response to Checklist Question XVII(b); as discussed there, Project impacts related to VMT would be less than significant.
Policy 2.1.2 – Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors in order to reduce work trips.	**Consistent:** The Project does not include any commercial uses and would not generate any employees. However, the Project Site's proximity to multiple transit lines and provision of bicycle parking spaces would facilitate a reduction in single-occupant vehicle trips, and as discussed in response to Checklist Question XVII(b), Project impacts related to VMT would be less than significant.
Policy 2.2.1 – Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans, and ridesharing subsidies.	**Consistent:** The infill Project's proximity to multiple high-quality transit options and its inclusion of 87 bicycle parking spaces would encourage the reduction of vehicle trips and VMT. A detailed analysis of the Project's VMT impacts is included in Appendix J and discussed in response to Checklist Question XVII(b). As discussed there, Project impacts related to VMT would be less than significant.
Policy 2.2.2 – Encourage multi-occupant vehicle travel and discourage single-	**Consistent:** The Project's proximity to multiple high-quality transit options and its

Table III-4
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
occupant vehicle travel by instituting parking management practices.	inclusion of 87 bicycle parking spaces would encourage the reduction of vehicle trips and VMT. A detailed analysis of the Project's VMT impacts is included in Appendix J and discussed in response to Checklist Question XVII(b). As discussed there, Project impacts related to VMT would be less than significant.
Policy 2.2.3 – Minimize the use of single-occupant vehicles associated with special events or in areas and in times of high levels of pedestrian activities.	**Not Applicable:** The Project would not include any facilities for the types of special events referenced by this policy.
Policy 3.2.1 – Manage traffic congestion during peak hours.	**Consistent:** A detailed analysis of the Project's VMT impacts is included in Appendix J and discussed in response to Checklist Question XVII(b). As discussed there, Project impacts related to VMT would be less than significant.
Policy 4.1.1 – Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent:** The Project is being entitled through the City, which coordinates with SCAG, Metro, and other regional agencies on the management of land use, air quality, and transportation policies.
Policy 4.1.2 – Ensure that project level review and approval of land use development remains at the local level.	**Consistent:** The Project would be entitled and environmentally cleared at the local level.
Policy 4.2.3 – Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent:** The Project includes infill development of a site currently developed with multi-family residential uses with 108 new and additional multi-family residential units, including 16 units set aside for Very Low Income households and 2 replacement units set aside for Low Income households. The Project Site is located in an urbanized area that is developed with a mix of residential and commercial uses and in proximately to sources of transit, employment, shopping, entertainment, and recreation. The Project would provide updated pedestrian connections to the surrounding

Table III-4
Project Consistency with City of Los Angeles General Plan Air Quality Element

Strategy	Project Consistency
	infrastructure and 87 bicycle parking spaces to encourage Project residents to walk or bike to such uses. Additionally, the Project's vehicle parking would include 6 EV parking spaces.
Policy 4.2.4 – Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent:** The Project's air quality impacts are analyzed in this document, and as provided herein, all Project impacts with respect to air quality would be less than significant.
Policy 4.2.5 – Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent:** The Project's proximity to multiple high-quality transit options and its inclusion of 87 bicycle parking spaces would encourage the reduction of vehicle trips and VMT. A detailed analysis of the Project's VMT impacts is included in Appendix J and discussed in response to Checklist Question XVII(b). As discussed there, Project impacts related to VMT would be less than significant.
Policy 5.3.1 – Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent:** The Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City's Green Building Code.
Source: DKA Planning. 2022.	

As discussed previously, Project-related growth would be consistent with 2016 AQMP projections that are themselves based on 2022-2045 RTP/SCS projections, and the Project's infill location in a HQTA and contribution to growth of a walkable and mixed-use community would be consistent with the latest regional land use planning strategies to reduce VMT and associated air emissions. As discussed below, pollutant emissions associated with the Project's construction and operations would neither exceed nor contribute to any exceedance of ambient air quality standards and thresholds, nor would they interfere with the AQMP's attainment of air quality standards or interim emissions reductions. As a result, the Project would not conflict with or obstruct the implementation of any applicable air quality plans. Therefore, no impacts related to this issue would occur as a result of the Project.

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. The Project would contribute to local and regional pollutant emissions during its construction and operational phases. However, as discussed below, the Project would not result in exceedances of SCAQMD daily thresholds for project-specific impacts that could subsequently cause cumulatively considerable increases in emissions of pollutants for which the Basin is designated as non-attainment.

Construction Emissions

Construction of the Project is anticipated to last approximately 28 months. During this time, a variety of diesel-powered vehicles and equipment would be operated on-site. Demolition and grading for the Project would require vehicles such as an excavator, a bulldozer, a grader, and other heavy equipment. The building construction phase would require equipment such as forklifts and welding tools. Table III-5 summarizes the estimated construction schedule that was used to model the Project's air quality impacts.

The Project would be required to comply with the following regulations, as applicable:

- SCAQMD Rule 403, would reduce the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce or mitigate fugitive dust emissions.
- SCAQMD Rule 1113, which limits the VOC content of architectural coatings.
- SCAQMD Rule 402, which states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
- In accordance with Section 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would 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 would meet specific fuel and fuel additive requirements and emissions standards.

Table III-5
Estimated Project Construction Schedule

Phase	Estimated Duration	Notes
Demolition	Weeks 1-6	Removal of approximately 9,240 square feet of building floor area and approximately 10,880 square feet of asphalt/concrete parking lot hauled 25 miles to landfill in 16-cubic-yard capacity trucks.
Grading	Weeks 7-11	Approximately 6,770 cubic yards of soil (including swell factors for topsoil and dry clay) hauled 25 miles to landfill in 16-cubic-yard capacity trucks.
Trenching	Weeks 12-17	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Weeks 18-108	Footings and Foundation work (e.g., pouring concrete pads), framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Weeks 114-118	Paving of driveways and parking lot surfaces.
Architectural Coatings	Weeks 109-113	Application of interior and exterior coatings and sealants.
Source: DKA Planning, 2022.		

The Project's maximum daily regional and local emissions from construction, as estimated using SCAQMD's CalEEMod 2022.1 model, are shown in Table III-6. Regional thresholds and LSTs for each air pollutant are also shown for comparison. As shown, the Project's regional construction emissions would not exceed SCAQMD regional significance thresholds for VOC, NO_X, CO, SO_X, PM_{10}, or $PM_{2.5}$. Also, local emissions would not exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, the Project's construction-related air quality impacts would be less than significant.

Table III-6
Maximum Regional and Localized Daily Construction Emissions

	Emissions (pounds per day)					
	VOC	**NO_X**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Regional Emissions						
2023	1.4	16.9	16.3	<0.1	4.0	1.9
2024	1.2	7.2	17.0	<0.1	2.1	0.7
2025	33.2	6.6	16.2	<0.1	2.1	0.7
Maximum Regional Emissions	33.2	16.9	17.0	<0.1	4.0	1.9
Regional Daily Threshold	*75*	*100*	*550*	*150*	*150*	*55*
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Maximum Localized Emissions	33.0	12.6	11.4	<0.1	2.7	1.6
Localized Significance Threshold	*-*	*74*	*680*	*-*	*5*	*3*
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**
Source: DKA Planning, 2022. Refer to Appendix B.						

Operational Emissions

Operational emissions associated with the Project were calculated using CalEEMod 2022.1. As shown below in Table III-7, operation of the Project would not generate daily emissions in excess of SCAQMD's regional significance thresholds for VOC, NO_X, CO, PM_{10}, and $PM_{2.5}$, nor would they exceed SCAQMD LSTs for NO_X, CO, PM_{10}, or $PM_{2.5}$. As a result, the Project's operational-related impacts on air quality would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. As stated previously, representative sensitive receptors in the vicinity of the Project Site include the following:

- Residences, 1233-1235 North Gower Street; 5 feet north of the Project Site
- Residences, 1232 Lodi Place; 5 feet north of the Project Site
- Residences, North Gower Street (east side); 80 feet east of the Project Site
- Residences, 1239 Lodi Place (west side); 100 feet northwest of the Project Site
- Residences, 1154 North Gower Street; 130 feet southeast of the Project Site
- Residences, 6130 Lexington Avenue; 240 feet southwest of the Project Site

- Sensitive receptors that are located at greater distances from the Project Site than the previously identified receptors would experience lesser impacts.

Table III-7
Maximum Regional and Localized Operational Emissions

Emissions Source	Emissions in lbs per day					
	VOC	**NO_x**	**CO**	**SO_x**	**PM_{10}**	**$PM_{2.5}$**
Area	6.4	0.1	10.4	<0.1	<0.1	<0.1
Energy	<0.1	0.4	0.2	<0.1	<0.1	<0.1
Mobile Sources	1.7	1.1	12.1	<0.1	0.9	0.2
Project Regional Emissions	*8.1*	*1.6*	*22.7*	*<0.1*	*1.0*	*0.2*
Less Existing Emissions	*(2.9)*	*(1.3)*	*(12.4)*	*(<0.1)*	*(0.6)*	*(0.1)*
Net Regional Total	*5.2*	*0.3*	*10.3*	*<0.1*	*0.4*	*0.1*
Regional Daily Thresholds	55	55	550	150	150	55
Exceed Threshold?	**No**	**No**	**No**	**No**	**No**	**No**
Project Localized Emissions	*5.0*	*0.1*	*6.3*	*<0.1*	*<0.1*	*<0.1*
Localized Significance Thresholds	-	74	680	-	2	1
Exceed Threshold?	**-**	**No**	**No**	**-**	**No**	**No**

LST analyses based on 1-acre site with 25-meter distances to receptors in Central Los Angeles SRA.

Source: DKA Planning, 2022, based on CalEEMod 2022.1 model runs. Refer to Appendix B. Totals reflect the summer season maximum and may not add up due to rounding.

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

The primary TAC that would be generated by construction activities is diesel PM, which would be released from the exhaust pipes of diesel-powered construction vehicles and equipment. According to SCAQMD methodology, health risks from carcinogenic air toxics such as diesel PM are usually quantified in terms of individual cancer risk, which is the likelihood that a person exposed to concentrations of TACs over a 30-year period every day will contract cancer based on standard risk-assessment methodology. However, the anticipated duration of construction activities associated with the Project's implementation is only approximately 28 months, and daily diesel PM emissions would vary considerably day by day, and by phase. As shown in Table III-7, the Project's maximum daily PM emissions, which include exhaust PM, would not exceed applicable regional thresholds and LSTs. Given these considerations, TAC emissions from the Project's construction phase would be less than significant.

As also discussed previously, the Project's operational emissions would not exceed SCAQMD regional significance thresholds or LSTs.

Additionally, the Project does not propose typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes, automotive repair facilities, or warehouse distribution facilities. As a result, the Project's operational phase emissions would not warrant the need for a health risk assessment, and this impact would be less than significant.

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors (refer to Table III-7). While long-term operations of the Project would add traffic to local roads that would produce off-site emissions, these emissions would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project Site area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce emissions concentrations needed to trigger a CO hotspot, as it would add 233 vehicle trips to the local roadway network on weekdays when the Project would be fully operational in 2025. The majority of vehicle-related impacts at the Project Site would come from up to 27 vehicles entering and exiting the development during the A.M. peak hour.[18] This would represent 2.0 percent of the 1,333 vehicles currently using Gower Street at Fountain Avenue in the A.M. peak hour.[19] Assuming peak hour volumes represent ten percent of daily volumes, this intersection would carry 13,330 daily vehicle trips, well below the traffic volumes that would be needed to generate CO exceedances of the ambient air quality standard.[20]

For these reasons, the Project would not expose sensitive receptors to substantial pollutant concentrations. Therefore, Project impacts related to this issue would be less than significant.

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18 *Overland Traffic Consultants, 1201 N. Gower Street Transportation Assessment; August 2022.*

19 *Ibid.*

20 *South Coast Air Quality Management District; 2003 AQMP. As discussed in the 2003 AQMP, the 1992 CO Plan included a CO hotspot analysis at four intersections in the peak A.M. and P.M. time periods, including Long Beach Boulevard and Imperial Highway (Lynwood), Wilshire Boulevard and Veteran Avenue (Westwood), Sunset Boulevard and Highland Avenue (Hollywood), and La Cienega Boulevard and Century Boulevard (Inglewood). The busiest intersection was Wilshire and Veteran, used by 100,000 vehicles per day. The 2003 AQMP estimated a 4.6 ppm one-hour concentration at this intersection, which meant that an exceedance (20 ppm) would not occur until daily traffic exceeded more than 400,000 vehicles per day.*

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

Less Than Significant Impact. During the Project's construction phase, some of the diesel-engine-operated construction equipment and architectural coatings could generate odor emissions. However, these emissions would be intermittent and temporary and would relatively quickly disperse into the atmosphere. Thus, the Project's construction phase would not produce odor emissions that would affect a substantial number of people.

The Project does not propose the types of land uses normally associated with odor emissions, such as industrial, solid waste, waste treatment, etc. The residential portion of the Project would not create unusual or objectionable odors during long-term operations. Proposed residential uses would not generate objectionable odors. The restaurant portion of the Project would produce food-cooking odor emissions. However, these emissions would be regulated by SCQAMD's Rule 402 (Nuisance), which states the following:

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

Additionally, the Project would be required to comply with California Health and Safety Code Section 41700(a), which states the following:

> *Except as otherwise provided in Section 41705, a person shall not discharge from any source whatsoever quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or that endanger the comfort, repose, health, or safety of any of those persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property.*

Thus, Project operation would not produce odor emissions that would affect a substantial number of people. Therefore, Project impacts related to odor emissions would be less than significant. No further analysis of this issue is required.

Cumulative Impacts

SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively

considerable.[21] Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions. As shown above, the Project's emissions would not exceed any of the SCAQMD's regional or localized significance thresholds. Therefore, the Project's contribution to cumulative air quality impacts would be less than significant.

[21] *SCAQMD, White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution, http://www.aqmd.gov/docs/default-source/Agendas/Environmental-Justice/cumulative-impacts-working-group/cumulative-impacts-white-paper.pdf, August 2003.*

IV. BIOLOGICAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☐	☐	☒
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
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. The Project Site is located in an urbanized and developed area of the City and is currently developed with an apartment complex. While the Project Site does contain ornamental landscaping, the Project Site does not contain any habitat for protected species. There are four street trees located along Gower Street adjacent to the Project Site that would be removed and replaced in accordance with the City's tree replacement requirements. These trees include two magnolias (*Magnolia grandiflora*), one ficus (*Ficus nidita*), and one camphor (*Cinnomomum camphora*). None of the trees is considered a "protected tree or shrub," as defined by the City.[22] However, these trees could potentially provide nesting sites for migratory birds. Thus, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15th to August 15th) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations would ensure impacts related to nesting birds would be less than significant.

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

No Impact. The Project Site is located in an urbanized and developed area of the City and is currently developed with an apartment complex. No riparian habitat or other sensitive natural community exist at the Project Site or in the immediate vicinity of the site. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is located in an urbanized and developed area of the City and is currently developed with an apartment complex. No wetlands exist at the Project

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22 *Protected trees and shrubs as defined by the City include oak trees (Quercus spp.) and Southern California black walnut trees (Juglans californica), western sycamore trees (Platanus racemosa), California bay trees (Umbellularia californica), Mexican elderberry shrubs (Sambucus Mexicana), and toyon (Heteromeles arbutifolia).*

Site or in the immediate vicinity of the site. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is located in an urbanized and developed area of the City and is currently developed with an apartment complex. The Project Site is not part of a migratory wildlife corridor or native wildlife nursery. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. There are four street trees located along Gower Street adjacent to the Project Site that would be removed and replaced in accordance with the City's tree replacement requirements. These trees include two magnolias (*Magnolia grandiflora*), one ficus (*Ficus nidita*), and one camphor (*Cinnomomum camphora*). None of the trees is considered a "protected tree or shrub," as defined by the City.[23] The Applicant would be required to plant replacement trees on or adjacent to the Project Sites in conformance with the City's requirements for Project landscaping and tree replacement and planting. Therefore, no impacts related to this issue would occur as a result of the Project.

f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. The Project Site is not subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impacts related to this issue would occur as a result of the Project.

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23 *Ibid.*

Cumulative Impacts

The 18 related projects listed in Appendix G in the *Transportation Assessment* prepared for the Project, included in Appendix J, are located in highly urban areas and likely do not contain significant biological resources, such as candidate, sensitive or special status species, riparian habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or significant ecological area (SEA) or subject to a habitat conservation plan, a natural community conservation plan, or other such plan. All related projects with existing trees would be required to comply with the requirements of the MBTA. Because the Project would not result in any impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

V. CULTURAL RESOURCES

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

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

Less Than Significant Impact. The analysis of Project impacts on historical resources below is based on the following (refer to Appendix C):

- *Historical Resources Assessment, Historic Resources Group, April 2023.*

Regulatory Framework

National Register of Historic Places

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

- Criterion A (events): associated with events that have made a significant contribution to the broad patterns of our history;

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

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

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

Integrity is evaluated by weighing all seven of these aspects together and is ultimately a "yes or no" determination – that is, a resource either retains sufficient integrity or it does not. Some aspects of integrity may be weighed more heavily than others depending on the type of resource being evaluated and the reason(s) for its significance. Since integrity

depends on a resource's placement within a historic context, integrity can be assessed only after it has been established that the resource is significant, and under which criteria.

Generally, a resource must be at least 50 years of age to be eligible for listing in the National Register. Exceptions are made if it can be demonstrated that a resource less than 50 years old is (1) of exceptional importance, or (2) is an integral component of a historic district that is eligible for the National Register.

California Register of Historical Resources

The California Register of Historical Resources (California Register) is the authoritative guide to the State's significant historical and archeological resources. In 1992, the California legislature established the California Register "to be used by state and local agencies, private groups, and citizens to identify the state's historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change." The California Register program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for historic preservation grant funding; and affords certain protections under CEQA. All resources listed on or formally determined eligible for the National Register are automatically listed in the California Register. In addition, properties designated under municipal or county ordinances, or through local historic resources surveys, are eligible for listing in the California Register.

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

1. Criterion 1 (events): associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

2. Criterion 2 (persons): associated with the lives of persons important to local, California, or national history;

3. Criterion 3 (architecture): embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic values;

4. Criterion 4 (information potential): has yielded, or has the potential to yield, information important to the prehistory or history of the local area, state, or the nation.

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

There is no prescribed age limit for listing in the California Register, although California Register guidelines state that "sufficient time must have passed to obtain a scholarly perspective on the events or individuals associated with the resource."

Resources are automatically listed in the California Register if they are listed in or have been officially determined eligible for the National Register. State Historic Landmarks #770 and forward are also automatically listed in the California Register.

City of Los Angeles Cultural Heritage Ordinance

The local designation programs for the City of Los Angeles include Historic-Cultural Monument (HCM) designation for individual resources and the adoption of Historic Preservation Overlay Zones (HPOZs) for concentrations of buildings, commonly known as historic districts. The City of Los Angeles Cultural Heritage Ordinance (Chapter 9, Section 22.171 et seq. of the Los Angeles Administrative Code) defines an HCM as any site (including significant trees or other plant life located thereon), building, or structure of particular historic or cultural significance to the City, meaning that it meets one or more of the following criteria:

1. It is identified with important events of national, state, or local history, or exemplifies significant contributions to the broad cultural, economic or social history of the nation, state, city, or community; or

2. It is associated with the lives of historic personages important to national, state, city, or local history; or

3. It embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder, or architect whose individual genius influenced his or her age.

The City of Los Angeles established its Historic Preservation Overlay Zone (HPOZ) ordinance in 1979. The ordinance was revised in 1997, 2000, 2004, and 2018. According to Section 12.20.3 B.17 of the LAMC, a *Preservation Zone* is "any area of the City of Los Angeles containing buildings, structures, landscaping, natural features or lots having historic, architectural, cultural or aesthetic significance."

Local historic preservation ordinances often include standards for determining whether a resource retains sufficient integrity to merit local historic designation, and this language

can vary widely from municipality to municipality. Some local ordinances do not mention integrity at all. The Los Angeles Cultural Heritage Ordinance does not include language about integrity. When evaluating historical resources in municipalities where the historic preservation ordinance does not provide guidance for assessing integrity, in accordance with best professional practices it is customary to use the National Register seven aspects of integrity to assess whether or not a resource retains sufficient integrity to convey its significance at the local level. For local eligibility in the City, the City typically considers integrity in determining whether a historical resource qualifies as a Historic-Cultural Monument (HCM), but practices greater flexibility when evaluating integrity for local designation than is the case for determining state or federal eligibility.

As with the National and California Registers, in assessing integrity at the local level, some aspects may be weighed more heavily than others depending on the type of resource being evaluated and the reason(s) for its significance. For example, if a property is significant as an excellent example of an architectural style, integrity of design, workmanship and materials may weigh more heavily than integrity of setting. In contrast, if a property is significant for its association with an important event or person, integrity of setting, feeling, and association may weigh more heavily than integrity of design.

Survey LA

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

As part of SurveyLA, the Office of Historic Resources has developed a Historic Context Statement (HCS) to provide a framework for identifying and evaluating potential historic resources within the City of Los Angeles. The HCS utilizes the Multiple Property Documentation (MPD) format developed by the National Park Service for the National Register of Historic Places and complies with the standards and guidelines set forth by the National Park Service and the California Office of Historic Resources. This approach organizes the themes, trends, and patterns of history shared by properties into historic contexts; identifies and describes historic resources or property types that represent the contexts; and provides specific standards to guide the evaluation of significance. The SurveyLA HCS is organized into nine broad historical contexts, which are specific to Los Angeles and focus on the development of the City during the period dating from 1780 to 1980, and further subdivided into themes and sub-themes that reflect the various historical trends and patterns of events associated with each context.

The Project Site falls within the boundaries of the Hollywood Redevelopment Project Area (RPA), which is located in the Hollywood Community Plan Area (CPA). The area

comprising the Project Site was surveyed most recently as part of the CRA/LA survey of the Hollywood RPA in 2020.

Hollywood Community Plan Area

The Project Site is located within the planning boundary of the Hollywood Community Plan Area (CPA), adopted in December 1988. The Hollywood Community Plan is one of thirty-five Community Plans that comprise the Land Use Element of the City of Los Angeles' General Plan. The General Plan is the City's fundamental policy document, directing the City's future growth and development.

The 1988 Hollywood Community Plan does not specifically address historic resources; however, a stated objective of the 1988 Plan is to "encourage the protection and enhancement of the varied and distinctive residential character of the Community…" In addition, Housing Policy in the 1988 Plan version "encourages the protection and enhancement of well-defined residential neighborhoods in Hollywood through (1) application of Historic Preservation Overlay Zones where appropriate, and/or (2) preparation of neighborhood preservation plans which further refine and tailor development standards to neighborhood character."

The Plan also reiterates that it is "the City's policy that the Hollywood Community Plan incorporate the sites designated on the Cultural and Historical Monuments Element of the General Plan."

Hollywood Redevelopment Project Area

The Project Site is contained within the Hollywood Redevelopment Project Area (RPA), which is generally bounded by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west. The Hollywood Redevelopment Project will expire in 2028. The Hollywood RPA was established in 1984 by the Community Redevelopment Agency (CRA). The CRA was dissolved on February 6, 2012, and administration of the Hollywood RPA has been transferred to the CRA/LA, a Designated Local Authority (DLA) and successor to the CRA and may transfer to the City Planning Department. The administration was then transferred to the City Planning Department in 2019.

The Hollywood Redevelopment Project's goals include "the retention, restoration and appropriate reuse of existing buildings, groupings of buildings, and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria."

Policies and guidelines for the preservation, rehabilitation, and retention of historic properties are discussed in Section 5.11 of the Redevelopment Plan. As part of its responsibilities in implementing the Hollywood Redevelopment Plan, the CRA compiled historic survey data on properties within the Hollywood RPA. Property evaluations from

historic surveys in 1986,1 997, 2003, and 2010 were compiled and made available on the CRA website. The area that includes the Project Site was surveyed most recently in 2020 as part of the CRA/LA survey of the Hollywood RPA

Summary of Previous Evaluations

Community Redevelopment Area Survey

The Project Site is located within the Hollywood Redevelopment Project Area, which is generally bounded by Franklin Avenue to the north, Fountain Avenue and Santa Monica Boulevard to the south, Serrano Avenue to the east, and La Brea Avenue to the west. The Redevelopment Project Area is located within the Hollywood Community Plan Area (CPA) and was established by the Community Redevelopment Agency (CRA) in 1984 to encourage revitalization within central Hollywood. The CRA was dissolved on February 6, 2012, and administration of the Hollywood Redevelopment Project Area was transferred to the CRA/LA, a Designated Local Authority (DLA) and successor to the CRA. The administration was then transferred to the City Planning Department in 2019.

As part of its responsibilities in implementing the Hollywood Redevelopment Plan, the CRA compiled historic survey data on properties within the Hollywood Redevelopment Project Area. Property evaluations from various historic surveys in 1986, 1997, and 2003 were compiled in a data table that was made available on the CRA website. An intensive-level survey of the Hollywood Redevelopment Project Area was conducted in 2010. After the CRA was dissolved, the City continued this effort with an intensive-level survey update completed in 2020. The 2020 survey update reevaluated all properties found eligible for historic listing in the 2010 survey using the historic contexts, registration requirements, and methodology established for SurveyLA, conforming evaluations of the Hollywood Redevelopment Project Area to SurveyLA findings for greater Hollywood and the City of Los Angeles. The 2020 survey update also benefitted from the breadth and depth of historic resources identified by SurveyLA for comparative analysis. The 2020 Hollywood CRA survey update was accepted by the City and published on the Department of City Planning's website.

The Project Site was identified by the 2010 CRA survey as eligible for historic listing and assigned a status code of 3CS, defined as "Appears eligible for California Register individually through survey evaluation." The 2020 CRA survey update reevaluated the Project Site and did not find it eligible for historic listing, assigning the site a status code 7SQ, which is defined by SurveyLA as "Individual property assessed for significance in accordance with the SurveyLA Multiple Property Documentation approach, but does not meet eligibility standards."

SurveyLA

SurveyLA is the City's citywide survey of historic resources, conducted in accordance with the standards and guidelines set forth by the National Park Service and the California State Office of Historic Preservation (OHP), and overseen by the City's Office of Historic Resources (OHR). Properties surveyed as part of SurveyLA were evaluated for eligibility for listing in the National Register, the California Register, and as City of Los Angeles HCMs and HPOZs.

Some parts of Los Angeles were surveyed concurrent with SurveyLA under the direction of the CRA were not reevaluated by SurveyLA. The Hollywood Redevelopment Project Area, surveyed by the CRA in 2010, therefore was not examined as part of SurveyLA. However, as noted above, this area was resurveyed in 2020 when responsibility for the CRA transferred to the City.

Built Environment Resources Directory

OHP maintains the Built Environment Resource Directory (BERD), a database of previously evaluated resources throughout the state. The BERD contains information only for cultural resources that have been processed through OHP. This includes resources reviewed for eligibility for the National Register and the California Historical Landmarks programs through federal and state environmental compliance laws, and resources nominated under federal and state registration programs. No buildings or features on the Project Site are listed in the BERD.

The BERD does record a set of 16 properties collectively listed as "N. Gower Ave, 1100-1200 Blocks." Each of the 16 properties is listed with a status code of 5D2, meaning "Contributor to a district that is eligible for local listing or designation." All 16 properties are located on Gower Street and were constructed between 1908 and 1930. The BERD listing does not reference a date for the district listing, but it is believed to be from the 1986 survey of the Hollywood Redevelopment Area. At that time, historic survey practice in California often evaluated groupings of buildings on individual streets. The result was a collection of buildings identified by address blocks such as the "300 – 400 blocks of Main Street." A similar grouping of buildings on a neighboring street would be identified separately i.e., "the 400-600 blocks of Elm Street." Today, standard historic resources survey practice regards neighboring buildings of similar periods and contexts as a single district regardless of their street address.

The Project Site, although located in the 1200 block of N. Gower Street, is not included as a contributing property in the BERD listing. This is presumably because the Project Site was developed in 1941, outside the 1908-1930 period. Potential districts in Hollywood that were identified as street blocks in the past have since been re-evaluated based on the standard survey practices used today. Many of the 16 properties on N. Gower Street listed in the BERD with the 5D2 status code have been demolished and

replaced with more recent development or have been substantially altered. No historic district has been identified in the vicinity of the Project Site in more recent surveys of Hollywood. For these reasons, the 1100-1200 blocks of N. Gower Street are not considered a historic district in this report for the purposes of CEQA.

Historical Resources in the Project Site Vicinity

One historical resource in the near vicinity of the Project Site has been previously identified. This is the YWCA Hollywood Studio Club located across the street from the Project Site at 1215-1233 Lodi Place which is designated as Los Angeles Historic-Cultural Monument No. 175 (1977) and is listed in the National Register of Historic Places (1980) as an individual historic resource. Because the YWCA Hollywood Studio Club is listed in the National Register, it is also listed in the California Register.

The two- and three-story building was constructed in 1925 and officially opened in 1926 under the auspices of the YWCA as a safe and inexpensive residence for young women pursuing careers in the motion picture industry. Designed in a Mediterranean Revival architectural style by renown California architect Julia Morgan, the building wraps an interior courtyard. Many residents went on to have substantial careers in the entertainment industry including actresses Maureen O'Sullivan, Donna Reed, Marilyn Monroe, Kim Novak, Rita Moreno, Nancy Kwan, and Sharon Tate.

By the late 1960s, aspiring actresses no longer made up the majority of residents and the Hollywood Studio Club largely functioned as a general and inexpensive hotel for transient women. Financial difficulties and serious fire code issues further compromised the Studio Club's operations and it finally closed in 1975.

History and Description of the Surrounding Area

Late 19th and Early 20th Century Development in Hollywood

The area that became Hollywood was originally part of two former Spanish land grants: Rancho La Brea and Rancho Los Feliz. These two ranchos were strategically oriented along the Cahuenga Pass, a major transportation corridor to the north, and the growing City of Los Angeles to the south. The Cahuenga Pass encompassed part of the Camino Real del Rey and was the principal coastal passageway and used continuously as a trail facilitating commerce, livestock transport, and travel since the earliest Spanish exploration. Hollywood began as a small agricultural community in the 19th century. Farmers, many of whom were European immigrants, experimented in cultivating a wide variety of exotic fruits, vegetables, and flowers. A freight rail line was first constructed in 1887-1888, linking Hollywood to downtown Los Angeles. The fields and orchards of the nineteenth century increasingly gave way to speculative real estate development by the turn of the 20th century.

In 1900, the Cahuenga Valley Improvement Association was established to guide real estate development in the area, just as the first electric track down the length of Prospect Avenue (present day Hollywood Boulevard) was completed. Other streetcar lines soon followed, including along Melrose Avenue, La Brea Avenue, Santa Monica Boulevard, Highland Avenue, Vine Street, Western Avenue, Vermont Avenue, Virgil/Hillhurst Avenues, Kenmore Avenue, Fountain Avenue, Talmadge Street, Hyperion Avenue, Los Feliz Boulevard, and Beachwood Drive.

In 1903, the City of Hollywood officially incorporated with a population of 700. In 1904, gas lines were laid, the streets were numbered, and a single track of the Los Angeles Pacific Railroad was placed perpendicular to the electric track already on Prospect Avenue. As the area became increasingly developed, churches, clubs, and schools were built in proximity to the grand single- family residences that lined Hollywood Boulevard and other nearby streets. By 1909, like many of its neighboring communities, Hollywood had experienced immense growth. While its population in 1903 was a mere 700, by 1909 it had reached 4,000. Though dwarfed by the neighboring City with 100,000 inhabitants, the small City of Hollywood quickly began to experience water shortages, drainage issues, and sewage problems, and less than ten years later Hollywood began to reconsider its status as an independent city. In February of 1910, Hollywood was consolidated to the City to take advantage the City's established sewer system and the anticipated new water supply created by the Los Angeles Aqueduct, which was then under construction. The pre-consolidation area boundary is generally defined by the southernmost portion of the Hollywood Hills to the north, Fountain Avenue to the south, Crescent Heights Boulevard to the west, and Mariposa Street to the east.

Although now formally part of the City, Hollywood continued to maintain its own identity, which was tied directly to the growth of the motion picture industry. By this time Hollywood was no longer a small independent city struggling to deal with infrastructural problems, but a thriving suburb with a rapidly growing population and the home of a significant national industry. As the popularity of motion pictures grew, more physical facilities related to film production were constructed in Hollywood, and the industry contributed significantly to the area's overall industrial growth. From the 1910s through the boom of the 1920s and into the 1930s, Hollywood experienced tremendous population growth. To accommodate the increased demand for housing as well as services and amenities, residential and commercial development in Hollywood increased dramatically. The large parcels of land which were once occupied by a bucolic landscape of citrus groves and single-family residences were disappearing, replaced more frequently by dense urban development.

As Hollywood began to grow more commercial in nature beginning in the late teens, it also began to lose its status as a prestigious address. Many of the mansions that lined Hollywood Boulevard were abandoned by 1925, as developments such as Hancock Park and Beverly Hills drew elite residents away from the district. In the mid-to-late 1930s, the glamorous image of Hollywood as a national fashion and entertainment destination began

to fade. This was due in part to the effects of the Great Depression. During this era, the area experienced little in the way of growth but much in the way of increased commercial activity in a manner that reinforced Hollywood's role as a hub between Los Angeles and adjacent communities.

World War II and Post-World War II Development

The United States' entry into World War II commenced following the bombing of Pearl Harbor in December 1941. Wartime austerity had a dramatic impact on the landscape of Los Angeles, and Hollywood was no exception. Residential construction was halted for the duration of the war, and existing businesses and manufacturing operations were converted for the production and distribution of materials essential to the war effort.

Since Los Angeles served as a major point of departure for combat in the Pacific, Hollywood became a hub of entertainment and tourism for GIs passing through town before leaving for the battlefront. Area hotels were booked solid, and the United Servicemen's Organization (USO) opened three Hollywood outposts in 1941. The famed Hollywood Canteen also opened in 1942, offering visiting servicemen an opportunity to be served by their favorite film stars.

With travel during wartime restricted to essential business only, visits from servicemen saved many Hollywood nightspots from going under during the war.

Density in Hollywood increased substantially following World War II. In the hillsides, residences were built on previously undeveloped lots. In the flatlands, inexpensive stucco-clad apartment buildings were erected as infill in previously established residential neighborhoods. Along the major commercial corridors, earlier buildings were updated or replaced with new construction. During this period, some of the nation's most important Modernist architects were working in Los Angeles, building sleek commercial buildings in the flatlands and highly innovative residential projects in the hillsides, and a number of Hollywood residential and commercial properties developed during this period were designed by important Modernist architects, including Richard Neutra, Rudolph Schindler, Lloyd Wright, John Lautner, Craig Ellwood, Raphael Soriano, Gregory Ain, and Pierre Koenig.

By the 1950s, motion picture operations began to relocate to other areas, and the major industry in Hollywood shifted to tourism. During the early 1950s, the Hollywood Freeway cut through the northeast corner of Hollywood, and widespread automobile ownership coupled with the development of the freeway system pulled new development to previously outlying areas on the West Side and in the San Fernando Valley. Later in the decade, the famous Capitol Records Building was constructed on Vine Street and the Hollywood Walk of Fame was created on Hollywood Boulevard as a tribute to actors, directors, and other contributors to the entertainment industry.

Late 20th Century Development

In the 1960s and 1970s Hollywood's population became more ethnically diverse, as new immigrant groups began settling in the area. In addition to a significant Latino population, Armenian and Thai immigrants began living and working in the East Hollywood area and opened shops and other businesses. Community and residential densities continued to increase, as original single-family houses, bungalow courts, and smaller apartment buildings were replaced with larger multi-family residential complexes.

By the 1980s the Hollywood community was in a state of economic decline as commercial development became focused more intensely to the west at Century City, along the Wilshire corridor in Westwood, and in Downtown Los Angeles. The Community Redevelopment Agency of Los Angeles established the Hollywood Redevelopment Project Area in 1986 to encourage development in the area. Among the goals of the agency were to revitalize the historic core and preserve historically significant buildings.

At the dawn of the new millennium, Hollywood began to experience a resurgence that continues today. In June 1999, the Hollywood extension of the Los Angeles County Metro Rail Red Line subway connected Downtown Los Angeles to the San Fernando Valley, with stops along Hollywood Boulevard at Western Avenue, Vine Street, and Highland Avenue.

Additionally, the establishment of the city's Adaptive Reuse ordinance greatly facilitated the reuse of under-utilized historic buildings into new housing. New, large-scale mixed-use projects – Hollywood & Highland (including the Kodak Theater), the Renaissance Hotel, the W Hotel at Hollywood and Vine – along with the Red Line subway stations, have helped to revitalize Hollywood's streets and its economy, bringing with it an influx of new residents and tourists, higher rents, and new development pressures. Sunset Boulevard in particular has seen numerous new projects in recent years, including new hotels, office towers, and apartment buildings, all of which add new height and density to the busy thoroughfare.

Description of the Project Site

Current Setting

The Project Site is in a subset of the Hollywood Community Plan Area, which was identified as a Redevelopment Project Area in 1984. The Project Site occupies a single parcel, which contains an apartment complex composed of three multi-family residential buildings and two parking garages unified by landscaped areas, courtyards and pedestrian paths.

The Project Site occupies the southern half of the block bounded by Fountain Avenue to the north, Gower Street to the east, Lexington Avenue to the south, and Lodi Place to the west. The surrounding area is characterized primarily by its relatively flat topography and

mix of low- to mid-rise residential, industrial, and commercial properties dating from the 1920s through the present day. The immediate surrounding area is largely characterized by multi-family residential buildings ranging between one- and four-stories in height. Commercial and industrial uses are located north, south, and west of the Project Site as one approaches Sunset Boulevard to the north, Santa Monica Boulevard to the south, and Vine Street to the west. Industrial uses in the area are primarily associated with the entertainment industry including the Hollywood Production Center immediately south of the Project Site and Sunset Gower Studios to the north. This area of Hollywood has been subject to decades of development, demolition, replacement and infill, and exhibits little architectural, stylistic, or functional cohesion.

Architectural Description

The Project Site is occupied by an apartment complex originally constructed in 1941. The complex consists of three two-story residential buildings and two one-story parking garages set within a unifying landscape of lawn, shrubbery, mature trees, and pedestrian circulation paths. The site is bordered by a wrought iron fence grown over with vines.

The buildings are of wood-frame construction with hipped roofs. Wall cladding is smooth stucco; roofing is composite shingle. The buildings appear to have been minimal traditional in style but almost all decorative detailing that might have existed has been stripped away since the original construction.

The apartment complex site plan is distinguished by two identical U-shaped apartment buildings at the center of the property. The two buildings face east (Gower Street) and west (Lodi Place), respectively, separated by a landscaped pedestrian path at their rear. Each building wraps a rectangular landscaped courtyard open toward the street. The U-shaped buildings are symmetrically arranged with pavilions marking a central entry at the back of each courtyard.

Other entries, distinguished by flat, projecting canopies supported by wood posts, are located at the four interior corners of each courtyard. Fenestration consists primarily of aluminum sliding windows. Ground-floor windows at corners facing the courtyards are delineated by projecting wood-surrounds wrapping the corner.

A third apartment building is located at the southern end of the property separated from the two courtyard buildings by an east-west oriented landscaped pedestrian path. This building is rectangular in plan and spans the full width of the two courtyard buildings. The south, street- facing façade is symmetrically arranged with two central pavilions delineating main entries to interior circulation between units. Like the two courtyard buildings, ground-floor windows at corners are delineated by projecting wood-surrounds wrapping the corner. The south façade also includes four sets of bay windows which are not present on the two courtyard buildings. Otherwise, fenestration consists of the same double and tripartite aluminum sliding windows found on the two courtyard buildings.

Two identical one-story garage buildings occupy the northern portion of the property, immediately north of the two courtyard buildings. The two buildings are rectangular in plan, of brick and concrete construction with truss roofs. Like the two courtyard buildings, the two garage buildings face east (Gower Street) and west (Lodi Place), respectively, directly accessing the street via concrete driveways. The street-facing openings are enclosed by metal gates.

Major Alterations

In 1983, the apartment complex was subject to substantial renovations. Windows were replaced with aluminum frame sliding windows, building exteriors were sandblasted, exterior walls were re-clad, and the garage buildings were re-roofed. In 2001, metal security bars were added to the garage windows. In 2007, 600 square feet of repairs to the roof of the garage were made. It is clear roofing material for the three residential buildings was also replaced more recently although no permit was found to corroborate this.

Site History

Development History

The Project Site was the homestead of Cornelius Cole, who owned much of the surrounding area that became the Colegrove Tract in Hollywood. According to a historic aerial photograph from 1938, the Project Site parcel contained a large home and surrounding gardens just prior to development of the apartment complex that currently occupies the site. In keeping with the increasing density of Hollywood residential development during the 1920s and into the 1930s, surrounding areas are more tightly subdivided and parcels are largely built out with small houses, bungalow courts and small apartment buildings.

The apartment complex at 1201 N. Gower Street (generally referred to as the Gower Apartments) was originally developed by the California Realty Corporation.

Constructed in 1941, the complex was designed by noted Los Angeles architect Maxwell Maltzman in what appears to be a “Minimal Traditional” style. The entire half-block parcel was improved with two, two-story U-shaped apartment buildings located at the center of the parcel. Each building wrapped an open courtyard landscaped with lawn, shrubs, trees and curving paved sidewalks. In form, the two buildings are typical examples of courtyard apartment buildings, a multi-family residential property type that proliferated throughout Los Angeles from the 1920s through the 1960s. A third two-story building, a long rectangular bar, was constructed at the southern end of the parcel. Two one-story garage buildings completed the complex at the north end of the parcel. The property was unified by narrow landscaped front yards and internal pedestrian circulation paths.

A 1941 Los Angeles Times classified ad promotes “BRAND NEW” three, four, and five room apartments at the “The Gower Apts” with rents at $40 and up. Amenities included carpet, refrigerator, venetian blinds, garage, and switchboard service. As the United States entered World War II, 1201 Gower Street became one of many Los Angeles apartment buildings to house members of the armed services during the War. Individuals included First Lieutenant Oscar L. Kenyon who was credited with participating in the last bombing raid on Germany before the end of the War; and Marine Corps Sergeant-Major Charles Francis who received the Congressional Medal of Honor for his service. Others included Corporal Roger B. Laswell and Corporal Jesse F. Upp.37

From its initial opening to the present day, 1201 N. Gower Street has continued to operate as a rental apartment complex. In 1983, the owners embarked on a series of renovations that included replacing all windows, exterior sandblasting, exterior stucco work, and roof repairs. It appears these alterations have given the complex its current appearance.

Courtyard Apartment Property Type

As noted above, two residential buildings that are signature components of the apartment complex at 1201 N. Gower Street are textbook examples of courtyard apartment buildings and the entire complex can be interpreted as a variant of the courtyard apartment property type. Courtyard apartments were first built beginning in the 1910s, when multi-family residential construction in Los Angeles began in earnest, with the type continuing to evolve in form and style through the 1960s. However, proliferation of the courtyard apartment in Los Angeles reached its zenith in the 1920s.

The growing popularity of this multi-family housing type during this period coincided with the greatest population growth in the city’s history. While the bungalow court reflected the earliest attempt at a compromise between privacy and density, the pressing demand for more housing made it necessary to develop a higher-density residential alternative. By the late 1920s, Southern California courtyard apartments were labeled by New York architect and housing expert Henry Wright as a “California Type”– essentially a complex constructed around an open patio. These projects were seen as regional variants of the “garden apartment,” a concept that Wright and others endorsed as a desirable solution to the cause of humane urban living.

Courtyard apartments were distinguished from their predecessors by their multi-story massing, which could more than double the number of units that could be accommodated on the same lot. Because of the unobtrusive manner in which courts merged with smaller and less socially active buildings, they were utilized extensively in spot development that did not disrupt the physical and social context of given neighborhoods. Also, courtyard apartments contained their residential units in a single building, or perhaps a mirrored pair of buildings, allowing for greater density than could be achieved with earlier bungalow courts, where units were freestanding.

Furthermore, unlike the relatively modest bungalow court, whose construction originally dominated the early development of multi-family housing in Southern California, the courtyard apartment of the 1920s was primarily designed for and marketed to somewhat more affluent residents.

The initial form of the courtyard apartment complex evolved from that of the bungalow court: one or two buildings, typically two stories in height, oriented around a central common area.

Examples of courtyard apartments constructed during the height of their development in the 1920s frequently featured a U-shaped plan, which is believed to account for some eighty percent of the known courtyard apartments in Los Angeles. Alternate arrangements included the similar double-L plan or the completely enclosed O-shaped plan.

Buildings could contain as few as four or as many as twenty units, sharing common walls. Few windows faced the street; instead, they were concentrated on the courtyard facades to provide more attractive views In the central open area of each building were one or more courtyards with fountains, and, often, luxuriant tropical plants in small private garden spaces. Today, examples of 1920s-1930s courtyard apartments can be found throughout the city, particularly in those neighborhoods that originally developed or saw rapid growth during this period. Most extant examples were designed in the Spanish Colonial Revival style, with other popular styles of the period represented in smaller numbers, including Mediterranean Revival, French Norman Revival, Tudor Revival, and Streamline Moderne. Known architects of these properties, in addition to those mentioned above, include C.S. Arganbright, Charles Gault, Arthur W. Larsen, Allen Ruoff, Milton R. Sutton, Frank M. Tyler, and Paul R. Williams.

The next evolution of the courtyard housing type occurred in the 1940s. Government regulations during and immediately after the War controlled price, size, financing, permits, and materials, which curbed the expression of earlier architectural forms and channeled building toward small houses and apartment houses. At the same time, the postwar population boom necessitated a sudden and substantial need for housing.

Developers of courtyard apartments during this period responded by moving away from the O- shaped plan and adopting the E-shape plan, which allowed for the construction of a greater number of units. Complexes also continued to exhibit the traditional U-shaped plan, but complexes now featured a central building entrance with common stairwells and interior corridors, rather than the former plan of individual entrances. Garages were no longer incorporated into the plan for the apartment complex itself but were detached from the building and frequently situated at the rear of the property. Styles, too, evolved during this period, away from the widely utilized Spanish Colonial Revival and other Exotic Revival styles popular during the 1920s. Postwar courtyard complexes frequently exhibited the more modern American Colonial Revival or Minimal Traditional styles.

The 1950s and 1960s marked another shift in the development of courtyard housing complexes. This period witnessed a new boom in apartment construction to accommodate the post-WWII population boom and mass migrations to California. Additionally, the extension of commercial corridors and connecting traffic arteries, which were zoned for multi-family residential development, opened large parcels of land for apartment construction. The resultant buildings tended to be larger than their 1920s or 1940s counterparts. In the postwar period, land values typically dictated higher densities, with building sometimes reaching three stories in height instead of just two, and frequently developed on two or more residential lots. Buildings still exhibited the typical O, U, or E-shaped plans – or paired L-shaped plans – oriented around a central common space. However, these spaces now frequently featured concrete patios and swimming pools.

While the better examples of these postwar courtyard complexes employed architects, most were builder designed. Buildings typically displayed modest interpretations of popular styles at the time, including most commonly Mid-Century Modern and the Traditional/California Ranch style. However, some builders embraced more exotic or fanciful motifs to persuade prospective renters away for its more prosaic neighbors. The Tiki or Polynesian style, for example, was used to evoke associations with vacations in a tropical paradise.

The popularity of courtyard housing as a multi-family dwelling type began to wane by the 1960s, due in part to the Height District Map adopted by the Los Angeles City Council in 1958. This gave rise to a new wave of high-rise multi-family residential development, a trend which continues to this day.

Architect Maxwell Maltzman

Max Maltzman was a noted Los Angeles architect and one of the first Jewish architects to open his own firm in Los Angeles. He was born in (present day Mykloaiv, Ukraine) on May 12, 1899. His family immigrated to Montreal, Canada, and a year later settled in Chelsea, Massachusetts. After serving in World War I, he returned to Boston and studied architecture. In 1921, he married Sadye Seltzer, and the couple had three children. In 1923, Maltzman became an American citizen and moved to Los Angeles shortly after. He opened his first office at 169 N. La Brea, and later moved to 704 S. Spring Street in downtown Los Angeles.

Over his many years of practice, Maltzman was responsible for designing a wide variety of buildings for commercial, residential, and institutional uses. These included single-family homes, multi-family residences, school buildings and retail stores. The majority of his designs exhibit the Art Deco or period revival styles that were popular during the period. Maltzman is remembered today for his design of several imposing apartment buildings. These include the Ravenswood Apartments (1930) at 570 Rossmore Avenue that is a designated Los Angeles Historic-Cultural Monument, and the Charmont Apartments in Santa Monica (1929) which is listed in the National Register of Historic

Places. Maltzman also designed the Jewish Home for the Aged (1929) at 325 S. Boyle Avenue and was the supervising architect for the Sahara Hotel and Casino (1952) in Las Vegas. Maltzman died in Los Angeles in 1971.

Historic Context: SurveyLA Context and Themes

Los Angeles' Citywide Historic Context Statement (HCS) was designed for use by SurveyLA field surveyors and by all agencies, organizations, and professionals completing historical resources surveys in the City. The context statement was organized using the Multiple Property Documentation (MPD) format developed by the National Park Service for use in nominating properties to the National Register. This format provided a consistent framework for evaluating historical resources. It was adapted for local use to evaluate the eligibility of properties for city, state, and federal designation programs. The HCS used Eligibility Standards to identify the character defining, associative features and integrity aspects a property must retain to be a significant example of a type within a defined theme. Eligibility Standards also indicated the general geographic location, area of significance, applicable criteria, and period of significance associated with that type. These Eligibility Standards are guidelines based on knowledge of known significant examples of property types; properties do not need to meet all of the Eligibility Standards in order to be eligible. Moreover, there are many variables to consider in assessing integrity depending on why a resource is significant under the National Register, California Register or City of Los Angeles HCM eligibility criteria. SurveyLA findings are subject to change over time as properties age, additional information is uncovered, and more detailed analyses are completed.

The Project Site was identified as eligible for listing in the California Register by the 2010 Hollywood CRA survey; the 2020 CRA survey update found the property not eligible for designation at the local, state, or federal level. Additional research conducted for this report confirmed and clarified the property's history and associations. Based on this additional research, the apartment complex at 1201 N. Gower Street is re-evaluated herein.

Utilizing the contexts and themes developed by SurveyLA, the Project Site was re-evaluated within the following context/theme/property type combination (CTP):

Courtyard Apartments

Context: Residential Development and Suburbanization, 1880-1980

Theme: Multi-Family Residential Development, 1895-1970

Subtheme: Courtyard Apartments, 1910-1969

Property Type: Residential - Multi-Family

Property Sub-type: 1940s Courtyard Apartment

Summary Statement of Significance: Courtyard apartments evaluated under this theme are significant in the area of Community Planning and Development. They represent an important multi-family building type that proliferated throughout the city during the first two-thirds of the twentieth century and reflect trends in urban planning to accommodate full and part time residents as well as tourists and other visitors. Many examples are also significant in the area of Architecture as excellent examples of their respective architectural styles. The courtyard apartment provided common open space and a connection to the outdoors not found in high- density multi-family housing types. Today, courtyard apartments throughout the city are threatened with demolition and replacement with large-scale apartment complexes.

Property Sub-type Significance: A 1940s courtyard apartment is significant for its association with residential development in Los Angeles as one of the region's dominant multi-family residential building types.

Period of Significance: 1910–1969

Period of Significance Justification: The period of significance begins in 1910, when substantial multi-family residential development begins in Los Angeles, and ends in 1969, as land values, parking requirements, and up-zoning necessitated higher residential densities.

Criteria: NR A/C; CR 1/3; Local 1/3

Areas of Significance: Community Planning and Development; Architecture

Associated Property Type: Residential – Multi-Family

Property Sub-type Description: The 1940s courtyard apartment is a multi-family residential property that is two stories in height and oriented around a central common area, such as a landscaped courtyard or patio, and constructed during the 1940s.

Eligibility Standards:

- Two stories in height
- An excellent example of the type
- Was constructed during the period of significance
- Represents an intact court plan from the period of construction

Character-Defining/Associative Features:

- Retains most of the essential character-defining features from the period of significance

- Generally U- or E-shaped plan; may be composed of two L-shaped buildings
- Building is oriented around a common outdoor area, typically a landscaped courtyard or patio
- Central building entrance, with common stairwells and interior corridors
- Detached garage(s) at the rear
- May also be significant as a good to excellent example of an architectural style from its period and/or the work of a significant architect
- Associated architectural styles may include, and not be limited to: American Colonial Revival and Minimal Traditional

Integrity Considerations:

- Should retain integrity of Location, Design, Materials, and Setting (must retain the relationship between the building and the courtyard or patio), and Feeling
- Some original materials may be altered or removed
- Replacement of some windows may be acceptable if the openings have not been changed or resized
- Security bars may have been added
- Original landscaping may have been altered or removed
- Surrounding buildings and land uses may have changed
- If it is a rare surviving example of its type, or is a rare example in the community in which it is located, a greater degree of alteration or fewer character-defining features may be acceptable
- Where this property type is situated within a grouping of multi-family residences, it may also be significant as a contributor to a multi-family residential district. A grouping may be composed of a single property type or a variety of types

Evaluation of Potential Historical Resources on the Project Site

The Project Site was identified as eligible for listing in the California Register by the 2010 Hollywood CRA survey, but was found not eligible for federal, state, or local designation in the 2020 CRA survey update. Additional research conducted for this report confirmed and clarified the site development and construction history of the property. Due to the 1941 construction date and its design by noted architect Maxwell Maltzman, the Project Site is re-evaluated herein. This analysis confirms the findings of the 2020 CRA survey update and finds that the property is not eligible for historic listing as outlined below.

Historic Resources Evaluation: 1201 N. Gower Street

Criterion A/1/1 (Association with Events or Patterns of Development)

According to guidance from the National Park Service, in order to be considered eligible for designation for representing a pattern of development:

> *…A property must be associated with one or more events important in the defined historic context. The event or trends, however, must clearly be important within the associated context: settlement, in the case of the town, or development of a maritime economy, in the case of the port city. Moreover, the property must have an important association with the event or historic trends, and it must retain historic integrity…Mere association with historic events or trends is not enough, in and of itself, to qualify under [this criterion]; the property's specific association must be considered important as well.*

As an apartment complex characteristic of the courtyard apartment property type, and more specifically the 1940s courtyard apartment sub-type, 1201 N. Gower Street is representative of an important multi-family building type that proliferated throughout the city during the first two-thirds of the twentieth century. It was constructed during the period of significance and displays many of the registration requirements and associated character-defining features necessary for eligibility. Thus, the Project Site is significant for its association with Community Planning and Development.

Integrity considerations are more problematic. The most important of these is the replacement of all the original windows during the 1980s with aluminum sliding windows. Constructed in 1941, original windows would almost certainly have been wood- or steel-frame, multi-light construction, and some combination of fixed, casement, or hung sash operation. As such, aluminum frame sliding windows from the 1980s cannot be considered "in-kind" replacements and are not compatible with the original design of the complex. Considering the Minimal Traditional character of the complex with very few architectural details, the loss of original windows throughout has substantially compromised integrity of Materials and Feeling reducing the ability of the complex to convey its historic significance.

Moreover, the Project Site is not a particularly rare surviving example of the property type such that a finding of eligibility despite the loss of all original windows might be justified.

Several courtyard apartment buildings were identified as eligible for historic listing by the 2020 CRA survey update. These include 1122-1132 N. Gower Street (1937-1938), 5405-5419 Fernwood Avenue (1939), 1406 N. Mansfield Avenue (1939), and 1749 N. Sycamore Avenue (1940). The 2020 CRA survey update also identified three multi-family residential historic districts that include courtyard apartments as contributing properties.43 In greater Hollywood (outside the CRA area), SurveyLA identified several multi-family districts containing contributing courtyard apartments. In addition, multiple courtyard apartment buildings were found eligible for historic listing by SurveyLA as either individually eligible properties or as contributors to a potential historic district throughout the City.

Due to the loss of integrity, the Project Site cannot be considered an excellent example of the property type despite retaining all five original buildings and associated landscaped

open spaces. For these reasons, the Project Site is not eligible for listing in the National Register, California Register, or as a Los Angeles HCM under criteria A/1/1.

Criterion B/2/2 (Association with an Important Person)

According to the National Park Service, properties may be eligible for an association with the lives of persons significant in our past. Persons "significant in our past" refers to individuals whose activities are demonstrably important within a local, state, or national historic context. A property is not eligible if its only justification for significance is that it was owned or used by a person who is a member of an identifiable profession, class, or social or ethnic group. In addition, the property must be associated with a person's productive life, reflecting the time period when he or she achieved significance.

No documentation was found to suggest that any former owner or occupant of the Project Site made significant lasting contributions demonstrably important to the social, political, institutional, artistic, professional, or commercial development within any local, state, or national historic context while occupying the building. Therefore, the Project Site is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles HCM under Criterion B/2/2.

Criterion C/3/3 (Example of a Style or Type, or Work of a Master)

According to guidance from the National Park Service, to be eligible under Criterion C/3/3, a building must clearly contain enough of the "distinctive characteristics" to be considered a true representative of the style or type. Buildings eligible for artistic merit must embody the distinctive characteristics or a type, period, or method of construction, and they must possess high artistic value. A building with some applied detailing is not eligible if the details are not fully integrated into the overall design.

The building was originally designed in 1941 in a Minimal Traditional style. The term "Minimal Traditional," references standards developed by the Federal Housing Administration during the 1930s for a "minimal house" that could provide basic living standards at costs affordable to the average wage earner. Minimal Traditional buildings generally adhere to traditional forms including rectangular plans and gabled roofs while applying a minimum of detailing to reference traditional architectural styles. As such, Minimal Traditional is not considered an architectural style that merits significance on its own. While many Minimal Traditional buildings have been identified as historically significant for other associations, they are not considered significant as an excellent example of a particular architectural style. Thus, the Project Site does not contain distinctive characteristics of a style and is not an excellent example of an architectural style.

The Project Site was designed by noted Los Angeles architect Maxwell Maltzman. The National Park Service defines a master architect as "a figure of generally recognized

greatness in a field." While not considered a "master architect," Maltzman was a skilled practitioner during his time and is responsible for several notable buildings that have been recognized for their architectural merit. These buildings, such as the Ravenswood Apartments in Los Angeles and the Charmont Apartments in Santa Monica were fully realized designs in recognizable Art Deco architectural styles. Other notable buildings designed by Maltzman also exhibit recognizable period revival architectural styles. The Project Site, executed in a stripped- down Minimal Traditional style, is a standard example of the courtyard apartment property type and does not display distinctive characteristics that distinguish it architecturally.

The Project Site does exhibit many of the associated character-defining features necessary for eligibility. These include the two-story massing of the residential buildings, the two U-shaped plan buildings oriented around a landscaped courtyard, and central building entrances with common stairwells and interior corridors. Thus, the Project Site is significant as a representative example of an important multi-family property type. However, as noted above, the Project Site has sustained a substantial loss of integrity due to the replacement of all the original windows with aluminum sliding windows and cannot be considered an excellent example of the courtyard apartment property type. It is also not a particularly rare surviving example of the property type such that a finding of eligibility despite the loss of integrity might be justified.

The Project Site is not an excellent or example of an architectural style or an excellent or unique example of a master architect or craftsman. The property is a significant example of the courtyard apartment property type but is not eligible for listing due to a substantial loss of integrity. Therefore, the Project Site is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles HCM under Criterion C/3/3.

Discussion of Potential Impacts

Direct Impacts

The Project includes the demolition of one of the U-shaped apartment buildings located at the center of the Gowen Garden Apartment Complex and the two one-story parking garages located at the north end of the complex. These buildings would be replaced by a new six-story apartment building and parking structure. The two remaining existing apartment buildings will be renovated and re-styled to match the architectural style of the new construction. None of the buildings located on the Project Site are eligible for listing as historic resources and are not considered historical resources for the purposes of CEQA. Because all demolition and new construction associated with the Project would take place on the Project Site, the Project would not demolish, alter, relocate, or convert any historical resources. Therefore, the Project's direct impacts to historical resources would be less than significant.

Indirect Impacts

Because no historical resources are located on the Project Site the analysis of potential impacts to historical resources is concerned with those resources located in the near vicinity of the Project Site. Due to the relative scope of construction associated with the proposed Project, those parcels which may be reasonably foreseen to be potentially impacted by the proposed Project due to their proximity to the Project Site in the "near vicinity" are defined as those historical resources generally located immediately adjacent to or directly across the street from the Project Site. As noted above, only one historical resource, the YWCA Hollywood Studio Club at 1213-1255 Lodi Place, is located in the near vicinity of the Project Site, directly west across Lodi Place. The Project does not include the demolition, relocation, rehabilitation, alteration, or conversion of the Hollywood Studio Club building which would remain unchanged and in its original location after implementation of the Project and continue to convey its historic significance.

As proposed, the Project would not destroy historic materials, features, or spatial relationships that characterize the YWCA Hollywood Studio Club building. Consequently, as explained below, the Project would not affect the integrity of location, design, materials, workmanship, feeling, or association of the Hollywood Studio Club building.

- The Hollywood Studio Club building would remain intact in its original location and would therefore retain integrity of location.
- The essential physical features reflecting the Hollywood Studio Club building's original design, including the building's original plan, form, two- and three-story height, and complex massing, would remain intact, and therefore the Hollywood Studio Club building would continue to retain integrity of design.
- The Hollywood Studio Club building would also continue to retain all of the character-defining features associated with its original construction, arched window and entrance openings, clay tile roof, cement plaster cladding, coins, wood-frame windows, and recessed and projecting balconies. As the building is largely intact and retains a majority of these original construction materials, it would therefore continue to retain integrity of materials.
- The Hollywood Studio Club would continue to retain the physical evidence of period construction techniques, including original finishes and design elements that reflect the character and identity of the building as a 1920s Mediterranean Revival-style municipal Hollywood Studio Club, and would therefore retain integrity of workmanship.
- As the Hollywood Studio Club would continue to retain a majority of the character-defining features associated with its original construction, it would continue to convey the original aesthetic and historic sense of the building as an intact branch

YWCA residence building dating from the 1920s. Therefore, the building would continue to retain integrity of feeling.

- Because the Hollywood Studio Club would retain integrity of location, design, materials, workmanship, and feeling, it would continue to convey its historic character and identity as a Julia Morgan designed Mediterranean Revival-style YWCA building from the 1920s, constructed specifically to house young women interested in careers in the motion picture industry following implementation of the proposed Project. Therefore, integrity of association would also remain unaffected by the Project.

The only aspect of integrity that could potentially be affected by the Project is integrity of setting. Setting features important to the significance of the include the street and sidewalk along Lexington Avenue and Lodi Place thT would remain intact. The majority of the parcels surrounding the Hollywood Studio Club building have been improved with multi-family residences in the years and decades after to the Hollywood Studio Club building's construction, and the area has remained largely residential in character. More importantly, the buildings on the Project Site directly across from the Hollywood Studio Club building (the U-shaped apartment building facing west and the rectangular apartment building at the south end of the Project Site) would be superficially altered on their exteriors but would retain their location, massing, form and size and continue to be used for residential purposes. New construction associated with the Project would be located across Lodi Place and behind the existing buildings located on the Project Site that face Lodi Place and Lexington Avenue. As such, the historic setting of the Hollywood Studio Club building would not be substantially altered and the Hollywood Studio Club would retain integrity of setting after implementation of the Project.

As an important example of Mediterranean Revival-style institutional architecture dating from the 1920s in Hollywood, the building's associative qualities make it essential that important views showcasing its historic character and identity as Mediterranean Revival-style residence building be maintained so that the building continues to remain visible and understood. As the building occupies the northwestern corner lot at the intersection of Lexington Avenue and Lodi Place, important views include the view of the building looking north from Lexington Avenue, and the view of the building looking west from Lodi Place. New construction associated with the Project would be constructed to the north and east of the Hollywood Studio Club building, and thus would not obscure views of the property from Lexington Avenue or Lodi Place.

New construction associated with the Project would include substantial foundation work and the construction of subterranean parking. However, there is little potential for these activities to cause damage to the Hollywood Studio Club building due to vibration or settlement given the Hollywood Studio Club's location across the street from the Project Site, and the concentration of excavation and construction activity at the west and north of the Project Site which further distances it from the Hollywood Studio Club building. As

is common in similar urban development sites, vibration and settlement would be controlled through adherence to values prescribed by the shoring engineer and geotechnical engineer with the intent to prevent damage to adjacent structures, and through monitoring of associated construction activities. In addition, noise and vibration would be analyzed prior to implementation of the Project and the estimated vibration velocity levels from all construction equipment would be kept well below the building damage significance threshold for the Hollywood Studio Club building. Therefore, the Project would not result in a substantial adverse change in the significance of Hollywood Studio Club building as defined by CEQA, and therefore would not result in a significant effect on the environment.

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

Less Than Significant With Mitigation Incorporated. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. The South Central Coast Information Center (SCCIC) conducted a records search for the Project Site and a half-mile radius around the site.[24] The search did not identify any known prehistoric or historic resources on the Project Site. Given that resources are known to existing in the Project Site area, it is possible that unknown archaeological resources could exist at the Project Site, and the potential exists for the inadvertent discovery of archaeological materials during ground-disturbing activities associated with the construction phase. However, implementation of Mitigation Measure CULT-1 (listed below) would ensure that potential impacts related to unknown archaeological resources would be less than significant.

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

Less Than Significant Impact. The Project Site is located within an urbanized area of the City and has been subject to grading and development in the past. No known human remains exist at the Project Site. In the event that unknown human remains were encountered at the site, the Applicant would be required to comply with the State's Health and Safety Code Section 7050.5, which provides that in the event of discovery or recognition of any human remains at the Project Sites, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations

[24] *South Central Coastal Information Center, Stacy St. James, correspondence, November 15, 2022. Refer to Appendix C.*

concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission (NAHC). Through compliance with existing regulatory standards, Project impacts on human remains would be less than significant.

Mitigation Measures

To ensure Project impacts related to unknown archaeological resources, the following mitigation measure is required:

CULT-1: Inadvertent Discovery of Archaeological Resources

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

    SCCIC Department of Anthropology
    McCarthy Hall 477
    CSU Fullerton
    800 North State College Boulevard
    Fullerton, CA 92834

- Prior to the issuance of any building permit, the Project Applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.

- A covenant and agreement binding the Project Applicant to this condition shall be recorded prior to the issuance of a grading permit.

Cumulative Impacts

As discussed above, the Project would not result in impacts to any significant historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historical resources. Impacts related to archaeological resources and human remains are site-specific and are assessed on a site-by-site basis. All development that involves ground-disturbing activities is required to implement mitigation measures similar to Mitigation Measure CULT-1 identified above for the Project, as well as existing state and City regulations related to discovery of human remains. For these reasons, cumulative impacts related to cultural resources would be less than significant.

VI. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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) Would the project result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. Refer to response to Checklist Question VI(b) below.

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

Less Than Significant Impact. Checklist Questions VI(a) and VI(b) are addressed together, because responses to both questions are linked. This analysis addresses the six criteria outlined in Appendix F of the CEQA Guidelines.

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

Construction

Electricity Demand

Project construction activities would consume relatively minor quantities of electricity to provide temporary power for lighting electronic equipment inside temporary construction trailers and within the proposed structure. This electricity would be supplied to the Project Site by the Los Angeles Department of Water and Power (LADWP) and would be obtained from the existing electrical infrastructure on Gower Street and Lexington Avenue.

Electricity consumed during Project construction would be temporary and would cease upon the completion of construction, as well as vary, depending on site-specific

operations and the amount of construction occurring at any given time. Overall, construction activities associated with the Project would require limited electricity supply that would not have an adverse impact on available electricity supplies. Therefore, electricity impacts during construction would be less than significant.

Transportation Energy Demand

As shown in Table VI-1, Project construction would consume approximately 47,992 gallons of gasoline and 36,530 gallons of diesel. Project construction is expected to be completed in 2025.

Table VI-1
Summary of Fuel Use During Project Construction[1]

Fuel Type	Quantity
Gasoline	
On-Road Construction Equipment	47,992 gallons
Off-Road Construction Equipment	0 gallons[2]
Total Gasoline	***47,992 gallons***
Diesel	
On-Road Construction Equipment	20,728 gallons
Off-Road Construction Equipment	15,803 gallons
Total Diesel	***36,530 gallons***
Total Petroleum-Based Fuel	**84,523 gallons**

[1] *Detailed calculations are included in Appendix D.*
[2] *Off-road construction equipment uses diesel fuel.*

Demolition activities are projected to take approximately one month. Heavy-duty construction equipment needed to complete these activities would include diesel-fueled haul trucks, concrete/industrial saw, generator sets, and a rubber-tired dozer. The use of haul trucks with double trailers could be used to increase the overall average capacity per trip, which would minimize the total number of trips and fuel required to transport the debris.

Heavy-duty construction equipment needed during construction of the Project that would use diesel fuel includes a crane, forklift, and tractors/loaders/backhoes. Construction equipment fuels would be provided by local or regional suppliers and vendors.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on EMFAC data compiled by CARB, the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) in 2021 was 23.09 miles per gallon (mpg) for gasoline and 8.05 mpg for

diesel.[25]

While construction activities would consume petroleum-based fuels, consumption of such resources would be temporary and cease upon the completion of construction. Therefore, construction-related impacts to petroleum fuel consumption would be less than significant.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h)) to reduce NO_X, PM_{10}, and $PM_{2.5}$ emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023.[26]

In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014, and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets.

Compliance with the above anti-idling and emissions regulations would result in the efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would the use of haul trucks with larger capacities.

Operation

Electricity Demand

Currently, LADWP is able to supply over 8,009 megawatts (MW) of generation capacity

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25 *CARB, https://arb.ca.gov/emfac/emissions-inventory.*

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

with the highest recorded peak being 6,502 MW.[27] Estimated peak demand in 2025-2026 (Project buildout year is 2025) is expected to grow to 6,076 MW.[28] Despite these growth projections, demand would still not exceed the existing capacity of 8,009 MW. Thus, there is adequate supply capacity to serve the Project, as it is projected that approximately 257,701 kilowatt hours per year (KWh/yr) of electricity would be used per year at the Project Site.[29] Electrical conduits, wiring, and associated infrastructure would be conveyed to the Project Site from existing LADWP lines that connect to the Project Site from just north of the Project Site and along Lexington Avenue.

LADWP has confirmed that existing electrical service is available to the Project Site and would be provided to the Project in accordance with LADWP's rules and regulations.[30] LADWP has also confirmed that the Project's estimated electricity requirements are part of the City's total load growth forecast and have been taken into account in the planned growth of the power system.[31]

The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP and what exists currently at the Project Site for the existing uses. The Project would comply with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards and would also comply with the City's Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[32] Based on the above analysis, a less than significant impact associated with the consumption of electricity would occur.

Natural Gas Demand

The Project would consume approximately 1,630,282 cubic feet of natural gas per year. Natural gas is provided to the Project Site by Southern California Gas Company (SoCalGas).[33] Natural gas service would be provided in accordance with the SoCalGas's policies and extension rules on file with the California Public Utilities Commission (CPUC) at the time contractual agreements are made.

The availability of natural gas is based on current conditions of gas supply and regulatory policies. As a public utility, SoCalGas is under the jurisdiction of the CPUC but can also be affected by actions of federal regulatory agencies. Should these agencies take any action that affects gas supply or the conditions under which service is available, gas

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27 *LADWP, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=12do6zwhm2_4&_afrLoop=86275907941327, accessed September 2022.*

28 *Source: 2017 Power Strategic Long-Term Resource Plan, December 2017.*

29 *Refer to page 20 in Appendix B.*

30 *LADWP, Marco Maldonado, District Engineer, Metro West Service Planning, Will Serve Letter, June 17, 2022. Refer to Appendix D.*

31 *Ibid.*

32 *LADWP Rules Governing Water and Electric Service: http://netinfo.ladbs.org/ladbsec.nsf/d3450fd072c7344c882564e5005d0db4/0476e63f972b28e288256b79007c417d/$FILE/Rule%2016-d.pdf.*

33 *Refer to page 20 in Appendix B.*

service would be provided in accordance with those revised conditions.

Gas supply available to SoCalGas from California sources averaged 69 million cubic feet per day (cf/day) in 2019.[34] SoCalGas projects total natural gas demand to decrease at an annual rate of 1.1 percent per year through 2035. This decrease is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, tighter standards created by revised Title 24 codes and standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with natural gas consumption becoming more efficient and decreasing, SoCalGas's projection for natural gas demand also decreases. SoCalGas's storage fields have a combined theoretical storage working inventory capacity of 130 billion cubic feet. The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service.

The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. The Project would not result in the construction of natural gas facilities (i.e., distribution lines) that would cause significant environmental impacts. As such, a less than significant impact to natural gas infrastructure would occur.

Project operation would result in the irreversible consumption of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in compliance with the City's Green Building Code, which requires building energy efficiency measures. Therefore, Project impacts related to natural gas supply would be less than significant.

Transportation Energy Demand

The Project includes the infill development of multi-family residential uses near existing sources of employment, shopping, entertainment, and transit all of which would minimize the use of transportation energy.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Sites would reduce the Project's consumption of gasoline and diesel. In addition, the

[34] *2022 California Gas Report, California Gas and Electric Utilities, 2021.*

Project would include EV chargers and EV-ready parking spaces. With compliance with regulatory measures, the Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

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

Electricity

The availability of electricity is dependent on adequate generating capacity and adequate fuel supplies. The estimated power requirement for the Project would be part of the total load growth forecast for the City and has been taken into account in the planned growth of the City's power system. The LADWP's load growth forecast incorporates construction activity and is built into the commercial floor space model. In planning sufficient future resources, the LADWP's *2017 Power Strategic Long-Term Resource Plan* (2017 SLTRP) incorporates the estimated power requirement for the Project through the load forecast input and has planned sufficient resources to supply the electricity needs. Based on LADWP's 2017 SLTRP, LADWP forecasts that its total energy sales in the 2025-2026 fiscal year (Project buildout) would be 23,537 gigawatt-hours (GWh) of electricity.[35] As discussed previously, the Project would consume approximately 257,701 kWh of electricity annually, representing a small fraction of one percent of LADWP's projected sales for that year. As future projected electricity supplies from LADWP are adequate to serve the Project, Project impacts on local and regional electricity supplies would be less than significant.

Natural Gas

As stated above, SoCalGas has a combined theoretical storage working inventory capacity of 130 billion cf allocated to residential, small industrial, and commercial customers.[36] In 2025 (Project buildout year), SoCalGas is anticipated to have a natural gas supply of approximately 3,775 million cf/day. Since the Project is located in an area already served by existing natural gas infrastructure, the Project would not require extensive infrastructure improvement to serve the Project Site. It is not anticipated that any new natural gas distribution pipelines or infrastructure facilities would be constructed or expanded as a result of the Project. However, the Project would require Project-specific infrastructure improvements to connect to the existing infrastructure serving the Project Site area.

As discussed previously, the Project's net natural gas demands are estimated to be approximately 1,630,282 cubic feet per year and would represent a very small fraction of one percent of the SoCalGas's existing natural gas storage capacity. Thus, the Project's estimated natural gas consumption would be within the SoCalGas's existing natural gas

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35 *2017 Power Strategic Long-Term Resource Plan, LADWP, December 2017.*

36 *2022 California Gas Report, California Gas and Electric Utilities, 2021.*

storage capacity of 69 billion cubic feet as of 2021. Therefore, Project's impacts on local and regional natural gas supplies would be less than significant.

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

As discussed above, the Project's demand for electricity and natural gas supply would be well within the available regional supplies of LADWP and SoCalGas, respectively. The Project's energy demand and consumption would be relatively negligible compared to available supplies. The Project's demand for electricity and natural gas would have a less than significant impact on the peak and base period demands of LADWP and SoCalGas, respectively.

Criterion 4: *The degree to which the project complies with existing energy standards.*

The proposed Project would be required to comply with Title 24 requirements, CalGreen requirements, and the City's Green Building Code. Additionally, vehicles used by Project residents would be subject to improving fuel-energy standards, including improved engine combustion and the use of electric vehicles. Thus, the Project would comply with energy standards, and impacts would be less than significant.

Criterion 5: *The effects of the project on energy resources.*

Electricity

LADWP's electricity generation is supplied from a variety of non-renewable and renewable sources, such as coal, natural gas, solar, geothermal, wind, and hydropower. Based on LADWP's 2017 SLTRP and as stated previously, LADWP forecasts that its total energy sales in the 2025-2026 fiscal year (Project buildout year) would be 23,537 GWh of electricity. As such, the Project's estimated net annual usage demand of 257,701 kWh would be a small fraction of one percent of LADWP's projected sales for the 2025-2026 fiscal year.

In accordance with Senate Bill 350 (SB 350) (Clean Energy and Pollution Reduction Act), which establishes clean energy, clean air, and GHG emissions reduction goals, LADWP is required to procure eligible renewable energy resources of 50 percent by 2030. According to the 2017 SLTRP, LADWP has increased renewable energy percentage from 3 percent to 29 percent from 2003 to 2016. LADWP's future strategy is pursuing higher renewables, energy efficiency, and future electrification of existing fossil fuel processes. It is expected that solar and wind will provide most of the new renewable electric generation in the years ahead.

Overall, the Project would adhere to the required building code standards, such as the current Title 24 standards and the City's Green Building Code, to ensure energy efficiency within the Project building. Compliance with energy standards is expected to result in

more efficient use of electricity in future years. As such, the Project would not impact electricity resources, and impacts would be less than significant.

Natural Gas

Sources of Southern California's natural gas are primarily obtained from the western United States and Canada with a small portion from in-state. As stated, in the *2021 California Gas Report*, SoCalGas's storage fields attain a combined theoretical storage working inventory capacity of 130 billion cf. The Project's demand for natural gas supply is estimated to be approximately 1,630,282 cubic feet per year, which would represent a very small fraction of one percent of the SoCalGas's existing natural gas storage capacity and thus, would be well within the SoCalGas's existing natural gas storage capacity of 69 billion cubic feet as of 2021. Compliance with energy standards is expected to result in more efficient use of natural gas in future years. Therefore, the Project would not impact natural gas resources, and impacts would be less than significant.

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

Approximately 0.15 billion barrels of oil were supplied to California refineries in 2021.[37] Assuming that oil supplies remain constant, the Project's estimated consumption of approximately 21,261 gallons of gasoline and 6,031 gallons of diesel fuel per year (refer to Appendix D) would be a small fraction of one percent of total fuel supplies. This estimate is conservative since it is assumed that California's future reliance on oil would be reduced since vehicles are transitioning to alternative fuels, such as electric-fueled vehicles.

The Project includes the infill development of multi-family residential uses near existing sources of employment, shopping, entertainment, and transit all of which would minimize the use of transportation energy. As such, the Project's transportation energy consumption would have a negligible impact to California's oil supplies and impacts on energy resources would be less than significant.

Renewable Energy Discussion

The use of off- or on-site renewable energy resources to meet the Project's operational demands would be constrained by the energy portfolio mix managed by LADWP and limitations on the availability or feasibility of on-site energy generation. LADWP is required to commit to the use of renewable energy sources for compliance with the California Renewable Energy Resources Act, as defined in its 2013 Renewables Portfolio Standard Policy and Enforcement Program. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020

[37] *California Energy Commission, Oil Supply Sources to California Refineries, https://www.energy.ca.gov/data-reports/energy-almanac/californias-petroleum-market/oil-supply-sources-california-refineries, July 2022.*

through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources are defined in the 2013 Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30 MW or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and "other renewables that may be defined later."[38]

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

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

> 99.04.211.4. Solar Ready Buildings [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid after the effective date of the 2013 California Energy Code (Title 24, Part 6) shall comply with the following:
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> 1. All one- and two-family dwellings, shall comply with Section 110.10(b)1A, 110.10(b)2, 110.10(b)3, 110.10(b)4, 110.10(c), 110.10(d) and 110.10(e) of the California Energy Code (Title 24, Part 6).
>
> 2. All buildings, other than one- and two-family dwellings, shall comply with Section 110.10(b) through 110.10(d) of the California Energy Code (Title 24, Part 6).
>
> 99.04.211.5. Space for Future Electrical Solar System Installation [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid prior to the effective date of the 2013 California Energy Code (Title 24, Part 6), shall provide a minimum of 250 square feet of contiguous unobstructed roof area for the installation of future solar photovoltaic or other

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

electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

Finally, solar and wind power represent variable-energy, or intermittent, resources that are generally used to augment, but not replace, natural gas-fired energy power generation, since reliability of energy availability and transmission is necessary to meet demand, which is constant. Wind-powered energy is not viable on the Project Sites due to the lack of sufficient wind in the Los Angeles basin. The California Energy Commission (CEC) studied the state's high wind resource potential.[39] Based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential. Wind resource areas with winds above 12 mph within Los Angeles County are located in relatively remote areas in the northwestern portion of the County. Additionally, there are no viable sites within the Project Site for placement and operation of a wind turbine. The CEC has identified areas within the State with high potential for viable solar, wind, and geothermal energy production. The CEC rated California's solar potential by county using insolation values available to typical photovoltaic system configurations, as provided by the National Renewable Energy Laboratory. Although Los Angeles County has a relatively high photovoltaic potential of 3,912,346 megawatt-hours per day (MWh)/day, inland counties such as Inyo (10,047,177 MWh/day), Riverside (7,811,694 MWh/day), and San Bernardino (25,338,276 MWh/day) are more suitable for large-scale solar power generation.[40] In addition, most of the high potential areas of greater than 6 KWh per square mile per day in Los Angeles County are concentrated in the northeastern corner of the county around Lancaster, approximately 67 miles northeast of the Project Site.

Conclusion

As discussed above, the Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Therefore, impacts related to energy would be less than significant.

Cumulative Impacts

Electricity

The Project, in conjunction with the related projects, could result in a net increased demand for electricity supplies. LADWP's 2017 SLTRP serves as a comprehensive 20-year plan to supply reliable electricity to the City in an environmentally responsible and cost effective manner. The 2017 SLTRP considers a 20-year planning horizon to guide

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39 *California Energy Commission. California Wind Resource Potential, http://www.energy.ca.gov/maps/renewable/Wind_Potential.pdf.*

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

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

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

Natural Gas

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

Transportation Energy

The Project, in conjunction with the related projects, could result in a net increased demand for transportation energy. As discussed in more detail under Checklist Topic VIII (Greenhouse Gas Emissions), the 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. Also, all of the related projects are located in a transit-rich area of the City and as such, provide opportunities for alternative sources of transportation. Thus, cumulative development would not result in related to potentially significant environmental impacts due to wasteful, inefficient ,and unnecessary use of transportation energy. Therefore, cumulative impacts related to transportation energy would be less than significant.

VII. GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii. Strong seismic ground shaking?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv. Landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d. Be located on expansive soil, as defined on 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 information and analysis provided below are primarily based on the following (refer to Appendix E):

- *Geotechnical Engineering Exploration, Irvine Geotechnical Inc., November 30, 2021.*
- *Natural History Museum of Los Angeles County, Alyssa Bell, Ph.D., correspondence, July 24, 2022.*

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

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

No Impact. The Project Site is not located within an Alquist-Priolo Earthquake Fault Zone, and no known faults exist on the Project Site.[41] The fault closest to the Project Site is the Newport-Inglewood Fault Zone, located approximately 3.4 kilometers from the Project Site.[42] Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault on the Project Site. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. Given the Project Site's location in a seismically active region, the Project Site could experience seismic groundshaking in the event of an earthquake. The fault closest to the Project Site is the Hollywood, located approximately 1.68 kilometers from the Project Site.[43] Notwithstanding, the Applicant would be required to design and construct the Project in conformance to the most recently adopted LAMC and applicable recommendations made in the *Geotechnical Engineering Exploration* prepared for the Project, dated November 30, 2021, and any updates made in a final geotechnical report. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life during an earthquake event. The Project would not exacerbate the existing potential for strong

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41 *Geotechnical Engineering Exploration, Irvine Geotechnical Inc., November 30, 2021. Refer to Appendix E.*
42 *Ibid.*
43 *ZIMAS, accessed July 10, 2022.*

seismic ground shaking. Therefore, Project impacts related to groundshaking would be less than significant.

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

No Impact. According to the *Geotechnical Engineering Exploration* prepared for the Project, the Project Site is not located within a State of California Seismic Hazard Zone area that is subject to liquefaction or earthquake-induced ground deformation. Notwithstanding, the Applicant would be required to design and construct the Project in conformance to the most recently adopted LAMC and applicable recommendations made in the *Geotechnical Engineering Exploration* prepared for the Project, dated November 30, 2021, and any updates made in a final geotechnical report. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life during an earthquake event. The Project would not exacerbate the existing potential for ground failure, including liquefaction. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. Based on the relatively flat nature of the Project Site and review of the geologic literature pertinent to the site, there are no indications of landslides close to or within the limits of the site. Thus, the Project would not directly or indirectly cause substantial adverse effects, including the risk of loss, injury, or death involving landslides. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. During the Project's construction phase, soil would be exposed. However, the Applicant would be required to implement SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site. Also, the Applicant would be required to prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to any ground-disturbing activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber

rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if ground-disturbing activities occur during a rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during ground-disturbing activities.

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

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

No Impact. As discussed in response to Checklist Question VII(a)(iii) (Geology and Soils – Liquefaction), the Project Site is not in an area subject to liquefaction or potential ground failure. Notwithstanding, the Applicant would be required to design and construct the Project in conformance to the most recently adopted LAMC and applicable recommendations made in the *Geotechnical Engineering Exploration* prepared for the Project, dated November 30, 2021, and any updates made in a final geotechnical report. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life during an earthquake event. The Project would not exacerbate the existing potential for geologic instability. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. The *Geotechnical Engineering Exploration* prepared for the Project (refer to Appendix E) noted that based on subsurface conditions and reported geologic conditions at the Project Site, soils at the site are expansive. The Applicant would be required to design and construct the Project in conformance to the most recently adopted LAMC and applicable recommendations made in the *Geotechnical Engineering Exploration* prepared for the Project, dated November 30, 2021, and any updates made in a final geotechnical report. Conformance with the City's current Building Code requirements would minimize the potential for structural failure, injury, and loss of life

during an earthquake event. The Project would not exacerbate the existing potential for risk associated with expansive soils. Therefore, Project impacts related to expansive soils would be less than significant.

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

No Impact. The Project would connect to the City's existing sewer system and would not require the use of septic tanks or alternative wastewater disposal systems. Thus, the Project would not result in any impacts related to soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. The Project Site, located in an urbanized area, has been previously disturbed by past development activities and is currently developed with surface parking areas and the foundation of a previous restaurant. According to a records search conducted by the Los Angeles County Museum of Natural History, there are no known paleontological resources present within the Project Site boundaries, although there are known resources within the general Project Site area.[44] Although the Project Site has been developed and redeveloped over the decades, disturbing the soil at the site, and no paleontological resources are known to exist at the site, it is possible that unknown paleontological resources could exist at the site and could be encountered during the Project's grading and excavation phases. However, implementation of Mitigation Measure PALEO-1 would ensure the protection of any resources encountered, and Project impacts related to paleontological resources would be less than significant.

Mitigation Measures

To ensure that Project impacts related to unknown paleontological resources would be less than significant, the following mitigation measure is required:

GEO-1 If paleontological resources are encountered, the Applicant would be required to notify the Building Safety Division 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

44 *Natural History Museum of Los Angeles County, Alyssa Bell, Ph.D., correspondence, July 24, 2022. Refer to Appendix E.*

required. The found deposits would be treated in accordance with federal, state, and local guidelines, including those set forth in PRC Section 5097.5.

Cumulative Impacts

Geotechnical impacts related to future development in the City involve hazards related to site-specific soil conditions, erosion, and ground-shaking during earthquakes. The impacts on each site are specific to that site and its users and would not be in common or contribute to (or shared with, in an additive sense) the impacts on other sites. In addition, development on each site is subject to uniform site development and construction standards that are designed to protect public safety. Therefore, cumulative geotechnical impacts related would be less than significant.

VIII. GREENHOUSE GAS EMISSIONS

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

The analysis provided below is primarily based on technical data prepared by DKA (refer to Appendix F).

Environmental Setting

Climate Change Background

Global climate change refers to changes in average climatic conditions on Earth as a whole, including changes in temperature, wind patterns, precipitation, and storms. Global warming, a related concept, is the observed increase in average temperature of Earth's surface and atmosphere. One identified cause of global warming is an increase of GHG emissions in the atmosphere. GHG emissions are those compounds in Earth's atmosphere that play a critical role in determining Earth's surface temperature.

Earth's natural warming process is known as the "greenhouse effect." It is called the greenhouse effect because Earth and the atmosphere surrounding it are similar to a greenhouse with glass panes in that the glass allows solar radiation (sunlight) into Earth's atmosphere but prevents radiative heat from escaping, thus warming Earth's atmosphere. Some levels of GHG emissions keep the average surface temperature of Earth close to a hospitable 60 degrees Fahrenheit. However, it is believed that excessive concentrations of anthropogenic GHG emissions in the atmosphere can result in increased global mean temperatures, with associated adverse climatic and ecological consequences.

GHG Emissions Background

GHG emissions include CO_2, methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3).[45] Carbon dioxide is the most abundant GHG. Other GHG emissions are less

[45] *As defined by California Assembly Bill (AB) 32 and Senate Bill (SB) 104.*

abundant but have greater global warming potential than CO_2. Thus, emissions of other GHGs are frequently expressed in their equivalent mass of CO_2, denoted as CO_2e. Forest fires, decomposition, industrial processes, landfills, and the consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

Regulatory Framework

In response to growing scientific and political concern with global climate change, federal and state entities have adopted a series of laws to reduce emissions of GHG emissions to the atmosphere.

Federal Clean Air Act

The U.S. Supreme Court ruled in *Massachusetts v. Environmental Protection Agency*, 127 S.Ct. 1438 (2007), that CO_2 and other GHG emissions are pollutants under the federal CAA, which the USEPA must regulate if it determines they pose an endangerment to public health or welfare. The U.S. Supreme Court did not mandate that the USEPA enact regulations to reduce GHG emissions. Instead, the Court found that the USEPA could avoid taking action if it found that GHG emissions do not contribute to climate change or if it offered a "reasonable explanation" for not determining that GHG emissions contribute to climate change.

On April 17, 2009, the USEPA issued a proposed finding that GHG emissions contribute to air pollution that may endanger public health or welfare. On April 24, 2009, the proposed rule was published in the Federal Register under Docket ID No. EPA-HQ-OAR-2009-0171. The USEPA stated that high atmospheric levels of GHG emissions "are the unambiguous result of human emissions and are very likely the cause of the observed increase in average temperatures and other climatic changes." The USEPA further found that "atmospheric concentrations of greenhouse gases endanger public health and welfare within the meaning of Section 202 of the Clean Air Act." The findings were signed by the USEPA Administrator on December 7, 2009. The final findings were published in the Federal Register on December 15, 2009. The final rule was effective on January 14, 2010.[46] While these findings alone do not impose any requirements on industry or other entities, this action is a prerequisite to regulatory actions by the USEPA, including, but not limited to, GHG emissions standards for light-duty vehicles.

On April 4, 2012, the USEPA published a proposed rule to establish, for the first time, a new source performance standard for GHG emissions. Under the proposed rule, new fossil fuel–fired electric generating units larger than 25 megawatts (MW) are required to limit emissions to 1,000 pounds of CO_2 per MW-hour (CO_2/MWh) on an average annual basis, subject to certain exceptions. Subsequently, on April 23, 2018, the USEPA issued

[46] *USEPA, Endangerment and Cause or Contribute Findings for Greenhouse Gases Under Section 202(a) of the Clean Air Act, Final Rule.*

a policy stating that CO_2 emissions from biomass-fired and other biogenic sources would be considered carbon neutral when used for energy production at stationary sources.

On April 17, 2012, the USEPA issued emission rules for oil production and natural gas production and processing operations, which are required by the CAA under Title 40 of the Code of Federal Regulations, Parts 60 and 63. The final rules include the first federal air standards for natural gas wells that are hydraulically fractured, along with requirements for several other sources of pollution in the oil and gas industry that currently are not regulated at the federal level.[47]

Corporate Average Fuel Economy (CAFE) Standards

In response to the *Massachusetts v. Environmental Protection Agency* ruling, the George W. Bush Administration issued Executive Order 13432 in 2007, directing the USEPA, the United States Department of Transportation (USDOT), and the United States Department of Energy (USDOE) to establish regulations that reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008. In 2009, the National Highway Traffic Safety Administration (NHTSA) issued a final rule regulating fuel efficiency for and GHG emissions from cars and light-duty trucks for model year 2011; in 2010, the USEPA and the NHTSA issued a final rule regulating cars and light-duty trucks for model years 2012–2016.

In 2010, President Obama issued a memorandum directing the USEPA, USDOT, USDOE, and NHTSA to establish additional standards regarding fuel efficiency and GHG emissions reduction, clean fuels, and advanced vehicle infrastructure. In response to this directive, the USEPA and NHTSA proposed stringent, coordinated federal GHG emissions and fuel economy standards for model years 2017–2025 light-duty vehicles. The proposed standards are projected to achieve 163 grams/mile of CO_2 in model year 2025, on an average industry fleet-wide basis, which is equivalent to 54.5 miles per gallon (mpg) if the standards were achieved solely through fuel efficiency. The final rule was adopted in 2012 for model years 2017–2021. In March 2020, NHTSA and USEPA adopted new less stringent standards covering model years 2021 through 2026.

In addition to the regulations applicable to cars and light-duty trucks described above, in 2011 the USEPA and the NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks for model years 2014–2018. The standards for CO_2 emissions and fuel consumption are tailored to three main vehicle categories: combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles.

[47] *USEPA, 2012 Final Rules for Oil and Natural Gas Industry, April 17, 2012, https://www.epa.gov/controlling-air-pollution-oil-and-natural-gas-industry/2012-final-rules-oil-and-natural-gas-industry, accessed April 2020.*

According to the USEPA, this regulatory program would reduce GHG emissions and fuel consumption for the affected vehicles by 6 to 23 percent over the 2010 baselines.[48]

Building on the success of the first phase of standards, in August 2016, the USEPA and the NHTSA finalized Phase 2 standards for medium and heavy-duty vehicles through model year 2027 that will improve fuel efficiency and cut carbon pollution. The Phase 2 standards were to lower CO_2 emissions by approximately 1.1 billion metric tons and save vehicle owners fuel costs of about $170 billion.[49] On August 10, 2021, NHTA proposed new CAFE standards for 2024-2026 that would increase the stringency of standards by 8 percent per year rather than the previous 1.5 percent.

On September 19, 2019, the U.S. Department of Transportation's National Highway Traffic Safety Administration (NHTSA) and USEPA issued a final action entitled the "One National Program Rules" to enable the federal government to provide nationwide uniform fuel economy and greenhouse gas (GHG) emission standards for automobile and light duty trucks. This action finalizes the Safe Affordable Fuel Efficient (SAFE) Vehicles Rule and clarifies that federal law preempts state and local tailpipe GHG emissions standards as well as zero emission vehicle (ZEV) mandates. The SAFE Vehicle Rule also withdraws the CAA waiver granted to the State of California that allowed the state to enforce its own Low Emission Vehicle program.[50] On March 31, 2020, Part II of the SAFE Vehicles was issued and sets carbon dioxide emissions and CAFE standards for passenger vehicles and light duty trucks, covering model years 2021-2026.[51] On December 21, 2021, NHTA repealed the SAFE I Rule.

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 (EISA) facilitates the reduction of national GHG emissions by requiring the following:

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

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48 *The emission reductions attributable to the regulations for medium- and heavy-duty trucks were not included in the Project's emissions inventory due to the difficulty in quantifying the reductions. Excluding these reductions results in a more conservative (i.e., higher) estimate of emissions for the Project.*

49 *USEPA and NHTSA Adopt Standards to Reduce GHG and Improve Fuel Efficiency of Medium- and Heavy-Duty Vehicles for Model Year 2018 and Beyond, August 2016.*

50 *U.S. Department of Transportation and EPA. 2019. One National Program Rule on Federal Preemption of State Fuel Economy Standards, https://www.epa.gov/regulations-emissions-vehicles-and-engines/final-rule-one-national-program-federal-preemption-state#:~:text=In%20this%20action%20NHTSA%20is,and%20local%20programs%20are%20preempted.*

51 *U.S. Department of Transportation. 2020. The Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule for Model Years 2021-2026 Passenger Cars and Light Trucks, https://www.nhtsa.gov/sites/nhtsa.dot.gov/files/documents/final_safe_preamble_web_version_200330.pdf.*

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

- Requiring approximately 25 percent greater efficiency for light bulbs by phasing out incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and

- While superseded by the USEPA and the NHTSA actions described above, (i) establishing miles per gallon targets for cars and light trucks, and (ii) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of the EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of "green jobs."[52]

California Executive Order S-3-05 and Executive Order B-30-15

Executive Order S-3-05, issued by Governor Schwarzenegger in June 2005, established GHG emissions targets for the state, as well as a process to ensure the targets are met. The order directed the Secretary for 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 emissions reduction targets are as follows:

- By 2010, reduce to 2000 emission levels[53];

- By 2020, reduce to 1990 emission levels;

- By 2030, reduce to 40 percent below 1990 levels; and

- By 2050, reduce to 80 percent below 1990 levels.

Executive Order B-30-15, issued by Governor Brown in April 2015, established an additional statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. Reducing GHG emissions by 40 percent below 1990 levels in 2030 and by 80 percent below 1990 levels by 2050 (consistent with Executive Order S-3-05) aligns

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52 *A green job, as defined by the United States Department of Labor, is a job in business that produces goods or provides services that benefit the environment or conserve natural resources.*

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with scientifically established levels needed in the U.S. to limit global warming below 2 degrees Celsius.[54]

The State Legislature adopted equivalent 2020 and 2030 statewide targets in the California Global Warming Solutions Act of 2006 (also known as Assembly Bill [AB] 32) and Senate Bill 32, respectively, both of which are discussed below. However, the Legislature has not yet adopted a target for the 2050 horizon year.

As a result of Executive Order S-3-05, the California CAT, led by the Secretary of CalEPA, was formed. The CAT is made up of representatives from a number of state agencies and was formed to implement global warming emission reduction programs and to report on the progress made toward meeting statewide targets established under the Executive Order. The CAT reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.[55] The CAT stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. “Intelligent transportation systems” is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and service.[56]

AB 32 (California Global Warming Solutions Act of 2006) and SB 32

In September 2005, Governor Arnold Schwarzenegger signed the California Global Warming Solutions Act of 2006, AB 32, into law. AB 32 committed the state to achieving the following:

- By 2010, reduce statewide GHG emissions to 2000 levels.[57]
- By 2020, reduce statewide GHG emissions to 1990 levels.

CARB was tasked with determining what the statewide GHG emissions level was in 1990 and approving a statewide GHG emissions limit equivalent to that level, to be achieved by 2020. AB 32 further requires CARB to adopt rules and regulations that achieve the maximum technologically feasible and cost-effective GHG emissions reductions.

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54 *California Air Resources Board, Frequently Asked Questions about Executive Order B-30-15, 2030 Carbon Target and Adaptation FAQs, April 29, 2015.*

55 *CalEPA, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.*

56 *Ibid.*

57 *The 2010 target to reduce GHG emissions to 2000 levels was not met.*

Signed in September 2016 by Governor Jerry Brown, SB 32 updates AB 32 to include an emissions reductions goal for the year 2030. Specifically, SB 32 requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030.

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

Climate Change Scoping Plan

In 2008, CARB approved the original *Climate Change Scoping Plan* as required by AB 32.[58] Subsequently, CARB approved updates to the *Climate Change Scoping Plan* in 2014 *(First Update)* and 2017 *(2017 Update)*, with the *2017 Update* considering SB 32 (adopted in 2016) in addition to AB 32.

The original *Climate Change Scoping Plan* proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health.[59] The original *Climate Change Scoping Plan* identified a range of GHG reduction actions that included direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms, such as a cap-and-trade system, and an AB 32 implementation fee to fund the program.

The original *Climate Change Scoping Plan* called for a "coordinated set of solutions" to address all major categories of GHG emissions. Transportation emissions were addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard (LCFS), and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to use energy more efficiently. Utility energy providers were required change to include more renewable energy sources through implementation of the Renewables Portfolio Standard (RPS).[60] Additionally, the original *Climate Change Scoping Plan* emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicated that substantial savings of electricity and natural gas would be accomplished through "improving energy efficiency by 25 percent."

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58 *Climate Change Proposed Scoping Plan was approved by CARB on December 11, 2008.*

59 *California Air Resources Board, Climate Change Scoping Plan, December 2008.*

60 *For a discussion of Renewables Portfolio Standard, refer to Subsection 2(h)(i), California Renewables Portfolio Standard.*

The original *Climate Change Scoping Plan* identified a number of specific issues relevant to the Project, including the following:

- The potential of using the green building framework as a mechanism, which could enable GHG emissions reductions in other sectors (i.e., electricity, natural gas), noting that:

  > *A Green Building strategy will produce greenhouse gas savings through buildings that exceed minimum energy efficiency standards, decrease consumption of potable water, reduce solid waste during construction and operation, and incorporate sustainable materials. Combined, these measures can also contribute to healthy indoor air quality, protect human health, and minimize impacts to the environment.*

- The importance of supporting the Department of Water Resources' work to implement the Governor's objective to reduce per capita water use by 20 percent by 2020.[61] Specific measures to achieve this goal include water use efficiency, water recycling, and reuse of urban runoff. The original *Climate Change Scoping Plan* noted that water use requires significant amounts of energy, including approximately one-fifth of statewide electricity.

- Encouraging local governments to set quantifiable emission reduction targets for their jurisdictions and use their influence and authority to encourage reductions in emissions caused by energy use, waste and recycling, water and wastewater systems, transportation, and community design.

Forecasting the amount of emissions that would occur in 2020 if no actions are taken was necessary to assess the scope of the reductions California has to make to return to the 1990 emissions level by 2020 as required by AB 32. CARB originally defined the "business-as-usual" or BAU scenario as emissions in the absence of any GHG emission reduction measures discussed in the original *Climate Change Scoping Plan*. For example, in further explaining CARB's BAU methodology, CARB assumed that all new electricity generation would be supplied by natural gas plants, no further regulatory action would impact vehicle fuel efficiency, and building energy efficiency codes would be held at 2005 standards. In the original *Climate Change Scoping Plan*, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of approximately 28.5 percent from the otherwise projected 2020 emissions level (i.e., those emissions that would occur in 2020, absent GHG-reducing laws and regulations).[62]

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61 *California Department of Water Resources, 20x2020 Water Conservation Plan. The Plan called for California to reduce per capita water use from 192 to 154 gallons per capita daily from 2009 to 2020 and beyond.*

62 *California Air Resources Board, Climate Change Scoping Plan: A Framework for Change, p. 12, December 2008.*

Subsequent to adoption of the original *Climate Change Scoping Plan*, a lawsuit was filed challenging CARB's approval of the *Climate Change Scoping Plan Functional Equivalent Document* (*FED to the Climate Change Scoping Plan*). On May 20, 2011 (Case No. CPF-09-509562), the Court found that the environmental analysis of the alternatives in the *FED to the Climate Change Scoping Plan* was not sufficient under the California Environmental Quality Act (CEQA). CARB staff prepared a revised and expanded environmental analysis of the alternatives, and the *Supplemental FED to the Climate Change Scoping Plan* was approved on August 24, 2011 (*Supplemental FED*). The *Supplemental FED* indicated that there is the potential for adverse environmental impacts associated with implementation of the various GHG emission reduction measures recommended in the *Climate Change Scoping Plan*.

As part of the *Supplemental FED*, CARB updated the projected 2020 BAU emissions inventory based on then current economic forecasts (i.e., as influenced by the economic downturn) and emission reduction measures already in place, replacing its prior 2020 BAU emissions inventory. CARB staff derived the updated emissions estimates by projecting emissions growth, by sector, from the state's average emissions from 2006 through 2008. Specific emission reduction measures included were the million-solar-roofs program, the AB 1493 (Pavley I) motor vehicle GHG emission standards, and the LCFS.[63,64] In addition, CARB also factored into the 2020 BAU inventory emissions reductions associated with a 33-percent RPS for electricity generation. Based on the new economic data, CARB determined that achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7 percent (down from 28.5 percent) from BAU conditions. When the 2020 emissions level projection also was updated to account for newly implemented regulatory measures discussed above, CARB determined that achieving the 1990 emissions level in 2020 would require a reduction in GHG emissions of 16 percent (down from 28.5 percent) from the BAU conditions.[65,66]

In 2014, CARB adopted the *First Update to the Climate Change Scoping Plan: Building on the Framework* (First Update).[67] The stated purpose of the First Update was to "highlight… California's success to date in reducing its GHG emissions and lay…the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050.[68] The First Update found that

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63 *Effective January 2020, AB 178 requires all single-family residences and multi-family residences up to three stories to include solar panels to offset annual electricity consumption.*

64 *Pavley I is the first GHG standards in the nation for passenger vehicles and took effect for model years starting in 2009 to 2016. Pavley I could potentially result in 27.7 million metric tonnes CO_2e reduction in 2020. Pavley II covers model years 2017 to 2025 and potentially result in an additional reduction of 4.1 million metric tons CO_2e.*

65 *California Air Resources Board, Supplement to the AB 32 Scoping Plan FED, Table 1.2-2.*

66 *The emissions and reductions estimates found in the Supplemental FED to the Climate Change Scoping Plan fully replace the estimates published in the 2008 Climate Change Scoping Plan. See CARB, Resolution 11-27 (Aug. 24, 2011) (setting aside approval of 2008 Climate Change Scoping Plan and associated emissions forecasts and approving the Supplemental FED). The estimates in the 2008 document are 596 million metric tons CO_2e under 2020 BAU and a required reduction of 169 million metric tons CO_2e (28.4 percent).*

67 *Health & Safety Code §38561(h) requires CARB to update the Scoping Plan every five years.*

68 *California Air Resources Board, First Update, May 2014, p. 4.*

California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels squarely in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.[69]

In conjunction with the First Update, CARB identified "six key focus areas comprising major components of the state's economy to evaluate and describe the larger transformative actions that will be needed to meet the state's more expansive emission reduction needs by 2050.[70] Those six areas were: (1) energy; (2) transportation (vehicles/equipment, sustainable communities, housing, fuels, and infrastructure); (3) agriculture; (4) water; (5) waste management; and (6) natural and working lands. The First Update identified key recommended actions for each sector that would facilitate achievement of the 2050 reduction target.

Based on CARB's research efforts, it has a "strong sense of the mix of technologies needed to reduce emissions through 2050."[71] Those technologies include energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and the rapid market penetration of efficient and clean energy technologies.

The First Update discussed new residential and commercial building energy efficiency improvements, specifically identifying progress towards zero net energy buildings as an element of meeting mid-term and long-term GHG emissions reduction goals. The First Update expressed CARB's commitment to working with the California Public Utilities Commission (CPUC) and California Energy Commission (CEC) to facilitate further achievements in building energy efficiency.

In December 2017, CARB adopted California's 2017 *Climate Change Scoping Plan Update: The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Scoping Plan Update*). The *2017 Climate Change Scoping Plan* addresses the deeper cuts required by SB 32 by a 2030 horizon year and has a range of GHG reduction actions that include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, market-based mechanisms such as a cap-and-trade system, and an AB 32 implementation fee to fund the program. The 2017 Scoping Plan Update includes policies to require direct GHG emissions reductions at some of the state's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and-Trade program, which constrains and reduces emissions at covered sources.[72]

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69 *California Air Resources Board, First Update, May 2014, p. 34.*
70 *California Air Resources Board, First Update, May 2014, p. 6.*
71 *California Air Resources Board, First Update, May 2014, p. 32*
72 *California Air Resources Board, 2017 Scoping Plan Update, November 2017, p. 7*

Certain elements of these regulations must be complied with by all projects that develop urban land uses (e.g., commercial, residential, industrial). This category of regulations can be grouped in terms of the GHG sector that benefit from their implementation. With regard to the energy sector, implementation of the California RPS program (SB 100), SB 350, and the Energy Independence and Security Act of 2007 (EISA) would reduce GHG emissions generated by energy consumption. With regard to the mobile sector, implementation of the Advanced Clean Cars Program, Advance Clean Truck Regulation, Low Carbon Fuel Standard (Executive Order S-01-07) and SB 375 would reduce GHG emissions generated by motor vehicle travel. In addition, ongoing implementation of the SB 1368/AB 398, CCR Title 20, and the Cap-and-Trade Program would reduce GHG emissions from both energy consumption and the fuels used for motor vehicle travel. With regard to the solid waste sector, implementation of the California Integrated Waste Management Act of 1989 and AB 341 would reduce GHG emissions generated by solid waste disposal in terms of reduced vehicle trips associated with the transport of solid waste materials as well as landfill emissions. Lastly, with regard to the water sector, implementation of SB X7-7 would reduce GHG emissions associated with the energy used by the infrastructure required for the conveyance of water.

In May 2022, CARB released its Draft 2022 Climate Change Scoping Plan for public review that is designed to meet the statutory 2030 target while identifying how the State can achieve carbon neutrality by 2045 or earlier.

Certain elements of these regulations must be complied with by all projects that develop urban land uses (e.g., commercial, residential, industrial). This category of regulations can be grouped in terms of the GHG sector that benefit from their implementation. Regarding the energy sector, implementation of the California RPS program (SB 100), SB 350, and the Energy Independence and Security Act of 2007 (EISA) would reduce GHG emissions generated by energy consumption. Regarding the mobile sector, implementation of the Advanced Clean Cars Program, Advance Clean Truck Regulation, Low Carbon Fuel Standard (Executive Order S-01-07) and SB 375 would reduce GHG emissions generated by motor vehicle travel. In addition, ongoing implementation of the SB 1368/AB 398, CCR Title 20, and the Cap-and-Trade Program would reduce GHG emissions from both energy consumption and the fuels used for motor vehicle travel. Regarding the solid waste sector, implementation of the California Integrated Waste Management Act of 1989 and AB 341 would reduce GHG emissions generated by solid waste disposal in terms of reduced vehicle trips associated with the transport of solid waste materials as well as landfill emissions. Lastly, regarding the water sector, implementation of SB X7-7 would reduce GHG emissions associated with the energy used by the infrastructure required for the conveyance of water.

CARB adopted its 2022 Scoping Plan update on December 15, 2022 that lays the groundwork to achieving carbon neutrality statewide by 2045. The 2022 Scoping Plan is designed to also reduce GHG emissions 85 percent below 1990 levels by 2045. Most reductions would come from conversion from combustion-based industries and

technologies to electricity. While Statewide programs calling for electrifying the vehicle fleet and energy sources would account for the vast majority of GHG reductions needed by 2030, local actions are needed to supplement these.

Assembly Bill 197

Passed in August 2007, SB 97 required the State Office of Planning and Research (OPR) to prepare and develop CEQA guidelines for the effects and/or mitigation of GHG emissions, including effects associated with transportation and energy consumption. Subsequently, the Draft Guidelines Amendments for Greenhouse Gas Emissions (Guidelines Amendments) were adopted in December 2009 to address the specific obligations of public agencies when analyzing GHG emissions to determine a project's effect on the environment, as pursuant to CEQA.

However, the Guidelines Amendments provide no thresholds of significance or any specific mitigation measures; rather, they require a lead agency to make a good-faith effort to describe, calculate, or estimate the amount of GHG emissions that would result from a Project, to the extent possible based on scientific and factual data. The Guidelines Amendments give discretion to the lead agency whether to (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance-based standards. Additionally, three factors that should be considered in the evaluation of the significance of GHG emissions are identified as follows:

(1) The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

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

(3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for the cumulative impact analysis."[73]

The California Natural Resources Agency is required to periodically update the Guidelines Amendments to incorporate new information or criteria established by CARB pursuant to

[73] *Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research, to Mike Chrisman, California Secretary for Natural Resources, dated 13 April 2009.*

AB 32. SB 97 applies to any environmental impact report (EIR), negative declaration, mitigated negative declaration, or other document requirements by CEQA.

Cap-and-Trade Program

The original *Climate Change Scoping Plan* identified a cap-and-trade program as one of the strategies for California to reduce GHG emissions. Under cap-and-trade, an overall limit on GHG emissions from capped sectors is established, and facilities subject to the cap are able to trade permits to emit GHG emissions within the overall limit. According to CARB, a cap-and- trade program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020.[74]

CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32 and the State Legislature extended the Program through 2030 with the adoption of Assembly Bill 398. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources, such as refineries and power plants, (deemed "covered entities"). "Covered entities" subject to the Cap-and-Trade Program are sources that emit more than 25,000 metric tons CO_2e ($MTCO_2e$) per year. Triggering of the 25,000 $MTCO_2e$ per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or MRR).

Under the Cap-and-Trade Program, CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or in part (if eligible) and may buy allowances at auction, purchase allowances from others, or purchase offset credits. Each covered entity with a compliance obligation is required to surrender an allowance for each metric ton CO_2e of GHG they emit.

The Cap-and-Trade Program provides a firm cap, ensuring that the 2030 statewide emission limit will not be exceeded. An inherent feature of the Cap-and-Trade program is that it does not guarantee GHG emissions reductions in any discrete location or by any particular source. Rather, GHG emissions reductions are only guaranteed on a cumulative basis. As summarized by CARB in the First Update:

> *The Cap-and-Trade Regulation gives companies the flexibility to trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more have to turn in more allowances or other compliance instruments. Companies that can cut their GHG emissions have to turn in fewer allowances. But as the cap declines, aggregate emissions must be reduced.*

For example, a covered entity theoretically could increase its GHG emissions every year and still comply with the Cap-and-Trade Program if there is a commensurate reduction in

[74] *With continuation of the Cap-and-Trade Program, the State can achieve a 40-percent reduction target by 2030.*

GHG emissions from other covered entities. Such a focus on aggregate GHG emissions is considered appropriate because climate change is a global phenomenon, and the effects of GHG emissions are considered cumulative.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2030 GHG emissions reduction mandate.

> *The Cap-and-Trade Program establishes an overall limit on GHG emissions from most of the California economy—the "capped sectors." Within the capped sectors, some of the reductions are being accomplished through direct regulations, such as improved building and appliance efficiency standards, the [Low Carbon Fuel Standard] LCFS, and the 33 percent [Renewables Portfolio Standard] RPS. Whatever additional reductions are needed to bring emissions within the cap is accomplished through price incentives posed by emissions allowance prices. Together, direct regulation and price incentives assure that emissions are brought down cost-effectively to the level of the overall cap. […]*[75]
>
> *[T]he Cap-and-Trade Regulation provides assurance that California's 2020 limit will be met because the regulation sets a firm limit on 85 percent of California's GHG emissions.*[76]

Overall, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the state's emissions forecasts and the effectiveness of direct regulatory measures. The Cap-and-Trade Program covered approximately 450 businesses responsible for about 85 percent of California's GHG emissions.[77]

The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. The Cap-and-Trade Program also covers fuel suppliers (natural gas and propane fuel providers and transportation fuel providers) to address emissions from such fuels and from combustion of other fossil fuels not directly covered at large sources in the

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[75] *California Air Resources Board, First Update, May 2014, p. 88.*

[76] *California Air Resources Board, First Update, May 2014, pp. 86–87.*

[77] *Center for Climate and Energy Solutions, California Cap-and-Trade, https://www.c2es.org/content/california-cap-and-trade/, accessed October 2022.*

Program's first compliance period.[78] Furthermore, the Cap-and-Trade Program also covers the GHG emissions associated with the combustion of transportation fuels in California, whether refined in state or imported. The point of regulation for transportation fuels is when they are "supplied" (i.e., delivered into commerce). Accordingly, as with stationary source GHG emissions and GHG emissions attributable to electricity use, virtually all, if not all, of GHG emissions from CEQA projects associated with vehicle-miles traveled (VMT) are covered by the Cap-and-Trade Program.

Assembly Bill 398 (AB 398) was enacted in 2017 to extend and clarify the role of the State's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.

California Renewables Portfolio Standard

The California RPS program (2002, SB 1078) required that 20 percent of the available energy supplies are from renewable energy sources by 2017. In 2006, SB 107 accelerated the 20 percent mandate to 2010. These mandates apply directly to investor-owned utilities. On April 12, 2011, California Governor Jerry Brown signed into law SB 2X, which modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California SB 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016. These levels of reduction are consistent with the Los Angeles Department of Water and Power's (LADWP) commitment to achieve 35 percent renewables by 2020.

LADWP indicates that 31 percent of its electricity came from renewable resources in Year 2018. Therefore, under SB 2X, LADWP is required to increase its electricity from renewable resources by an additional two percent to comply with the RPS of 33 percent.[79]

Senate Bill 350

Senate Bill (SB) 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. SB 350 is the implementation of some of the goals of Executive Order B-30-15. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by December 31, 2030; and (2) to

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[78] *While the Cap-and-Trade Program technically covered fuel suppliers as early as 2012, fuel suppliers did not have a compliance obligation (i.e., they were not fully regulated) until 2015.*

[79] *LADWP, 2018 Power Content Label update,https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-powercontentlabel;jsessionid=dJLKfT5pp6lLZJlZtvTTlVVltXW1VPLLqnnKXLLSpkTGLbn6nh6n!56480797?_afrLoop=49111251050871&_afrWindowMode=0&_afrWindowId=null#%40%3F_afrWindowId%3Dnull%26_afrLoop%3D49111251050871%26_afrWindowMode%3D0%26_adf.ctrl-state%3Ddmbiw8w82_4*

double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[80]

Senate Bill 1368

Senate Bill (SB) 1368, signed September 29, 2006, is a companion bill to AB 32 that requires the CPUC and the CEC to establish GHG emission performance standards for the generation of electricity. These standards also generally apply to power that is generated outside of California and imported into the state. SB 1368 provides a mechanism for reducing the emissions of electricity providers, thereby assisting CARB to meet its mandate under AB32. On January 25, 2007, the CPUC adopted an interim GHG Emissions Performance Standard, which is a facility-based emissions standard requiring that all new long-term commitments for baseload generation to serve California consumers be with power plants that have GHG emissions no greater than a combined cycle gas turbine plant. That level is established at 1,100 pounds of CO_2 per MWh. Furthermore, on May 23, 2007, the CEC adopted regulations that establish and implement an identical Emissions Performance Standard of 1,100 pounds of CO_2 per MWh (see CEC Order No. 07-523-7).

Assembly Bill 1493 (Pavley I)

Assembly Bill (AB) 1493, passed in 2002, requires the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the state. CARB originally approved regulations to reduce GHG emissions from passenger vehicles in September 2004, with the regulations to take effect in 2009. On September 24, 2009, CARB adopted amendments to these "Pavley" regulations that reduce GHG emissions in new passenger vehicles from 2009 through 2016.[81] Although setting emission standards on automobiles is solely the responsibility of the USEPA, the federal CAA allows California to set state-specific emission standards on automobiles if the state first obtains a waiver from the USEPA. The USEPA granted California that waiver on July 1, 2009. A comparison between the AB 1493 standards and the Federal CAFE standards was completed by CARB and the analysis determined that California emission standards are 16 percent more stringent through the 2016 model year and 18 percent more stringent for 2020 model year.[82] California is also committed to further strengthening these standards beginning with 2020 model year vehicles to obtain a 45-percent GHG reduction in comparison to the 2009 model year.

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[80] *Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, ch. 547.*

[81] *California Air Resources Board, Clean Car Standards—Pavley, Assembly Bill 1493, www.arb.ca.gov/cc/ccms/ccms.htm, accessed October 2022.*

[82] *California Air Resources Board, "Comparison of Greenhouse Gas Reductions for all Fifty United States under CAFE Standards and ARB Regulations Adopted Pursuant to AB 1493," January 23, 2008.*

Executive Order S-1-07 (California Low Carbon Fuel Standard)

Executive Order S-1-07, the LCFS (issued on January 18, 2007), requires a reduction of at least 10 percent in the carbon intensity of California's transportation fuels by 2020. Regulatory proceedings and implementation of the LCFS were directed to CARB. The LCFS has been identified by CARB as a discrete early action item in the adopted Climate Change Scoping Plan. The LCFS program was re-adopted in 2015 and will continue to complement other AB 32 measures, transform and diversify the fuel pool, and is a key part of the State's petroleum reduction goals for 2030.

Advanced Clean Cars Regulations

In 2012, CARB approved the Advanced Clean Cars (ACC) program, a new emissions-control program for model years 2015–2025.[83] The components of the Advance Clean Car program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.[84] In March 2017, CARB voted unanimously to continue with the vehicle greenhouse gas emission standards and the ZEV program for cars and light trucks sold in California through 2025.[85]

Senate Bill 375

Acknowledging the relationship between land use planning and transportation sector GHG emissions, Senate Bill (SB) 375 was passed by the State Assembly on August 25, 2008 and signed by the Governor on September 30, 2008. This legislation links regional planning for housing and transportation with the GHG reduction goals outlined in AB 32. Reductions in GHG emissions would be achieved by, for example, locating employment opportunities close to transit. Under SB 375, each Metropolitan Planning Organization (MPO) would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduce passenger VMT and trips so that the region will meet a target, created by CARB, for reducing GHG emissions. If the SCS is unable to achieve the regional GHG emissions reduction targets, then the MPO is required to prepare an alternative planning strategy that shows how the GHG emissions reduction target could be achieved through alternative development patterns, infrastructure, and/or transportation measures.

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83 *California Air Resources Board, California's Advanced Clean Cars Program, https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/about, accessed October 2022.*

84 *Ibid.*

85 *California Air Resources Board, News Release: ZEV Regulation Fact Sheet https://ww2.arb.ca.gov/sites/default/files/2019-06/zev_regulation_factsheet_082418_0.pdf, accessed October 2022.*

California Appliance Efficiency Regulations (Title 20, Sections 1601 through 1608)

The 2014 Appliance Efficiency Regulations, adopted by the CEC, include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California. These standards include minimum levels of operating efficiency, and other cost- effective measures, to promote the use of energy- and water-efficient appliances.

California Building Energy Efficiency Standards (Title 24, Part 6)

California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. Title 24 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.[86] The CEC adopted the 2016 Title 24 standards, which became effective on January 1, 2017.[87] The 2019 standards continue to improve upon the 2013 Title 24 standards for new construction of, and additions and alterations to, residential and non-residential buildings and became effective January 1, 2020.[88] Compliance with Title 24 is enforced through the building permit process.

California Green Building Standards (CALGreen Code)

The California Green Building Standards Code (California Code of Regulations, Title 24, Part 11), commonly referred to as the CALGreen Code, went into effect on January 1, 2017. Most mandatory measure changes in the 2016 CALGreen Code from the previous 2013 CALGreen Code were related to the definitions and to the clarification or addition of referenced manuals, handbooks, and standards. For example, several definitions related to energy that were added or revised affect electric vehicles chargers and charging and hot water recirculation systems. For new multi-family dwelling units, the residential mandatory measures were revised to provide additional electric vehicle charging space requirements, including quantity, location, size, single EV space, multiple EV spaces, and identification.[89] For nonresidential mandatory measures, the table (Table 5.106.5.3.3) identifying the number of required EV charging spaces has been revised in its entirety.[90] Compliance with Title 24 is enforced through the building permit process. The 2019

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86 *California Energy Commission, 2019 Building Energy Efficiency Standards, https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2019-building-energy-efficiency, accessed October 2022.*

87 *Ibid.*

88 *Ibid.*

89 *California Building Standards Commission, 2016 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, Chapter 4—Residential Mandatory Measures, effective January 1, 2017.*

90 *California Building Standards Commission, 2016 California Green Building Standards Code, California Code of Regulations, Title 24, Part 11, Chapter 5—Nonresidential Mandatory Measures, effective January 1, 2017.*

CalGreen code updates were published July 1, 2019 with an effective date of January 1, 2020. The 2022 updates will take effect January 1, 2023.

Senate Bill 97

SB 97, passed in August 2007, is designed to work in conjunction with CEQA and AB 32. SB 97 requires the Office of Planning and Rules (OPR) to prepare and develop guidelines for the mitigation of GHG emissions or the effects thereof, including, but not limited to, the effects associated with transportation and energy consumption. The Draft Guidelines Amendments for Greenhouse Gas Emissions (Guidelines Amendments) were adopted on December 30, 2009 and 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 the Guidelines Amendments.[91] The Guidelines Amendments require a lead agency to make a good-faith effort, based on the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. The Guidelines Amendments give discretion to the lead agency whether to: (1) use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use; or (2) rely on a qualitative analysis or performance- based standards. Furthermore, the Guidelines Amendments identify the following three factors that should be considered in the evaluation of the significance of GHG emissions:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;

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

3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.[92]

The administrative record for the Guidelines Amendments also clarifies "that the effects of greenhouse gas emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis."[93]

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[91] *See 14 Cal. Code Regs. §§ 15064.7 (generally giving discretion to lead agencies to develop and publish thresholds of significance for use in the determination of the significance of environmental effects), 15064.4 (giving discretion to lead agencies to determine the significance of impacts from GHG emissions).*

[92] *14 Cal. Code Regs. § 15064.4(b).*

[93] *Letter from Cynthia Bryant, Director of the Governor's Office of Planning and Research to Mike Chrisman, California Secretary for Natural Resources, dated April 13, 2009.*

In December 2018, the Governor's Office of Planning and Research (OPR) released a CEQA and Climate Change Advisory (Discussion Draft) updates the 2009 guidance for project-level analyses. It reaffirms the discretion that lead agencies have in establishing an appropriate methodology and determining significance.

Senate Bill 743

This 2013 legislation updates the way transportation impacts are measured in California, focusing on vehicle miles traveled (VMT) rather than level of service as the main measure of transportation impacts. It calls on decisionmakers throughout the State to focus on reducing overall VMT and the GHG emissions from such vehicle activity. Traffic studies in the City of Los Angeles began formally analyzing projects in this fashion effective July 1, 2020.

South Coast Air Quality Management District

The South Coast Air Quality Management District (SCAQMD) adopted a "Policy on Global Warming and Stratospheric Ozone Depletion" on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the Air Quality Management Plan. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy to include the following directives:

- Phase out the use and corresponding emissions of chlorofluorocarbons, methyl chloroform (1,1,1-trichloroethane or TCA), carbon tetrachloride, and halons by December 1995;
- Phase out the large quantity use and corresponding emissions of hydrochlorofluorocarbons by the year 2000;
- Develop recycling regulations for hydrochlorofluorocarbons (e.g., SCAQMD Rules 1411 and 1415);
- Develop an emissions inventory and control strategy for methyl bromide; and
- Support the adoption of a California GHG emission reduction goal.

Assembly Bill 1279

This 2022 legislation creates a legally binding goal that California achieve carbon neutrality by 2045. It would also require the State to reduce GHG emissions by 85 percent below 1990 levels by 2045.

Southern California Association of Governments

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020-2045 RTP/SCS on September 3, 2020, calling for $639 billion in transportation investments and reducing VMT by 19 percent per capita from 2005 to 2035. The updated plan accommodates 21.3 percent growth in population from 2016 (3,933,800) to 2045 (4,771,300) and a 15.6 percent growth in jobs from 2016 (1,848,300) to 2045 (2,135,900). The updated RTP/SCS calls for a number of land use-based strategies to accommodate growth, minimize criteria pollutant emissions, and achieve climate change objectives:

- Decreasing drive-along work commutes by three percent
- Reducing per capita VMT by five percent and vehicle hours traveled per capita by nine percent
- Increasing transit commuting by two percent
- Reducing travel delay per capita by 26 percent
- Creating 264,500 new jobs annually
- Reducing greenfield development by 29 percent by focusing on smart growth
- Locating six more percent household growth in High Quality Transit Areas (HQTAs), which concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, create local jobs, and have the potential to improve public health and housing affordability.
- Locating 15 percent more jobs in HQTAs

The 2020-2045 RTP/SCS calls for a 19 percent reduction in per capita GHG emissions by 2035 from 2005 levels. This is intended to be consistent with CARB's performance targets during this same period. The bulk of these reductions are to come from transportation investments, pricing strategies, TDM strategies, and land use programs. On October 30, 2020, CARB accepted the RTP/SCS quantification of GHG emissions on October 30, 2020 (Executive Order G-20-239, SCAG 2020 SCS ARB Acceptance of GHG Quantification Determination).

City of Los Angeles Green Building Code

On December 15, 2011, the Los Angeles City Council approved Ordinance No. 181,481, which amended Chapter IX of the Los Angeles Municipal Code (LAMC), referred to as the Los Angeles Green Building Code, by adding a new Article 9 to incorporate various

provisions of the 2010 CALGreen Code. On December 20, 2016, the Los Angeles City Council approved Ordinance No. 184,692, which further amended Chapter IX of the LAMC, by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2016 CALGreen Code. The 2020 Los Angeles Green Building Code incorporates by reference the mandatory requirements of the 2019 California Green Building Standards Code.

City of Los Angeles Green New Deal/Sustainable City pLAn

The Sustainable City pLAn (also known as L.A.'s Green New Deal) was adopted in 2015, updated in 2019, and includes both short-term and long-term aspirations through the year 2035 in various topic areas, including water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[94] Specific targets include ensuring 75 percent of new housing units within 1,500 feet of transit by 2046, reducing vehicle miles traveled per capita by 45 percent by 2050, and moving toward 100 percent zero-emission *vehicles by 2050*. The Sustainable City pLAn is to be updated every four years.

Traffic Study Policies and Procedures

The City of Los Angeles Department of Transportation (LADOT) has developed the Transportation Assessment Guidelines (TAG) (July 2020) to provide the public, private consultants, and City staff with standards, guidelines, objectives, and criteria to be used in the preparation of a transportation impact study. The TAG is consistent with the City's goals to emphasize the importance of sustainability, smart growth, and reduction of GHG emissions in addition to traditional traffic flow considerations when evaluating and mitigating impacts to the transportation system as a result of land use policy decisions. The TAG prioritizes transportation demand management strategies and multi-modal strategies over automobile-centric solutions when mitigating project-related impacts to the City's transportation system. Through acknowledgment of an imminent update that will identify VMT reduction thresholds, the TAG stands as an implementing mechanism of the City's strategy to conform to the mandates and requirements of AB 32, SB 375, and SB 743.

Existing Conditions

Existing Statewide GHG Emissions

GHG emissions are the result of both natural and human-influenced activities. Regarding human-influenced activities, motor vehicle travel, consumption of fossil fuels for power generation, industrial processes, heating and cooling, landfills, agriculture, and wildfires are the primary sources of GHG emissions. Without human intervention, Earth maintains an approximate balance between the release of GHG emissions into the atmosphere and

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[94] *City of Los Angeles, Sustainable City pLAn, 2019.*

the storage of GHG emissions in oceans and terrestrial ecosystems. Events and activities, such as the industrial revolution and the increased combustion of fossil fuels (e.g., gasoline, diesel, coal), have contributed to the rapid increase in atmospheric levels of GHG emissions over the last 150 years.

As reported by the CEC, California contributes approximately one percent of global and 8.2 percent of national GHG emissions.[95] California represents approximately 12 percent of the national population. Approximately 80 percent of GHGs in California are CO_2 produced from fossil fuel combustion. The current California GHG inventory compiles statewide anthropogenic GHG emissions and carbon sinks/storage from the years 2000 through 2019.[96] It includes estimates for CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6. The GHG emissions inventory for California for the years 2010 through 2019 is presented in Table VIII-1. As shown therein, the GHG inventory for California in 2019 was 418.2 million $MTCO_2e$.

Table VIII-1
California GHG Emissions Inventory ($MTCO_2e$)

	2013	2014	2015	2016	2017	2018	2019
Transportation	161.2	162.6	166.2	169.8	171.2	169.6	166.1
Electric Power	91.7	92.5	90.3	89.0	88.8	89.2	88.2
Industrial	16.8	17.7	18.6	19.2	20.0	20.4	20.6
Commercial & Residential	91.4	88.9	84.8	68.6	62.1	63.1	58.8
Agriculture	161.2	162.6	166.2	169.8	171.2	169.6	166.1
High GWP	91.4	88.9	84.8	68.6	62.1	63.1	58.8
Recycling & Waste	91.7	92.5	90.3	89.0	88.8	89.2	88.2
Total	**447.5**	**443.0**	**440.7**	**429.1**	**424.6**	**425.1**	**418.2**

Source: California Air Resources Board (2021). California Greenhouse Gas Emission Inventory - 2021 Edition. Data available at: https://ww3.arb.ca.gov/cc/inventory/data/data.htm

Existing Project Site Emissions

The Project Site is currently improved with 72 multi-family residences (59,622 square feet).[97] As summarized in Table VIII-2, most existing GHG emissions are associated with mobile sources, specifically the 287 net daily vehicle trips to and from the Project Site generated by existing uses.

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95 *California Energy Commission, Tracking Progress, Greenhouse Gas Emission Reductions. https://www.energy.ca.gov/data-reports/tracking-progress. Accessed October 2022.*

96 *A carbon inventory identifies and quantifies sources and sinks of greenhouse gases. Sinks are defined as a natural or artificial reservoir that accumulates and stores some carbon-containing chemical compound for an indefinite period.*

97 *City of Los Angeles, ZIMAS database, accessed October 4, 2022.*

Table VIII-2
Existing Annual GHG Emissions Summary[a]
(MTCO2e)

Source	Emissions ($MTCO_2$[a])
Area[b]	11
Energy[c] (electricity and natural gas)	1,014
Mobile	1,604
Solid Waste[d]	100
Water/Wastewater[e]	57
Refrigerants	<0.1
Total Emissions	**2,787**

[a] *CO_2e was calculated using CalEEMod.*
[b] *Area source emissions are from landscape equipment and other operational equipment only; hearths omitted.*
[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.*
[d] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.*
[e] *Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.*

Source: DKA Planning, 2022. Refer to Appendix F.

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

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

Less Than Significant Impact. Whether the Project would generate GHG emissions that could have a significant impact on the environment is based on whether the Project would conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHG emissions. As such, both of these Checklist Questions are addressed together.

Methodology and Thresholds of Significance

CEQA Guidelines Section 15064.4(a) assists lead agencies in determining the significance of the impacts of GHG emissions, giving lead agencies discretion to determine whether to assess impacts quantitatively or qualitatively, calling for a good-faith effort to describe and calculate emissions. The emissions inventory also demonstrates the reduction in a project's incremental contribution of GHG emissions that results from regulations and requirements adopted as implementation efforts for these plans for the reduction or mitigation of GHG emissions. As such, it provides further

justification that a project is consistent with plans adopted for the purpose of reducing and/or mitigating GHG emissions by a project and over time. The significance of a project's GHG emissions impacts is not based on the amount of GHG emissions resulting from the Project.

The City, SCAQMD, Office of Planning and Research (OPR), CARB, California Air Pollution Control Officers Association (CAPCOA), and other applicable agencies have not adopted a numerical threshold of significance for assessing impacts related to GHG emissions. As a result, the methodology for evaluating a project's impacts related to GHG emissions focuses on its consistency with statewide, regional, and local plans adopted for the purpose of reducing and/or mitigating GHG emissions.[98] This evaluation is the sole basis pursuant to CEQA for determining the significance of a project's GHG-related impacts on the environment.

The analysis also calculates the amount of GHG emissions from the Project using recommended air quality models. The primary purpose of quantifying the Project's GHG emissions is to satisfy CEQA Guidelines Section 15064.4(a). The estimated emissions inventory is also used to determine if there would be a reduction in the Project's incremental contribution of GHG emissions as a result of compliance with regulations requirements adopted to implement plans for reducing or mitigating GHG emissions. However, the significance of the Project's GHG emissions is not based on the amount of emissions from the Project.

Consistency with Applicable Plans and Policies

A consistency analysis has been provided that describes the Project's compliance with or exceedance of performance-based standards, and consistency with applicable plans and policies adopted for the purpose of reducing GHG emissions. For informational purposes, this analysis also compares the Project's consistency with the applicable portions of the *Climate Change Scoping Plan*, the 2020-2045 RTP/SCS, and the City's Green New Deal/Sustainable City pLAn.

OPR encourages lead agencies to make use of programmatic mitigation plans and programs from which to tier when they perform project analyses. Statewide, the *Climate Change Scoping Plan* provides measures to achieve AB 32 and SB 32 targets. On a regional level, SCAG's 2020-2045 RTP/SCS contains measures to achieve VMT reduction required by SB 375.

As noted in CEQA Guidelines Section 15064.4(b)(3), consistency with such plans and policies "must reduce or mitigate the project's incremental contribution of greenhouse gas emissions." To demonstrate such incremental reductions, this section estimates reductions of Project-related GHG emissions resulting from consistency with plans.

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98 *CEQA Guidelines, Section 14 CCR 15064.4.*

Consistent with evolving scientific knowledge, approaches to GHG emissions reductions quantification may continue to evolve in the future.

Quantification of Emissions

This analysis quantifies the Project's GHG emissions for informational purposes, taking into account the GHG emissions reduction features that would be incorporated into the Project's design. This analysis relies on CalEEMod, a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California, who provided data (e.g., emission factors, trip lengths, meteorology, source inventory) to account for local requirements and conditions. The model is considered by SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG emissions impacts from land use projects throughout California.

This analysis quantifies the Project's emissions and compares them to a Project without Reduction Features scenario, as defined by CARB's most updated projections for AB 32 and SB 32. This comparison is included for informational purposes to disclose the relative carbon efficiency of the Project and to determine if there would be a reduction in the Project's incremental contribution of GHG emissions based on compliance with regulations and requirements adopted to implement plans for reducing GHG emissions. The Project without Reduction Features scenario does not account for energy efficiency measures that would go beyond Title 24 building standards or trip reductions from the availability of public transit. However, the Project without Reduction Features does take into account regulatory measures included in CARB's 2022 Scoping Plan, SCAG's 2020-2045 RTP/SCS, and the City's Green New Deal/Sustainable City pLAn.

Project GHG Emissions

<u>Construction Emissions</u>

The Project's construction emissions were calculated using CalEEMod Version 2022.1. CalEEMod calculates emissions from off-road equipment usage and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecasted based on the proposed construction schedule and included the mobile- source and fugitive dust emissions factors derived from CalEEMod.

The calculations of the emissions generated during Project construction activities reflect the types and quantities of construction equipment that would be used to remove existing pavement, grade, and excavate the Project Site; construct the proposed building and related improvements; and plant new landscaping within the Project Site.

In accordance with SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged annually) over the assumed lifetime of the Project. Because emissions from construction activities occur over a relatively short-term period of time, they contribute a relatively small portion of the overall lifetime GHG emissions for the Project. In addition, GHG emissions reduction measures for construction equipment are relatively limited. Thus, SCAQMD recommends that construction emissions be amortized over an assumed 30-year project lifetime, so that GHG emissions reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies.[99] As a result, the Project's total construction GHG emissions were divided by 30 to determine an approximate annual construction emissions estimate comparable to operational emissions.

Operational Emissions

Similar to construction, CalEEMod is used to calculate potential GHG emissions generated by new land uses on the Project Site, including area sources, electricity, natural gas, mobile sources, stationary sources (i.e., emergency generators), solid waste generation and disposal, and water usage/wastewater generation.

Area source emissions include landscaping equipment that are based on the size of the land uses (e.g., square footage or dwelling unit), the GHG emission factors for fuel combustion, and the GWP values for the GHG emissions emitted.

GHG emissions associated with electricity demand are based on the size of the land uses, the electrical demand factors for the land uses, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted. As with electricity, the emissions of GHG emissions associated with natural gas combustion are based on the size of the land uses, the natural gas combustion factors for the land uses in units of million British thermal units (MMBtu), the GHG emission factors for natural gas combustion, and the GWP values for the GHG emissions emitted.

Mobile source GHG emissions are calculated based on an estimate of the Project's annual VMT, which is derived using CalEEMod based on the trip generation provided in the Transportation Study prepared for the Project. The CalEEMod-derived VMT values account for the daily and seasonal variations in trip frequency and length associated with new residential, employee, and visitor trips to and from the Project Site and other activities that generate a vehicle trip.

Stationary source GHG emissions are based on proposed stationary sources (i.e., emergency generators) that would be provided on the Project Site.

GHG emissions associated with solid waste disposal are based on the size of the Project's proposed land uses, the waste disposal rate for the land uses, the waste

[99] *SCAQMD Governing Board Agenda Item 31, December 5, 2008.*

diversion rate, the GHG emission factors for solid waste decomposition, and the GWP values for the GHG emissions emitted.

GHG emissions related to water usage and wastewater generation are based on the size of the land uses, the water demand factors, the electrical intensity factors for water supply, treatment, and distribution, electrical intensity factors for wastewater treatment, the GHG emission factors for the electricity utility provider, and the GWP values for the GHG emissions emitted.

The analysis of Project GHG emissions at buildout uses assumptions in CARB's EMFAC2014 model and also takes into account actions and mandates expected to be in force in 2024 (e.g., Pavley I Standards, full implementation of California's 33 percent RPS by 2030 and 50 percent by 2050 and the California LCFS). In addition, because mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of project-generated trips as a result of project features (e.g., close proximity to transit) would provide a proportional reduction in mobile source GHG emissions compared to a generic project without such locational benefits. Calculation of Project GHG emissions conservatively did not include actions and mandates that are not already in place but are expected to be enforced in 2024 (e.g., Pavley II, which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent). Similarly, emissions reductions regarding Cap-and-Trade were not included in this analysis as they applied to other future reductions in non-transportation sectors. As for the Cap-and-Trade program's benefits for the transportation sector, the analysis utilizes CARB's assumptions in EMFAC2021 for any short-term reductions in GHG emissions. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at buildout, because the state is expected to implement a number of policies and programs aimed at reducing GHG emissions from the land use and transportation sectors to meet the state's long-term climate goals.

Impact Discussion

In support of the consistency analysis above that describes the Project's compliance with, or exceedance of performance-based standards included in the regulations and policies outlined in the applicable portions of the *Climate Change Scoping Plan*, the 2020-2045 RTP/SCS, and the City's Green New Deal/Sustainable City pLAn, quantitative calculations are provided below.

The Project would generate direct and indirect GHG emissions as a result of different types of emissions sources, including the following:

- Construction: emissions associated with demolition of the existing motel uses and parking areas, shoring, excavation, grading, and construction-related equipment and vehicular activity;

- Area source: emissions associated with landscape equipment;
- Energy source (building operations): emissions associated with electricity and natural gas use for space heating and cooling, water heating, energy consumption, and lighting;
- Stationary source: emissions associated with stationary equipment (e.g., emergency generators);
- Mobile source: emissions associated with vehicles accessing the Project Site;
- Solid Waste: emissions associated with the decomposition of the waste, which generates methane based on the total amount of degradable organic carbon; and
- Water/Wastewater: emissions associated with energy used to pump, convey, deliver, and treat water.
- Refrigerants: These are substances used in equipment for air conditioning and refrigeration. Most refrigerants are HFCs or blends of them, which can have high GWP values.

The Project would generate an incremental contribution to and a cumulative increase in GHG emissions. A specific discussion regarding potential GHG emissions associated with the construction and operational phases of the Project is provided below.

Construction Emissions

Project construction is anticipated to be completed in 2025 with occupancy the same year. A summary of construction details (e.g., schedule, equipment mix, and vehicular trips). The GHG emissions associated with construction of the Project were calculated for each year of construction activity.

Construction of the Project is estimated to generate a total of 945 $MTCO_2e$ (refer to Table VIII-3). As recommended by the SCAQMD, the total GHG construction emissions were amortized over the 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate that can be added to the Project's operational emissions) in order to determine the Project's annual GHG emissions inventory.[100] This results in annual Project construction emissions of 32 $MTCO_2e$. A complete listing of the construction equipment by on-site and off-site activities, duration, and emissions estimation model input assumptions used in this analysis is included within the emissions calculation worksheets that are provided in the Appendix F.

[100] *SCAQMD Governing Board Agenda Item 31, December 5, 2008.*

Table VIII-3
Combined Construction-Related Emissions ($MTCO_2e$)

Year	$MTCO_2e$[a]
2023	248
2024	455
2025	242
Total	**945**
Amortized Over 30 Years	**32**

[a] *CO_2e was calculated using CalEEMod version 2022.1. Refer to Appendix B.*

Source: DKA Planning, 2022.

Operation

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes landscape maintenance equipment, use of consumer products, and other everyday sources. As shown in Table VIII-4, the Project would result in three $MTCO_2e$ per year from area sources.

Electricity and Natural Gas Generation Emissions

GHG emissions are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO_2 and other GHG emissions directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHG emissions are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emissions in an indirect manner.

Electricity and natural gas emissions were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG emissions intensity factors for LADWP were selected in CalEEMod. The carbon intensity ((pounds per megawatt an hour [lbs/MWh]) for electricity generation was calculated for the Project buildout year based on LADWP projections. A straight-line interpolation was performed to estimate the LADWP carbon intensity factor for the Project buildout year. LADWP's carbon intensity projections also take into account SB 350 RPS requirements for renewable energy.

Table VIII-4
Annual GHG Emissions Summary[a]
(MTCO2e)

Year	$MTCO_2$[a]
Area[b]	3
Energy[c] (electricity and natural gas)	286
Mobile	436
Solid Waste[d]	28
Water/Wastewater[e]	20
Refrigerants	<1
Construction	32
Total Emissions	**805**

[a] *CO_2e was calculated using CalEEMod.*
[b] *Area source emissions are from landscape equipment and other operational equipment only; hearths omitted.*
[c] *Energy source emissions are based on CalEEMod default electricity and natural gas usage rates.*
[d] *Solid waste emissions are calculated based on CalEEMod default solid waste generation rates.*
[e] *Water/Wastewater emissions are calculated based on CalEEMod default water consumption rates.*

Source: DKA Planning, 2022. Refer to Appendix B.

This approach is conservative, given the 2018 chaptering of SB 100 (De Leon), which requires electricity providers to provide renewable energy for at least 60 percent of their delivered power by 2030 and 100 percent use of renewable energy and zero-carbon resources by 2045. SB 100 also increases existing renewable energy targets, called Renewables Portfolio Standard (RPS), to 44 percent by 2024 and 52 percent by 2027.

The 2019 Title 24 standards contain more substantial energy efficiency requirements for new construction, emphasizing the importance of building design and construction flexibility to establish performance standards that substantially reduce energy consumption for water hating, lighting, and insulation for attics and walls.

Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as in plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., HVAC system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

CalEEMod electricity and natural gas usage rates are based on the CEC-sponsored California Commercial End-Use Survey (CEUS) and the California Residential Appliance

Saturation Survey (RASS) studies.[101] The data are specific for climate zones; therefore, Zone 11 was selected for the Project Site based on the zip code tool.

As shown in Table VIII-4, Project GHG emissions from electricity and natural gas usage would result in a total of 286 $MTCO_2e$ per year.

Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with residents and visitors visiting the Project Site based on the number of daily trips generated and VMT.

Mobile source operational GHG emissions were calculated using output from the City's VMT Calculator (version 1.3), which factors in the benefit of urban infill projects that have access to public transit, such as the Project. These are described below.

The Project represents an infill development within an urbanized area that would concentrate more housing within an HQTA.[102] The Project Site is located in the dense Hollywood neighborhood with proximity to Metro rail and local bus services, as well as LADOT DASH shuttle services. The Project would provide bicycle storage areas for Project residents and visitors. The Project would also incorporate characteristics that would reduce trips and VMT. The Project characteristics listed below are consistent with the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation related design techniques.[103] Techniques applicable to the Project include the following (a brief description of the Project's relevance to the measure is also provided):

- **CAPCOA Measure LUT-1 – Increase Density:** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services.

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[101] *California Energy Commission, Commercial End-Use Survey, March 2006, and California Residential Appliance Saturation Survey, October 2010.*

[102] *The Project Site is also located in Transit Priority Area as defined by Public Resources Code Section 20199. Public Resources Code Section 21099 defines a "transit priority area" as an area within 0.5 miles of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Also refer to the City's ZIMAS System regarding the location of the Project Site within a Transit Priority Area.*

[103] *CAPCOA, Quantifying Greenhouse Gas Mitigation Measures, 2010.*

- **CAPCOA Measure LUT-4 – Increase Destination Accessibility:** The Project Site is located in a dense Hollywood neighborhood, a regional job center, also easily accessible by public transportation. Access to multiple destinations, and commercial and retail uses in proximity to the Project Site would reduce vehicle trips and VMT compared to the statewide average and encourage walking and non-automotive forms of transportation and would result in corresponding reductions in transportation-related emissions as a result of the Project.

- **CAPCOA Measure LUT-5 – Increase Transit Accessibility:** The Project would be located near Metro bus and rail services, as well as LADOT local shuttles. The Project would also provide bicycle parking spaces to encourage utilization of alternative modes of transportation.

As shown in Table VIII-4, the Project GHG emissions from mobile sources would result in a total of 436 $MTCO_2e$ per year. This estimate reflects reductions attributable to the Project's characteristics (e.g., infill project near transit that supports multi-modal transportation options), as described above.

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of the USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown in Table VIII-4, the Project scenario is expected to result in a total of 28 $MTCO_2e$ per year from solid waste that accounts for a 50-percent recycling/diversion rate.[104]

Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, and distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Three processes are necessary to supply potable water; these include (1) supply and conveyance of the water from the source; (2) treatment of the water to potable standards; and (3) distribution of the water to individual users. After use, energy is used as the wastewater is treated and reused as reclaimed water.

Emissions related to water usage and wastewater generation were calculated for the Project using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor to determine the embodied

[104] *AB 341 (2012) increased the Statewide waste diversion goal from 50 to 75 percent from baseline rates established by CalRecycle by 2020 and beyond. Further, SB 1383 (2016) requires jurisdictions to reduce 75 percent of organic waste disposal in landfills by 2030.*

energy necessary to supply potable water.[105] GHG emissions are then calculated based on the amount of electricity consumed multiplied by the GHG emissions intensity factors for the utility provider. In this case, embodied energy for Southern California supplied water and GHG emissions intensity factors for LADWP were selected in CalEEMod. Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2019 California Plumbing Code, 2019 CALGreen, Los Angeles Plumbing Code, and Los Angeles Green Building Code, and reflect an approximately 20-percent reduction as compared to the base demand.

LADWP's programs includes programs designed to reduce indoor water consumption and wastewater generation by 20 percent. These include the 2019 requirements for installation of the latest ultra-high efficiency plumbing fixtures, the 2016 standards that promote increasing water-resistant turf and incorporating rainfall capture techniques in project designs, aggressive outdoor water consumption programs through its Landscape ordinance, and water recycling programs designed to increase recycled water to 59,000 acre-feet by 2035.

As shown in Table VIII-4, Project GHG emissions from water/wastewater usage would result in a total of 20 $MTCO_2e$ per year, which reflects a 20-percent reduction in water/wastewater emissions consistent with building code requirements as compared to the Project without sustainability features related to water conservation.

Refrigerants

Emissions related to cooling structures and refrigeration needs were calculated using the CalEEMod emissions inventory model. As shown in Table VIII-4, the Project scenario is expected to result in less than one $MTCO_2e$ per year from use of refrigerants that used HFCs and have high GWP values.

Combined Construction and Operational Emissions

As shown in Table VIII-4, when taking into consideration implementation of project design features, including the requirements set forth in the City's Green Building Code and the full implementation of current state mandates, the GHG emissions for the Project would equal 31.5 $MTCO_2e$ annually (as amortized over 30 years) during construction.

Estimated Reduction of Project-Related GHG Emissions Resulting from Consistency with Plans[106]

The estimation of Project GHG emissions under a "Project Without Reduction Features" scenario and from the Project at buildout based on actions and mandates in force in 2024.

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[105] *The intensity factor reflects the average pounds of CO_2e per megawatt generated by a utility company.*

[106] *A discussion of the Project's consistency with applicable plans, policies, and regulations related to reducing GHG emissions is provided below.*

As shown in Table VIII-5, the emissions for the Project and its associated CARB 2024 Project Without Reduction Features scenario are estimated to be 805 and 1,197 $MTCO_2e$ per year, respectively, which shows the Project would reduce emissions by 32.8 percent from CARB's 2025 Project Without Reduction Features scenario.

Consistency with Applicable Plans and Policies

The discussion below describes the extent the Project complies with or exceeds the performance-based standards included in the regulations outlined in the *Climate Change Scoping Plan* and the 2020-2045 RTP/SCS, each of which identifies GHG-reducing measures that directly and indirectly apply to the Project. This analysis also evaluates the Project's consistency with City plans and programs that generally address climate change. As shown herein, the Project would be consistent with the applicable GHG reduction plans and policies.

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Table VIII-6 assesses the Project's consistency with applicable reduction actions/strategies by emissions source category outlined in the *2022 Climate Change Scoping Plan Update*.[107] As demonstrated therein, the Project would be consistent with its objectives and the GHG-emissions-reduction-related actions and strategies of the 2022 Scoping Plan. Table VIII-6 confirms that the Project is consistent with the 2022 Scoping Plan's focus on increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries. Although a number of these strategies are currently promulgated, some have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets.

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

Table VIII-5
Estimated Reduction of Project-Related GHG Emissions

Scenario and Source	Project Without Reduction Features Scenario*	As Proposed Scenario	Reduction from Project Without Reduction Features Scenario	Change from Project Without Reduction Features Scenario
Area Sources	3	3	-	0%
Energy Sources	493	286	-207	-42%
Mobile Sources	621	436	-185	-30%
Waste Sources	28	28	-	0%
Water Sources	20	20	-	0%
Refrigerants	<1	<1	-	0%
Construction	32	32	-	0%
Total Emissions	1,197	805	-392	-32.8%

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

** Project Without Reduction Features scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

Source: DKA Planning, 2022.

Based on the following analysis, the Project would be consistent with the 2022 Scoping Plan's objective of achieving carbon neutrality statewide by 2045 and reducing 2030 GHG emissions in accordance with SB 32.

Based on the assessment in Table VIII-6, the Project would be consistent with the 2022 Scoping Plan and thus, impacts related to consistency with the 2022 Scoping Plan would be less than significant.

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Smart Growth / Vehicle Miles Traveled (VMT)	VMT per capita reduced 25% below 2019 levels by 2030, and 30% below 2019 levels by 2045	SB 375: Reduce demand for fossil transportation fuels and GHG	**No Conflict.** The Project represents an infill development within an urbanized area that would concentrate new housing within an HQTA and reduce per capita VMT and GHG emissions. The Project would be consistent with SB 375 and its VMT reduction goals, as well as the GHG and transportation goals of the 2020-2045 RTP/SCS.
Light-duty Vehicle (LDV) Zero Emission Vehicles (ZEVs)	100% of Light Duty Vehicle sales are ZEV by 2035	EO N-79-20: Reduce demand for fossil transportation fuels and GHGs, and improve air quality. In November 2022, the Advanced Clean Cars II regulations took effect, setting ZEV and plug-in hybrid vehicle sales requirements for model years 2026 to 2035 (ZEV program) and increasingly stringent emission standards (LEV program) to ensure automakers phase out sales of internal combustion engine vehicles.	**No Conflict.** Emissions from vehicle engines associated with Project traffic would be regulated by state regulations governing technology and cleaner emissions.
Truck ZEVs	100% of medium-duty (MDV)/HDV sales are ZEV by 2040 (AB 74	EO N-79-20: Reduce demand for fossil transportation fuels and GHGs, and improve air quality.	**No Conflict.** Medium-duty trucks would be used during Project construction and

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
	University of California Institute of Transportation Studies [ITS] report)	CARB's Advanced Clean Truck Regulation accelerates the transition of zero-emission medium- and heavy-duty vehicles from 2024 to 2035. CARB also adopted the Innovative Clean Transit measure in 2018 that requires all public transit agencies to transition to zero emission fleets.	during the Project's operational phase by residents moving in/out of the dwelling units. Emissions from these truck engines would be regulated by state regulations governing technology and cleaner emissions. The Project would not impede the advancement of cleaner trucks over time.
Aviation	20% of aviation fuel demand is met by electricity (batteries) or hydrogen (fuel cells) in 2045. Sustainable aviation fuel meets most or the rest of the aviation fuel demand that has not already transitioned to hydrogen or batteries.	CARB focuses on reducing emissions from ground support equipment and airport transit vehicles. It is also working with national and international entities to tighten aircraft emission standards. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impact aviation industry and would not impede the advancement of a cleaner aviation industry over time.
Ocean-going Vessels (OGVs)	2020 OGV At-Berth regulation fully implemented, with most OGVs utilizing shore power by 2027. 25% of OGVs utilize hydrogen fuel cell electric technology by 2045.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In 2015, Executive Order B-32-15 called. For a less polluting freight transport system that addressed	**No Conflict.** The Project would not impact trade or OGVs and would not impede the advancement of a cleaner on- or off-shore sources over time.

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
		OGVs, transport refrigeration units, and clean trucks.	
Port Operations	100% of cargo handling equipment is zero-emission by 2037. 100% of drayage trucks are zero emission by 2035.	Executive Order N-79-20: Reduce demand for petroleum fuels and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory. In 2015, Executive Order B-32-15 called. For a less polluting freight transport system that addressed OGVs, transport refrigeration units, and clean trucks.	**No Conflict.** The Project would not impact trade or port operations and would not impede the advancement of a cleaner on-shore sources over time.
Freight and Passenger rail	100% of passenger and other locomotive sales are ZEV by 2030. 100% of line haul locomotive sales are ZEV by 2035. Line haul and passenger rail rely primarily on hydrogen fuel cell technology, and others primarily utilize electricity.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In 2015, Executive Order B-32-15 called. For a less polluting freight transport system that addressed OGVs, transport refrigeration units, and clean trucks.	**No Conflict.** The Project would not impact freight or passenger rail and would not impede the advancement of a cleaner locomotives over time.
Oil and Gas Extraction	Reduce oil and gas extraction operations in line with petroleum demand by 2045.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impact oil extraction and would not impede reducing demand for petroleum products from

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
			energy, area, and mobile sources.
Petroleum Refining	CCS on majority of operations by 2030, beginning in 2028 Production reduced in line with petroleum demand.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impact oil extraction and would not impede reducing demand for petroleum products that require refining.
Electricity Generation	Sector GHG target of 38 million metric tons of carbon dioxide equivalent (MMTCO2e) in 2030 and 30 MMTCO2e in 2035 Retail sales load coverage134 20 gigawatts (GW) of offshore wind by 2045 Meet increased demand for electrification without new fossil gas-fired resources.	SB 350 and SB 100: Reduce GHGs and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not impact the sources of electricity generation.
New Residential and Commercial Buildings	All electric appliances beginning 2026 (residential) and 2029 (commercial), contributing to 6 million heat pumps installed statewide by 2030	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would incorporate appliances that are consistent with Title 24 and Green Building requirements and consistent with the reduction of residential energy use.

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Existing Residential Buildings	80% of appliance sales are electric by 2030 and 100% of appliance sales are electric by 2035. Appliances are replaced at end of life such that by 2030 there are 3 million all-electric and electric-ready homes—and by 2035, 7 million homes—as well as contributing to 6 million heat pumps installed statewide by 2030.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would comply with Title 24 and Green Building requirements during construction and any future retrofit or appliance replacement requirements.
Existing Commercial Buildings	80% of appliance sales are electric by 2030, and 100% of appliance sales are electric by 2045. Appliances are replaced at end of life, contributing to 6 million heat pumps installed statewide by 2030.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project is not a commercial development and would not interfere with any future requirements to retrofit commercial appliances.
Food Products	7.5% of energy demand electrified directly and/or indirectly by 2030; 75% by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not include food production or otherwise impact the sources of energy for food production.

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Construction Equipment	25% of energy demand electrified by 2030 and 75% electrified by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not interfere with the electrification of construction equipment.
Chemicals and Allied Products; Pulp and Paper	Electrify 0% of boilers by 2030 and 100% of boilers by 2045. Hydrogen for 25% of process heat by 2035 and 100% by 2045 Electrify 100% of other energy demand by 2045.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not manufacture pulp or paper product or otherwise use chemicals. otherwise impact the sources of energy for industrial facilities.
Stone, Clay, Glass, and Cement	CCS on 40% of operations by 2035 and on all facilities by 2045 Process emissions reduced through alternative materials and CCS	SB 596: Reduce demand for fossil energy, process emissions, and GHGs, and improve air quality. AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not manufacture r stone, clay, glass, or cement or otherwise impact the sources of energy for industrial facilities.
Other Industrial Manufacturing	0% energy demand electrified by 2030 and 50% by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not include any other industrial manufacturing or otherwise impact the sources of energy for industrial facilities.
Combined Heat and Power	Facilities retire by 2040.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not affect facilities that produced heat and power.

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Agriculture Energy Use	25% energy demand electrified by 2030 and 75% by 2045	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory	**No Conflict.** The Project would not include any agricultural use or otherwise affect agricultural sources of energy.
Low Carbon Fuels for Transportation	Biomass supply is used to produce conventional and advanced biofuels, as well as hydrogen.	AB 197: direct emissions reductions for sources covered by the AB 32 Inventory In November 2022, the Advanced Clean Cars II regulations took effect, setting low emission standards for transportation.	**No Conflict.** This regulatory program applies to fuel suppliers, not directly to land use development. GHG emissions related to vehicular travel associated with the Project would benefit from this regulation because fuel used by Project-related vehicles would be required to comply with the LCFS. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors. The current LCFS targets a 20 percent reduction in CI from a 2010 baseline by 2030. GHG emissions generated by Project-related vehicular travel would benefit from the

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
			Advanced Clean Cars Program.
Low Carbon Fuels for Buildings and Industry	In 2030s biomethane blended in pipeline Renewable hydrogen blended in fossil gas pipeline at 7% energy (~20% by volume), ramping up between 2030 and 2040 In 2030s, dedicated hydrogen pipelines constructed to serve certain industrial clusters	SB 350: The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030.[a] Required measures include increasing RPS to 50 percent of retail sales by 2030, establishing annual targets for statewide energy efficiency that achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030. SB 100: The California Renewables Portfolio Standard Program (2018) requires retail sellers to procure renewable energy that is at least 50 percent by December 31, 2026 and 60 percent by December 31, 2030. It requires local publicly owned electric utilities to procure a minimum quantity of electricity from renewable energy resources of 44 percent of retail sales	**No Conflict.** The Project would comply with this action/strategy given the Project Site's location within the LADWP service area and would comply with CalGreen and Title 24 energy efficiency standards. LADWP must generate electricity that would increase renewable energy resources to 33 percent by 2020 and 50 percent by 2030. As LADWP would provide electricity service to the Project Site, by 2030 the Project would use electricity consistent with the requirements of SB 350. LADWP's 2021 LA100 Renewable Energy Study found that 45 percent of LADWP's electricity was from renewable sources in 2020 and that 100 percent of electricity could be achieved by 2045.

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
		by December 31, 2024 and 60 percent by December 31, 2030.	As required under SB 350, doubling of the energy efficiency savings from retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR Title 24, Part 6 and utility-sponsored programs such as rebates for high-efficiency appliances, HVAC systems, and insulation.
Non-combustion Methane Emissions	Increase landfill and dairy digester methane capture. Some alternative manure management deployed for smaller dairies Moderate adoption of enteric strategies by 2030 Divert 75% of organic waste from landfills by 2025. Oil and gas fugitive methane emissions reduced 50% by 2030 and further reductions as infrastructure components retire in line	SB 1383 (2016) requires CARB to set 2030 emission reduction targets of 40 percent for methane and hydrofluorocarbons and 50 percent black carbon emissions below 2013 levels.[e] The Project would comply with the CARB SLCP Reduction Strategy by using HVAC equipment with lower GWP refrigerants.	**No Conflict.** This program applies to state regulators looking to reduce methane emissions from landfill and dairy facilities and is not related to development of the Project. However, the Project would not interfere with or impede efforts to reduce such pollutants.

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
	with reduced fossil gas demand		
High GWP Potential Emissions	Low GWP refrigerants introduced as building electrification increases, mitigating HFC emissions	SB 605 (2014) directed CARB to develop a comprehensive Short-Lived Climate Pollutant (SLCP) strategy.	**No Conflict.** This program applies to state regulators looking to reduce high GWP refrigerants and is not related to development of the Project. However, the Project would not interfere with or impede efforts to reduce such pollutants.
Natural and Working Lands	Conserve 30% of the state's NWL and coastal waters by 2030. Implement near- and long-term actions to accelerate natural removal of carbon and build climate resilience in our forests, wetlands, urban greenspaces, agricultural soils, and land conservation activities in ways that serve all communities—and in particular low-income, disadvantaged, and vulnerable communities.	EO N-82-20 and SB 27: CARB to include an NWL target in the Scoping Plan. AB 1757: Establish targets for carbon sequestration and nature-based climate solutions. SB 1386: NWL are an important strategy in meeting GHG reduction goals.	**No Conflict.** This program applies to state regulators governing Natural and Working Lands and is not related to development of the Project. However, the Project would not interfere with or impede implementation of the Integrated Natural and Working Lands Implementation Plan, EO N-82-20, SB 27, or SB 1386.

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Forests and Shrublands	At least 2.3 million acres treated statewide annually in forests, shrublands/chaparral, and grasslands, comprised of regionally specific management strategies that include prescribed fire, thinning, harvesting, and other management actions. No land conversion of forests, shrublands/chaparral, or grasslands.	Restore health and resilience to overstocked forests and prevent carbon losses from severe wildfire, disease, and pests. Improve air quality and reduce health costs related to wildfire emissions. Improve water quantity and quality and improve rural economies. Provide forest biomass for resource utilization. EO B-52-18: CARB to increase the opportunity for using prescribed fire. AB 1504 (Skinner, Chapter 534, Statutes of 2010): CARB to recognize the role forests play in carbon sequestration and climate mitigation.	**No Conflict.** This program applies to state regulators governing forest and shrubland management and is not related to development of the Project. However, the Project would not interfere with or impede implementation of EO B-52-18, AB 1504, or the Forest Carbon Plan.
Grasslands	At least 2.3 million acres treated includes increased management of grasslands interspersed in forests to reduce fuels surrounding communities using management strategies appropriate for grasslands. No land conversion of forests, shrublands/chaparral, or grasslands.		**No Conflict.** This program applies to state regulators of grasslands and is not related to development of the Project. However, the Project would not interfere with or impede efforts to reduce fuels in grasslands surrounding communities.

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Croplands	Implement climate smart practices for annual and perennial crops on ~80,000 acres annually. Land easements/ conservation on annual crops at ~5,500 acres annually. Increase organic agriculture to 20% of all cultivated acres by 2045 (~65,000 acres annually).	SB 859: Recognizes the ability of healthy soils practices to reduce GHG emissions from agricultural lands.	**No Conflict.** This program applies to state regulators overseeing croplands and is not related to development of the Project. However, the Project would not interfere with or impede SB 859 and efforts to increase organic agriculture and conserve croplands.
Developed Lands	Increase urban forestry investment by 200% above current levels and utilize tree watering that is 30% less sensitive to drought. Establish defensible space that accounts for property boundaries.	AB 2251 (Calderon, Chapter 186, Statutes of 2022): Increase urban tree canopy 10% by 2035.	**No Conflict.** This program applies to state regulators addressing urban forestry and is not related to development of the Project. However, the Project would not interfere with or impede implementation of AB 2251 and efforts to increase the urban canopy.
Wetlands	Restore 60,000 acres of Delta wetlands		**No Conflict.** This program applies to state regulators restoring Delta wetlands and is not related to development of the Project. However, the Project would not interfere with or impede efforts to restore wetland ecologies.

Table VIII-6
Consistency Analysis—2022 Scoping Plan

Sector	Actions and Strategies	Statutes, Executive Orders, Other Direction	Project Consistency Analysis
Sparsely Vegetated Lands	Land conversion at 50% of the Reference Scenario land conversion rate.		**No Conflict.** This program applies to state regulators slowing the conversion of sparsely vegetated lanes and is not related to development of the Project. However, the Project would not interfere with or impede efforts to slow urban conversion of such lands.
Cap-and-Trade Program	Implement the post-2020 Cap-and-Trade Program with declining annual caps.	AB 398 was enacted in 2017 to extend and clarify the role of the state's Cap-and-Trade Program from January 1, 2021, through December 31, 2030. As part of AB 398, refinements were made to the Cap-and-Trade program to establish updated protocols and allocation of proceeds to reduce GHG emissions.	**Not Applicable.** This applies to the market-based program to reduce GHG emissions over time and is not applicable to a development project.

Source: DKA Planning, 2023, based on California Air Resources Board, 2022 Scoping Plan for Achieving Carbon Neutrality, Scoping Plan Scenario.

Regional: 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

A discussion of the Project's consistency with the 2020-2045 RTP/SCS is included in Table VIII-7. As discussed there, the Project would be substantially consistent with the 2020-2045 RTP/SCS, and impacts would be less than significant.

Table VIII-7
Project Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
Increase percentage of region's total household growth occurring within HQTAs.	**Consistent.** The Project would add 80 residences to the region's housing stock in an HQTA with substantial transportation infrastructure.
Increase percent of the region's total employment growth occurring within HQTAs.	**Not Applicable.** The Project is an infill residential development that would not create more jobs. However, it would generate more housing for employees seeking more options for working in jobs in urban Los Angeles.
Decrease total acreage of greenfield or otherwise rural land uses converted to urban use.	**Consistent.** The Project is an infill development that would reduce the demand for sprawl development in greenfield or rural areas on the fringes of Southern California.
Decrease daily vehicle miles driven per person.	**Consistent.** The Project is an infill development in the midst of heavy transit infrastructure that would reduce daily VMT per capita. This would reduce potential driving distances for home-work and home-to other types of trips, as well as reducing vehicle trips altogether from use of public transit and active transportation modes.
Decrease average daily distance traveled for work and non-work trips (in miles)	**Consistent.** The Project is an infill development in the dense Hollywood neighborhood with a heavy density of housing and jobs in the midst of heavy transit infrastructure that would reduce travel distances per capita.
Increase percentage of work and non-work trips which are less than 3 miles in length.	**Consistent.** The Project is an infill development in the dense Hollywood neighborhood with a heavy density of housing and jobs in the midst of heavy transit infrastructure that would increase the rate of travel less than three miles in length.
Increase share of short trip lengths for commute purposes.	**Consistent.** The Project is an infill development in the dense Hollywood neighborhood with a heavy density of housing and jobs in the midst of heavy transit infrastructure that would shorten commute trips. This would reduce potential driving distances for employees who could live closer to jobs in urban Los Angeles.
Decrease average minutes of delay experienced per capita due to traffic congestion.	**Consistent.** The Project is an infill development in the dense Hollywood neighborhood that will reduce the rate of growth in auto traffic and congestion by virtue of its heavy transit and active transportation mode share given its location.

Table VIII-7
Project Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
Decrease excess travel time resulting from the difference between a reference speed and actual speed.	**Consistent.** The Project is an infill development in the dense Hollywood neighborhood that will reduce the rate of growth in auto traffic and congestion by virtue of its heavy transit and active transportation mode share given its location. As such, the Project would help reduce recurrent traffic congestion delay for general vehicles.
Decrease excess travel time for heavy-duty trucks result from the difference between reference speed and actual speed.	**Consistent.** The Project is an infill development in the dense Hollywood neighborhood that will reduce the rate of growth in auto traffic and congestion by virtue of its heavy transit and active transportation mode share given its location. As such, the Project would help reduce recurrent traffic congestion delay for heavy-duty trucks.
Increase percentage of PM peak period trips completed within 45 minutes by travel mode.	**Consistent.** The Project is an infill development in the dense Hollywood neighborhood that will reduce the rate of growth in auto traffic and congestion by virtue of its transit accessibility. Because the Project's location will attract travel to and from the local community, the share of P.M. peak period trips that are less than 45 minutes would increase when compared to an urban sprawl location.
Increase percentage of trips that use transit (work and all trips)	**Consistent.** The Project is an infill development in the dense Hollywood neighborhood with a heavy density of housing and jobs in the midst of heavy transit infrastructure that would help increase transit mode share.
Decrease average travel time to work (all modes)	**Consistent.** The Project is an infill development in the dense Hollywood neighborhood that will reduce the rate of growth in auto traffic and congestion by virtue of its heavy transit and active transportation mode share given its location. Because the Project's location will attract travel to and from the local community, average travel time to work should be reduced when compared to an urban sprawl location.
Increase percentage of trips using either walking or biking (by trip type)	**Consistent.** The Project is an infill development in the dense Hollywood neighborhood that would reduce the rate of growth in auto traffic and congestion by virtue of its transit accessibility in this area. Additionally, the Project's proximity to existing sources of employment, shopping, and entertainment and inclusion of 87 bicycle parking spaces would allow Project residents to walk or bike to destinations in lieu of driving a vehicle.
Reduce per capita GHG emissions (from 2005 levels)	**Consistent.** The Project is an infill development in the dense Hollywood neighborhood that will reduce the rate of growth in auto traffic and congestion by virtue of its transit accessibility. As such, it is consistent with AB 32, SB 32, SB 375, and other initiatives designed to reduce per capita GHG emissions from 2005 levels.

Table VIII-7
Project Consistency with the 2020-2045 RTP/SCS

Objectives	Consistency Analysis[a]
Increase percentage of trips using a travel mode other than single occupancy vehicle (SOV)	**Consistent.** The Project is an infill development in the dense Hollywood neighborhood that will reduce the rate of growth in SOV use and congestion by virtue of its transit accessibility in the area.
Source: SCAG, 2020-2045 RTP/SCS.	

Local: City of Los Angeles Green New Deal/Sustainability pLAn

The Sustainable City pLAn was a mayoral initiative in 2015 and includes both short-term and long-term aspirations through 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[108]

The Green New Deal, a 2019 mayoral initiative that updates the Sustainable City pLAn, includes both short-term and long-term aspirations through 2035 for water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others.[109] Targets include ensuring 75 percent of new housing units within 1,500 feet of transit by 2046, reducing vehicle miles traveled per capita by 45 percent by 2050, and moving toward 100 percent zero emission vehicles by 2050.

Although the Green New Deal is not an adopted plan or directly applicable to private development projects, the Project would benefit from local access to Metro bus and rail service, as well as LADOT DASH shuttle service. Further, the Project would comply with CALGreen and would comply with the City's Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Green New Deal with regard to energy-efficient buildings and waste and landfills. Therefore, the Project would be consistent with the Green New Deal, and impacts would be less than significant.

Post-2030 Analysis

Recent studies show that the state's existing and proposed regulatory framework will put the state on a pathway to reduce its GHG emissions level to 40 percent below 1990 levels by 2030, and to 80 percent below 1990 levels by 2050 if additional appropriate reduction measures are adopted.[110] Even though these studies did not provide an exact regulatory

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108 *City of Los Angeles, Sustainable City pLAn, 2019.*

109 *City of Los Angeles, Green New Deal, 2019.*

110 *Energy and Environmental Economics (E3). "Summary of the California State Agencies' PATHWAYS Project: Long-term Greenhouse Gas Reduction Scenarios" (April 2015); Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158–172). The California Air Resources Board, California Energy Commission, California Public Utilities Commission, and the California Independent System*

and technological roadmap to achieve the 2030 and 2050 goals, they demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the studies could allow the state to meet the 2050 target. Subsequent to the findings of these studies, SB 32 was passed on September 8, 2016, and would require the state board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. As discussed above, the new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

As discussed above, SCAG's 2020-2045 RTP/SCS establishes a regulatory framework for achieving GHG reductions from the land use and transportation sectors pursuant to SB 375 and the state's long-term climate policies. The 2020-2045 RTP/SCS ensures VMT reductions and other measures that reduce regional emissions from the land use and transportation sectors.

The Project is the type of land use development that is encouraged by the 2020-2045 RTP/SCS to reduce VMT and expand multi-modal transportation options in order for the region to achieve the GHG reductions from the land use and transportation sectors required by SB 375, which, in turn, advances the state's long-term climate policies. By furthering implementation of SB 375, the Project supports regional land use and transportation GHG reductions consistent with state climate targets for 2020 and beyond. In addition, the Project would be consistent with the Actions and Strategies set forth in the 2020-2045 RTP/SCS. Therefore, the Project would be consistent with the 2020-2045 RTP/SCS.

Consistency Conclusion

In summary, the consistency analysis provided above demonstrates that the Project would not conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions. As a result, the Project's GHG emissions would not result in a significant impact to the environment, and Project-specific impacts with regard to climate change would be less than significant.

Cumulative Impacts

The analysis of a project's GHG emissions is inherently a cumulative impact analysis because climate change is a global problem and the emissions from any single project

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Operator engaged E3 to evaluate the feasibility and cost of a range of potential 2030 targets along the way to the state's goal of reducing GHG emissions to 80 percent below 1990 levels by 2050. With input from the agencies, E3 developed scenarios that explore the potential pace at which emission reductions can be achieved, as well as the mix of technologies and practices deployed. E3 conducted the analysis using its California PATHWAYS model. Enhanced specifically for this study, the model encompasses the entire California economy with detailed representations of the buildings, industry, transportation, and electricity sectors.

alone would be negligible. Accordingly, the analysis above took into account the potential for the Project to contribute to the cumulative impact of global climate change. Given the Project's consistency with statewide, regional, and local plans adopted for the reduction of GHG emissions, it is concluded that the Project's incremental contribution to greenhouse gas emissions and its effect on global climate change would not be cumulatively considerable. For these reasons, the Project's cumulative contribution to global climate change would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS

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

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

Less Than Significant Impact. The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a residential development (e.g., paints, solvents, fuel for

construction equipment, building materials, etc.). Although construction of the Project would require the temporary transport, use, and disposal of hazardous waste, construction activities associated with Project would be required to comply with all applicable federal, state, and local regulations governing such activities.

The Project Site is currently developed with an apartment complex. The Project includes demolition and removal of two garage buildings and one of the residential buildings from the Project Site and development of the site with a 216,259-square-foot addition to one of the remaining residential buildings on the site that would include 108 multi-family residential units. The proposed residential development would be similar to the existing residential use on the Project Site and other residential uses throughout the Project Site area. The Project would use common types of cleaning products, paint, petroleum products, etc. and would not require the routine transport, use, or disposal of hazardous materials that would pose a significant hazard to the public or environment. Therefore, Project impacts related to the transport, use, and disposal of hazardous materials would be less than significant.

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

Less Than Significant Impact. A *Phase I Environmental Site Assessment* (*Phase I ESA*) was prepared for the Project by Partner Engineering and Science, Inc. (Partner) (refer to Appendix G). The purpose of the Phase I ESA was determined if there are any recognized environmental concerns (RECs) associated with the Project Site.[111] The Phase I ESA included a review of current and historical records associated with on- and off-site uses; a property inspection and viewing of adjacent and surrounding properties for conditions that could be RECs; interviews with present and past owners, operators and/or occupants of a property, and local government officials; and an evaluation of the information gathered as part of the records review, site reconnaissance, and interviews.

Given the age of some of the existing buildings on the Project Site, it is possible that asbestos-containing materials (ACMs) and lead-based paint (LBP) could be encountered at the Project Site during the demolition and remodeling period. As such, the Applicant would be required as part of the Project permitting process to provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no ACMs are present in the building. If ACMs are found to be present, the ACMs would need to be abated in compliance with SCAQMD's Rule 1403, as well as other applicable state and federal rules and regulations. Also, the Applicant would be required as part of the Project permitting process to submit an LBP survey to the

[111] *An REC is defined by the ASTM Standard Practice E1527-13 as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.*

Department of Building and Safety. Should LBP materials be identified, standard handling and disposal practices shall be implemented pursuant to Occupational Safety and Health Administration (OSHA) regulations.

Otherwise, the Phase I ESA did not identify any RECs associated with the Project Site. For these reasons, the Project would not create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, Project impacts related to this issue would be less than significant.

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

No Impact. No schools are located within 0.25 miles of the Project Site. The school closest to the Project Site is the Hollywood Elementary School, located approximately 0.4 miles southeast of the Project Site. Thus, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project is not included on any list compiled pursuant to Government Code Section 65962.5 (i.e., certain hazardous waste facilities, sites that include leaking USTs, contaminated drinking water wells, and landfills with migrating hazardous waste).[112] Thus, the Project would not create a significant hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is not located approximately two miles northeast of an airport. The airport closest to the Project Site is the Burbank Airport located approximately 8.6 miles northwest of the site. Thus, the Project would not result in a safety hazard or

[112] *Department of Toxic Substance Control, https://www.envirostor.dtsc.ca.gov/public/map/?myaddress, accessed July 5, 2022.*

excessive noise for people residing or working in the Project Site area. Therefore, no impacts related to this issue would occur as a result of the Project.

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

Less Than Significant Impact. The Project would not require the closure of any public or private streets and would not impede emergency vehicle access to the Project Site or surrounding area. While it is expected that the majority of construction activities for the Project would be confined to the Project Site, temporary and limited off-site construction activities could occur in adjacent street rights-of-way during certain periods of the day. Access to the Project Site and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Prior to issuance of a building permit, the Applicant would be required by the City to develop an emergency response plan in consultation with the Los Angeles Fire Department (LAFD). The emergency response plan shall include but not be limited to: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Through compliance with this City requirement, Project impacts related to this issue would be less than significant.

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

No Impact. The Project Site is located in an urbanized area of the City that is not at risk of experiencing wildland fires. Thus, the Project would not expose people or structures either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires. Therefore, Project impacts related to wildland fires would occur as a result of the Project.

Cumulative Impacts

The geographic extent of the Project's environmental impacts is limited to the Project Site and would not contribute to any other potential environmental impact that may occur beyond the boundaries of the Project Site. All related projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, no significant Project cumulative impacts related to hazards and hazardous materials would occur.

X. HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or 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 a 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) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater?

Less Than Significant Impact. The Project Site is currently developed with an apartment complex. In its existing condition, the Project Site is almost completely developed with impervious surface, including buildings and paved areas. While some of the stormwater that encounters the site is absorbed in grassy areas on the site, the majority of the stormwater that encounters the site is directed to the City's local storm drain system.

The Project includes demolition and removal of two garage buildings and one of the residential buildings from the Project Site and development of the site with a 216,259-square-foot addition to one of the remaining residential buildings on the site that would include 108 multi-family residential units. During the Project's construction phase, soil would be temporarily exposed. In addition, on-site watering activities to reduce airborne dust would occur. Also, construction-related materials, including adhesives, coatings, lubricants, and fuel would be temporarily stored on the Project Site. However, the Applicant would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit including the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs), required to minimize soil erosion/sedimentation and other runoff from the Project Site from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Site would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements would ensure that any construction stormwater runoff would not violate water quality and/or discharge requirements.

Additionally, during the Project's operational phase, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features to allow for infiltration and to control stormwater flows from the Project Site to the City's storm drain system and would not come into contact with bare soil surfaces. However, the Applicant would still be required to comply with the City's Low Impact Development (LID) Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall from a storm event or the runoff associated with the 85th percentile, 24-hour storm event, whichever is greater, in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would control the amount of surface water runoff leaving the Project Site. Compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Conformance with these regulations would ensure construction and operational activities would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade water quality. Therefore, Project impacts related to water quality would be less than significant.

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

No Impact. The Project Site is currently developed with an apartment complex. In its existing condition, the Project Site is almost completely developed with impervious surface, including buildings and paved areas. While some of the stormwater that encounters the site is absorbed in grassy areas on the site, the majority of the stormwater that encounters the site is directed to the City's local storm drain system. The Project Site is not a source of groundwater recharge. In the Project's post-development stage, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features to allow for infiltration and to control stormwater flows from the Project Site to the City's storm drain system. Potable water would be provided to the Project from the Los Angeles Department of Water and Power's (LADWP) existing water supply sources. Thus, the Project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. Therefore, no Project impacts related to groundwater recharge would occur.

c) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner, which would result in substantial erosion or siltation on- or off-site?

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

Less Than Significant Impact. Refer to response to Checklist Question X(a).

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

Less Than Significant Impact. The Project Site is currently developed with an apartment complex. In its existing condition, the Project Site is almost completely developed with impervious surface, including buildings and paved areas. While some of the stormwater that encounters the site is absorbed in grassy areas on the site, the majority of the stormwater that encounters the site is directed to the City's local storm drain system. In the Project's post-development stage, most of the Project Site would be developed with impervious surfaces, and all stormwater flows would be directed to storm drainage features to allow for infiltration and to control stormwater flows from the Project Site to the

City's storm drain system. The Project would not increase the rate or amount of surface runoff from the site.

The City uses the Los Angeles County Department of Public Works Hydrology Manual for designing and hydrology and drainage infrastructure. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm even and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. The Project would be required by the City to control stormwater runoff from the Project Site to meet these requirements. Runoff would follow new discharge paths and drain to on-site storm drain infrastructure, including catch basins, planter drains, building roof drain downspouts, etc., throughout the Project Site. The rate and amount of stormwater runoff would be controlled through this on-site BMP infrastructure and could be accommodated by the City's existing storm drain system. Thus, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. Therefore, Project impacts related to flooding would be less than significant.

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

Less Than Significant Impact. Regarding storm drain capacity, refer to response to Checklist Question X(c)(ii) (Hydrology and Water Quality – on- or off-site flooding. Regarding water quality, refer to response to Checklist Question X(a) (Hydrology and Water Quality – Water Quality).

iv) Impede or redirect flood flows?

No Impact. The Project Site is not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA).[113] Thus, the Project would not have the potential to impede or redirect flood flows. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is not located near any large bodies of water and is not located in an area susceptible to flood hazards, tsunamis, or. Therefore, the Project would not risk release of pollutants due to inundation by a flood, tsunami, or seiche. Therefore, no impacts related to this issue would occur as a result of the Project.

[113] *FEMA, https://msc.fema.gov/portal/search?AddressQuery#searchresultsanchor, accessed July 10, 2022.*

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

Less Than Significant Impact. As discussed previously, the Project would be required to comply with the NPDES General Construction Permit, including the preparation of a SWPPP and implementation of BMPs that would require the Project to minimize soil erosion/sedimentation and other runoff from the site from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Sites would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements, would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements. Therefore, Project impacts related to this issue would be less than significant.

Cumulative Impacts

The site of the proposed Project and the related projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs, it generally does not lead to substantial additional runoff, since new developments is required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, Project cumulative impacts related to hydrology and water quality would be less than significant.

XI. LAND USE AND PLANNING

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

a) Would the project physically divide an established community?

No Impact. The Project Site is located in an urbanized area of the City and is currently developed. The Project Site is surrounded by existing development and roadway and utility infrastructure. Thus, the Project would not physically divide an established community. Therefore, no impacts related to this issue would occur.

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

Less Than Significant. As discussed below, the Project would be substantially consistent with all of the applicable plans, policies, and regulations associated with development of the Project Site. Therefore, Project impacts related to land use and planning would be less than significant.

Regional Plans

Southern California Association of Governments

SCAG functions as the Metropolitan Planning Organization for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

2020-2045 RTP/SCS

SB 375 requires MPOs such as SCAG to revise and update their RTPs and SCS, periodically. SCAG's most recent RTP/SCS is the 2020-2045 RTP/SCS, finally adopted on September 3, 2020 by SCAG's Regional Council.

The 2020-2045 RTP/SCS is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. It charts a path toward a more mobile, sustainable, and prosperous region by making connections between transportation networks, between planning strategies and between the people whose collaboration can improve the quality of life for Southern Californians.

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

2020-2045 RTP/SCS Consistency Discussion

The Project's consistency with the 2020-2045 RTP/SCS is discussed in Table 3-1 in Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis). As discussed there, the Project would be substantially consistent with the 2020-2045 RTP/SCS. Therefore, impacts related to consistency with the 2020-2045 RTP/SCS would be less than significant.

South Coast Air Quality Management District

Air Quality Management Plan

The Project Site is located within the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies, including periodic updates to the AQMP, and guidance to local government about how to incorporate these strategies into their land use plans and decisions about development.

SCAG is responsible for generating the socio-economic profiles and growth forecasts on which land use, transportation, and air quality management and implementation plans are based. The growth forecasts provide the socioeconomic data used to estimate vehicle trips and VMT. Emission estimates then can be forecast by SCAQMD based on these projected estimates. Reductions in emissions due to changes in the socio-economic profile of the region are an important way of taking account of changes in land use patterns. For example, changes in jobs/housing balance induced by changes in urban form and transit-oriented development induce changes in VMT by more closely linking housing to jobs. Thus, socio-economic growth forecasts are a key component to guide the Basin toward attainment of the NAAQS.

The current AQMP establishes a comprehensive regional air pollution control program leading to the attainment of State and federal air quality standards in the Basin. In addition to setting minimum acceptable exposure standards for specified pollutants, the AQMP incorporates SCAG's growth management strategies that can be used to reduce vehicle trips and VMT, and hence air pollution. These include, for example, co-location of employment and housing, and mixed-use land patterns that allow the integration of residential and non-residential uses.

AQMP Consistency Discussion

Air quality impacts of the Project and consistency of the Project with the AQMP are discussed in response to Checklist Question III(a) (Air Quality – AQMP Consistency) of this IS/MND.

Local Plans

City of Los Angeles

General Plan

The City's General Plan, adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element, and 10 citywide elements. The Framework Element of the General Plan serves as guide for the City's overall long-range growth and development policies and serves as a guide to update the community plans and the citywide elements. The citywide elements address functional topics that cross community boundaries, such as transportation, and address these topics in more detail than is appropriate in the Framework Element, which is the "umbrella document" that provides the direction and vision necessary to bring cohesion to the City's overall general plan. The Framework Element provides a conceptual relationship between land use and transportation and provides guidance for future updates to the various elements of the General Plan but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use

Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, but the community plans determine the specific land use designations. The Land Use Element of the General Plan is contained within 35 community plans.

Land Use Element Consistency Discussion

The Project's consistency with the General Plan Framework Element is discussed on Table XI-1. As shown, the Project would be substantially consistent with the Framework Element. Therefore, Project impacts related to consistency of the Project with the Framework Element would be less than significant.

Table XI-1
Project Consistency with Applicable Policies of the Framework Element

Goals, Objectives, and Policies	Project Consistency
LAND USE	
Distribution of Land ***GOAL 3A*** *A physically balanced distribution of land uses that contributes towards and facilitates the City's long-term fiscal and economic viability, revitalization of economically depressed areas, conservation of existing residential neighborhoods, equitable distribution of public resources, conservation of natural resources, provision of adequate infrastructure and public services, reduction of traffic congestion and improvement of air quality, enhancement of recreation and open space opportunities, assurance of environmental justice and a healthful living environment, and achievement of the vision for a more livable city.*	
Objective 3.1 *Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.*	
Policy 3.1.1 Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	**Consistent.** The Project includes development of the Project Site with a residential building with 108 dwelling units, 16 of which would be restricted to Very Low Income households and 2 replacement units set aside for Low Income households. The Project would provide housing to meet the City's housing needs.
Policy 3.1.2 Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses	**Consistent.** As discussed in response to Checklist Topics XV (Public Services), XVII (Transportation), and XIX (Utilities and Service Systems), existing public

Table XI-1
Project Consistency with Applicable Policies of the Framework Element

Goals, Objectives, and Policies	Project Consistency
within the patterns of use established in the community plans as guided by the Framework Citywide Long-Range Land Use Diagram.	infrastructure and services would be adequate to accommodate the Project.
Objective 3.2 *Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution.*	
Policy 3.2.1 Provide a pattern of development consisting of distinct districts, centers, boulevards, and neighborhoods that are differentiated by their functional role, scale, and character. This shall be accomplished by considering factors such as the existing concentrations of use, community-oriented activity centers that currently or potentially service adjacent neighborhoods, and existing or potential public transit corridors and stations.	**Consistent.** The Project includes development of housing (including affordable housing) in an urbanized portion of the City that is already developed with a mix of residential and commercial uses.
Policy 3.2.3 Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Consistent.** The Project Site is located in a highly urbanized area of the City, near the Santa Monica Boulevard and Sunset Boulevard corridors, which are developed with sources of employment, shopping, and entertainment. The Project Site area is served by multiple bus lines, including Metro Local Lines 2 and 4, LADOT DASH Hollywood/Wilshire line, and the Hollywood/Vine transit station. The Project Site is also located within HQTA as defined by SCAG (refer to Figure 3-5) and a TPA as defined by SB 743, each of which supports transit opportunities and promotes a walkable environment. The Project is an infill development that includes demolition and removal of a portion of an existing apartment complex and development of the Project Site with an eight-story, 108-unit multi-family residential building. Sixteen of the multi-

Table XI-1
Project Consistency with Applicable Policies of the Framework Element

Goals, Objectives, and Policies	Project Consistency
	family residential units would be restricted to Very Low Income households and 2 replacement units would be set aside for Low Income households. Additionally, the Project would include a total of 87 bicycle parking spaces (79 long-term spaces and 8 short-term spaces), which would support cycling as a form of transportation. The Project would allow for accessible and reliable modes of travel for the Project residents as an inherent aspect of the Project Site's proximity to sources of transit and the Project's inclusion of bicycle parking spaces. The Project would ensure safe travel at and near the Project Site by improving the public sidewalks adjacent to Project Site and ensuring safe vehicular and pedestrian access. In addition, the Project would include lighting of pedestrian pathways adjacent to the Project Site to allow for safe travel. Thus, the Project would fit into the existing pattern of land use development in the area that allows for pedestrian/bicycle access.
Objective 3.3 *Accommodate projected population and employment growth within the City and each community plan area and plan for the provision of adequate supporting transportation and utility infrastructure and public services.*	
Policy 3.3.1 Accommodate projected population and employment growth in accordance with the Long-Range Land Use Diagram and forecasts in Table 2-2 (see Chapter 2: *Growth and* Capacity), using these in the formulation of the community plans and as the basis for the planning for and implementation of infrastructure improvements and public services.	**Consistent.** As discussed in detail in response to Checklist Question XIV (a) (Population and Housing – Unplanned Population Growth), the Project's population and housing growth would fall within the forecasted growth for the City. Thus, the Project would not represent substantial or significant unplanned growth as compared to projected growth for the City.

Table XI-1
Project Consistency with Applicable Policies of the Framework Element

Goals, Objectives, and Policies	Project Consistency
Policy 3.3.2 Monitor population, development, and infrastructure and service capacities within the City and each community plan area, or other pertinent service area.	**Consistent.** As discussed in response to Checklist Question XIV (a) (Population and Housing – Unplanned Population Growth), the Project's population and housing growth would fall within the forecasted growth for the City. Thus, the Project would not represent substantial or significant unplanned growth as compared to projected growth for the City. As discussed in response to Checklist Topics XV (Public Services), XVII (Transportation), and XIX (Utilities and Service Systems), existing public infrastructure and services would be adequate to accommodate the Project.
Objective 3.4 *Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.*	
Policy 3.4.1 Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	**Consistent.** The Project includes development of the Project Site with a residential building with 108 dwelling units, 16 of which would be restricted to Very Low Income households and 2 replacement units set aside for Low Income households. The Project would provide housing to meet the City's housing needs. The Project Site area is served by Metro Local Lines 2 and 4, LADOT DASH Hollywood/Wilshire line, and the Hollywood/Vine transit station. The Project would not impede any existing residential neighborhoods.
Goals, Objectives and Policies **GOAL 3C** Multi-family neighborhoods that enhance the quality of life for the City's existing and future residents.	

Table XI-1
Project Consistency with Applicable Policies of the Framework Element

Goals, Objectives, and Policies	Project Consistency
Objective 3.7 *Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.*	
Policy 3.7.1 Accommodate the development of multi-family residential units in areas designated in the community plans in accordance with Table 3-1 and Zoning Ordinance densities indicated in Table 3-3, with the density permitted for each parcel to be identified in the community plans.	**Consistent.** The Project Site is zoned R3, which allows 30-55 dwelling units per acre. The Project Site is 0.9 acres in size. With 108 dwelling units, the Project would provide 120 units per acre. The Project is requesting by-right density bonus pursuant to AB 2334 to permit up to a 50 percent increase in density.
Policy 3.7.4 Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.	**Consistent.** The design and construction of the proposed multi-family dwelling units would comply with all of the City's applicable design standards.
Goal 3 K Transit stations to function as a primary focal point of the City's development.	
Objective 3.15 *Focus mixed commercial/residential uses, neighborhood-oriented retail, employment opportunities, and civic and quasi-public uses around urban transit stations, while protecting and preserving surrounding low-density neighborhoods from the encroachment of incompatible land uses.*	
Policy 3.15.4 Design and site new development to promote pedestrian activity and provide adequate transitions with adjacent residential uses.	**Consistent.** The Project Site is located in an urbanized area that is developed with a mix of residential and commercial uses and in proximately to sources of transit, employment, shopping, entertainment, and recreation. The Project would provide updated pedestrian connections to the surrounding infrastructure and 87 bicycle parking spaces to encourage Project residents to walk or bike to such uses.
HOUSING	
GOAL 4A *An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*	
Objective 4.1 *Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City subregion to meet the projected housing needs by income level of the future population to the year 2010.*	
Policy 4.1.1 Provide sufficient land use and density to accommodate an	**Consistent.** The Project includes development of the Project Site with 108

Table XI-1
Project Consistency with Applicable Policies of the Framework Element

Goals, Objectives, and Policies	Project Consistency
adequate supply of housing units by type and cost within each City subregion to meet the twenty-year projections of housing needs (see Figure 4-1).	multi-family residential units, inclusive of 16 units set aside for Very Low Income household and 2 replacement units set aside for Low Income households, thereby helping the City meet its housing needs.
Policy 4.1.2 Minimize the overconcentration of very low- and low-income housing developments in City subregions by providing incentives for scattered site development citywide.	**Consistent.** The Project includes development of the Project Site with 108 multi-family residential units, inclusive of 16 units set aside for Very Low Income household and 2 replacement units set aside for Low Income households, pursuant to the State's Density Bonus Law.
Policy 4.1.5 Monitor the growth of housing developments and the forecast of housing needs to achieve a distribution of housing resources to all portions of the City and all income segments of the City's residents.	**Consistent.** The Project includes development of the Project Site with 108 multi-family residential units, inclusive of 16 units set aside for Very Low Income household and 2 replacement units set aside for Low Income households, thereby helping the City meet its housing needs.
Policy 4.1.6 Create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City.	**Consistent.** The Project includes development of the Project Site with 108 multi-family residential units, inclusive of 16 units set aside for Very Low Income household and 2 replacement units set aside for Low Income households, pursuant to the State's Density Bonus Law.
Policy 4.1.7 Establish incentives for the development of housing units appropriate for families with children and larger families.	**Consistent.** The Project includes a mix of 1-, 2- and 3-bedroom units, which could accommodate families.
Objective 4.2 *Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.*	
Policy 4.2.1 Offer incentives to include housing for very low- and low-income households in mixed-use developments.	**Consistent.** The Project includes development of the Project Site with 108 multi-family residential units, inclusive of 16 units set aside for Very Low Income

Table XI-1
Project Consistency with Applicable Policies of the Framework Element

Goals, Objectives, and Policies	Project Consistency
	household and 2 replacement units set aside for Low Income households, pursuant to the State's Density Bonus Law.
Urban Form and Neighborhood Design	
Goal 5A *A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.*	
Objective 5.2 *Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community or the region.*	
Policy 5.2.3 Encourage the development of housing surrounding or adjacent to centers and along designated corridors, at sufficient densities to support the centers, corridors, and the transit system. While densities and distances will vary based on local conditions, the following residential density standards, which are based on the City's adopted Land Use/Transportation Policy, should be used as a general guide when updating community plans through a public participation process: a. Four-stories over parking (R4) within 1,500 feet of grade-separated (subway or arterial) fixed rail transit stations; b. Three-stories over parking (R3) within 1,500 feet of at-grade fixed rail transit stations; c. Two-stories over parking (RD1.5) within 750 feet of major bus corridor intersections; d. Where appropriate, two units per lot (R2) maybe considered within 750 feet of major bus corridors.	**Consistent.** The Project Site is zoned R3. The Project includes development of 108 multi-family residential units near major corridors including Gower Street, Sunset Boulevard, and Santa Monica Boulevard, pursuant to the State's Density Bonus Law, which allows for an increase in density that can be accommodated in additional stories beyond the three stories identified in the policy.
Infrastructure and Public Services	
Goal 9P *Appropriate lighting required to (1) provide for nighttime vision, visibility, and safety needs on streets, sidewalks, parking lots, transportation, recreation, security, ornamental, and other outdoor locations; (2) provide appropriate and desirable regulation of architectural and informational lighting such as building facade lighting or advertising lighting; and (3) protect and preserve the nighttime environment, views,*	

Table XI-1
Project Consistency with Applicable Policies of the Framework Element

Goals, Objectives, and Policies	Project Consistency
driver visibility, and otherwise minimize or prevent light pollution, light trespass, and glare.	
Objective 9.40 *Ensure efficient and effective energy management in providing appropriate levels of lighting for private outdoor lighting for private streets, parking areas, pedestrian areas, security lighting, and other forms of outdoor lighting and minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare.*	
Policy 9.40.1 Require lighting on private streets, pedestrian oriented areas, and pedestrian walks to meet minimum City standards for street and sidewalk lighting.	**Consistent.** The Project would meet the City's lighting requirements for pedestrian, sidewalk, and street lighting
Policy 9.40.2 Require parking lot lighting and related pedestrian lighting to meet recognized national standards.	**Consistent.** The Project would meet the City's lighting requirements for parking and pedestrian areas.
Policy 9.40.3 Develop regulations to ensure quality lighting to minimize or eliminate the adverse impact of lighting due to light pollution, light trespass, and glare for facade lighting, security lighting, and advertising lighting, including billboards.	**Consistent.** The Project would meet the City's lighting requirements, which minimize light trespass.
Policy 9.40.6 Placement and location of street trees shall be coordinated with the placement of street lights.	**Consistent.** The Applicant would be required to coordinate with the City regarding the placement and location of street trees and lighting.
Source: City of Los Angeles General Plan Framework Element, adopted December 11, 1996, re-adopted August 8, 2001.	

Hollywood Community Plan

The Project Site is located within the boundaries of the Hollywood Community Plan (Community Plan), which was adopted in December 1988. In 2012, the Hollywood Community Plan was updated and underwent a comprehensive planning process with extensive community outreach. Both the Draft and Final EIRs were published in 2011, before adoption of the updated Hollywood Community Plan in 2012.

A legal challenge to the EIR followed the adoption of the plan. As a result of a Los Angeles Superior Court decision on the EIR, the City Council rescinded the Hollywood Community Plan Update. The City has reverted, by operation of law, to the 1988 Hollywood Community Plan and the zoning regulations that existed immediately prior to June 19,

2012 (the date of the adoption of the Hollywood Community Plan Update and ordinance). A new update to the Hollywood Community Plan is currently in process, and no changes to the land use designation are proposed for the Project Site.

The purpose of the Community Plan is to provide an official guide to the future development of the Hollywood Community Plan area for the use of the City Council, the Mayor, the City Planning Commission; other concerned government agencies, residents, property owners, and businesspeople of the Community; and private organizations concerned with planning and civic betterment. For the Council, the Mayor, and the Planning Commission, the Community Plan provides a reference to be used in connection with their actions on various city development matters as required by law.

The Community Plan is intended to promote an arrangement of land use, circulation, and services that will encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the Community Plan area, within the larger framework of the City; guide the development, betterment, and change of the Community Plan area to meet existing and anticipated needs and conditions; balance growth and stability; reflect economic potentials and limits, land development and other trends; and protect investment to the extent reasonable and feasible.

This Community Plan proposes approximate locations and dimensions for land use. Development may vary slightly from the Community Plan, provided that the total acreage of each type of land use, the land use intensities, and the physical relationships among the various land uses are not altered.

The Community Plan is not an official zone map and while it is a guide it does not imply any implicit right to a particular zone or to the land uses permitted therein. Changes of zone are considered under a specific procedure established under the Los Angeles City Charter and the LAMC, subject to various requirements set forth therein.

The existing land use designation for the Project Site in the Community Plan is Medium Residential (refer to Figure 2-4 in Section 2 [Project Description]).

Hollywood Community Plan Consistency Discussion

Consistency of the Project with the Hollywood Community Plan is discussed on Table XI-2. As discussed, the Project would be substantially consistent with the Hollywood Community Plan. Therefore, Project impacts related to consistency of the Project with the Hollywood Community Plan would be less than significant.

Table XI-2
Project Consistency with the Hollywood Community Plan

Objectives	Consistency Discussion
1. To coordinate the development of Hollywood with that of other parts of the City of Los Angeles and the metropolitan area. To further the development of Hollywood as a major center of population, employment, retail services, and entertainment; and to perpetuate its image as the international center of the motion picture industry.	**Consistent.** The Project is consistent with the intent of this objective, by providing housing (including affordable housing) to help the City meet its housing demand.
2. To designate lands at appropriate locations for the various private uses and public facilities in the quantities and at densities required to accommodate population and activities projected to the year 2010.	**Consistent.** The Project Site is designated Medium Residential. The Project would provide housing (including affordable housing) that is allowed under the existing land use designation for the site to help the City meet its housing demand.
3. To make provision for the housing required to satisfy the varying needs and desires of all economic segments of the Community, maximizing the opportunity for individual choice. To encourage the preservation and enhancement of the varied and distinctive residential character of the Community, and to protect lower density housing from the scattered intrusion of apartments. In hillside residential areas to: a. Minimize grading so as to retain the natural terrain and ecological balance. b. Provide a standard of land use intensity and population density which will be compatible with street capacity, public service facilities and utilities, and topography and in coordination with development in the remainder of the City.	**Consistent.** The Project is an infill housing development that includes market-rate and affordable housing units to help the City meet its housing demand. Furthermore, the Project Site is located in a highly urbanized area that is well-served by public transit provided by Metro and LADOT.

Table XI-2
Project Consistency with the Hollywood Community Plan

Objectives	Consistency Discussion
4. To promote economic well-being and public convenience through: a. Allocating and distributing commercial lands for retail, service, and office facilities in quantities and patterns based on accepted planning principles and standards. b. Designating land for industrial development that can be so used without determent to adjacent uses of other types, and imposing restrictions on the types and intensities of industrial uses as are necessary to this purpose. c. Encouraging the revitalization of the motion picture industry. d. Recognizing the existing concentration of medical facilities in East Hollywood as a center serving the medical needs of Los Angeles.	**Not Applicable.** The Project Site is currently designated for residential development. The Project includes development of the Project Site with residential uses that are allowed under the existing land use designated for the site.
5. To provide a basis for the location and programming of public services and utilities and to coordinate the phasing of public facilities with private development. To encourage open space and parks in both local neighborhoods and in high density areas.	**Consistent.** As discussed in response to Checklist Topics XV (Public Services), XVII (Transportation), and XIX (Utilities and Service Systems), existing public infrastructure and services would be adequate to accommodate the Project.
6. To make provision for a circulation system coordinated with land uses and densities and adequate to accommodate traffic; and to encourage the expansion and improvement of public transportation service.	**Consistent.** As discussed in response to Checklist Topic XVII (Transportation), the Project would not result in any significant impacts related to traffic. Furthermore, the Project Site is located in a highly urbanized area that is well-served by public transit provided by Metro and LADOT. Additionally, the Project would provide vehicle and bicycle parking in accordance with LAMC requirements. Thus, the Project would promote opportunities for the use of alternative modes of transportation, including use of public transportation, walking, and bicycling, that could help to

Table XI-2
Project Consistency with the Hollywood Community Plan

Objectives	Consistency Discussion
	reduce the amount of vehicle traffic in the Project Site vicinity.
7. To encourage the preservation of open space consistent with property rights when privately owned and to promote the preservation of views, natural character and topography of mountainous parts of the Community for the enjoyment of both local residents and persons throughout the Los Angeles region.	**Consistent.** The Project includes infill development of residential uses and would not develop and existing open space.
Source: City of Los Angeles, Hollywood Community Plan, December 13, 1988.	

Redevelopment Plan

On December 29, 2011, the California Supreme Court issued its decision in the *California Redevelopment Association v. Matosantos* case, which involved challenging the constitutionality of Assembly Bill (AB)X1 26, the bill that dissolved all redevelopment agencies in California. The decision upheld (AB)X1 26, which then led to the dissolution of the Community Redevelopment Agency of the City of Los Angeles (CRA/LA). The dissolution of the agencies became effective February 1, 2012. However, ABX1 26 did not dissolve adopted redevelopment plans. Thus, the Redevelopment Plan and its requirements for development within the Redevelopment Area are still in effect. As the City of Los Angeles elected not to become the successor agency to the CRA/LA, a Designated Local Authority (DLA) was formed and the Governor appointed its three-member board to wind down the operations of the former CRA/LA. In June of 2012, the state approved AB 1484, which amended California Health and Safety Code Section 34173(i) to allow the land use related plans and functions of the former redevelopment agency to be transferred to the jurisdiction that initially authorized the creation of the redevelopment agency, upon request by that jurisdiction. On June 29, 2012, a motion was introduced to request the transfer of the former redevelopment agency's land use plans from the DLA to the City. On December 11, 2012, the Planning and Land Use Management (PLUM) Committee recommended that the motion be received and filed, pursuant to a report by the City Administrative Officer recommending that the Department of City Planning be first allowed to assemble and coordinate staff to undertake the responsibilities that would accompany the land use plans and functions of the redevelopment agency, before requesting the transfer. On December 12, 2012, the City Council adopted the PLUM Committee's recommendations, and the motion was received and filed. Ordinance 186325 was subsequently prepared to transfer the CRA land use powers to the City of Los Angeles. The Ordinance was adopted on September 20, 2019,

and effective November 11, 2019. The Department of City Planning is now responsible for implementing land use provisions in active redevelopment project areas.

Development of the Project Site is subject to the requirements of Hollywood Redevelopment Plan (Redevelopment Plan). As stated above, the Community Plan designates the Project Site as Medium Residential. Notwithstanding anything to the contrary in the Redevelopment Plan, the Redevelopment Plan defers to the Community Plan's land use designations.

Redevelopment Plan Consistency Discussion

As discussed previously, development of the Project Site is subject to the requirements of Redevelopment Plan. As stated above, the Community Plan designates the Project Site as Medium Residential. Notwithstanding anything to the contrary in the Redevelopment Plan, the Redevelopment Plan defers to the Community Plan's land use designations. Consistency of the Project with the applicable goals and objectives of the Redevelopment Plan is included on Table XI-3. As discussed, the Project would be substantially consistent with the Redevelopment Plan.

Table XI-3
Project Consistency with the Redevelopment Plan

Goals and Objectives	Consistency Discussion
Goal 1: Encourage the involvement and participation of residents, businesspersons, property owners, and community organizations in the redevelopment of the community.	**Consistent.** As part of the Project's CEQA and entitlements processes, the community will be notified of actions regarding the Project and will be able to provide input.
Goal 2: Preserve and increase employment, and business and investment opportunities through redevelopment programs and, to the greatest extent feasible, promote these opportunities for minorities and women.	**Not Applicable.** The Project includes development of residential uses, which are allowed under the existing zoning and land use designation for the site and would not provide employment or business opportunities.
Goal 3: Promote a balanced community meeting the needs of the residential, commercial, industrial, arts and entertainment sectors.	**Consistent.** The Project includes redevelopment of the Project Site with residential uses (including affordable housing) to help the City meet its housing needs.
Goal 6: Support and promote Hollywood as the center of the entertainment industry and a tourist destination through the retention, development and expansion of all sectors of the entertainment industry and the preservation of landmarks related to the entertainment industry.	**Consistent.** The Project includes development of residential uses, which are allowed under the existing zoning and land use designation for the site and would help the City meet its housing needs particularly in the Hollywood area.

Table XI-3
Project Consistency with the Redevelopment Plan

Goals and Objectives	Consistency Discussion
Objective 1: Encourage preservation, restoration and appropriate reuse of historically or architecturally significant structures.	**Consistent.** As discussed in response to Checklist Question V(a) (Cultural Resources – Historical Resources), the Project would not affect any significant historical resources.
Objective 2: Assure that new development is sympathetic to and complements the existing scale of development.	**Consistent.** As discussed in response to Checklist Question I (Aesthetics), the Project Site is zoned R3-1 (Multiple Dwelling Zone, Height District 1) and R3-1XL (Multiple Dwelling Zone, Height District 1XL with a General Plan land use designation of Medium Residential. The proposed uses are allowed under the existing zoning and land use designation for the site. The proposed building would contain approximately 216,259 square feet of floor area, with a floor area ratio (FAR) of 3.35:1 and would reach a maximum building height of 95 feet. The massing, height, and setbacks of the Project would comply with those allowed under the existing zoning for the site as well as the provisions of State Density Bonus law. In addition, the Project would be required to undergo Site Plan Review to ensure consistency with all applicable City standards.
Objective 3: Provide pedestrian oriented retail uses along the street level.	**Not Applicable.** The Project includes development of residential uses, which are allowed under the existing zoning and land use designation for the site.
Objective 4: Encourage entertainment, theater and tourist related uses.	**Consistent.** The Project includes development of residential uses, which are allowed under the existing zoning and land use designation for the site and would help the City meet its housing needs particularly in the Hollywood area.
Objective 6: Reinforce and enhance the existing pedestrian environment	**Consistent.** The Project Site is located in a highly urbanized area of the City, near the Santa Monica Boulevard and Sunset Boulevard corridors, which are developed with sources of employment,

Table XI-3
Project Consistency with the Redevelopment Plan

Goals and Objectives	Consistency Discussion
	shopping, and entertainment. The Project Site area is served by multiple bus lines, including Metro Local Lines 2 and 4, LADOT DASH Hollywood/Wilshire line, and the Hollywood/Vine transit station. The Project Site is also located within HQTA as defined by SCAG (refer to Figure 3-5) and a TPA as defined by SB 743, each of which supports transit opportunities and promotes a walkable environment. The Project is an infill development that includes demolition and removal of a portion of an existing apartment complex and development of the Project Site with an eight-story, 108-unit multi-family residential building. Sixteen of the multi-family residential units would be restricted to Very Low Income households and 2 units would be set aside for Low Income households. Additionally, the Project would include a total of 8 bicycle parking spaces (79 long-term spaces and 8 short-term spaces), which would support cycling as a form of transportation. The Project would allow for accessible and reliable modes of travel for the Project residents as an inherent aspect of the Project Site's proximity to sources of transit and the Project's inclusion of bicycle parking spaces. The Project would ensure safe travel at and near the Project Site by improving the public sidewalks adjacent to Project Site and ensuring safe vehicular and pedestrian access. In addition, the Project would include lighting of pedestrian pathways adjacent to the Project Site to allow for safe travel.

Table XI-3
Project Consistency with the Redevelopment Plan

Goals and Objectives	Consistency Discussion
Source: Hollywood Redevelopment Plan, May 2020.	

Cumulative Impacts

As discussed previously, the Project would not result in any inconsistencies with any of the applicable plans, policies, or regulations associated with development of the Project Site. The City would assess the consistency of the related projects that are located in the City with all applicable plans, policies, and regulations associated with those projects, individually. Regardless of any potentially inconsistencies the related projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

XII. MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
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) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Project Site is located in an urbanized part of the City. There are no known mineral resources on the Project Site or in the vicinity. Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impacts related to issue would occur.

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

No Impact. The Project Site is located in an urbanized part of the City. The Project Site is not identified as a mineral resource recovery site. Thus, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, no impacts related to issue would occur.

Cumulative Impacts

As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless to what degree the related projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

XIII. NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

The analysis provided below is primarily based on technical data prepared by DKA Planning (refer to Appendix H).

Environmental Setting

Fundamentals of Sound and Environmental Noise

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel, abbreviated dB. Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range of the human ear. Table XIII-1 provides examples of A-weighted noise levels from common sources. Although the terms "sound" and "noise" are often used synonymously, noise is commonly defined as sound that is either loud, unpleasant, unexpected, or undesired.[114] Because decibels are logarithmic units, they cannot be simply added or subtracted. For example, two cars each producing 60 dBA of noise would not produce a combined 120 dBA.

[114] *California Department of Transportation (Caltrans), Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.*

Table XIII-1
A-Weighted Decibel Scale

Common Noise Sources	Sound Level, dBA
Near Jet Engine	130
Rock and Roll Band	110
Jet Flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
Note: These noise levels are approximations intended for general reference and informational use. They do not meet the standard required for detailed noise analysis but are provided for the reader to gain a rudimentary concept of various noise levels.	
Source: Cowan, James P., Handbook of Environmental Acoustics, 1993	

Noise Definitions

This noise analysis discusses sound levels in terms of equivalent noise level (L_{eq}), maximum noise level (L_{max}), minimum noise level (L_{mix}), and Community Noise Equivalent Level (CNEL). Statistical descriptors (L_x) are also discussed.

Equivalent Noise Level (L_{eq})

L_{eq} represents the equivalent steady-state noise level for a stated period of time that would contain the same acoustic energy as the fluctuating, time-varying noise level of that same period. For example, the L_{eq} for one hour is the energy average noise level for that hour. L_{eq} can be thought of as a continuous noise level for a certain period that is equivalent in acoustic energy content to a fluctuating noise level of that same period. In this report L_{eq} is expressed in units of dBA.

Maximum Noise Level (L_{max})

L_{max} represents the highest instantaneous noise level of a specified time period.

Minimum Noise Level (L_{mix})

L_{min} represents the lowest instantaneous noise level of a specified time period.

Community Noise Equivalent Level (CNEL)

CNEL is a weighted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL penalizes evening noise levels between 7:00 P.M. and 10:00 P.M. by an additional 5 dBA and nighttime noise levels between 10:00 P.M. and 7:00 A.M. by an additional 10 dBA. Because of this, 24-hour CNEL figures are always higher than their corresponding 24-hour L_{eq}.

Statistical Descriptor (L_x)

L_x is used to represent the noise level exceeded "X" percent of a specified time period. For example, L_{90} represents the noise level that is exceeded 90 percent of a specified time period. L_{90} is commonly used to represent ambient or background steady-state noise levels.[115]

Effects of Environmental Noise

The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses may include the intensity, frequency, and pattern of noise; the amount of background or existing noise present; and the nature of work or human activity that is exposed to intruding noise.

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous and repeated exposure, are unlikely to cause hearing loss.[116] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[117]

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels should not exceed 30 dBA L_{eq} and that individual noise events of 45 dBA or higher be limited.[118]

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115 *Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.*

116 *National Institute of Health, National Institute on Deafness and Other Communication. www.nidcd.nih.gov/health/noise-induced-hearing-loss.*

117 *World Health Organization, Guidelines for Community Noise, 1999.*

118 *Ibid.*

Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65 to 70 dBA L_{eq} or greater and cardiovascular effects, including ischaemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

It is generally accepted that people with normal hearing sensitivity can barely perceive a 3 dBA change in noise levels, though if changes occur to the character of a sound (i.e., changes to the frequency content), then changes less than 3 dBA may be more noticeable.[119] Changes of 5 dBA may be readily perceptible, and changes of 10 dBA are perceived as a doubling in loudness.[120] However, few people are highly annoyed by daytime noise levels below 55 dBA.[121]

Loud noises, such as those from construction activities, can interfere with peoples' abilities to effectively communicate via speech, as well as other activities, resulting in annoyance or inconvenience. The EPA has determined that a home interior noise level of 45 dBA L_{eq} generally protects speech and communication by providing 100 percent intelligibility of speech sounds.[122] Other common daily activities that may be disrupted by elevated interior noise levels include watching television, listening to music, or activities requiring concentration (such as reading). The EPA has surmised that, given the preservation of an indoor noise level associated with 100 percent speech intelligibility, the average community reaction is not evident and "7 dBA below levels associated with significant complaints and threats of legal action." Any complaints and annoyance are dependent on "attitude and other non-level related factors."

Noise Attenuation

Generally speaking, noise levels decrease, or "attenuate," as distances from noise sources to receivers increases. For each doubling of distance, noise from stationary or small, localized sources, commonly referred to as "point sources," may attenuate at the rate of 6 dBA for each doubling of distance. This attenuation is referred to as the inverse square law. For example, if a point source emits a noise level of 80 dBA at a reference distance of 50 feet its noise level would be approximately 74 dBA at a distance of 100 feet, 68 dBA at a distance of 200 feet, etc. Noise emitted by "line" sources, such as highways, attenuates at the rate of 3 dBA for each doubling of distance.[123]

Factors such as ground absorption and atmospheric effects may also affect the propagation of noise. In particular, ground attenuation by non-reflective surfaces such as

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[119] *Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.*
[120] *Ibid.*
[121] *World Health Organization, Guidelines for Community Noise, 1999.*
[122] *EPA, Information on Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety, 1974.*
[123] *Caltrans, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.*

soft dirt or grass may contribute to increased attenuation rates of up to an additional 8-10 dBA per doubling of distance.[124]

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between a noise source and a receiver. Barriers that break the line of sight between noise sources and receivers, such as walls and buildings, can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. In cases where the noise path from source to receiver is direct but grazes the top of a barrier, noise attenuation of up to 5 dBA may still occur.[125]

Fundamentals of Vibration

Vibration is an oscillatory motion that can be described in terms of displacement, velocity, and acceleration.[126] Unlike noise, vibration is not a common environmental issue, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration may include trains, construction activities, and certain industrial operations.

Vibration Definitions

This analysis discusses vibration in terms of Peak Particle Velocity (PPV):

<u>Peak Particle Velocity (PPV)</u>

PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are generally measured in inches per second (in/sec).[127]

Effects of Vibration

High levels of vibration may cause damage to buildings or even physical personal injury. However, vibration levels rarely affect human health outside the personal operation of certain construction equipment or industrial tools. Background vibration in residential areas is usually not perceptible, and perceptible indoor vibrations are generally caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Vibration from traffic on smooth roadways is rarely perceptible, even from larger vehicles such as buses or trucks.[128] The threshold of human perception of vibration is approximately 0.01-0.02 in/sec PPV.[129]

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[124] *Ibid.*
[125] *Ibid.*
[126] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.*
[127] *Ibid.*
[128] *Caltrans, Transportation and Construction Vibration Guidance Manual, September 2013.*
[129] *Ibid.*

Regulatory Framework

Federal

Currently, no federal noise standards regulate environmental noise associated with temporary construction activities or the long-term operations of development projects. As such, both temporary and long-term noise impacts resultant from the Project would be largely regulated or otherwise evaluated by State and City of Los Angeles standards designed to protect public well-being and health.

State

2017 General Plan Guidelines

The State of California's 2017 General Plan Guidelines propose county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. The State's suggested compatibility considerations between various land uses and exterior noise levels are not regulatory in nature, but recommendations intended to aid communities in determining their noise-acceptability standards.

City of Los Angeles

General Plan Noise Element

The City of Los Angeles General Plan contains a Noise Element that includes objectives and policies intended to guide the control of noise to protect residents, workers, and visitors. Its primary goal is to manage long-term noise impacts to preserve acceptable noise environments for all types of land uses. The Noise Element contains no quantitative or other thresholds of significance for evaluating a project's noise or vibration impacts. However, the Noise Element does contain a land use and noise compatibility table, which is shown on Table XIII-2. Policy P16 of the Noise Element instructs to use, "as appropriate," this table "or other measures that are acceptable to the city, to guide land use and zoning reclassification, subdivision, conditional use and use variance determinations and environmental assessment considerations, especially relative to sensitive uses, as defined by this chapter…"[130] "Noise sensitive" uses are defined as "single-family and multi-unit dwellings, long-term care facilities (including convalescent and retirement facilities), dormitories, motels, hotels, transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks."[131] The Noise Element

[130] *Noise Element of the Los Angeles City General Plan, February 1999*
[131] *Ibid.*

further instructs that the table is designed “to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels.”

Table XIII-2
City of Los Angeles Noise Element – Guidelines for Noise Compatible Land Use

Land Use Category	Day-Night Average Exterior Sound Level (CNEL dB)						
	50	55	60	65	70	75	80
Residential Single Family, Duplex, Mobile Home	A	C	C	C	N	U	U
Residential Multi-Family	A	A	C	C	N	U	U
Transient Lodging, Motel, Hotel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditoriums, Concert Halls, Amphitheaters	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/U	U	U
Playground, Neighborhood Park	A	A	A	A/N	N	N/U	U
Golf Course, Riding Stable, Water Recreation, Cemetery	A	A	A	A	N	A/N	U
Office Building, Business, Commercial, Professional	A	A	A	A/C	C	C/N	N
Industrial, Manufacturing, Utilities, Agriculture	A	A	A	A	A/C	C/N	N

A = Normally Acceptable - Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.
C = Conditionally Acceptable - New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply system or air conditioning will normally suffice.
N = Normally Unacceptable - New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.
U = Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: Noise Element of the Los Angeles City General Plan – Exhibit I.

Los Angeles Municipal Code

The LAMC contains a number of regulations that would apply to the Project's temporary construction activities and long-term operations.

Section 112.03 "Construction Noise" instructs that "Noise due to construction or repair work shall be regulated as provided by Section 41.40 of this Code." Section 41.40(a) would prohibit the Project's construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c) would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

> *SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED*
>
> *(a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.*
>
> *(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…*

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance is subdivision (a), which institutes a maximum noise limit of 75 dBA at 50 feet for the types of construction vehicles and equipment that would be required for the Project's construction. However, the LAMC notes that these limitations would not necessarily apply if it can be

proven that compliance would be technically infeasible despite the use of noise-reducing means or methods.

SEC.112.05 MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS

Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

(a) 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

(b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques during the operation of the equipment.

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA.

SEC.112.01 RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

(a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.

(b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

(c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

Federal Transit Administration (FTA)

For the evaluation of construction-related vibration impacts, Federal Transit Administration (FTA) guidelines and recommendations are used given the absence of applicable federal, County, or City standards specific to temporary construction activities.

Though not regulatory in nature, the FTA has established vibration impact criteria for buildings and other structures, as building and structural damage is generally the foremost concern when evaluating the impacts of construction-related vibration. Table XIII-3 shows the FTA's vibration guidelines for building and structural damage.

Table XIII-3
FTA Construction Vibration Damage Criteria

Building Category	PPV (in/sec)
I. Reinforced concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, September 2018.	

Existing Conditions

Noise-Sensitive Receptors

The Project Site is located in a residential area within the Hollywood neighborhood near a number of media production studios. Sensitive receptors within 0.25 miles of the Project Site include, but are not limited to, the following representative sampling:

- Residences, 1233-1235 North Gower Street; 5 feet north of the Project Site

- Residences, 1232 Lodi Place; 5 feet north of the Project Site
- Hollywood Studio Club, 1215 Lodi Place; 70 feet west of the Project Site
- Residences, North Gower Street (east side); 80 feet east of the Project Site
- Residences, 1239 Lodi Place (west side); 100 feet northwest of the Project Site
- Hollywood Production Studios, 1149 North Gower Street; 110 feet south of the Project Site
- Residences, 1154 North Gower Street; 130 feet southeast of the Project Site
- Residences, 6130 Lexington Avenue; 240 feet southwest of the Project Site
- Media Production Studios, 6091 Fountain Avenue; 395 feet northeast of the Project Site
- Media Production Studios, 1438 North Gower Street; 530 feet northeast of the Project Site

In addition, Building 2 that is located in the Gower Gardens Apartment Complex adjacent to the Project Site would also be subject to noise impacts of the Project.

Existing Ambient Noise Conditions

In February and June 2022, DKA Planning took short-term noise measurements near the Project Site to determine ambient noise conditions near the Project Site.[132] The location of the measurements is shown in Figure XIII-1. The measured noise levels are shown in Table XIII-4.

[132] *Noise measurements were taken using a Quest Technologies Sound Examiner SE-400 Meter. The Sound Examiner meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.*

Source: DouglasKim+Associates, 2022.

Figure XIII-1
Noise Measurement Locations

Table XIII-4
Existing Noise Levels

Noise Measurement Locations	Primary Noise Source	Sound Levels		Nearest Sensitive Receptor(s)	Noise/Land Use Compatibility[b]
		dBA (L_{eq})	dBA (CNEL)[a]		
6130 Lexington Ave.	Traffic on Lexington Ave.	53.7	51.7	Residences – 6130 Lexington Ave.	Normally Acceptable
1232 Lodi Place	Traffic on Lodi Pl.	52.3	50.3	Residences – Lodi Pl, Hollywood Studio Club	Normally Acceptable
1212 Gower St.	Traffic on Gower St.	62.4	60.4	Residences – 1233 Gower St., 1200 block Gower St. (east side)	Conditionally Acceptable
Hollywood Production Studios	Traffic on Gower St.	63.6	61.6	Hollywood Production Studios, Residences – 1154 Gower St.	Conditionally Acceptable

[a] *Estimated based on short-term (15-minute) noise measurement using Federal Transit Administration procedures from 2018 Transit Noise and Vibration Impact Assessment Manual, Appendix F, Option 4.*

[b] *Pursuant to California Office of Planning and Research "General Plan Guidelines, Noise Element Guidelines, 2017. When noise measurements apply to two or more land use categories, the more noise-sensitive land use category is used. Refer to Table XIII-2 for definition of compatibility designations.*

Source: DKA Planning, 2022.

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

Less Than Significant With Mitigation Incorporated. The Project would generate noise during the construction and operational phases. Below is an analysis of the Project's noise levels and whether these levels would result in a substantial temporary or permanent increase in ambient noise levels in vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Construction

Construction Noise Threshold

Construction noise impacts could be considered significant if the following occurred:

- Construction activities lasting more than one day would exceed existing ambient exterior sound levels by 10 dBA (hourly L_{eq}) or more at a noise-sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA (hourly L_{eq}) or more at a noise-sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA at a noise-sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on a Sunday.

Construction Noise Impacts

On-Site Construction Activities

Project construction would occur over an estimated 28 months (refer to Table XIII-5. Construction would be permitted between the hours of 7:00 A.M. and 9:00 P.M. Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On Saturdays, construction activities would be permitted to occur between 8:00 A.M. and 6:00 P.M.

Table XIII-5
Estimated Construction Schedule Assumptions

Phase	Duration	Notes
Demolition	Weeks 1-6	Removal of 9,240 square feet of building floor area and 10,880 square feet of asphalt/concrete parking lot hauled 25 miles to landfill in 16-cubic-yard capacity trucks.
Grading	Weeks 7-11	Approximately 6,770 cubic yards of soil (including swell factors for topsoil and dry clay) hauled 25 miles to landfill in 16-cubic-yard capacity trucks.
Trenching	Weeks 12-17	Trenching for utilities, including gas, water, electricity, and telecommunications.
Building Construction	Weeks 18-108	Footings and Foundation work (e.g., pouring concrete pads), framing, welding; installing mechanical, electrical, and plumbing. Floor assembly, cabinetry and carpentry, elevator installations, low voltage systems, trash management.
Paving	Weeks 114-118	Paving of driveways and parking lots.
Architectural Coatings	Weeks 109-113	Application of interior and exterior coatings and sealants.

Source: DKA Planning, 2022.

Noise levels would generally peak during the demolition and grading phases, when diesel-fueled heavy-duty equipment like excavators and dozers are used to move large amounts of debris and dirt, respectively. This equipment is mobile in nature and does not always operate at in a steady-state mode full load, but rather powers up and down

depending on the duty cycle needed to conduct work. As such, equipment is occasionally idle during which time no noise is generated.

During other phases of construction (e.g., trenching, building construction, paving, architectural coatings), noise impacts are generally lesser than during grading because they are less reliant on using heavy equipment with internal combustion engines. Smaller equipment such as forklifts, generators, and various powered hand tools and pneumatic equipment would generally be utilized. Off-site secondary noises would be generated by construction worker vehicles, vendor deliveries, and haul trucks.

Because the Project's construction phase would occur for more than three months, the applicable City threshold of significance for the Project's construction noise impacts is an increase of 5 dBA over existing ambient noise levels. As shown in Table XIII-6, when considering ambient noise levels, the use of multiple pieces of powered equipment simultaneously would increase ambient noise in excess of the City's significance threshold of 5dBA at two off-site sensitive receptor locations. Also, the Project's construction noise levels would exceed the same City threshold at the receptors in Building 2 that would face the construction site (refer to Table XIII-7). The Project's construction noise contours (without mitigation) are shown in Figure XIII-2. However, Mitigation Measure NOISE-1 (listed below at the end of the Noise analysis) from the 2020-2045 RTP/SCS Program EIR (amended for Project specifics) has been identified for the Project that includes various measures to reduce construction noise levels, including such measures as the use of temporary noise barriers, scheduling of construction activities, proper equipment maintenance, strategic siting of equipment, etc. With implementation of Mitigation Measure NOISE-1, the Project's construction-related noise impact would be reduced to less than significant (refer to Tables XIII-14 and XIII-15 and Figure XIII-4 included after Mitigation Measure NOISE-1).

Table XIII-6
Project Construction Noise Levels at Off-Site Sensitive Receptors (Without Mitigation)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Residences 6130 Lexington Ave.	46.6	53.7	54.5	0.8	No
Hollywood Studio Club	57.1	52.3	58.3	**6.0**	**Yes**
Residences Lodi Pl.	63.0	52.3	63.4	**11.1**	**Yes**
Residences 1233 Gower St.	63.3	62.4	65.9	3.5	No
Residences 1200 block Gower St. (east side)	62.5	62.4	65.5	3.1	No
Residences 1154 Gower St.	55.6	63.6	64.2	0.6	No
Hollywood Production Studios	50.2	63.6	63.8	0.2	No
Source: DKA Planning, 2022.					

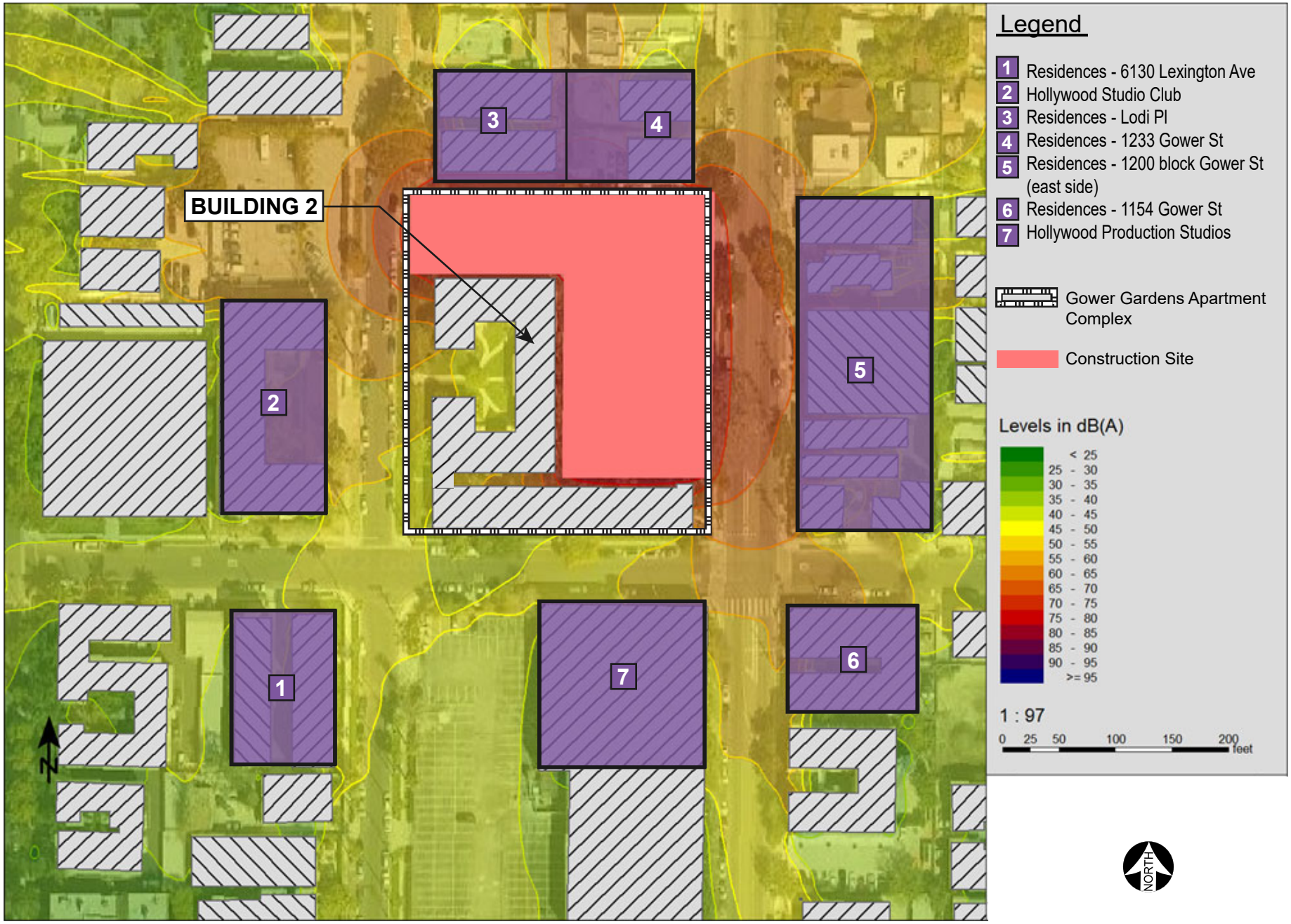
Table XIII-7
Project Combined Construction Noise Levels at On-Site Receptors (Without Mitigation)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Residences Building 2 (northwest, facing north)	71.6	52.3	71.7	**19.4**	**Yes**
Residences Building 2 (central, facing east)	71.2	52.3	71.3	**19.0**	**Yes**
Residences Building 2 (southeast, facing north)	70.8	52.3	70.9	**18.6**	**Yes**
Source: DKA Planning, 2022.					

Off-Site Construction Activities

The Project would generate noise at off-site locations from haul trucks moving debris and soil from the Project Site during demolition and grading activities, respectively; vendor and contractor trips; and worker commute trips. These activities would generate up to an estimated 190 peak hour PCE vehicle trips, as summarized in Table XIII-8, during the building construction phase, assuming all workers travel to the worksite at the same time and that all worker trips and vendor trips use the same route to travel to and from the Project Site. This includes converting noise from heavy-duty truck trips to an equivalent number of passenger vehicle trips. This would represent about 14.3 percent of traffic volumes on Gower Street, which carries about 1,333 vehicles at Fountain Avenue in the morning peak hour of traffic.[133] Because workers and vendors will likely use more than one route to travel to and from the Project Site, this conservative assessment of traffic volumes overstates the likely traffic volumes from construction activities at this intersection.

[133] *Overland Traffic Consultants, 1201 N. Gower Street Transportation Assessment; August 2022.*



Source: DouglasKim+Associates, 2022.

Figure XIII-2
Project Construction Noise Contours (Without Mitigation)

Table XIII-8
Construction Vehicle Trips (Maximum Hourly)

Construction Phase	Worker Trips [a]	Vendor Trips	Haul Trips	Total Trips	Percent of Peak A.M. Hour Trips on Gower St.[b]
Demolition	10	0	131[c]	140	10.5
Grading	8	0	105[d]	112	8.4
Trenching	8	0	0	8	0.6
Building Construction	127	63[e]	0	190	14.3
Paving	18	0	0	18	1.3
Architectural Coating	25	0	0	25	1.9

[a] *Assumes all worker trips occur in the peak hour of construction activity.*
[b] *Percent of existing traffic volumes on Gower Street at Fountain Avenue.*
[c] *The project would generate 1,530 haul trips over a 32-day period with seven-hour workdays. Because haul trucks emit more noise than passenger vehicles, a 19.1 passenger car equivalency (PCE) was used to convert haul truck trips to a passenger car equivalent.*
[d] *The project would generate 846 haul trips over a 22-day period with seven-hour workdays. Assumes a 19.1 PCE.*
[e] *This phase would generate about 23 vendor truck trips daily over a seven-hour workday. Assumes a blend of vehicle types and a 9.55 PCE.*

Source: DKA Planning, 2022

Gower Street would serve as part of the ultimate haul route for any soil exported from the Project Site given its access to the Hollywood Freeway via Santa Monica or Sunset Boulevard. Because the Project's construction-related trips would not cause a doubling in traffic volumes (i.e., 100 percent increase) on Gower Street, the Project's construction-related traffic would not increase existing noise levels by 3 dBA or more, below the City's significance threshold of 5 dBA L_{eq}.[134] Therefore, the Project's noise impacts from construction-related traffic would be less than significant.

[134] *Federal Highway Administration. Techniques for Reviewing Noise Analyses and Associated Noise Reports. 2018. Doubling the number of sources (i.e., vehicles) increases the hourly equivalent sound level (L_{eq}) by approximately 3 dB, which is usually the smallest change that people can detect without specifically listening for the change.*

Operation

Operational Noise Threshold

Operational noise impacts would be significant if the Project would cause any 5 dBA or greater noise increase at a noise-sensitive receptor.

On-Site Operational Noise

The Project's potential on-site operational noise sources are identified and discussed below. As detailed below, the Project's operational noise impacts from on-site sources would be less than significant.

Mechanical Equipment

The Project would operate mechanical equipment on the roof that would generate incremental long-term noise. HVAC equipment would be located on the rooftop, approximately 85 feet above grade. This equipment would include a number of sound sources, including compressors, condenser fans, supply fans, return fans, and exhaust fans that could generate a sound pressure level of up to 81.9 dBA at one foot.[135]

However, noise impacts from rooftop mechanical equipment on nearby sensitive receptors would be negligible for several reasons. First, there would be no line-of-sight from these rooftop units to the sensitive receptors. Because the residences and other sensitive receptors adjacent to the Project Site are one- to two-stories in height, there would be no sound path from the HVAC equipment to residences that would be 60 to 70 feet lower than the roof of the Project. Second, the presence of the Project's roof edge creates an effective noise barrier that further reduces noise levels from rooftop HVAC units by 8 dBA or more.[136] A four-foot high parapet would further shield sensitive receptors near the Project Site. These design elements would be helpful in managing noise, as equipment often operates continuously throughout the day and occasionally during the day, evenings, and weekends.

As a result, noise from HVAC units would negligibly elevate ambient noise levels, far less than the 5 dBA Leq threshold of significance for operational impacts. Compliance with LAMC Section 112.02 would further limit the impact of HVAC equipment on noise levels at adjacent properties.

Other mechanical equipment would be fully enclosed within the structure, shielded from outside sources, and would therefore produce minimal noise impacts for off-site sensitive receptors. This includes an electrical room and elevator equipment (including hydraulic

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[135] *City of Pomona, Pomona Ranch Plaza WalMart Expansion Project, Table 4.4-5; August 2014. Source was cluster of mechanical rooftop condensers including two Krack MXE-04 four-fan units and one MXE-02 two-fan unit. Reference noise level based on 30 minutes per hour of activity.*

[136] *Ibid.*

pump, switches, and controllers) in the subterranean B1 basement level and the P1 parking garage level.

Auto-Related Activities

The majority of vehicle-related noise impacts at the Project Site would come from vehicles entering and exiting the residential development from driveways off both Gower Street and Lodi Place. During the P.M. peak hour, up to 24 net vehicles would generate noise in and out of the garage via these driveways, with up to 27 net vehicles using the garage in the A.M. peak hour.[137]

Over an average day, auto activities from the additional 233 vehicles entering and exiting the garage would generate additional noise at nearby residences across Lodi Place and Gower Street. These residences would have a direct line of sight to the driveways, approximately 80 feet away on both streets. As shown in Table XIII-9, the average vehicle use of the garage during daytime hours (average of 14 vehicles per hour between 8:00 A.M. and 7:00 P.M.) and nighttime hours (an average of five vehicles hourly from 7:00 P.M. to 8:00 A.M.) would elevate ambient noise levels at residences facing each driveway by less than 0.1 dBA L_{eq}, well below the 5 dBA threshold of significance for operational sources of noise.

Table XIII-9
Parking-Garage-Related Noise Levels at Off-Site Sensitive Receptors

Receptor	Maximum Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Significant ?
Residences Lodi Place (west side)	28.0	50.3	50.3	<0.1	No
Residences Gower Street (east side)	31.0	60.4	60.4	<0.1	No
Source: DKA Planning, 2022, using FTA Noise Impact Assessment Spreadsheet.					

Parking garage noise would include tire friction as vehicles navigate to and from parking spaces, doors slamming, car alarms, and minor engine acceleration. Most of these sources are instantaneous (e.g., car alarm chirp, door slam) while others may last a few seconds. As such, the Project's parking garage activities would not have a significant impact on the surrounding noise environment.

[137] *Hourly trip generation based on Institute of Transportation Engineer's hourly trip generation factors for Multifamily Housing (Mid-Rise) (land use code 221).*

Outdoor Uses

While most operations would be conducted inside the development, outdoor activities could generate noise that could impact local sensitive receptors. This would include trash collection and landscape maintenance. These are discussed below..

- Trash collection. On-site trash and recyclable materials for the residents would be managed from the waste collection area on Level P1 of the parking garage. Haul trucks would access solid waste from Lodi Place or Gower Street, where solid waste activities would include use of trash compactors and hydraulics associated with the refuse trucks themselves, similar to existing trash collection activities. Noise levels of approximately 71 dBA L_{eq} and 66 dBA L_{eq} could be generated by collection trucks and trash compactors, respectively, at 50 feet of distance.[138] Intermittent solid waste management activities would operate during the day and be similar to noise associated with current pickup activities. As such, trash collection activities would not substantially elevate 24-hour noise levels at off-site locations by 5 dBA or more.

- Landscape maintenance. Noise from leaf blowers, lawnmowers, and other landscape equipment can generate bursts of noise during regular maintenance. Any intermittent landscape equipment would operate during the day similar to existing landscape activities and would represent a negligible impact that would not increase 24-hour noise levels at off-site locations by 5 dBA L_{eq} or more.[139]

Based on the assessment of these on-site sources, the impact of on-site operational noise sources would be less than significant.

Off-Site Operational Noise

The majority of the Project's operational noise impacts would be off-site from vehicles traveling to and from the development. The Project could add up to the Project would add up to 311 net vehicle trips to the local roadway network on a peak weekday at the start of operations in 2025.[140] This would represent approximately two percent of the 13,330 daily vehicles currently traveling on Gower Street at Fountain Avenue.[141]

Because it takes a doubling of traffic volumes (i.e., 100 percent) to increase ambient noise levels by 3 dBA L_{eq}, the Project's traffic would neither increase ambient noise levels 3 dBA or more into "normally unacceptable" or "clearly unacceptable" noise/land use compatibility categories, nor increase ambient noise levels 5 dBA or more. Twenty-four

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138 *RK Engineering Group, Inc. Wal-Mart/Sam's Club reference noise level, 2003.*

139 *While AB 1346 (Berman, 2021) bans the sale of new gas-powered leaf blowers by 2024, existing equipment can continue to operate indefinitely.*

140 *Overland Traffic Consultants, 1201 N. Gower Street Transportation Assessment; August 2022.*

141 *Ibid.*

hour CNEL impacts would similarly be minimal, far below criterion for significant operational noise impacts, which begin at 3 dBA. Therefore, this impact would be less than significant.

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

Less Than Significant Impact. Construction equipment can produce groundborne vibration based on equipment and methods employed. While this spreads through the ground and diminishes in strength with distance, buildings on nearby soil can be affected. This ranges from no perceptible effects at the lowest levels, low rumbling sounds and perceptible vibration at moderate levels, and slight damage at the highest levels. Table XIII-10 summarizes vibratory levels for common construction equipment.

Table XIII-10
Vibration Source Levels for Common Construction Equipment

Equipment[1]	Approximate PPV at 25 feet (in/sec)
Pile Driver (impact)	0.644
Pile Drive (sonic)	0.170
Clam shovel drop (slurry wall)	0.202
Hydromill (slurry wall)	0.008
Vibratory Roller	0.210
Hoe Ram	0.089
Large Bulldozer	0.089
Caisson Drilling	0.089
Loaded Truck	0.076
Jackhammer	0.035
Small Bulldozer	0.003

[1] *The construction equipment listed here are common types of construction equipment and are included to show relative vibration levels. Not all of this equipment would be used for Project construction. For instance, the Project would not use pile drivers, clam shovel drop, hydromill, vibratory roller, or hoe ram.*

Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment Manual, 2018.

Groundborne vibration would be generated by a number of construction activities at the Project site. Building on and near the Project Site would experience some level of groundborne vibration during the Project's construction phase, including the following:

- Residential building, 1233-1235 North Gower Street; 5 feet north of the Project Site. This is a timber-based construction type with a roof of wood frame construction. This would be considered a Category III structure (Non-engineered timber and masonry building).

- Residential building, 1232 Lodi Place; 5 feet north of the Project Site. This is a timber-based construction type with a roof of wood frame construction. This would be considered a Category III structure (Non-engineered timber and masonry building).

- Hollywood Studio Club, 1215 Lodi Place; 70 feet west of the Project Site. This historic club has been deemed to be of significant historic importance, having been listed in the National Register of Historic Places. This would be considered a Historic structure under Caltrans criteria.

- Residential buildings, North Gower Street (east side); 80 feet east of the Project Site. These residential structures are generally timber-based construction type with roofs of wood frame construction. These would be considered CategoryXIII-11II structure (Non-engineered timber and masonry building).

- Residential building, Building 2; 10 feet west and south of the construction area. This is a timber-based construction type with a roof of wood frame construction. This would be considered a Category III structure (Non-engineered timber and masonry building).

As a result of equipment that could include on-site bulldozer operations or the vibrational equivalent, vibration velocities of up to 0.148 inches per second PPV are estimated to occur at the residences north of the Project Site, the nearest structures to the Project Site. This impact is below the 0.2 inches per second PPV threshold from FTA that is considered potentially harmful to Category III buildings. And as shown in Table XIII-11, more distant receptors would experience even lower levels of groundborne vibration. Other potential construction activities would produce less vibration and have lesser potential impacts on nearby sensitive receptors. As a result, construction-related structural vibration impacts would be considered less than significant.

Table XIII-11
Building Damage Vibration Levels – On-Site Sources

Off-Site Receptor Location	Distance to Project Site (feet)[a]	Vibration Velocity Levels at Off-Site Sensitive Receptors from Construction Equipment (in/sec PPV)					Significance Criterion (PPV)	Potentially Significant Impact?
		Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small Bulldozer		
FTA Reference Vibration Level (25 Feet)	N/A	0.089	0.089	0.076	0.035	0.003	--	--
1233-1235 N. Gower St.	15	0.148	0.148	0.127	0.058	0.005	0.20[b]	No
1232 Lodi Pl.	15	0.148	0.148	0.127	0.058	0.005	0.20[c]	No
Hollywood Studio Club	80	0.028	0.028	0.024	0.011	0.001	0.12[c]	No
North Gower Street (east side)	90	0.025	0.025	0.021	0.010	0.001	0.20[c]	No
Building 2	20	0.111	0.111	0.095	0.044	0.004	0.20[c]	No

[a] *Includes ten-foot buffer for equipment maneuverability*
[b] *FTA criterion for Category III (non-engineered timber and masonry buildings)*
[c] *FTA criterion for Category IV (Buildings extremely susceptible to vibration damage)*

Source: DKA Planning, 2022.

During operation of the residential development, there would be no significant stationary sources of groundborne vibration, such as heavy equipment or industrial operations. Operational groundborne vibration in the Project Site's vicinity would be generated by its related vehicle travel on local roadways. However as previously discussed, road vehicles rarely create vibration levels perceptible to humans. As a result, the Project's long-term vibration impacts would be less than significant.

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

No Impact. The Project Site is not located within the boundaries of an airport land use plan and is not located within two miles of an airport. The airport closest to the Project Site is the Burbank Airport located approximately 8.6 miles to the northwest. As a result,

the Project would not expose people residing or working in the Project Site area to excessive noise levels from aircraft, and no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Construction Noise

There are 18 related projects in the vicinity of the Project Site (refer to Appendix G in the *Transportation Assessment* prepared for the Project, included in Appendix J). The three related projects closest to the Project Site include Related Projects 2, 6, and 10. Because Related Project 6 has already been constructed and is operational, this related project would not contribute to any cumulative noise impacts. Thus, this analysis focuses on cumulative construction noise associated with Related Projects 2 and 10, which are the only related projects that share sensitive receptors in common with the Project.

- Related Project 2 – Located at 1255 N. Beachwood Drive, includes 6 condominium units.
- Related Project 10 – Located at 1121-1149 N. Gower Street, includes 169 apartment units.

The construction schedules for these related projects are unknown. However, for a conservative analysis, it is assumed that the construction schedules could overlap with the Project's construction schedule, resulting in cumulative construction noise levels in the vicinity of the Project Site.

Construction-related noise levels from these (or any) related project would be intermittent and temporary. As with the Project, the related projects would be required to comply with the LAMC's restrictions related to noise, including restrictions on construction hours (LAMC Section 41.40) and noise from powered equipment (LAMC Section 112.05). Noise associated with cumulative construction activities would be reduced to the degree reasonably and technically feasible through proposed mitigation measures for each related project and compliance with the LAMC.

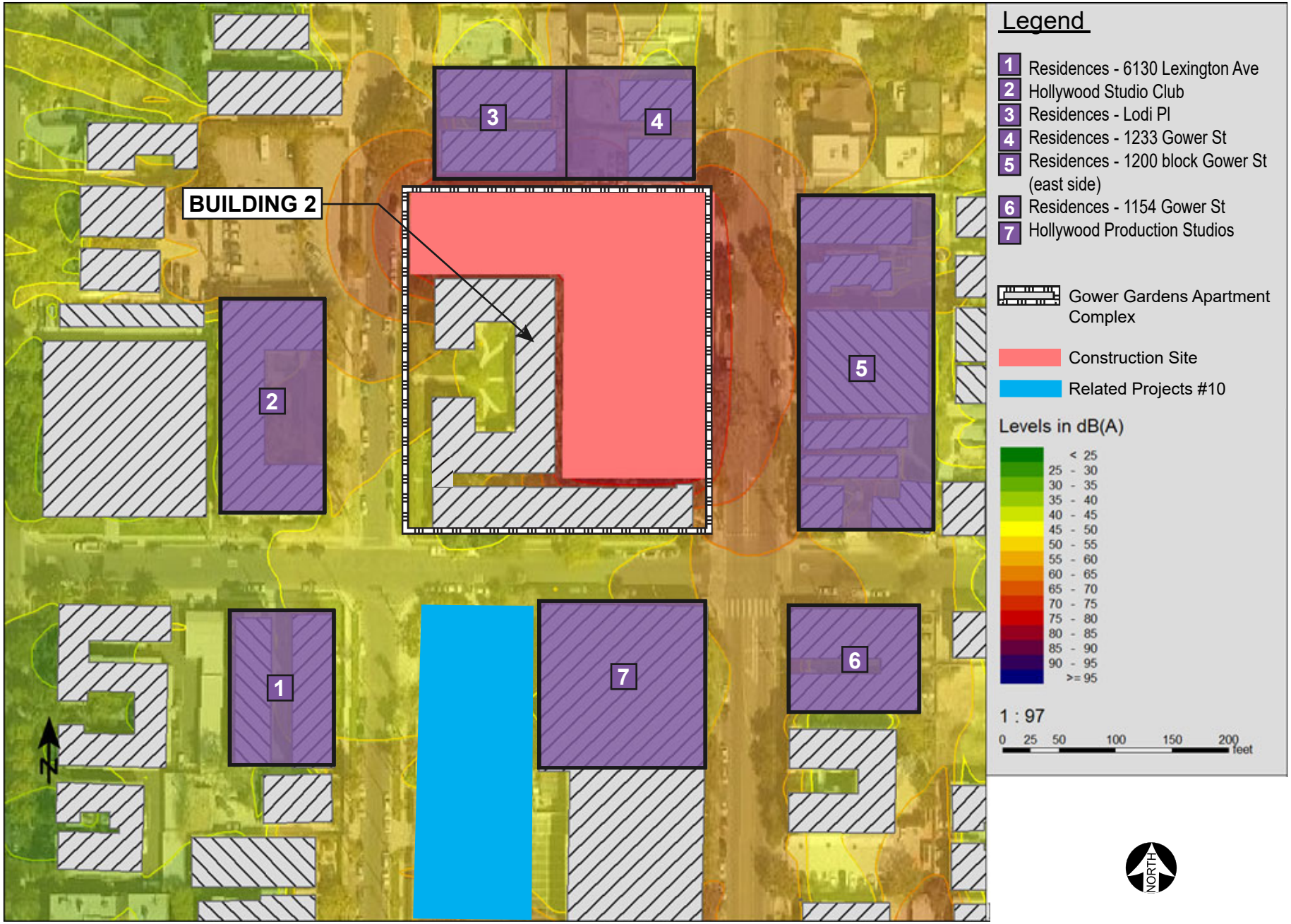
Estimated cumulative construction noise levels at the location of the sensitive receptors are shown in Tables XIII-12 and XIII-13. Cumulative construction noise contours (without mitigation) are shown in Figure XIII-3. As illustrated, cumulative noise impacts would be significant at the location of the same two sensitive receptors identified for Project-specific construction noise impacts and for Building 2. However, with implementation of Mitigation Measure NOISE-1 previously identified for the Project's specific construction-related noise impact (listed below), cumulative construction-related noise impacts would be less than significant (refer to Tables XIII-16 and XIII-17 and Figure XIII-5 included after Mitigation Measure NOISE-1).

Table XIII-12
Cumulative Construction Noise Levels at Off-Site Sensitive Receptors (Without Mitigation)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Residences 6130 Lexington Ave.	53.0	53.7	56.4	2.7	No
Hollywood Studio Club	58.2	52.3	59.2	**6.9**	**Yes**
Residences Lodi Pl.	63.0	52.3	63.4	**11.1**	**Yes**
Residences 1233 Gower St.	63.4	62.4	65.9	3.5	No
Residences 1200 block Gower St. (east side)	62.5	62.4	65.5	3.1	No
Residences 1154 Gower St.	56.1	63.6	64.3	0.7	No
Hollywood Production Studios	53.1	63.6	64.0	0.4	No
Source: DKA Planning, 2022.					

Table XIII-13
Cumulative Combined Construction Noise Levels at On-Site Receptors (Without Mitigation)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Residences Building 2 (northwest, facing north)	71.6	52.3	71.7	**19.4**	**Yes**
Residences Building 2 (central, facing east)	71.4	52.3	71.4	**19.1**	**Yes**
Residences Building 2 (southeast, facing north)	70.8	52.3	70.9	**18.6**	**Yes**
Source: DKA Planning, 2022.					



Source: DouglasKim+Associates, 2022.

Figure XIII-3
Cumulative Construction Noise Contours (Without Mitigation)

Construction Vibration

On-Site Construction Vibration

During construction of the Project, vibration impacts would be generally limited to buildings and structures located near the construction site (i.e., within 15 feet as related to building damage). As noted earlier, the Project's groundborne vibration levels would not exceed the applicable significance thresholds.

The two related projects identified by the City located closest to the Project Site are 65 feet south and 270 feet northeast of the Project Site, distances that exceed 15 feet of the Project Site and are too far away to generate cumulative vibration impacts when the Project begins construction in 2023. As such, there is no potential for a cumulative construction vibration impact that subjects nearby buildings to vibration levels that exceed the FTA's vibration damage criteria or Caltrans criteria for historic buildings.

Off-Site Construction Vibration

While haul trucks from any related projects and other concurrent construction projects could generate additional vibration along haul routes, the potential to damage buildings is extremely low. The Project could generate an average of one hourly haul truck trip during the course of construction. The FTA finds that "[i]t is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads." The vibration generated by a typical heavy truck would be approximately 0.00566 in/sec PPV at a distance of 50 feet.

As discussed above, there are existing buildings that are near the right- of-way of the anticipated haul route(s) for the Project (e.g., Gower Street). These buildings are anticipated to be exposed to groundborne vibration levels that are far less than the levels recommended by FTA as potential thresholds for building damage. Trucks from the two related projects within 0.25 miles are expected to generate similar groundborne vibration levels. However, the vibration levels generated from off-site construction trucks associated with the Project and other related projects along the anticipated haul route(s) would be below the most stringent building damage threshold of 0.12 PPV for buildings extremely susceptible to vibration. Therefore, potential cumulative vibration impacts with respect to building damage from off-site construction would be less than significant.

Operational Noise

On-Site Noise Sources

The two related projects that share sensitive receptors in common with the Project are both residential developments, which would include the same sources of noise as identified for the Project that typically do not generate excessive noise levels. As with the Project, the operational activities of both of the related projects would be required to

comply with LAMC noise requirements and would not result in a noticeable increase in ambient noise levels. Thus, cumulative operational noise impacts would be less than significant.

Off-Site Mobile Noise Sources

As noted earlier, the Project would add up to 311 net vehicle trips to the local roadway network on a peak weekday at the start of operations in 2025.[142] The two related projects within 0.25 miles of the Project Site at 1201 North Gower Street are projected to generate about 570 net vehicle trips in the A.M. peak hour.[143] When combined with the Project, these two developments would add up to 881 daily vehicle trips onto local roadways, which would represent approximately 6.6 percent of the 13,330 daily vehicles currently traveling on Gower Street at Fountain Avenue, far less than the doubling of traffic activity needed to elevate noise levels by 3 dBA.[144] Therefore, cumulative noise impacts due to off-site traffic would not increase ambient noise levels by 3 dBA to or within their respective "Normally Unacceptable" or "Clearly Unacceptable" noise categories, or by 5 dBA or greater overall. Additionally, the Project would not result in an exposure of persons to or a generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.

Vibration

On-Site Operation Vibration

During operation of the Project, vibration impacts are generally limited to buildings and structures located near the construction site (i.e., within 15 feet as related to building damage). The two related projects within 0.25 miles are residential developments that would not operate impact equipment and operations and would not generate substantial vibration. As a result, operation of new cumulative development in the area would have no potential to exceed FTA vibration damage standards at off-site receptors.

Off-Site Operation Vibration

Like the Project, any concurrent development near the Project Site would contribute normal passenger vehicle traffic that would generate negligible changes to roadway vibration. Use of larger heavy-duty trucks for delivery of goods and materials would be intermittent and not result in significant, cumulative increases in groundborne vibration on Gower Street and other local roadways. Therefore, potential cumulative vibration impacts with respect to building damage from off-site operations would be less than significant.

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[142] *Overland Traffic Consultants, 1201 N. Gower Street Transportation Assessment; August 2022.*

[143] *Ibid.*

[144] *Ibid.*

Mitigation Measures

As discussed above, without mitigation, the Project could result in a significant construction-related noise impact. PRC Section 21151.2 requires that a TPP incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs. Prior applicable EIRs include SCAG's 2020-2045 RTP/SCS Program EIR. The City has chosen to incorporate applicable portions of Mitigation Measure PMM NOISE-1 from the 2020-2045 RTP/SCS Program EIR. As shown in Tables XIII-14 through XIII-17 and Figures XIII-4 and XIII-5, with implementation of this mitigation measure (as amended for Project specifics), Project-specific and cumulative construction-related noise impact would be less than significant.

NOISE-1: The Project shall incorporate the following applicable measures from the 2020-2045 RTP/SCS Mitigation Measure "PMM NOISE-1" (as amended to address Project-specific impacts) to reduce the impact of construction-related noise to on-site and off-site receptors:

(a) Temporary noise barriers shall be installed along the perimeter of the Project Site along the northern property line, the property line along Lodi Place where construction would face, and along Building 2's frontage with the construction site. The barrier shall achieve at least a 6.2 dBA L_{eq} reduction at off-site sensitive receptors (not including Building 2) and a 14.5 dBA L_{eq} reduction at Building 2. The supporting structure shall be engineered and erected in order to comply with Los Angeles Municipal Code noise requirements, including those set forth in Chapter XI, Article 2 of the Los Angeles Municipal Code.

Table XIII-14
Project Construction Noise Levels at Off-Site Sensitive Receptors (With Mitigation)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Residences 6130 Lexington Ave.	44.5	53.7	54.2	0.5	No
Hollywood Studio Club	51.5	52.3	54.9	2.6	No
Residences Lodi Pl.	53.1	52.3	55.7	3.4	No
Residences 1233 Gower St.	55.2	62.4	63.2	0.8	No
Residences 1200 block Gower St. (east side)	52.6	62.4	65.5	3.1	No
Residences 1154 Gower St.	55.5	63.6	64.2	0.6	No
Hollywood Production Studios	50.5	63.6	63.8	0.2	No
Source: DKA Planning, 2022.					

Table XIII-15
Project Combined Construction Noise Levels at On-Site Receptors (With Mitigation)

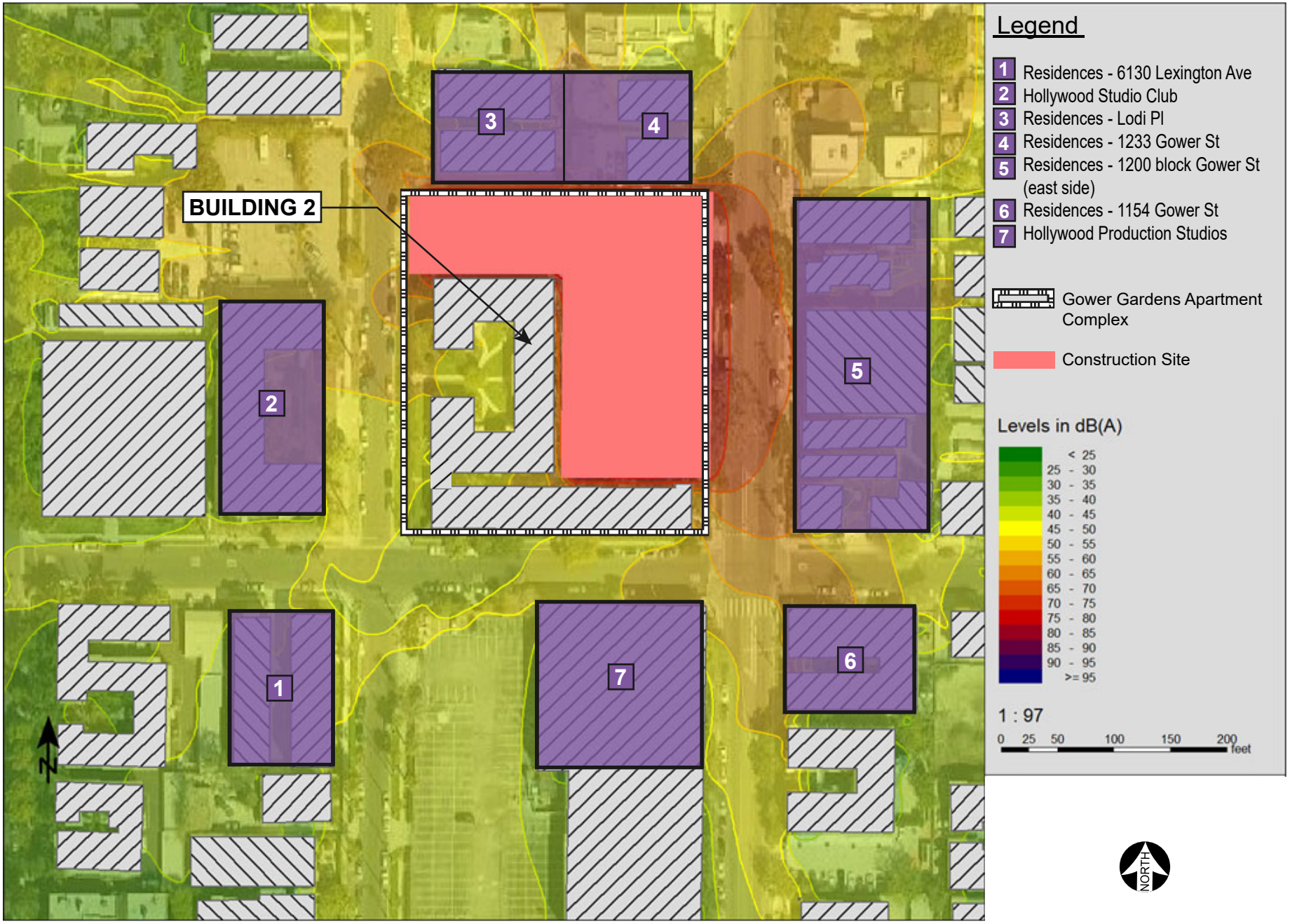
Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Residences Building 2 (northwest, facing north)	54.2	52.3	56.4	4.1	No
Residences Building 2 (central, facing east)	54.4	52.3	56.5	4.2	No
Residences Building 2 (southeast, facing north)	55.1	52.3	56.9	4.6	No
Source: DKA Planning, 2022.					

Table XIII-16
Cumulative Construction Noise Levels at Off-Site Sensitive Receptors (With Mitigation)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Residences 6130 Lexington Ave.	52.6	53.7	56.2	2.5	No
Hollywood Studio Club	54.0	52.3	56.2	3.9	No
Residences Lodi Pl.	52.3	52.3	55.3	3.0	No
Residences 1233 Gower St.	55.2	62.4	63.2	0.8	No
Residences 1200 block Gower St. (east side)	62.6	62.4	65.5	3.1	No
Residences 1154 Gower St.	56.0	63.6	64.3	0.7	No
Hollywood Production Studios	53.1	63.6	64.0	0.4	No
Source: DKA Planning, 2022.					

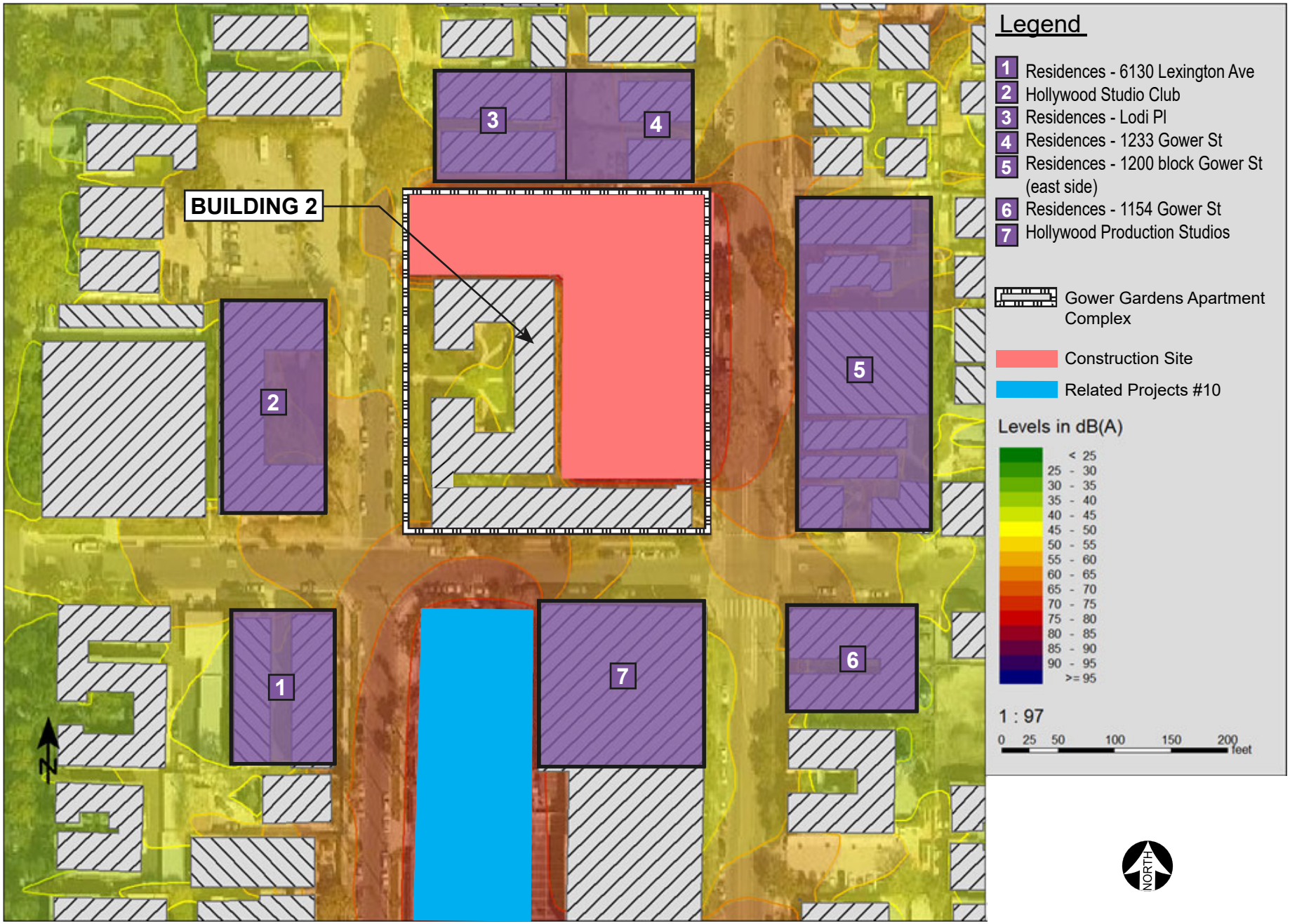
Table XIII-17
Cumulative Combined Construction Noise Levels at On-Site Receptors (With Mitigation)

Receptor	Maximum Construction Noise Level (dBA L_{eq})	Existing Ambient Noise Level (dBA L_{eq})	New Ambient Noise Level (dBA L_{eq})	Increase (dBA L_{eq})	Potentially Significant?
Residences Building 2 (northwest, facing north)	55.0	52.3	56.9	4.6	No
Residences Building 2 (central, facing east)	55.5	52.3	57.2	4.9	No
Residences Building 2 (southeast, facing north)	55.4	52.3	57.1	4.8	No
Source: DKA Planning, 2022.					



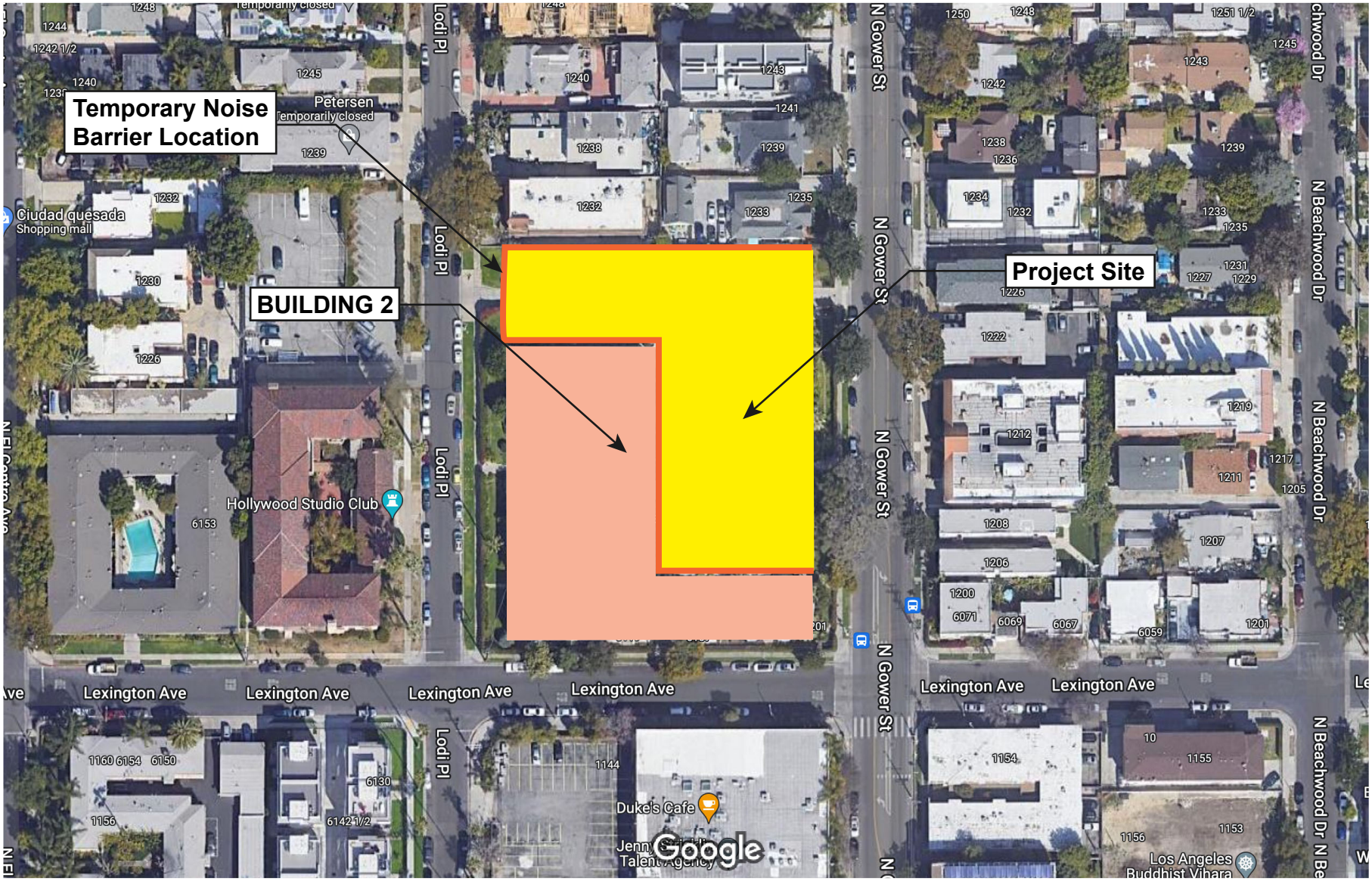
Source: DouglasKim+Associates, 2022.

Figure XIII-4
Project Construction Noise Contours (With Mitigation)



Source: DouglasKim+Associates, 2022.

Figure XIII-5
Cumulative Construction Noise Contours (With Mitigation)



Imagery ©2022 Maxar Technologies, U.S. Geological Survey, USDA/FPAC/GEO, Map data ©2022 50 ft

NORTH

Source: DouglasKim+Associates, 2022.

Figure XIII-6
Location of Temporary Noise Barriers

XIV. POPULATION AND HOUSING

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

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

Less Than Significant Impact. The Project Site is located within SCAG's jurisdiction. SCAG's mandated responsibilities include development plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. The 2020-2045 RTP/SCS includes the following proposed growth forecast for population, households, and employment for the City[145]:

- Population: 3,933,800 persons in 2016 and 4,771,300 in 2045;
- Households: 1,367,000 households in 2016 and 1,793,000 in 2045; and
- Employment: 1,848,300 jobs in 2016 and 2,135,900 in 2045.

Table XIV-1 lists SCAG's forecasts for population, housing, employment, and persons-per-household rate for the City, as well as the number and percent change.[146]

145 *SCAG, 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy, Demographics and Growth Forecast, Table 14,*

146 *Employment information is provided for informational purposes only.*

Table XIV-1
Population, Housing, Employment,
and Persons-per-Household Forecasts for the City
Based on the 2020-2045 RTP/SCS

Year	Population	Households	Employment[1]	Person/Households
2022[2]	4,104,076	1,454,862	1,843,156	2.82
2025[3]	4,193,714	1,498,967	1,881,340	2.80
2045	4,771,300	1,793,000	2,135,900	2.66
Change 2022 to 2025[3]				
Number Changed	+86,638	+44,105	+38,184	-0.03
Percent Changed	+2.13%	+3.09%	+2.1%	-0.88%
Change 2025 to 2045				
Number Changed	+577,586	+294,033	+254,560	-0.14
Percent Changed	+13.67%	+19.42%	+13.43%	-4.89%

[1] *Employment information is provided for informational purposes only.*
[2] *Population, housing, and employment rate data for 2022 (baseline year) and 2025 (anticipated buildout year of the Project) was calculated based on a linear interpolation of growth projections in SCAG's 2020-2045 RTP/SCS.*
[3] *Represents a comparison of baseline year to Project buildout year.*

Project Impacts

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless, the work requirements of most construction activities are highly specialized, so that construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project area and would not induce substantial population growth and/or require permanent housing. Therefore, the Project's population growth impacts associated with construction activities would be less than significant.

Operation

Indirect Growth

The Project includes infill development of a site that is located in an urbanized area. The Project does not include the development of any new roadways or utility infrastructure that would accommodate development other than the Project.

Direct Growth

The Project Site is currently developed with an apartment complex. The northern portion of the Project Site is developed with two one-story parking garages (Garage Buildings. The middle portion of the Project Site is developed with two multi-family residential buildings (Building 1 and Building 2). Building 1 contains 28 dwelling units, while Building 2 contains a total of 44 dwelling units (28 dwelling units in the eastern wing and 16 dwelling units in the southern wing). The Project includes demolition and removal of the two Garage Buildings and Building 1 (containing 28 dwelling units) from the Project Site and development of a 216,259-square-foot addition to Building 2 (that would include 108 multi-family residential units, of which 16 units (i.e., 15 percent of the base dwelling units) would be set aside for Very Low Income households and 2 replacement units set aside for Low Income households.

Based on *Transportation Assessment* prepared for the Project (refer to Appendix J), the Project would add a residential population of approximately 357 people to the Project Site. As shown in Table XIV-2, the Project's residential population and number of housing units would represent less than one percent of the forecasted growth between 2022 and 2025 and 2025 and 2045. Thus, the Project's population and housing growth would fall within the forecasted growth for the City. Thus, the Project would not represent substantial or significant unplanned growth as compared to projected growth for the City. Therefore, Project impacts related to population and housing growth would be less than significant.

Table XIV-2
Project Estimated Comparison for the City
Based on the 2020-2045 RTP/SCS

Project	Comparison Amount[1]	% of Comparison
As compared to Growth Forecast from 2022 to 2025		
357 residents	+86,638	0.41%
108 units	+44,105	0.24%
As compared to Growth Forecast from 2025 to 2045		
357 residents	+577,586	0.06%
108 units	+294,033	0.03%

[1] *Refer to Table XIV-1.*

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

Less Than Significant Impact. The Project includes the demolition and removal of the two Garage Buildings and Building 1 (containing 28 dwelling units) from the Project Site and the development of a 216,259-square-foot addition to Building 2 that would include 108 multi-family residential units, of which 16 units (i.e., 15 percent of the base dwelling units) would be set aside for Very Low Income households and 2 replacement units would be set aside for Low Income households. Prior to construction of the Project, the Project Applicant would pay monetary relocation assistance and provide residents ample time to obtain new housing in accordance with the Ellis Act. Additionally, the Project would add a net increase in housing units at the Project Site that could be rented by the current residents once the Project is complete. The Project would not require the construction of replacement housing for the residents. As such, the Project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere, and no impacts related to this issue would occur.

Cumulative Impacts

There are 18 related projects in the vicinity of the Project Site (refer to Appendix G in the *Transportation Assessment* prepared for the Project, included in Appendix J). Combined with the Project, the potential cumulative housing increase would be 2,259 dwelling units, and the potential cumulative residential population increase would be 6,914, based on a City persons-per-household rate of 2.77.[147] As shown on Table XIV-3, cumulative population would represent approximately 7.97 percent of the forecasted population growth between 2022 and 2025, and cumulative housing growth would represent approximately 5.36 percent of the forecasted housing growth between 2022 and 2025. Cumulative population growth would represent approximately 1.19 percent of the forecasted growth between 2025 and 2045, and cumulative housing growth would represent approximately less than one percent of the forecasted growth between 2025 and 2045. Thus, cumulative population and housing growth would fall within the forecasted growth for the City. Thus, cumulative development would not represent substantial or significant unplanned growth as compared to projected growth for the City. Therefore, cumulative impacts related to population and housing growth would be less than significant.

[147] *The 2.77 persons-per-household rate is based on 2020 Census Estimates. https://www.laalmanac.com/population/po30.php, accessed on September 29, 2022.*

Table XIV-3
Cumulative Estimated Comparison for the City
Based on the 2020-2045 RTP/SCS

Project	Comparison Amount[1]	% of Comparison
As compared to Growth Forecast from 2022 to 2025		
6,914 residents	+86,638	7.97%
2,367 units	+44,105	5.36%
As compared to Growth Forecast from 2025 to 2045		
6,914 residents	+577,586	1.19%
2,367 units	+294,033	0.80%

[1] *Refer to Table XIV-1.*

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, 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. The Project Site is currently developed with an apartment complex. The northern portion of the Project Site is developed with two one-story parking garages (Garage Buildings. The middle portion of the Project Site is developed with two multi-family residential buildings (Building 1 and Building 2). Building 1 contains 28 dwelling units, while Building 2 contains a total of 44 dwelling units (28 dwelling units in the eastern wing and 16 dwelling units in the southern wing). The Project includes demolition and removal of the two Garage Buildings and Building 1 (containing 28 dwelling units) from the Project Site and development of a 216,259-square-foot addition to Building 2 (that would include 108 multi-family residential units. Based on the *Transportation Assessment* prepared for the Project (refer to Appendix J), the Project would add a residential population of approximately 357 people to the Project Site. It should be noted that it is possible that all or some of the 357 residents could already live in the City with existing demand for fire protection services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for fire protection services. This analysis conservatively assumes that all 357 residents would be new residents to the City.

Fire protection services to the Project Site are provided by the LAFD. The LAFD considers fire protection services for a project adequate if a project: (1) is within the maximum response distance for the land uses proposed; (2) complies with emergency access

requirements; (3) complies with fire-flow requirements; and (4) complies with fire hydrant placement. Pursuant to LAMC Section 57.507.3.3, the maximum response distance between a high-density residential/commercial neighborhood land use such as the Project and an LAFD station that houses an engine company is 1.5 miles and an LAFD station that houses a truck company is 2.0 miles. If these distances are exceeded, all structures shall be constructed with automatic fire sprinkler systems.

The Project Site is served by several fire stations, as shown in Table XV-1. As shown, the Project Site is located approximately 0.6 miles from LAFD Fire Station 27. Regardless, the proposed building would be required to include a fire sprinkler system, which it will do.

Table XV-1
Fire Stations Serving the Project Site

No.	Address	Distance from Project Site (miles)
27	1327 Cole Avenue	0.6
41	1439 N. Gardner Street	2.1
52	4957 Melrose Avenue	1.4
82	5769 Hollywood Boulevard	1.0
Source: http://www.lafd.org/fire-stations/find-your-station		

All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department and LAFD standards and requirements for design and construction. Thus, the Project would not result in any significant impacts related to emergency access. Based on Section 57.507.3 of the LAMC, the approximate fire-flow requirement for a high-density residential/neighborhood commercial land use such as the Project is 4,000 gallons per minute from four hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch. Final fire-flow demands, fire hydrant placement, and other fire protection equipment would be determined for the Project during LAFD's plan check process, and any necessary infrastructure improvements would be completed by the Project. Through compliance with these requirements, the Project would not cause the need for new or altered fire protection facilities, the construction of which could result in significant environmental impacts. Therefore, Project impacts related to fire protection services would be less than significant.

Cumulative Impacts

Implementation of the 18 related projects listed in Appendix G of the *Transportation* Assessment prepared for the Project (refer to Appendix J) in concert with the Project could result in a net increase in the number of residents and employees in the Project Site area and could further increase the demand for fire protection services. Cumulative development requires the LAFD to continually evaluate the need for new or physically

altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for projects located farther than specified distances from the nearest LAFD fire stations to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the proposed Project and related projects would contribute. Thus, cumulative development would not cause the need for new or altered fire protection facilities, the construction of which could result in significant environmental impacts. Therefore, the cumulative impact to fire protection services would be less than significant.

b) Police protection?

Less Than Significant Impact. Police protection services are provided to the Project Site by the LAPD. The Project Site is located within the boundaries of LAPD's Hollywood Community area (Reporting District 0666).

Construction

Although there is the potential for Project construction to create an increase in demand for police protection services, the Project would provide security on the Project Site as needed and appropriate during the construction process. This security would include perimeter fencing, lighting, and security guards, thereby reducing the demand for LAPD services. The specific type and combination of construction site security features would depend on the phase of construction. The Applicant would install temporary construction fencing to secure the Project Site during the construction phase to ensure that valuable materials (e.g., building supplies and metals such as copper wiring), as well as construction equipment is not easily stolen or abused.

During construction, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Lights and other identifying noises compel traffic to pull to the side where available to provide access through traffic. Although minor traffic delays due to potential lane closures could occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times are considered to be less than significant for the following reasons:

(1) Emergency access would be maintained to the Project Sites during construction through marked emergency access points approved by the LAPD;

(2) Construction impacts are temporary in nature and do not cause lasting effects; and

(3) Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Sites, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Construction of the Project would not affect the LAPD's ability to respond to emergencies to the extent that there is no a need for any additional new or expanded police facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. For these reasons, Project construction impacts on police services would be less than significant.

Operation

The Project Site is currently developed with an apartment complex. The northern portion of the Project Site is developed with two one-story parking garages (Garage Buildings. The middle portion of the Project Site is developed with two multi-family residential buildings (Building 1 and Building 2). Building 1 contains 28 dwelling units, while Building 2 contains a total of 44 dwelling units (28 dwelling units in the eastern wing and 16 dwelling units in the southern wing). The Project includes demolition and removal of the two Garage Buildings and Building 1 (containing 28 dwelling units) from the Project Site and development of a 216,259-square-foot addition to Building 2 (that would include 108 multi-family residential units. Based on the *Transportation Assessment* prepared for the Project (refer to Appendix J), the Project would add a residential population of approximately 357 people to the Project Site. It should be noted that it is possible that all or some of the 357 residents could already live in the City with existing demand for police protection services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for police protection services. This analysis conservatively assumes that all 357 residents would be new residents to the City.

In accordance with the City's practices, the Project developer would be required to refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the LAPD. The Project would include standard security measures such as adequate security lighting, controlled residential access, and secure parking facilities. These measures for the Project shall be approved by the LAPD prior to the issuance of building permits. Further, the Applicant would be required to provide the Commanding Officer of the Pacific Community Police Station with a diagram of each portion of the Project. Through compliance with the requirements of the LAPD, the Project would not cause the need for new or altered police protection facilities, the construction of which

could result in significant environmental impacts. Therefore, Project impacts related to police protection services would be less than significant.

Cumulative Impacts

Implementation of the 18 related projects listed in Appendix G of the *Transportation Assessment* prepared for the Project (refer to Appendix J) in concert with the Project could result in a net increase in the number of residents and employees in the Project Site area and could further increase the demand for police protection services. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the review and oversight of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the proposed Project and related projects would contribute. According to the LAPD, the Project, combined with other past, present, or future projects, would not result in the need for new or altered police facilities. Thus, cumulative development would not cause the need for new or altered police protection facilities, the construction of which could result in significant environmental impacts. Therefore, the cumulative impact ON police protection services would be less than significant.

c) Schools?

Less Than Significant Impact. Los Angeles Unified School District's (LAUSD) schools that serve the Project Site and area are shown on Table XV-2. As shown in Table XV-3, the Project would generate a total of approximately 44 students. It should be noted that it is possible that all or some of the estimated Project students could already live in the City with an existing demand for school services and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for school services. This analysis conservatively assumes that all estimated Project students would be new students to the City. As stated, the elementary school serving the Project Site and area is currently operating under capacity, while the middle and high schools serving the Project Site and area are operating over capacity However, pursuant to California Government Code Section 65995, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Thus, the Project would not cause the need for new or altered school facilities, the construction of which could result in significant environmental impacts. Therefore, Project impacts on school services would be less than significant.

Table XV-2
LAUSD Schools Serving the Project Site Area and Student Capacity and Enrollment

School Type (Grade)	Capacity	Residential Enrollment	Actual Enrollment	(-)Under/(+)Over Capacity
Hollywood Elementary School	201	230	183	(29)
Le Conte Middle School	560	991	533	(431)
Hollywood High School	1,242	1,181	1,263	61

Source: LAUSD, 2022. Refer to Appendix I.

Table XV-3
Estimated Project Student Generation

Land Use	Size	Student Type	Student Generation Rate[1]	Total Students Generated
Residential	108 du	Elementary (K-6)	0.1953/du	21
		Middle (7-8)	0.0538/du	6
		High (9-12)	0.1071/du	15
		Special Day Class	0.0148/du	2
			Total	**44**

du = dwelling unit

[1] *2022 Developer Fee Justification Study, LAUSD, March 2022.*

Cumulative Impacts

Implementation of the 18 related projects listed in Appendix G of the *Transportation Assessment* prepared for the Project (refer to Appendix J) in concert with the Project could result in a net increase in the number of students in the Project Site area and could further increase the demand for school services. However, similar to the Applicant of the Project, the applicants of all the related projects would be required to pay the state-mandated applicable school fees to their respective school districts to ensure that no significant impacts on school services would occur. Thus, cumulative development would not cause the need for new or altered school facilities, the construction of which could result in significant environmental impacts. Therefore, the cumulative impacts on school services would be less than significant.

d) Parks?

Less Than Significant Impact. The Los Angeles Department of Recreation and Parks (LADRP) operates and maintains park and recreational services and facilities in the

Project area. Parks and recreational facilities that serve the Project Site are listed below.[148]

Neighborhood Parks (Within 2-mile Radius)

- Cahuenga Elementary Community School Park, located at 220 South Hobart Boulevard
- Carlton Way Park, located at 5927 West Carlton Way
- De Longpre Park, located at 1350 North Cherokee Avenue
- Dorothy J & Benjamin B. Smith Park, located at 7020 West Franklin Avenue
- Harvard Elementary Community School Park, located at 330 North Harvard Boulevard
- La Mirada Avenue Park, located at 5401 West La Mirada Avenue
- Lexington Avenue Pocket Park, located at 5523 West Lexington Avenue
- Robert L. Burns Park, located at 4900 West Beverly Boulevard
- Seily Rodriguez Park, located at 5707 West Lexington Avenue
- Selma Park, located at 6567 West Selma Avenue

Community Parks (Within 5-mile Radius)

- Barnsdall Park, located at 4800 West Hollywood Boulevard
- Bellevue Recreation Center, located at 826 North Lucille Avenue
- Chevy Chase Park, located at 4165 East Chevy Chase Drive
- Claude and Pepper Senior Citizen Center, located at 1762 South La Cienega Boulevard
- Denker Recreation Center, located at 1550 West 35th Place
- Echo Park, located at 751 North Echo Park Boulevard
- Echo Park (Deep) Pool, located at 1419 West Colton Street
- Eleanor Green Roberts Aquatic Center, located at 4526 West Pico Boulevard
- Elysian Valley Recreation Center, located at 1811 West Ripple Street
- Fairfax Senior Citizen Center, located at 7929 West Melrose Avenue
- Hollywood Recreation Center, located at 1122 North Cole Avenue
- Hoover Recreation Center, located at 1010 West 25th Street
- Lafayette Park, located at 625 South Lafayette Park Place
- Lake Street Community Center, located at 227 North Lake Street
- Las Palmas Senior Citizen Center, located at 1820 North Las Palmas Avenue
- Lemon Grove Recreation Center, located at 4959 West Lemon Grove Avenue
- Loren Miller Recreation Center, located at 2717 South Halladale Avenue
- MacArthur (General Douglas) Park, located at 2230 West 6th Street
- Normandie Recreation Center, located at 1550 South Normandie Avenue
- Pan Pacific Park, located at 7600 West Beverly Boulevard

148 *City of Los Angeles Department of Recreation and Parks, Darryl Ford, correspondence, October 11, 2022. Refer to Appendix I.*

- Poinsettia Recreation Center, located at 7341 West Willoughby Avenue
- Queen Anne Recreation Center, located at 1240 South West Boulevard
- Rancho Cienega Sports Complex, located at 5001 West Obama Boulevard
- Rio De Los Angeles State Park, located at 1240 South West Boulevard
- Robertson Recreation Center, located at 1641 South Pruess Road
- Seoul International Park, located at 3250 West San Marino Street
- Shatto Recreation Center, located at 3191 West 4th Street
- Silverlake Dog Park, located at 1869 North Silverlake Boulevard
- Silverlake Recreation Center, located at 1850 North Silver Lake Drive
- South Seas House Park, located at 2301 West 24th Street
- Toberman Recreation Center, located at 1725 South Toberman Street
- Tommy Lasorda Field of Dreams, located at 1901 North Waterloo Street
- Vineyard Recreation Center, located at 2942 South Vineyard Avenue
- Vista Hermosa Soccer Field, located at 1301 West 1st Street
- Weddington Park North, located at 10844 West Acama Street
- Weddington Park South, located at 10600 West Valleyheart Drive
- Yucca Community Center, located at 6671 West Yucca Street

Regional Parks (Within 10-mile Radius)

- Ascot Hills Park, located at 4371 East Multnomah Street
- Beverly Glen Park, located at 2448 North Angelo Drive
- Campo de Cahuenga, located at 3919 North Lankershim Boulevard
- Charles F. Lummis Home, located at 200 East Avenue 43
- Coldwater Canyon Park, located at 12601 North Mulholland Drive
- Deervale-Stone Canyon Park, located at 14890 West Valley Vista Boulevard
- Eagle Rock Hillside Park, located at 2747 South Valle Vista Drive
- Elysian Park, located at 929 West Academy Road
- Ernest E Debs Regional Park, located at 4235 North Monterey Road
- Exposition Park Rose Garden, located at 701 West State Drive
- Griffith Park, located at 4730 North Crystal Springs Drive
- Heritage Park, located at 3800 North Homer Street
- Holmby Park, located at 601 South Club View Drive
- La Tuna Canyon Park, located at 6801 North La Tuna Canyon Road
- Laurel Canyon Mulholland Park, located at 8100 West Mulholland Drive
- Rose Hill Park, located at 3606 North Boundary Avenue
- Runyon Canyon Park, located at 2000 North Fuller Avenue
- Sepulveda Basin Recreation Area, located at 17017 West Burbank Boulevard
- Verdugo Mountain Park, located at 9999 South Edmore Place
- Villa Cabrini Park, located at 9401 West Cabrini Drive
- Wattles Garden Park, located at 1824 North Curson Avenue

The Project Site is currently developed with an apartment complex. The northern portion of the Project Site is developed with two one-story parking garages (Garage Buildings.

The middle portion of the Project Site is developed with two multi-family residential buildings (Building 1 and Building 2). Building 1 contains 28 dwelling units, while Building 2 contains a total of 44 dwelling units (28 dwelling units in the eastern wing and 16 dwelling units in the southern wing). The Project includes demolition and removal of the two Garage Buildings and Building 1 (containing 28 dwelling units) from the Project Site and development of a 216,259-square-foot addition to Building 2 (that would include 108 multi-family residential units. Based on the *Transportation Assessment* prepared for the Project (refer to Appendix J), the Project would add a residential population of approximately 357 people to the Project Site. It should be noted that it is possible that all or some of the 357 residents could already live in the City with existing demand for parks and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for parks. This analysis conservatively assumes that all 357 residents would be new residents to the City.

As shown in Table XV-4, based on LAMC open space standards and after application of a 25 percent reduction in open space pursuant to State Density Bonus law, the Project would be required to include a minimum of 10,181 square feet of open space. As shown in Table XV-5, the Project would provide 10,181 square feet of open space, including an exercise room, recreation room, screen/game room, a deck, and private open space.

TableXV-4
Open Space Requirements

Unit Type	Number of Units	LAMC Section 12.21 G.2 Open Space Requirement[1]	Size
1 Bedroom	49	100 sf/unit	4,900 sf
2 Bedroom	33	125 sf/unit	4,125 sf
3 Bedroom	54	175 sf/unit	4,550 sf
		LAMC Section 12.21 G.2 Requirement	**13,575 sf**
		(Less 25% Off-Menu Incentive)	***(3,394 sf)***
		Total Required	***10,181 sf***

LAMC = Los Angeles Municipal Code *sf = square feet*

[1] *The LAMC's open space requirements for a residential development with more than 6 units are as follows:*

Units with fewer than 3 habitable rooms = 100 sf/unit
Units with 3 habitable rooms = 125 sf/unit
Units with more than 3 habitable rooms = 175 sf/unit

"Habitable room" as defined by the City for the purposes of calculating open space requirements generally includes bedrooms and living rooms and excludes kitchens, hallways, bathrooms, and closets.

Table XV-5
Project Open Space

Type	Size
Roof Deck	2,033 sf
South Courtyard	1,435 sf
North Courtyard	1,830 sf
Third Floor Recreation Room	788 sf
Third Floor Gym	745 sf
Private Decks	3,350
Total	***10,181 sf***

sf = square feet

Source: pk architecture, February 27, 2023.

In accordance with Ordinance 184,505, the Applicant shall be required to dedicate land or to pay a fee for the purpose of developing park and recreational facilities to mitigate the Project's demand for parks and recreational facilities. Through compliance with City requirements, the Project would not cause the need for new or altered parks and recreational services, the construction of which could result in significant environmental impacts. Therefore, Project impacts related to parks and recreational services would be less than significant.

Cumulative Impacts

Implementation of the 18 related projects listed in Appendix G of the *Transportation Assessment* prepared for the Project (refer to Appendix J) in concert with the Project could result in a net increase in the number of residents in the Project Site area and could further increase the demand for parks. However, similar to the Project, the applicants of the residential related projects would be required to provide open space in accordance with the LAMC and to comply with Ordinance 184,505, which requires payment of park fees or parkland dedication to mitigate demand for parks. Thus, cumulative development would not cause the need for new or altered parks and recreational facilities, the construction of which could result in a significant impact. Therefore, the cumulative impact on parks would be less than significant.

e) Other public facilities?

Libraries

Less Than Significant Impact. Libraries in the Project Site area include the following:

- Frances Howard Goldwyn-Hollywood Regional Branch Library
- John C. Fremont Branch Library
- Vista Branch Library

- Lous B. Mayer Library
- Cahuenga Branch Library

The Project Site is currently developed with an apartment complex. The northern portion of the Project Site is developed with two one-story parking garages (Garage Buildings. The middle portion of the Project Site is developed with two multi-family residential buildings (Building 1 and Building 2). Building 1 contains 28 dwelling units, while Building 2 contains a total of 44 dwelling units (28 dwelling units in the eastern wing and 16 dwelling units in the southern wing). The Project includes demolition and removal of the two Garage Buildings and Building 1 (containing 28 dwelling units) from the Project Site and development of a 216,259-square-foot addition to Building 2 (that would include 108 multi-family residential units. Based on the *Transportation Assessment* prepared for the Project (refer to Appendix J), the Project would add a residential population of approximately 357 people to the Project Site. It should be noted that it is possible that all or some of the 357 residents could already live in the City with existing demand for libraries and would relocate to the Project Site, thereby resulting in a proportional net increase or no net increase in the demand for libraries. This analysis conservatively assumes that all 357 residents would be new residents to the City.

Although the Project could increase the demand for library services in the Project Site area, because the area is well served by several existing libraries, the Project would not cause the need for new or altered library facilities, the construction of which could result in significant environmental impacts. Therefore, Project impacts related to library services would be less than significant.

Cumulative Impacts

Implementation of the residential related projects listed in Appendix G of the *Transportation Assessment* prepared for the Project (refer to Appendix J) in concert with the Project could result in a net increase in the number of residents in the Project Site area and could further increase the demand for library services. However, the Project Site area is well served by several existing libraries, and cumulative development would not cause the need for new or altered library facilities, the construction of which could result in significant environmental impacts. Therefore, cumulative impacts related to library services would be less than significant.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
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 facility would occur or be accelerated?

Less Than Significant Impact. Refer to the response to Checklist Question XI(a)(iv) (Public Services – Parks).

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

No Impact. The Project includes development of a variety of indoor and outdoor private and public open space areas that would serve Project residents. The impact of developing the Project's open space is inclusive of the overall impacts of the Project. The Project does not include the construction of recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment. Therefore, no Project impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Refer to the response to Checklist Question XI(a)(iv) (Public Services – Parks).

XVII. TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
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 analysis in this section is primarily based on the following (refer to Appendix J):

- *Transportation Assessment for a Proposed Residential Development, Overland Traffic Consultants, Inc., August 2022.*

Senate Bill 743 (SB 743), effective in January 2014, required the Governor's Office of Planning and Research to change the CEQA guidelines regarding the analysis of transportation impacts. Under SB 743, the focus of transportation analysis shifts from driver delay or level of service (LOS) to VMT, in order to reduce GHG emissions, create multimodal networks, and promote mixed-use developments.

To adapt to SB 743, the City Planning Commission, on February 28, 2019, recommended the approval of revised guidelines to include new transportation analysis screening procedures and thresholds, subsequently approved by the City Council on July 30, 2019. The Los Angeles Department of Transportation (LADOT) concurrently adopted its Transportation Assessment Guidelines (TAG), which were subsequently revised in July 2020, and which define the methodology of analyzing a project's transportation impacts in accordance with SB 743.

Per the TAG, the CEQA transportation analysis contains the following thresholds for identifying significant impacts:

- Threshold T-1: Conflicting with Plans, Programs, Ordinances, or Policies

- Threshold T-2.1: Causing Substantial Vehicle Miles Traveled (VMT)
- Threshold T-2.2: Substantially Inducing Additional Automobile Travel
- Threshold T-3: Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use

These thresholds are discussed below.

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

No Impact. As discussed below, the Project would not conflict with any applicable programs, plans, ordinances, or policies addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Therefore, no impacts related to Threshold T-1would occur as a result of the Project.

Threshold T-1: Conflicting with Plans, Programs, Ordinances, or Policies

To guide the City's Mobility Plan 2035 (Transportation Element of the General Plan), the City adopted programs, plans, ordinances, and policies that establish the transportation planning framework for all travel modes, including vehicular, transit, bicycle, and pedestrian facilities. Land development projects are evaluated for conformance with these City adopted transportation plans, programs, and policies.

The Threshold T-1 impact criteria applies if a project would conflict with a program, plan, ordinance, or policy addressing the transportation circulation system. However, it should be noted that a project would not result in an impact merely based on whether a project would not implement a program, policy, or plan. Rather, it is the intention of this threshold test to ensure that proposed development does not conflict with nor preclude the City from implementing adopted programs, plans, and policies.

Screening Criteria for Policy Analysis

If the development project requires a discretionary action, and the answer is yes to any of the following screening threshold questions, further analysis may be needed to assess whether the proposed project would conflict with plans, programs, ordinances, or policies:

1. *Does the project require a discretionary action that requires the decision maker to find that the decision substantially conforms to the purpose, intent, and provisions of the General Plan?*

   Answer: Yes, the Project requires a discretionary action.

2. *Is the Project known to directly conflict with a transportation plan, policy or program adopted to support multi-modal transportation options or public safety?*

   Answer: No, the Project would not conflict with these key City planning documents, and potential impacts would be less than significant. Refer to Table XVII-1.

3. *Is the Project proposing to, or required to, make any voluntary or required, modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb lines, etc.)?*

   Answer: Yes, Pursuant to the following Mobility Element Street Standards for the Project's adjacent street standards, the Project has a 1-foot dedication requirement on Gower Street but no street widening requirements.

   - Gower Street is a Modified Avenue III roadway, which has a street standard of 72-foot right-of-way (36-foot half-width) and a 48-foot roadway (24-foot half-width) per NavigateLA. Gower Street is dedicated to 70-foot right-of-way (35-foot west half-width) and a 48-foot roadway (24-foot west half-width) adjacent to the Project Site. A 1-foot dedication is needed to satisfy the right-of-way standard, but no street widening is necessary to satisfy the Modified Avenue III standard for Gower Street. The Project Site plan shows a 1-foot dedication along the Project's Gower Street frontage.

   - Lodi Place is a Local roadway, which has a street standard of 60-foot right-of-way (30-foot half-width) and 36-foot roadway (18-foot half-width) per NavigateLA. Lodi Place is dedicated to 60-foot right-of-way (30-foot east half-width) and a 30-foot roadway (15-foot east half-width) adjacent to the Project Site. No dedication is needed to satisfy the right-of-way standard. However, a 3-foot street widening (reducing the adjacent sidewalk/parkway from 15 feet to 12 feet) would be necessary to satisfy the Local roadway standard for Lodi Place.

   - Lexington Avenue is a Local roadway, which has a street standard of 60-foot right-of-way (30-foot half-width) and 36-foot roadway (18-foot half-width) per NavigateLA. Lexington Avenue is dedicated to a 60-foot right-of-way (30-foot north half-width) and a 40-foot roadway (20-foot north half-width) adjacent to the Project Site. No dedication is needed to satisfy the right-of-way standard. However, a 2-foot sidewalk widening by reducing the adjacent street would be necessary to satisfy the Local roadway 12-foot sidewalk standard.

The TAG provides a list of key City plans, policies, programs, and ordinances for consistency review as shown in Table XVII-1. Projects that conform with and do not conflict with the City's development policies and standards addressing the circulation system are considered consistent. As demonstrated in Table XVII-1, the Project would be substantially consistent with all applicable plans, policies, programs, and ordinances identified in the TAG. Therefore, Project impacts related to Threshold T-1 would be less than significant.

b) Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3?

Less Than Significant Impact. As discussed below, Project impacts related to VMT (Threshold T-2.1) would be less than significant.

Threshold T-2.1: Causing Substantial VMT

The intent of this threshold question is to assess whether a land development project causes a substantial VMT impact. CEQA Guidelines Section 15064.3(b) relates to use of VMT as the methodology for analyzing transportation impacts. To address this question, LADOT's TAG identified significant VMT impact thresholds for each of the seven Area Planning Commission (APC) sub-areas in the City. A project's VMT is compared against its applicable APC threshold goal for household VMT per capita and/or work VMT per employee to evaluate the significance of the project's VMT.

A development project will have a potential significant impact if the development project generates VMT exceeding 15 percent below the existing average VMT for the applicable APC area in which the project is located per TAG's Table 2.2-1 (refer to Table XVII-2).

The Project is in the Central APC sub-area, which limits daily household VMT per capita to a threshold value of 6.0 and a daily work VMT per employee to a threshold value of 7.6 (i.e., 15 percent below the existing VMT for the Central APC).

The Project's design features include TDM measures that reduce trips and VMT through strategies selected in the VMT calculator. Specifically, the Project's TDM measures include reduced vehicle parking and inclusion of bicycle parking both of which are existing regulatory measures and part of the Project, as described below by LADOT's TAG.

- <u>Parking Strategy – Reduced Parking Supply</u>: This strategy changes the on-site parking supply to provide less than the amount of vehicle parking required by direct application of the LAMC without consideration of parking reduction mechanisms permitted in the code. Permitted reductions in parking supply could utilize parking reduction mechanisms such as Transit Oriented Communities (TOC), Density Bonus, Bike Parking ordinance, or locating in an Enterprise Zone or Specific Plan area.

Table XVII-1
Consistency Check with Key City Plans, Programs, Ordinances, and Policies

	Plan or Policy	Consistent?	Notes	Preclude City Implementation
1.	LA Mobility Plan 2035	Yes	The Project will comply with the LA Mobility Plan 2035 street standards as required by the City of Los Angeles Bureau of Engineering Department.	No
2	Plan for Healthy LA	Yes	The Project would support Policy 5.7 (Land Use Planning for Public Health and Greenhouse Gas (GHG) Emission Reduction) by reducing single-occupant-vehicle trips by its proximity to high-quality and high-frequency transit service. The Project would include both electric charging stations and pre-wiring spaces for potential future electric vehicle charging (Ord. 186485). The Project provides pedestrian access separate from the vehicular access. The Project would not conflict with policies in the Plan for Healthy LA.	No
3.	Land Use Element of the General Plan	Yes	The Project is in the Hollywood Community Plan area, which is currently going through a Plan update. The Project would be in substantial conformance with the purposes, intent, and provisions of the General Plan and the Community Plan.	No
4.	Specific Plans	Yes	The Project Site is not located in a Specific Plan area	No
5.	LAMC Section 12.21.A.16 (Bicycle Parking)	Yes	The Project complies with the ratio of short- and long-term bicycle parking pursuant to LAMC Section 12.21.A.16.	No

Table XVII-1
Consistency Check with Key City Plans, Programs, Ordinances, and Policies

	Plan or Policy	Consistent?	Notes	Preclude City Implementation
6.	LAMC Section 12.26.J (TDM Ordinance)	Yes	LAMC Section 12.26J for Transportation Demand Management and Trip Reduction Measures applies only to the construction of new non-residential floor area greater than 25,000 square feet. The Project does not include the development of non-residential uses.	No.
7.	LAMC Section 12.37 (Waivers of Dedications and Improvement)	Yes	No waivers for street dedications or improvements are requested. The Project would comply with the Mobility Street Standards to serve long-term mobility needs identified in the Mobility Plan 2035.	No
8.	Vision Zero Action Plan	Yes	Vision Zero is a strategy to eliminate all traffic fatalities and severe injuries, while increasing safe, healthy, equitable mobility for all. The Project would not preclude or conflict with the implementation of future Vision Zero projects in the public right-of-way, no Vision Zero Projects have been identified in the vicinity of the Project Site as shown on the Los Angeles safety improvement maps. https://ladotlivablestreets.org/programs/vision-zero/maps	No
9.	Vision Zero Corridor Plan	Yes	No Vision Zero Corridor projects are planned in the study area. The Project would not preclude or conflict with the implementation of future Vision Zero street projects in the public right-of-way.	No
10.	Citywide Design Guidelines			

Table XVII-1
Consistency Check with Key City Plans, Programs, Ordinances, and Policies

	Plan or Policy	Consistent?	Notes	Preclude City Implementation
	• Guideline 1: Promote a safe, comfortable, and accessible pedestrian experience for all.	Yes	The Project will create a continuous and straight sidewalk clear of obstructions for pedestrian travel. The Project will provide adequate sidewalk width and right-of-way that accommodates pedestrian flow and activity. Pedestrian access will be at street level with direct access to the surrounding neighborhood and amenities.	No
	• Guideline 2: Carefully incorporate vehicular access such that it does not degrade the pedestrian experience.	Yes	The Project complies with the Citywide Design Guidelines incorporating vehicle access locations that do not discourage and/or inhibit the pedestrian experience. Vehicular access is from Gower Street and Lodi Place.	No
	• Guideline 3: Design project to actively engage with streets and public space and maintain human scale.	Yes	The building design uses attractive architectural elements. The Project would not preclude or conflict with the implementation of future streetscape projects in the public right-of-way.	No

Source: Overland Traffic Consultants, Inc., August 2022.

Table XVII-2
VMT Impact Criteria

APC	15% Below APC Criteria	
	Daily Household VMT per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1
Source: TAG, LADOT, July 2020.		

- Bike Parking: This strategy involves the implementation of short- and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project (LAMC Section 12.21.A.16). The Project would provide 87 bicycle parking spaces on-site (79 long-term spaces and 8 short-term spaces).

The Project's household VMT per capita is estimated at 4.1 per the LADOT VMT calculator tool and is below the VMT threshold for the Central APC. The work VMT per employee is not applicable to the Project because no commercial use is proposed. (Results of the Project's VMT calculations are included in Appendix F of the Transportation Assessment included in Appendix J of this SCEA). Therefore, Project impacts related to Threshold T-2.1 would be less than significant.

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

Less Than Significant Impact. As discussed below, Project impacts related to geometric design features or incompatible uses (Threshold T-3.1) would be less than significant.

Threshold T-3: Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use

Impacts regarding the potential increase of hazards due to a geometric design feature relate to the design of access points to and from the Project Site and may include safety, operational, or capacity impacts. Impacts can be related to vehicle conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site.

Based on a review of Project plans, no deficiencies are apparent in the site access plans that would be considered significant. This determination considers the following factors:

1. The Project includes a total of 99 vehicle parking spaces at-grade and one level above. Access to the at-grade parking would be from two driveways – an exit-only driveway to Gower Street and an entry-only driveway from Lodi Place. An internal ramp would connect the at-grade parking level to the basement level used primarily as parking/storage. Access to the upper-level parking will be from a two-way driveway on Lodi Place. On-site parking is located a sufficient distance back to avoid vehicles spilling back onto the adjacent sidewalk.

2. The Project's access is consistent with LADOT driveway width and placement per LADOT Manual of Policies and Procedures, Section 321, Driveway Design, which addresses such factors as driveway placement, width, and type. LADOT reviewed and preliminarily approved the Project access in a City Case Management Meeting. The final design of the Project access would be reviewed by the City Department of Building and Safety, Bureau of Engineering, and LADOT during the building permit process.

The Project would not present any hazardous geometric design features that would result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle safety hazards. Therefore, Project impacts related to Threshold T-3 would be less than significant.

d) Would the project result in inadequate emergency access?

Less Than Significant Impact. All ingress/egress associated with the Project would be designed and constructed in conformance to all applicable City Building and Safety Department, Bureau of Engineering, and LAFD standards and requirements for design and construction. The drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, existing emergency access to the Project Site and surrounding uses would be maintained during operation of the Project.

Also, prior to issuance of a building permit, the Applicant would be required to submit parking and driveway plans to the Bureau of Engineering, LAFD, and LADOT for approval to ensure that the Project complies with code-required emergency access. Therefore, the Project would not result in any significant impacts related to emergency access.

Cumulative Impacts

OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA states the following regarding cumulative traffic impacts:

> *Cumulative Impacts. A project's cumulative impacts are based on an assessment of whether the "incremental effects of an individual 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." (Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1).) When using an absolute VMT metric, i.e., total VMT (as recommended below for retail and transportation projects), analyzing the combined impacts for a cumulative impacts analysis may be appropriate. However, metrics such as VMT per capita or VMT per employee, i.e., metrics framed in terms of efficiency (as recommended below for use on residential and office projects), cannot be summed because they employ a denominator. A project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact. Accordingly, a finding of a less-than-significant project impact would imply a less than significant cumulative impact, and vice versa. This is similar to the analysis typically conducted for greenhouse gas emissions, air quality impacts, and impacts that utilize plan compliance as a threshold of significance. (See Center for Biological Diversity v. Department of Fish & Wildlife (2015) 62 Cal.4th 204, 219, 223; CEQA Guidelines, § 15064, subd. (h)(3).)

As discussed above, the Project is screened out from further VMT analysis, as it is presumed the Project would cause less-than-significant transportation impacts. For this reason, the Project's contribution to cumulative traffic impacts would also be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES

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

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	☒
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)?

No Impact. The Project's demolition of the existing improvements on the Project Site would not involve the demolition of any historic resources. As discussed in detail in response to Checklist Question V(a) (Cultural Resources – Historic Resources), no significant historical resources are located on the Project Site. Also, the Project would not impact any offsite historical resources. Therefore, no impacts related to this issue would occur as a result of the Project.

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant With Mitigation Incorporated. The Project includes demolition and removal of two garage buildings and one of the residential buildings from the Project Site and development of the site with a 216,259-square-foot addition to one of the remaining residential buildings on the site that would include 108 multi-family residential units. The result of the Sacred Lands File (SLF) search conducted through the NAHC was negative.[149] However, the Project would include ground-disturbing activities and any unknown resources could be encountered during the Project's construction phase. To ensure that development in the City does not result in any significant impacts related to unknown tribal cultural resources, the Project would be required to implement Mitigation Measure TCR-1. With implementation of this mitigation measure, Project impacts related to this issue would be less than significant.

Mitigation Measures

To ensure that Project impacts related to the inadvertent discovery of tribal cultural resources would be less than significant, the following mitigation measure is required:

TCR-1: Inadvertent discovery of tribal cultural resources

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are

[149] *Native American Heritage Commission, Andrew Green, Cultural Resources Analyst, correspondence, August 31, 2022. Refer to Appendix K.*

traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1290.

- If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

- The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.

- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.

- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.

- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources

that could occur as a result of development, as necessary. As discussed previously, with implementation of Mitigation Measure TCR-1, Project impacts associated with unknown tribal cultural resources would be less than significant. Additionally, the occurrence of these impacts would be limited to the Project Site and would not contribute to any potentially significant tribal cultural resources impacts that could occur at the sites of the related projects. As such, the Project would not contribute to any potential cumulative impacts related to tribal cultural resources. Therefore, cumulative impacts related to tribal cultural resources would be less than significant.

XIX. UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
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?	☐	☐	☒	☐

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

Less Than Significant Impact. As discussed below, Project impacts related to these issues would be less than significant.

Water Facilities

Local water conveyance infrastructure in the vicinity of the Project Site is maintained and operated by LADWP. The Project would connect to the existing water conveyance infrastructure near the Project Site that includes a 4-inch line in Lodi Place, a 6-inch line in Lexington Avenue, and an 18-inch line in Gower Street. As shown in Table XIX-1, the Project's operational phase would consume a net increase of approximately 11,080 gallons of water per day (or 0.01 mgd). It should be noted that this amount does not take into account the reduction in water consumption associated with the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely reduce the Project's water consumption (and wastewater generation) shown on Table XIX-1.

Table XIX-1
Estimated Project Water Consumption and Wastewater Generation[1]

Proposed Use	Amount	Rate[2]	Total (gpd)
Existing			
Residential			
2-bedroom	28 units	150 gpd/du	4,200
Project			
Residential			
1-bedroom	49 du	110 gpd/du	5,390
2-bedroom	33 du	150 gpd/du	4,950
3-bedroom	26 du	190 gpd/du	4,940
		Total Project	***15,280***
		(Less Existing)	*(4,200)*
		Net Total	**11,080**

gpd = gallons per day *du = dwelling unit*

[1] *Assumes wastewater generation is equivalent to water consumption.*
[2] *Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Factors, April 6, 2012.*

For these reasons, the Project would not require or result in relocation or the construction of new or expanded water facilities, the construction or relocation of which could cause significant environmental effects. Therefore, Project impacts related to water facilities would be less than significant.

Cumulative Impacts

Implementation of the 18 related projects in concert with the Project could result in a net cumulative increased demand on water conveyance infrastructure (refer to Appendix G in the *Transportation Assessment* prepared for the Project, included in Appendix J). Table XIX-2 shows that the cumulative development would consume approximately 581,593 gallons of water per day (or 0.58 mgd per day). It should be noted that this amount does not take into consideration the water consumption reductions associated with removal of existing uses or the effectiveness of the City's current water conservation measures, both of which would likely substantially reduce the cumulative water consumption and wastewater generation shown in Table XIX-2. The applicants of the related projects would be subject to review by the City to ensure that existing infrastructure would be adequate to meet the water demand requirements for each project. All development is subject to standard requirements regarding potential infrastructure improvements need to meet respective water infrastructure needs. Additionally, all development is required to comply with Fire Code requirements for fire flow and other fire protection requirements and are subject to ongoing evaluations by the LAFD to ensure water conveyance infrastructure is adequate. Compliance with existing regulations would ensure that cumulative impacts related to water infrastructure would be less than significant.

Table XIX-2
Estimated Cumulative Water Consumption and Wastewater Generation[1]

Land Uses	Size	Rate[2]	Total (gpd)
Multi-Family Residential	2,259 du[3]	150 gpd/du	338,850
Market	81,102 sf	50 gpd/1,000 sf	4,055
Retail	50,687 sf	50 gpd/1,000 sf	2,534
Hotel	450 rooms	120 gpd/room	54,000
Restaurant	1,422 seats[4]	30 gpd/seat	42,660
Office	795,055 sf	120 gpd/1,000 sf	95,406
Studio	628,005 sf	50 gpd/1,000 sf	31,400
Commercial	31,960 sf	50 gpd/1,000 sf	1,598
		Subtotal	***570,503***
		Plus Project	*11,080*
		Total	**581,593**

gpd = gallons per day *du = dwelling unit* *sf = square feet*

1 *Assumes wastewater generation is equivalent to water consumption.*
2 *Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Factors, April 6, 2012.*
3 *Conservatively assumes all units in related projects are 2-bedroom units.*
4 *Assumes 30 square feet per seat.*

Wastewater Treatment

Less Than Significant Impact. Sewer conveyance infrastructure serving the Project includes an 8-inch line on Lodi Place, a 10-inch line on Gower Street, and an 8-inch line on Lexington Avenue.[150] The Project Site is located within the service area of the Hyperion Treatment Plant (HTP), which has been designed to accommodate both dry and wet weather days with a maximum daily flow of 450 million gallons per day (mgd) to and peak wet weather flows of 800 mgd.[151] Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the Los Angeles Regional Water Quality Control Board's (LARWQCB) discharge policies for the Santa Monica Bay. The HTP currently treats an average daily flow of approximately 260 mgd.[152] Thus, there is approximately 190 mgd available capacity (based on dry weather flows). The Project would generate a net increase of approximately 11,080 gallons of wastewater per day (or 0.01 mgd) (refer to Table XIX-1) in wastewater generation associated with the effectiveness of water conservation measures required in accordance with the City's Green Building Code, which would likely reduce the Project's water consumption (and wastewater generation) shown in Table XIX-1. With a remaining daily capacity of 190 mgd, the HTP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

Implementation of the 18 related projects in concert with the Project could result in an increase the need for wastewater treatment refer to Appendix G in the *Transportation Assessment* prepared for the Project, included in Appendix J). Table XIX-2 shows that the cumulative development in the Project Site area could result in the need to treat approximately 581,583 gallons of wastewater per day (or 0.58 mgd per day). It should be noted that this amount does not take into account the net decrease in wastewater generation that would occur as a result of removal of existing uses or the effectiveness of the City's current water conservation measures, both of which would likely substantially reduce the cumulative water consumption and wastewater generation shown on Table XIX-2. With a remaining treatment capacity of approximately 190 mgd, the HTP would have adequate capacity to accommodate the wastewater treatment requirements of

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150 *Sewer Capacity Availability Report, City of Los Angeles Bureau of Engineering, April 11, 2023. Refer to Appendix K.*

151 *City of Los Angeles, Bureau of Sanitation, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp;jsessionid=jUrnVQbn9vgPkYhDPsPok0_6N2Et3-regkKyGDPGQOeIRw1AidG1!-2128337332!-2072722080?_afrLoop=12329266215937952&_afrWindowMode=0&_afrWindowId=null&_adf.ctrl-state=16yw9t94vo_1#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D12329266215937952%26_afrWindowMode%3D0%26_adf.ctrl-state%3D16yw9t94vo_5, accessed July 21, 2022.*

152 *City of Los Angeles, Bureau of Sanitation, Sewer System Management Plan, January 25, 2019. https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdm1/~edisp/cnt035427.pdf, accessed September 3, 2022.*

cumulative development. No new or upgraded treatment facilities would be required. Therefore, the cumulative wastewater impacts would be less than significant.

Storm Water Drainage

Less Than Significant Impact. As discussed in response to Checklist Question X(c)(iii) (Hydrology and Water Quality – Storm Drain Capacity), Project impacts related to storm drainage facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic X (Hydrology and Water Quality).

Electrical Power

Less Than Significant Impact. As discussed in response to Checklist Questions VII(a) and (b) (Energy), Project impact related to electric power facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VII (Energy).

Natural Gas

Less Than Significant Impact. As discussed in response to Checklist Questions VII(a) and (b) (Energy), Project impact related to natural gas facilities would be less than significant.

Cumulative Impacts

Refer to the cumulative impact discussion provided in response to Checklist Topic VII (Energy).

Telecommunications

Less Than Significant Impact. In the Project Site area, existing telephone service is typically provided by AT&T, and existing cable television/internet is typically provided by Spectrum (formerly Time Warner Cable). The Project Site could be served by existing telecommunications facilities that are available in the Project Site area. The Project would require Project- and site-specific infrastructure to connect to the existing utilities, but the Project would not require new or expanded facilities. Therefore, Project impacts related to telecommunications facilities would be less than significant.

Cumulative Impacts

All 18 of the related projects listed in Appendix G of the *Transportation Assessment* prepared for the Project (refer to Appendix J) are located within a 0.5-mile radius of the Project Site and within an urbanized area of the City. All of the related projects represent infill development and are served by existing utilities, including telecommunications infrastructure. As with the Project, the related projects would likely require project- or site-specific infrastructure to connect to the existing infrastructure, but the related projects would not require new or expanded facilities. Therefore, cumulative impacts related to telecommunications infrastructure would be less than significant.

b) Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. The Los Angeles Department of Water and Power (LADWP) provides water service to the Project Site. LADWP's water supply sources include the Los Angeles Aqueduct (LAA), local groundwater, the SWP (supplied by the Metropolitan Water District [MWD]), the Colorado River Aqueduct (also supplied by MWD), and recycled water.

The California Urban Water Management Planning Act of 1984 requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 acre-feet per year (AFY) of water to prepare an Urban Water Management Plan (UWMP) every five years to identify short-term and long-term water resources management measures to meet growing water demands during normal, single-dry, and multiple-dry years. In the UWMP, the water supplier must describe the water supply projects and programs that may be undertaken to meet the total water use of the service area. The UWMP that is applicable to the Project is LADWP's 2020 UWMP.

The 2020 UWMP provides historical and forecasted water demands for the City. Total water demand varies annually and is contingent on various factors including: population growth, weather, water conservation, drought, and economically activity. Table XIX-3 shows a breakdown of historical water demand for the LADWP service area. Table XIX-4 provides LADWP's projected water demand from 2025 to 2045 for average year, single dry year, and multi dry year hydrological conditions. Demographic projections were provided for the LADWP service area by the Metropolitan Water District (MWD), who received the data from SCAG. SCAG applied its 2020 Regional Transportation Plan demographic data to water service areas for MWD's member agencies. These data were expected to continue to grow over the next 25 years at a rate of 0.7 percent annually.[153]

[153] *2020 Urban Water Management Plan, LADWP, p. 1-5.*

Table XIX-3
Breakdown of Historical Water Demand for LADWP's Service Area

Fiscal Year Ending Average	Single Family		Multi-Family		Commercial		Industrial		Government		Non-Revenue		Total
	AF	%	AF	%	AF	%	AF	%	AF	%	AF	%	AF
2016-2020	170,660	35%	141,088	28%	88,680	18%	14,938	3%	39,628	8%	40,690	8%	495,685
2011-2015	206,652	37%	161,592	29%	96,832	18%	17,855	3%	43,573	8%	26,139	6%	552,768
2006-2010	236,154	38%	180,277	29%	106,964	17%	23,196	4%	42,956	7%	30,617	5%	620,165
2001-2005	239,754	37%	190,646	29%	109,685	17%	21,931	3%	41,888	6%	52,724	8%	656,628
1996-2000	222,748	36%	191,819	31%	111,051	18%	23,560	4%	39,421	6%	33.696	5%	622,295
1991-1995	197,322	34%	177,104	30%	110,724	19%	21,313	4%	38,426	7%	39,364	7%	584,253
30-Year Average	212,215	36%	173,755	30%	103,990	18%	20,465	3%	40,982	7%	37,205	6%	588,611

AF = Acre Feet

Source: 2020 Urban Water Management Plan, LADWP.

Table XIX-4
Service Area Reliability Assessment (AFY)

Hydrological Conditions[1]	Years				
	2025	2030	2035	2040	2045
Average Year	642,600	660,200	678,800	697,800	710,500
Single Dry Year	674,700	693,200	712,700	732,700	746,000
Multi-Dry Year (Year 1)	657,900	675,800	694,900	714,400	727,400
Multi-Dry Year (Year 2)	661,700	679,700	698,900	718,500	731,500
Multi-Dry Year (Year 3)	674,400	693,200	712,800	732,700	746,000
Multi-Dry Year (Year 4)	661,600	679,600	698,900	718,400	731,500
Multi-Dry Year (Year 5)	655,700	673,600	692,600	712,000	724,900

AFY = acre-feet per year

Source: 2020 UWMP, LADWP, Exhibits 11E, 11F, and 11G.

More frequent and longer-lasting dry periods, regulatory constraints, and seismic risks that can result in water delivery system outages are causing increased stress on water supply reliability for LADWP. As such, in preparation to take reasonable actions to balance water demands with limited water supplies, LADWP has prepared a Water Shortage Contingency Plan (WSCP) that outlines a set of actions that the City can take in the event of a declared water supply shortage or emergency situation. The City has six standard water shortage levels and response actions, as summarized in Table XIX-5. Under state law, LADWP has the authority to implement the water shortage actions outlined in the WSCP. In all water shortage cases, shortage response actions to be implemented are at the discretion of LADWP based on an assessment of the supply shortage, customer response, and the need for demand reductions. Upon proclamation by the Governor of a state of emergency under the California Emergency Services Action based on extended dry conditions, the state will defer to implementation of locally adopted water shortage contingency plans to the extent practicable. LADWP will coordinate with regional and local water suppliers for which it provided water supply services for possible proclamation of a local emergency, as necessary.

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
Level 1: No Shortage	≤10%	Water Shortage Level 1 constitutes a consumer demand reduction of up to 10%. Shortage response actions under this level include the permanent water use restrictions listed below. **<u>Phase I Restrictions</u>** - No LADWP customer shall use a water hose to wash any paved surfaces, except to alleviate immediate safety or sanitation hazards. - No LADWP customer shall use water to clean, fill or maintain levels in decorative fountains, ponds, lakes, or similar structures used for aesthetic purposes, unless such water is part of a recirculating system. - No restaurant, hotel, cafe, cafeteria, or other public place where food is sold, served, or offered for-sale, shall serve drinking water to any person unless expressly requested.

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
		- No LADWP customer shall permit water to leak from any pipe or fixture on the customer's premises.
Level 2: Moderate Shortage	≤20%	Water Shortage Level 2 is implemented when there is a reasonable probability of supply shortage from LADWP-controlled supplies in the long-term and a demand reduction of up to 20% is necessary to mitigate this long-term shortage risk. Conservation Ordinance Phase 2 will be implemented to achieve the necessary demand reduction. Additionally, to reduce consumption during this phase and all higher levels of conditions, LADWP may increase its public education and outreach efforts and enforcement measure to build awareness of voluntary water conservation practices and all permanent water waste prohibitions. **<u>Actions</u>** <u>Mandatory Conservation Phase 2</u> - Restrictions on landscape irrigation watering days (Monday, Wednesday, or Friday for odd-numbered street addresses and Tuesday, Thursday, or Sunday for even-numbered street addresses). - Irrigation of Sports Fields may deviate from the non-watering days to maintain play areas and accommodate event schedules. - Irrigation of large landscape areas may deviate from the non-watering days under certain conditions. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - Increase outreach efforts for high-volume customers and provide one on one assessments. - Expand enforcement of unreasonable use of water.

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
		- Increase water conservation rebates and incentives. - Increase conservation messaging (radio, TV, social media, educational events).
Level 3: Significant Shortage	≤30%	A Water Shortage Level 3: Significant Shortage is implemented when demand must be reduced up to 30% to ensure sufficient supplies. During a Significant Shortage, a new set of mandatory water conservation practices takes effect, in addition to all Permanent Water Waste Prohibitions and Level 1 and Level 2 conservation practices. Beginning with Water Shortage Level 3, LADWP may elect to withdraw from available emergency storage along the LAA system and from local groundwater basins. Emergency storage along the LAA may come in the form of emergency reservoir storage and/or emergency groundwater pumping in the Owens Valley with the approval of the LA/Inyo Standing Committee. Emergency storage from local groundwater basin may come in the form of storied water credits. Withdrawals from emergency supplies may provide only short-term relief and the extent of withdrawals will be determined based on assessments of long-term shortage risk. **<u>Actions</u>** <u>Mandatory Conservation Phase 3</u> - Further restrictions on landscape irrigation watering days (Monday or Friday for odd-numbered street addresses and Sunday or Thursday for even-numbered street addresses) - Recommend use of pool covers to decrease water loss from evaporation. - Recommend washing of vehicles at commercial car wash facilities.

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
		- Irrigation of sports fields may deviate from the non-watering days to maintain play areas and accommodate event schedules. - Irrigation of large landscape areas may deviate from the non-watering days under certain conditions. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - Withdraw from available emergency storage along the LAA System and local groundwater basins.
Level 4: Severe Shortage	≤40%	Water Shortage Level 4: Severe Shortage is implemented when demand must be reduced up to 40% to ensure sufficient supplies. During a Severe Shortage, a new set of mandatory water conservation practices takes effect, in addition to all Permanent Water Waste Prohibitions and additional restriction practices that became mandatory under Water Shortage Level 1, Level 2, and Level 3. LADWP may also elect to increase withdrawals from available emergency storage along the LAA system and from local groundwater basins. **<u>Actions</u>** <u>Mandatory Conservation Phase 4</u> - Further restrictions on landscape irrigation watering days (Monday for odd-numbered street addresses and Tuesday for even-numbered street addresses). - Mandate use of pool covers on all residential swimming pools when not in use. - No washing of vehicles allowed except at commercial car wash facilities. - No filling of decorative fountains, ponds, lakes, or similar structures

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
		used for aesthetic purposes, with potable water. - Irrigation of sports fields may deviate from the non-watering days to maintain play areas and accommodate event schedules. - Irrigation of large landscape areas may deviate from the non-watering days under certain conditions. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - Withdraw from available emergency storage along the LAA System and local groundwater basins
Level 5: Critical Shortage	≤50%	Water Shortage Level 5: Critical Shortage is implemented when a water shortage emergency requires that demand be reduced up to 50% to ensure sufficient supplies. Mandatory conservation practices imposed under Water Shortage Levels 1 through 4 remain in effect and LADWP may elect to further increase withdrawals from available emergency storage along the LAA system and from local groundwater basins. **<u>Actions</u>** <u>Mandatory Conservation Phase 5</u> - No landscape irrigation allowed. - No filling of residential swimming pools and spas with potable water. - No washing of vehicles allowed except at commercial car wash facilities. - No filling of decorative fountains, ponds, lakes, or similar structures used for aesthetic purposes, with potable water. - Golf courses and professional sports fields may apply water to sensitive areas, such as greens and tees,

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
		during non-daylight hours and only to the extent necessary to maintain minimum levels of biological viability. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - Withdraw from available emergency storage along the LAA System and local groundwater basins
Level 6: Super Critical Shortage	> 50%	Water Shortage Level 6: Supercritical Shortage is implemented when a water shortage emergency requires that demand be reduced greater than 50% to ensure sufficient supplies. During a Supercritical Shortage, a new set of mandatory conservation measures takes effect, in addition to all Permanent Water Waste Prohibitions. Mandatory conservation practices that were imposed Levels 1 through 5 remain in effect. LADWP may elect maximize withdrawals from available emergency storage along the LAA system and from local groundwater basins for supply augmentation. **<u>Actions</u>** Mandatory Conservation Phase 6 - No landscape irrigation allowed. - No filling of residential swimming pools and spas with potable water. - No washing of vehicles allowed except at commercial car wash facilities. - No filling of decorative fountains, ponds, lakes, or similar structures used for aesthetic purposes, with potable water. - Golf courses and professional sports fields may apply water to sensitive areas, such as greens and tees, during non-daylight hours and only to

Table XIX-5
Water Shortage Response Actions

Water Shortage Level	Percent Shortage	Shortage Response Actions
		the extent necessary to maintain minimum levels of biological viability. - Provisions do not apply to drip irrigation supplying water to a food source or to hand-held hose watering of vegetation. - The Board is hereby authorized to implement additional prohibited uses of water based on the water supply situation. Any additional prohibition shall be published at least once in a daily newspaper of general circulation and shall become effective immediately upon such publication and shall remain in effect until cancelled. - Withdraw from available emergency storage along the LAA and local groundwater basin. - Additional measures authorized by the Board
Source: 2020 UWMP, Appendix J, LADWP.		

The Project would connect to the existing water conveyance infrastructure near the Project Site that includes a 4-inch line in Lodi Place, a 6-inch line in Lexington Avenue, and an 18-inch line in Gower Street.[154] As shown in Table XIX-1, the Project would consume an increase of approximately 11,080 gallons of water per day. As discussed under Checklist topic XIV (Population and Housing), the Project's development would not exceed the growth assumptions of the 2020-2045 RTP/SCS. Based on its 2020 UWMP, LADWP has supply capabilities that would be sufficient to meet expected demands from 2025 through 2045 under single dry-year and multiple dry-year hydrologic conditions. The Project Applicant would be required to comply with the water efficiency standards outlined in Los Angeles City Ordinance No. 180,822 and in the LAGBC to conserve water usage. Additionally, the Project would be subject to any water shortage response actions identified by LADWP to ensure water service availability. Further, prior to issuance of a building permit, the Project Applicant would be required to consult with LADWP to determine Project-specific water supply service needs and all water conservation measures that shall be incorporated into the Project. As such, the Project would not

[154] *NavigateLA, City of Los Angeles, https://navigatela.lacity.org/navigatela/, accessed September 2022.*

require new or additional water supply or entitlements. Therefore, Project impacts related to water supply would be less than significant.

Cumulative Impacts

Table XIX-2 shows that the cumulative development would consume approximately 581,583 gallons of water per day (or 0.58 mgd per day). As discussed previously, LADWP's 2020 UWMP anticipates meeting projected water supplies through the year 2045, through conservation measures for drought years, and LADWP's water shortage response actions identified (refer to Table XIX-3). Similar to the Project, each related project would be required to comply with their respective conservation programs for both water supply and infrastructure. For these reasons, cumulative impacts related to water supply would be less than significant.

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

Less Than Significant Impact. Refer to response to Checklist Question XIX(a) (Utilities and Service Systems – Wastewater Treatment).

Cumulative Impacts

Refer to the cumulative impacts discussion included in response to Checklist Question XIX(a) (Utilities and Service Systems – Wastewater Treatment).

d) Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. The landfills that serve the City and the capacity of these landfills are shown in Table XIX-6. As shown, the landfills have an approximate available daily intake of 16,531 tons. As shown in Table XIX-7 it is estimated the Project would generate an increase of approximately 0.16 tons of solid waste per day. This total is conservative and does not account for the reduction in solid waste associated with the effectiveness of recycling efforts, which the Project would be required by the City to implement. With a remaining daily intake capacity of approximately 16,531 tons of solid waste per day, the landfills serving the City could accommodate the Project's approximately increase of 0.16 tons of solid waste per day.

Table XIX-6
Landfill Capacity

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Sunshine Canyon	17	65.9	12,100	7,420	4,680
Chiquita Canyon	27	54.4	12,000	6,114	5,886
Antelope Valley	13	10.1	3,600	2,785	815
Lancaster	81	9.8	3,000	395	2,605
Calabasas	14	1.0	3,500	955	2,545
				Total	**16,531**

Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2020 Annual Report, October 2021.

Table XIX-7
Estimated Project Solid Waste Generation

Proposed Use	Amount	Rate[1]	Total (tpd)
Existing			
Residential	28 du	4.0 lbs/du/day	0.05
Project			
Residential	108 du	4.0 lbs/du/day	0.21
		(Less Existing)	*(0.05)*
		Net Total	**0.16**

tpd = tons per day lbs = pounds du = dwelling unit sf = square feet

[1] *Source: City of Los Angeles Bureau of Sanitation, "Solid Waste Generation," 1981.*

The Project's solid waste would be handled by private waste collection services. Pursuant to Section 66.32 of the LAMC, the Project's solid waste contractor must obtain, in addition to all other required permits, and Assembly Bill 939 (AB 939) Compliance Permit from the Los Angeles Bureau of Sanitation (LASAN). The Project would be required to comply with LAMC Section 12.21 A.19, which requires new development to provide an adequate recycling area or room for collecting and loading recyclable materials. Additionally, the

Project would be required to comply with CALGreen Code waste reduction measures for the operation of the Project. Recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Project's regular solid waste disposal program. For these reasons, the Project would not generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure and would not otherwise impair the attainment of solid waste reduction goals. Therefore, Project impacts related to solid waste would be less than significant.

Cumulative Impacts

As shown on Table XIX-8, implementation of the Project in conjunction with the related projects in the Project Site area would result in an estimated solid waste generation of approximately 9.09 tons per day. It should be noted that this amount does not take into account the net decrease in solid waste generation that would occur as a result of removal of existing uses or the effectiveness of recycling measures required in accordance with existing City's recycling regulations, both of which would likely substantially reduce the cumulative solid waste generation shown on Table XIX-8.

Table XIX-8
Estimated Cumulative Solid Waste Generation[1]

Land Uses	Size	Rate[2]	Total (tpd)
Multi-Family Residential	2,259 du	4.0 lbs/day/du	4.52
Market	81,102 sf	0.005 lbs/day/sf	0.20
Retail	50,687 sf	0.005 lbs/day/sf	0.13
Hotel	135,000 sf[3]	0.005 lbs/day/sf	0.34
Restaurant	42,674 sf	0.005 lbs/day/sf	0.11
Office	795,055 sf	0.005 lbs/day/sf	1.99
Studio	628,005 sf	0.005 lbs/day/sf	1.57
Commercial	31,960 sf	0.005 lbs/day/sf	0.08
		Subtotal	***8.93***
		Plus Project	*0.16*
		Total	**9.09**

gpd = gallons per day *du = dwelling unit* *sf = square feet*

1 *Assumes wastewater generation is equivalent to water consumption.*
2 *Source: City of Los Angeles Bureau of Sanitation, Sewer Generation Factors, April 6, 2012.*
3 *Assumes 300 square feet per room.*

With a remaining daily capacity of approximately 16,531 tons of solid waste per day, the landfills serving the Project and related project would have adequate capacity to accommodate cumulative solid waste generation. Additionally, all development in the City

is required to comply with City and state recycling regulations. Therefore, cumulative impacts related to solid waste generation would be less than significant.

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

Less Than Significant Impact. Refer to response to Checklist Question XIX(d) (Solid Waste Facilities and Regulations).

Cumulative Impacts

Refer to the cumulative impact analysis under response to Checklist Question XIX(d) (Solid Waste Facilities and Regulations).

XX. 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?	☐	☐	☐	☒

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. The Project Site is not located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Thus, the Project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Therefore, no impacts related to this issue would occur as a result of the Project.

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

No Impact. The Project Site is not located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Thus, the Project would not expose project occupants to, pollutant concentrations from a wildfire or uncontrolled spread of a wildfire. Therefore, no impacts related to this issue would occur as a result of the Project.

c) Requires 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?

No Impact. The Project Site is not located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact. The Project Site is not located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Neither the Project Site nor any of the sites of the related projects are located near or within the boundaries of a state responsibility area or land classified as very high fire hazard severity zone. Therefore, no cumulative impacts related to this issue would occur.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

a) Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant With Mitigation Incorporated. As discussed in response to Checklist Question V(b) (Cultural Resources – Archaeological Resources) and Checklist Question XVIII(b) (Tribal Cultural Resources), with implementation of Mitigation Measure CULT-1 and Mitigation Measure TCR-1 (respectively), Project impacts related to archaeological resources would be less than significant. Thus, the Project would not eliminate important examples of the major periods of California 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)?

Less Than Significant With Mitigation. As discussed in response to Checklist Question XIII(a) (Noise – Substantial Increase in Noise, Cumulative Impacts), with implementation of Mitigation Measure NOISE-1, the Project's contribution to cumulative construction noise impacts would not be considerable. Thus, the Project would not result in any significant impacts would not have the potential to contribute to significant cumulative impacts.

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

Less Than Significant With Mitigation Incorporated. As discussed in response to Checklist Question XIII(a) (Noise – Substantial Increase in Noise), with implementation of Mitigation Measure NOISE-1, Project impacts related to construction noise would be less than significant. Thus, the Project would not have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly.

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MITIGATION AND MONITORING PROGRAM

1 INTRODUCTION

This Mitigation Monitoring Program (MMP) has been prepared according to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a "reporting or monitoring program for changes to the project or conditions of project approval, adopted to mitigate or avoid significant effects on the environment." In addition, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6, and Section 15097 of the State CEQA Guidelines.

The City of Los Angeles (City) is the Lead Agency for the Project and therefore is responsible for administering and implementing the MMP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

A Sustainable Communities Environmental Assessment (SCEA) has been prepared for the Project that evaluates the Project's potential impacts, taking into consideration mitigation measures (MM) the Applicant has incorporated into the Project to avoid or reduce potentially significant environmental impacts. This MMP is designed to monitor the implementation of the MMs incorporated into the Project.

2 ORGANIZATION

As shown on the following pages, each MM incorporated into the Project is listed and categorized by environmental impact area, with accompanying identification of the following:

- **Enforcement Agency**: the agency with the power to enforce the MM.
- **Monitoring Agency**: the agency to which reports involving feasibility, compliance, implementation, and development are made.
- **Monitoring Phase**: the phase of the Project during which the MM shall be monitored.
- **Monitoring Frequency**: the frequency at which the MM shall be monitored.
- **Action Indicating Compliance**: the action by which the Enforcement or Monitoring Agency indicates that compliance with the incorporated MM has been implemented.

3 ADMINISTRATIVE PROCEDURES AND ENFORCEMENT

This MMP shall be enforced throughout all phases of the Project. The Applicant shall be responsible for implementing each incorporated MM and shall be obligated to provide certification, as identified below, to the appropriate monitoring and enforcement agencies that each MM has been implemented. The Applicant shall maintain records demonstrating compliance with each MM. Such records shall be made available to the City upon request.

During the construction phase and prior to the issuance of building permits, the Applicant shall retain an independent Construction Monitor (either via the City or through a third-party consultant), approved by the Department of City Planning, who shall be responsible for monitoring implementation of MMs during construction activities consistent with the monitoring phase and frequency set forth in the MMP.

The Construction Monitor shall also prepare documentation of the Applicant's compliance with the incorporated MMs during construction every 90 days in a form satisfactory to the Department of City Planning. The documentation must be signed by the Applicant and Construction Monitor and be included as part of the Applicant's Compliance Report. The Construction Monitor shall be obligated to immediately report to the Enforcement Agency any non-compliance with the MMs within two business days if the Applicant does not correct the non-compliance within a reasonable time of notification to the Applicant by the monitor or if the non-compliance is repeated. Such non-compliance shall be appropriately addressed by the Enforcement Agency.

4 PROGRAM MODIFICATION

After review and approval of the final MMP by the Lead Agency, minor changes and modifications to the MMP are permitted, but can only be made subject to City approval. The Lead Agency, in conjunction with any appropriate agencies or departments, will determine the adequacy of any proposed change or modification. This flexibility is necessary in light of the nature of the MMP and the need to protect the environment. No changes will be permitted unless the MMP continues to satisfy the requirements of CEQA, as determined by the Lead Agency. The Project shall be in substantial conformance with the MMs contained in this MMP. The enforcing departments or agencies may determine substantial conformance with MMs in the MMP in their reasonable discretion. If the department or agency cannot find substantial conformance, an MM may be modified or deleted as follows: the enforcing department or agency, or the decision maker for a subsequent discretionary project-related approval finds that the modification or deletion complies with CEQA, including CEQA Guidelines Sections 15162 and 15164, which could include the preparation of an addendum or subsequent environmental clearance, if necessary, to analyze the impacts from the modifications to or deletion of the MMs. Any addendum or subsequent CEQA clearance shall explain why the MM is no longer needed, not feasible, or the other basis for modifying or deleting the MM, and that the modification will not result in a new significant impact consistent with the requirements of CEQA. Under this process, the modification or deletion of an MM shall not, in and of itself, require a modification to any Project discretionary approval unless the Director of Planning also finds that the change to the MM results in a substantial change to the Project or the non-environmental conditions of approval.

5 MITIGATION MONITORING PROGRAM

Cultural Resources

ARCHEO-1: Inadvertent Discovery of Archaeological Resources

If any archaeological materials are encountered during the course of Project development, all further development activity in the vicinity of the materials shall halt and:

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or a member of the Society of Professional Archaeologist (SOPA) or a SOPA-

qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact;

- The archaeologist's survey, study or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource; and

- The Project Applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report.

- Project development activities may resume once copies of the archaeological survey, study or report are submitted to the following:

  SCCIC Department of Anthropology
  McCarthy Hall
  477 CSU Fullerton
  800 North State College Boulevard
  Fullerton, CA 92834

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

  - **Enforcement Agency**: Department of City Planning
  - **Monitoring Agency**: Department of City Planning
  - **Monitoring Phase**: Construction
  - **Monitoring Frequency**: Once during ground-distrubing activities; once after ground-distrubing activities
  - **Action Indicating Compliance**: Issuance of Grading Permit; Issuance of Building Permit

Geology and Soils

PALEO-1: If paleontological resources are encountered, the Applicant would be required to notify the Building Safety Division 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, including those set forth in PRC Section 5097.5.

- **Enforcement Agency**: Department of Building and Safety
- **Monitoring Agency**: Department of Building and Safety
- **Monitoring Phase**: Construction
- **Monitoring Frequency**: Once after ground-disturbing activities
- **Action Indicating Compliance**: Submission of compliance report by Monitor

Noise

NOISE-1: Temporary noise barriers shall be installed along the perimeter of the Project Site along the northern property line, the property line along Lodi Place where construction would face, and along Building 2's frontage with the construction site. The barrier shall achieve at least a 6.2 dBA L_{eq} reduction at off-site sensitive receptors (not including Building 2) and a 14.5 dBA L_{eq} reduction at Building 2. The supporting structure shall be engineered and erected in order to comply with Los Angeles Municipal Code noise requirements, including those set forth in Chapter XI, Article 2 of the Los Angeles Municipal Code.

- **Enforcement Agency**: Department of Building and Safety
- **Monitoring Agency**: Department of Building and Safety
- **Monitoring Phase**: Construction
- **Monitoring Frequency**: Periodically throughout construction phase
- **Action Indicating Compliance**: Submission of compliance report by Monitor

Tribal Cultural Resources

TCR-1: Inadvertent discovery of tribal cultural resources

In the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities (excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, driving posts, augering, backfilling, blasting, stripping topsoil or a similar activity), all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below:

- Upon a discovery of a potential tribal cultural resource, the Applicant shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 978-1290.

- If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any affected tribe a reasonable period of time, not less than 30 days, to conduct a site visit and make recommendations to the Applicant and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

- The Applicant shall implement the tribe's recommendations if a qualified archaeologist and by a culturally affiliated tribal monitor, both retained by the City and paid for by the Applicant, reasonably concludes that the tribe's recommendations are reasonable and feasible.

- The Applicant shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist and by a culturally affiliated tribal

monitor to be reasonable and feasible. The Applicant shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

- If the Applicant does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist or by a culturally affiliated tribal monitor, the Applicant may request mediation by a mediator agreed to by the Applicant and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Applicant shall pay any costs associated with the mediation.

- The Applicant may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and by a culturally affiliated tribal monitor and determined to be reasonable and appropriate.

- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the South Central Coastal Information Center (SCCIC) at California State University, Fullerton.

    - **Enforcement Agency**: Department of Building and Safety
    - **Monitoring Agency**: Department of Building and Safety
    - **Monitoring Phase**: Construction
    - **Monitoring Frequency**: Periodically during ground-disturbing activities
    - **Action Indicating Compliance**: Issuance of Building Permit; Field Inspection sign-off by Monitor