CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
PROPOSED MITIGATED NEGATIVE DECLARATION

LEAD CITY AGENCY	**COUNCIL DISTRICT**
City of Los Angeles	13
PROJECT TITLE	**CASE NO.**
1800 West Beverly Boulevard	**ENV-2016-4955 EAF**
	ENV-2016-4954-DB-SPR; VTT-74771

PROJECT LOCATION:
1800-1850 West Beverly Boulevard, 114-118 ¾ South Bonnie Brae Street, and 101-111 South Burlington Avenue, Los Angeles, California, 90057

PROJECT DESCRIPTION

CV 1800 Beverly, LLC, the Applicant, proposes to develop the 1800 West Beverly Boulevard Project (Project) on an approximately 1.66-acre site (Project Site) located along West Beverly Boulevard between S. Bonnie Brae Street and South Burlington Avenue within the Westlake Community Plan area of the City of Los Angeles (City). The Project would involve the demolition of the existing vacant warehouse, commercial building, 12-unit apartment building, and surface parking and circulation on the Project Site to allow for construction of an approximately 79-foot-tall, mixed-use building with four stories of residential use above an upper ground floor level with amenity space and parking, a lower ground level with commercial uses and parking, and a half level of fully subterranean parking. The residential component of the Project would include up to 243 residential units, of which 21 units, or approximately 11%, would be designated as Very Low Income restricted affordable housing. The commercial component of the Project would include approximately 3,500 sf of ground level retail and restaurant uses located at the northwest portion of the site. Overall, the Project would include approximately 223,007 sf of floor area (FAR of 3.19:1). The Project would provide approximately 292 vehicle parking spaces and 272 bicycle parking spaces on site.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY
CV 1800 Beverly, LLC
10877 Wilshire Boulevard, 12th Floor, Los Angeles, California 90024

FINDING:
The City Planning Department of the City of Los Angeles has Proposed that a mitigated negative declaration be adopted for this Project because the mitigation measure(s) outlined on the attached page(s) will reduce any potential significant adverse effects to a level of insignificance.

SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED.

Any written comments received during the public review period are attached together with the response of the Lead City Agency. The Project decision-maker may adopt the mitigated negative declaration, amend it, or require preparation of an EIR. Any changes made should be supported by substantial evidence in the record and appropriate findings made.

THE INITIAL STUDY PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM	**TITLE**	**TELEPHONE NUMBER**
Oliver Netburn	City Planner	(213) 978-1382
ADDRESS	**SIGNATURE (Official)**	**DATE**
200 North Spring Street, Room 763 Los Angeles, CA. 90012		November 15, 2017

TABLE OF CONTENTS

1800 W. Beverly Boulevard Initial Study

Appendices

Figures

Tables

Tables (continued)

SUMMARY OF PROJECT DESIGN FEATURES AND MITIGATION MEASURES

Project Design Features

Aesthetics

PDF AES-1 The Applicant shall provide and maintain a construction fence along the perimeter of the Project Site during construction. The fence shall be a minimum height of 8 feet and up to 14 feet as appropriate for purposes of noise mitigation. The construction management company's name and telephone number(s) shall be posted at multiple locations along the perimeter of the Project Site. The Applicant shall ensure through appropriate postings and frequent visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

PDF AES-2 Outdoor lighting shall be designed, shielded and directed toward the areas of the Project Site to be lit to limit spill-over onto adjacent residential uses.

PDF AES-3 The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance low reflective glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces, that would avoid substantial glare and reflected heat.

Agriculture and Forestry Resources

Not applicable.

Air Quality

PDF AIR-1 The Project will provide on-site electric or solar-powered generators, where feasible, to provide power for electric construction equipment such as handheld tools and temporary lights.

Biological Resources

Not applicable.

Cultural Resources

Not applicable.

Geology and Soils

Not applicable.

Greenhouse Gas Emissions

Not applicable.

Hazards and Hazardous Materials

PDF HAZ-1: A Soil Management Plan (SMP) shall be prepared that will provide guidance to contractors for appropriate handling, screening, and management of potentially impacted or impacted soils from historical operations that may be encountered at the Project Site during grading and excavation activities. These procedures would include training for construction personnel on the appropriate procedures for identification of suspected impacted soils; requirements for testing and collection of potentially contaminated soils; segregation of potentially impacted soils; and applicable soil handling and disposal procedures. The SMP shall also contain procedures to be followed in the event that undocumented subsurface features of potential environmental concern (e.g., USTs, abandoned oil wells, sumps, hydraulic lifts, clarifiers, buried drums) are encountered during the excavation grading, and/or other earthmoving activities. These procedures would include safety training, testing protocols, decontamination and decommission standards, and notification to the appropriate relevant regulatory oversight agency or agencies.

The SMP would also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses, religious uses, and schools. In accordance with SCAQMD Rule 1166 requirements, impacted soil removed from the Project Site shall comply with the following:

- Be transported to an approved treatment/disposal facility.
- When loading into trucks is completed, and during transportation, no excavated material shall extend above the sides or rear of the truck or trailer.
- Prior to covering/tarping, loaded impacted soil shall be wetted by spraying with dust inhibitors.
- The trucks or trailers shall be completely covered/tarped prior to leaving the Project Site to prevent particulate emissions to the atmosphere.
- The exterior of the trucks (including the tires) shall be cleaned off prior to the trucks leaving the excavation location.

With implementation of the SMP, impacts related to potentially contaminated soils or undocumented subsurface features of potential environmental concern during construction would remain less than significant.

PDF HAZ-2: A Groundwater Management Plan (GWMP) shall be prepared that includes training and protocol procedures to contractors for segregating potentially impacted soils and avoiding contact with groundwater during excavation and construction of the subterranean

parking. In the unlikely event that groundwater contamination occurs, the GWMP includes remedial efforts that may include batch extraction of groundwater using an on-site dewatering system or application of a chemical amendment, such as oxygen or hydrogen source depending on the type of contamination impact. With implementation of the GWMP, impacts on groundwater would remain less than significant.

PDF-HAZ-3: In conjunction with the SMP and GWMP, a health and safety plan (HASP) would be prepared that would include safety requirements to reduce impacts for construction workers when handling soil potentially contaminated soils or encountering undocumented subsurface features of potential environmental concern (e.g., USTs, abandoned oil wells, sumps, hydraulic lifts, clarifiers, buried drums). The HASP shall include guidelines and/or procedures for controlling/minimizing exposures to hazards, including worker safety training and standards for the appropriate level(s) of personal protective equipment (PPE) that may be required. With implementation of the HASP, hazard impacts to construction workers would remain less than significant.

Hydrology and Water Quality

See PDF HAZ-2.

Land Use and Planning

Not applicable.

Mineral Resources

Not applicable.

Noise

PDF NOISE-1 The Project shall limit construction and demolition to the hours of 7:00 am to 7:00 pm Monday through Friday, and 8:00 am to 6:00 pm on Saturdays or holidays (City observed).

Population and Housing

Not applicable.

Public Services

PDF PS-1: A construction fence shall be constructed around the Project Site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

PDF PS-2: The Project would incorporate a security program to ensure the safety of residents and site visitors. Access to the parking structure would be controlled through gated entries and the structure would be well illuminated. Site security would include controlled keycard access to residential areas, secured entry and exit points to all buildings, security fencing, and security lighting within common areas and entryways, as well as security patrols. The design would

consider guidelines per the "Design out Crime Guidelines: Crime Prevention Through Environmental Design" published by the Los Angeles Police Department's Crime Prevention Section. These measures would be approved by the LAPD prior to issuance of building permits.

PDF PS-3: Prior to the occupancy of the Project, the Applicant shall provide the Rampart Area Commanding Officer with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.

Recreation

Not applicable.

Transportation and Traffic

PDF-TRAF-1: The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Bonnie Brae Street, Burlington Avenue, and Beverly Boulevard, to ensure traffic safety on public rights–of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways.
- Temporary traffic controls during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Potential sequencing of construction activity for the Project to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Prohibition on construction-related vehicles/equipment parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety.
- No staging of hauling trucks on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route.
- Spacing of trucks so as to discourage a convoy effect.
- Installation of truck crossing signs within 300 feet of the exit of the Project Site in each direction.

- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind.
- Securing of loads by trimming and watering or covering to prevent the spilling or blowing of the earth material.
- Cleaning of trucks and loads at the export site to prevent blowing dirt and spilling of loose earth.
- Maintenance of a log documenting the dates of hauling and the number of trips (i.e., trucks) per day available on the job site at all times.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading and construction.
- Ongoing contact with the administrator of nearby schools during construction. The administrative offices shall be contacted when demolition, grading and construction activity begin on the Project Site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the Los Angeles Unified School District's Transportation Branch and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.
- No staging or parking of construction vehicles, including vehicles to transport workers, on any of the streets immediately adjacent to schools.
- Assignment by the Los Angeles Department of Building and Safety of specific haul route hours of operation based upon nearby schools' hours of operation.
- Haul route scheduling sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past schools during periods when school is in session, especially when students are arriving or departing from the campus.

Tribal Cultural Resources

Not applicable.

Utilities and Service Systems

Not applicable.

Mitigation Measures

Aesthetics

Not applicable.

Agriculture and Forestry Resources

Not applicable.

Air Quality

MM AIR-1 The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 horsepower (hp) or greater during Project construction. Equipment, such as tower cranes and welders shall be electric-powered. To the extent possible, pole power shall be made available for use with electric tools, equipment, lighting, etc. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

Biological Resources

MM BIO-1: Any construction activities that occur during the nesting season (February 15 to August 31) shall require that all suitable habitat (i.e., trees and shrubs) be surveyed for the presence of nesting birds by a qualified biologist, retained by the Applicant as approved by the City of Los Angeles Department of Building and Safety, before commencement of clearing and prior to grading permit issuance. The survey shall be conducted within 72 hours prior to the start of construction. A copy of the pre-construction survey shall be submitted to the City of Los Angeles Department of Building and Safety. If any active nests are detected, an appropriate buffer as determined by the biological monitor, shall be delineated, flagged, and avoided until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.

Cultural Resources

MM CULT-1: In the event that historic (e.g., bottles, foundations, refuse dumps/privies, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed during ground-disturbing activities, the Applicant shall halt or redirect ground-disturbing activities away from the vicinity of the find so that the find can be evaluated by a qualified archaeologist. A buffer area shall be established by the qualified archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by an archaeologist. The Applicant shall coordinate with the qualified archaeologist and the City to develop an appropriate treatment plan for the resources if they are determined to be potentially eligible for the California Register of Historical Resources or potentially qualify as unique archaeological resources pursuant to CEQA. If the resources are or appear to be Native American, Tribal Cultural, or prehistoric in origin, a Gabrieleno Tribe shall be contacted and consulted with regarding treatment and curation of the resources. Preservation in place (i.e., avoidance) shall be considered as a treatment measure first. If preservation in place is not feasible, treatment may include the implementation of archaeological data recovery excavations to remove the resource from the Project Site along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If

no institution accepts the archaeological material, they shall be donated to a local school or historical society or similar organization for educational purposes. The qualified archaeologist shall determine the need for archaeological construction monitoring in the vicinity of the find thereafter.

The qualified archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of treatment and/or the any follow-up archaeological construction monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

MM CULT-2 Prior to the issuance of a demolition permit, the Applicant shall retain a qualified Paleontologist to develop and implement a paleontological monitoring program for construction excavations that would encounter Puente Formation sediments (associated with sediments below 1.5 to 10 feet deep across the Project Site). The qualified Paleontologist shall attend a pre-grading/excavation meeting to discuss the paleontological monitoring program. A qualified Paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into Puente Formation sediments. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the qualified Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified Paleontologist.

MM CULT-3 If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the qualified Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the qualified Paleontologist shall implement a paleontological salvage program to remove the resources from the project site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the

fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

MM CULT-4 Prior to the release of the grading bond, the qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and their significance. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

MM CULT-5: If human remains are encountered unexpectedly during implementation of the project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants on all reasonable options regarding the descendants' preferences for treatment.

Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance

Geology and Soils

Not applicable.

Greenhouse Gas Emissions

Not applicable.

Hazards and Hazardous Materials

MM HAZ-1: Prior to the issuance of any permit for the demolition or alteration of the existing on-site building, a comprehensive ACBMs survey of the buildings shall be performed. If no ACBMs are found, the project applicant shall provide a letter to the City of Los Angeles Building and Safety Division from a qualified asbestos consultant indicating that no ACBMs are present in the onsite buildings. If ACBMs are found to be present, they should be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as other applicable State and Federal rules and regulations.

MM HAZ-2: Prior to issuance of any permit for the demolition or alteration of the existing structures, a comprehensive lead-based paint materials survey shall be performed to the written satisfaction of the City of Los Angeles Building and Safety Division. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

Hydrology and Water Quality

Not applicable.

Land Use and Planning

Not applicable.

Mineral Resources

Not applicable.

Noise

MM NOISE-1 Noise-generating equipment operated at the Project Site shall be equipped with the most effective noise control devices, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

MM NOISE-2 The Applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at the Project Site. Signs shall also be posted at the Project Site that includes permitted construction days and hours.

MM NOISE-3 Construction and demolition activities shall be scheduled so as to avoid operating several heavy pieces of equipment simultaneously.

MM NOISE-4 The Project shall provide a temporary 14-foot-tall construction barrier along property lines facing adjacent off-site residential buildings, adult day care, school, and religious facilities and be equipped with noise blankets capable of achieving sound level reductions of at least 15 dBA between the Project construction site and the off-site residential, adult day care facility, school, and religious facilities. Temporary noise barriers shall be used to block the line-of-sight between the construction equipment and the noise-sensitive receptors. The temporary barrier shall remain in place until windows have been installed. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel.

MM NOISE-5 Heavy equipment, such as use of a large bulldozer (greater than 600 horsepower), shall not be used within 50 feet of the neighboring residential structures. If such proximate construction is required, alternative equipment and methods such as small construction equipment (less than 300 horsepower), a small dozer, a small excavator, or a small grader shall be used to ensure that vibration effects on adjacent residential uses.

Population and Housing

Not applicable.

Public Services

Not applicable.

Recreation

Not applicable.

Transportation and Traffic

MM TRAF-1

- The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the Applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.), from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities shall be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- The Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. The sidewalk shall be reopened as soon as reasonably feasible, taking construction and construction staging into account.

Tribal Cultural Resources

See MM CULT-1

Utilities and Service Systems

Not applicable.

CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

INITIAL STUDY
AND CHECKLIST

(Article IV B City CEQA Guidelines)

LEAD CITY AGENCY	**COUNCIL DISTRICT**	**DATE**
Department of City Planning	13	November 15, 2017

RESPONSIBLE AGENCIES

City of Los Angeles Department of City Planning

PROJECT TITLE/NO.	**CASE NO.**
1800 W. Beverly Boulevard	ENV-2016-4955 EAF ENV-2016-4954-DB-SPR;VTT-74771

PREVIOUS ACTIONS CASE NO.	☐ **DOES have significant changes from previous actions.** ☒ **DOES NOT have significant changes from previous actions.**

PROJECT DESCRIPTION:

CV 1800 Beverly, LLC, the Applicant, proposes to develop the 1800 West Beverly Boulevard Project (Project) on an approximately 1.66-acre site (Project Site) located along West Beverly Boulevard between S. Bonnie Brae Street and South Burlington Avenue within the Westlake Community Plan area of the City of Los Angeles (City). The Project would involve the demolition of the existing vacant warehouse, commercial building, 12-unit apartment building, and surface parking and circulation on the Project Site to allow for construction of an approximately 79-foot-tall, mixed-use building with four stories of residential use above an upper ground floor level with amenity space and parking, a lower ground level with commercial uses and parking, and a half level of fully subterranean parking. The residential component of the Project would include up to 243 residential units, of which 21 units, or approximately 11%, would be designated as Very Low Income restricted affordable housing. The commercial component of the Project would include approximately 3,500 sf of ground level retail and restaurant uses located at the northwest portion of the site. Overall, the Project would include approximately 223,007 sf of floor area (FAR of 3.19:1). The Project would provide approximately 292 vehicle parking spaces and 272 bicycle parking spaces on site.

ENVIRONMENTAL SETTING:

The Project Site is located in the Westlake Community Plan area, west of Downtown Los Angeles. The Project Site consists of a through lot bounded by South Bonnie Brae Street to the west, West Beverly Boulevard to the north, South Burlington Avenue to the east, and existing multi-family development to the south. The Project Site is in a highly urbanized location surrounded by a mix of land uses, including commercial, retail, office, institutional, and residential uses as well as religious and school facilities.

PROJECT LOCATION:

The Project Site is located at 1800-1850 West Beverly Boulevard, 114-118 ¾ South Bonnie Brae Street, and 101-111 S. Burlington Avenue. Immediately to the east along South Burlington Drive is the Wat Khmer Buddhist Temple and the Los Angeles Unified School District (LAUSD) Union Avenue Elementary School. To the north along West Beverly Boulevard, are various commercial uses including the Joy Christian Church, the Moses Yu Acupuncture/Chiropractic Center, the East Gate Korean Presbyterian Church, and the Central Adult Day Health Care Center. To the west, along South Bonnie Brae Street, are various commercial uses such as a drycleaner, key copy center, a café, and multi-family residential uses. To the south of the Project Site, are multi-family and single family residences. Further southeast of the Project Site is the San Castro Middle School.

The Project is 0.44 miles south of U.S. Route 101 (US 101) Highway, 0.90 miles west of the SR 110 Freeway (SR-110), and 1.86 miles north of Interstate 10 (I-10) Freeway.

The Project is located less than a mile from the Westlake/MacArthur Park Metro Station, which serves the Metro Purple Line (805) and the Metro Red Line (802).

For further discussion, see Attachment A, Project Description.

PLANNING DISTRICT	**STATUS:**
Westlake Community Plan Area	☐ **PRELIMINARY** ☐ **PROPOSED** ☒ **ADOPTED**

EXISTING ZONING C2-1 (Commercial) R4-1 (Multiple Residential)	**MAX. DENSITY ZONING** C2-1: FAR 1.5:1, 168 DUs R4-1: FAR 3:1, 79 DUs	☒ **DOES CONFORM TO PLAN**
PLANNED LAND USE & ZONE High Medium Residential, Highway Oriented Commercial C2-1 and R4-1	**MAX. DENSITY PLAN** Highway Oriented Commercial C2/RAS4: 147 DUs (1 DU/400 SF on 49,969 SF parcel) and FAR 1.5:1 High Medium Residential – R4 : 96 DUs (1 DU/400 SF on 19,842 SF Parcel) FAR 3:1	☐ **DOES NOT CONFORM TO PLAN**
SURROUNDING LAND USES See Attachment A, Project Description	**PROJECT DENSITY** FAR 3.19: 1, 243 DUs	☐ **NO DISTRICT PLAN**

☞ DETERMINATION (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

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

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

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

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

[signature]	City Planner
SIGNATURE	**TITLE**

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants based on a project-specific screening analysis).
2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less that significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of a mitigation measure has reduced an effect from "Potentially Significant Impact" to "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from Section XVII, "Earlier Analysis," cross referenced).
5) Earlier analysis must be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR, or negative declaration. Section 15063 (c)(3)(D). In this case, a brief discussion should identify the following:
    1) Earlier Analysis Used. Identify and state where they are available for review.
    2) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
    3) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated
7) Supporting Information Sources: A sources list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whichever format is selected.
9) The explanation of each issue should identify:
    1) The significance criteria or threshold, if any, used to evaluate each question; and
    2) The mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is "Less Than Significant With Mitigation Incorporated" as indicated by the checklist on the following pages.

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

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency)

☞ **BACKGROUND**

PROPONENT NAME	**PHONE NUMBER**
CV 1800 Beverly, LLC	(310) 566-8703

PROPONENT ADDRESS

10877 Wilshire Boulevard, 12th Floor, Los Angeles, California 90024

AGENCY REQUIRING CHECKLIST	**DATE SUBMITTED**
Department of City Planning	October 20, 2017

PROPOSAL NAME (If Applicable)

1800 W. Beverly Boulevard

☞ **ENVIRONMENTAL IMPACTS** (Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. 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, or other locally recognized desirable aesthetic natural feature within a city-designated scenic highway?	☐	☐	☐	☒
c. Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
2. AGRICULTURE AND FOREST 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. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, 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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
3. 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:				
a. Conflict with or obstruct implementation of the SCAQMD or Congestion Management Plan?	☐	☐	☒	☐
b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c. 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?	☐	☐	☒	☐
d. Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
e. Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐
4. BIOLOGICAL RESOURCES. Would the project:				
a. 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 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 the City or regional plans, policies, regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service ?	☐	☐	☐	☒
c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (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 tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?	☐	☐	☒	☐
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES: Would the project:				
a. Cause a substantial adverse change in significance of a historical resource as defined in State CEQA §15064.5?	☐	☐	☐	☒
b. Cause a substantial adverse change in significance of an archaeological resource pursuant to State CEQA §15064.5?	☐	☒	☐	☐
c. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐
6. GEOLOGY AND SOILS. Would the project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse caused in whole or in part by the project's exacerbation of existing environmental conditions?	☐	☐	☒	☐
d. 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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
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?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GREENHOUSE GAS EMISSIONS. 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?	☐	☐	☒	☐
8. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment caused in whole or in part by the project's exacerbation of existing environmental conditions?	☐	☐	☒	☐
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 for people residing or working in the project area?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands caused in whole or in part from the project's exacerbation of existing environmental conditions?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HYDROLOGY AND WATER QUALITY. Would the project result in:				
a. Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in an manner which would result in flooding on- or off site?	☐	☐	☒	☐
e. 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?	☐	☐	☒	☐
f. Otherwise substantially degrade water quality?	☐	☐	☒	☐
g. Place housing within a 100-year flood plain as mapped on federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h. Place within a 100-year flood plain structures which would impede or redirect flood flows?	☐	☐	☐	☒
i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j. Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
10. LAND USE AND PLANNING. Would the project:				
a. Physically divide an established community?	☐	☐	☐	☒
b. Conflict with 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, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
11. MINERAL RESOURCES. 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?	☐	☐	☐	☒
12. NOISE. Would the project result in:				
a. Exposure of persons to or generation of noise in level in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☒	☐	☐
b. Exposure of people to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☒	☐	☐
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without 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 expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
13. POPULATION AND HOUSING. Would the project:				
a. Induce substantial 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 housing necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐
c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
14. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other governmental services?	☐	☐	☒	☐
15. RECREATION.				
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
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?	☐	☐	☒	☐
16. TRANSPORTATION/CIRCULATION. Would the project:				
a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b. Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☒	☐
d. Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e. Result in inadequate emergency access?	☐	☐	☒	☐
f. Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRIBAL CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?	☐	☒	☐	☐
b. 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?	☐	☒	☐	☐
18. UTILITIES. Would the project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?	☐	☐	☒	☐
e. 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?	☐	☐	☒	☐
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g. Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐
h. Other utilities and service systems?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
19. MANDATORY FINDINGS OF SIGNIFICANCE.				
a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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 which are individually limited, but cumulatively considerable?("Cumulatively considerable" means that 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).	☐	☒	☐	☐
c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

☞ **DISCUSSION OF THE ENVIRONMENTAL EVALUATION (Attach additional sheets if necessary)**

PREPARED BY	TITLE	TELEPHONE #	DATE
Oliver Netburn **Los Angeles Department of City Planning**	**City Planning Associate**	**(213) 978-1382**	**October 20, 2017**

ATTACHMENT A
Project Description

A. Introduction

CV 1800 Beverly, LLC, the Applicant, proposes to develop the 1800 West Beverly Boulevard Project (Project) on an approximately 1.66-acre site (Project Site) located along West Beverly Boulevard between South Bonnie Brae Street and South Burlington Avenue within the Westlake Community Plan area of the City of Los Angeles (City).

The Project Site is currently developed with a 23,189 square-foot (sf) vacant warehouse, a 13,226 sf commercial building, a 6,137 sf 12-unit apartment building, as well as a surface parking lot. The Project involves the demolition of the existing structures on the Project Site to allow for construction of the Project.

The Project would include an approximately 79-foot-tall, mixed-use building with four stories of residential uses above an upper ground floor level with amenity space and parking, a lower ground level with commercial uses and parking, and a half level of fully subterranean parking. Due to the 16-foot grade difference from the lower elevation along South Bonnie Brae Street to the higher elevation along South Burlington Avenue, the Project has six above grade levels along the west side of the Project Site and five above grade levels along the east side of the Project Site. The residential component of the Project would include up to 243 residential dwelling units. Of the 243 residential dwelling units, 21 units, or approximately 11 percent of the base maximum density of 183 units, would be designated as restricted affordable housing for Very Low Income Households. The commercial component of the Project would include approximately 3,500 sf of ground level retail and restaurant uses located at the northwest corner of the Project Site. Overall, the Project would include approximately 223,007[1] sf of floor area (FAR[2] of 3.19:1).

Open space areas and amenities for residents would be provided in two courtyards located on the second level of the building. The courtyard areas would be open to the sky and would include a swimming pool, seating areas, landscaping and barbeque areas. Additional outdoor open space would be provided in two roof decks on the roof level located at the northwest and northeast corners of the building fronting West Beverly Boulevard to give residents unobstructed views of the Downtown skyline and Hollywood Hills. The ground level would include two public outdoor

[1] Unless otherwise specified, square footage numbers used throughout this section reflect floor area, as calculated in accordance with LAMC Section 12.03, which excludes basement storage, parking, bike parking, vertical circulation, and rooms housing mechanical equipment. The gross square footage of the Project is approximately 355,130 sf including garage and utility areas. (Source: Humphreys & Partners Architects, May 2017).

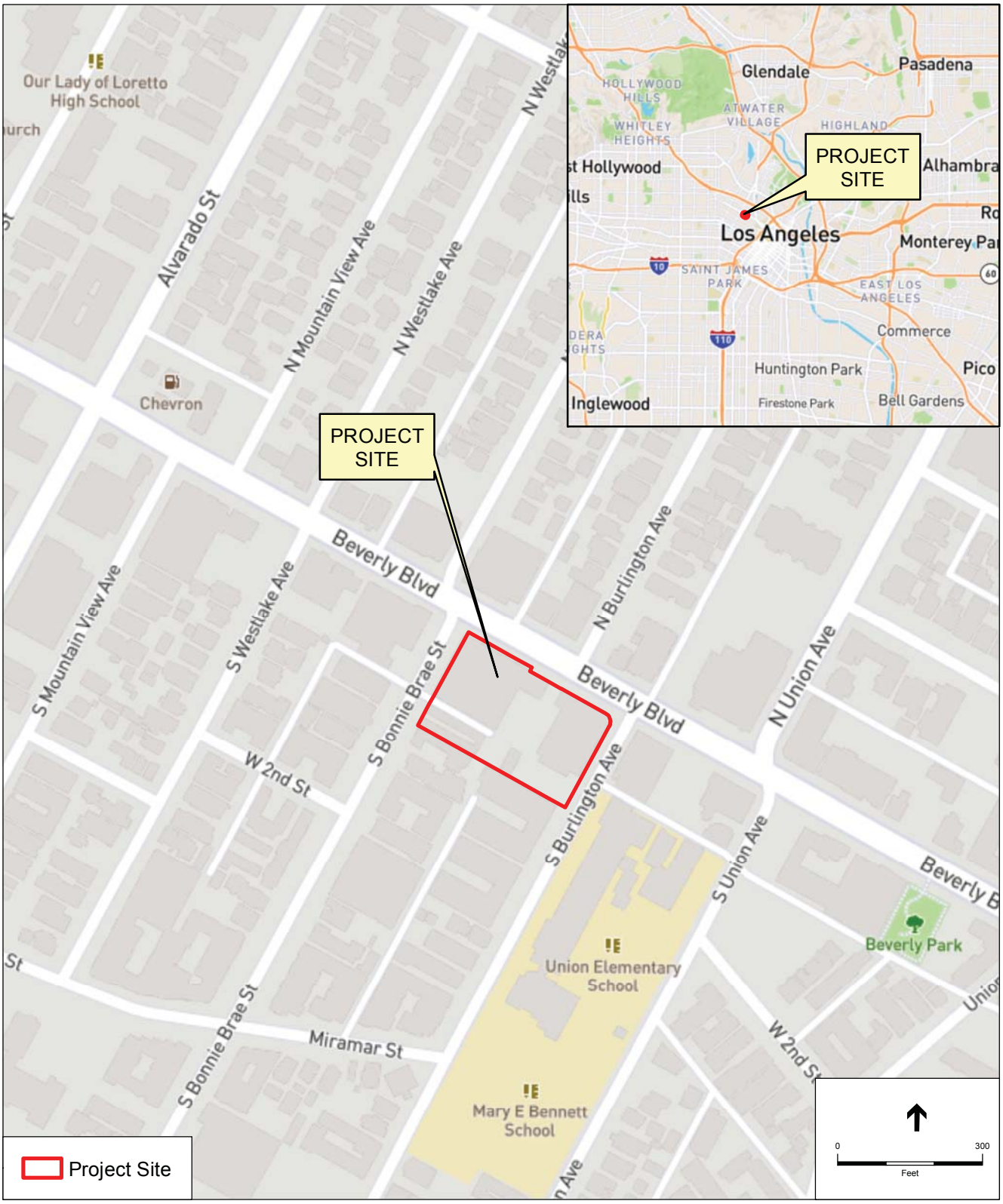
[2] FAR expresses the relationship between the amount of useable floor area permitted in a building (or buildings) and the area of the lot on which the building stands. It is obtained by dividing the floor area of a building by the buildable area of the lot.

plazas. Adjacent to the Project's commercial component, the first plaza would be located at the northwest corner of the Project Site. A second plaza would be located at the northeast corner of the Project Site where the leasing office and main building entrance would be located. Approximately 292 vehicle parking spaces and 272 bicycle parking spaces would be provided within the upper ground floor level, lower ground floor level, and one-half level of a subterranean parking structure. Access to the commercial parking would be from South Bonnie Brae Street. Access to the residential parking would be from South Bonnie Brae Street and South Burlington Avenue. Both garage entries for residential and commercial uses would include controlled access.

B. Project Location and Surrounding Uses

The Project Site is bounded by South Bonnie Brae Street to the west, West Beverly Boulevard to the north, South Burlington Avenue on the east, and existing multi-family developments to the south as shown in **Figure 1**, *Regional and Vicinity Map*. The Project Site is served by a network of regional transportation facilities providing connectivity to the larger metropolitan area. The Project is 0.44 miles south of U.S. Route 101 (US 101) Highway, 0.90 miles west of the SR 110 Freeway (SR-110), and 1.86 miles north of Interstate 10 (I-10) Freeway. The Project is located less than a mile from the Westlake/MacArthur Park Metro Station, which serves the Metro Purple Line (805) and the Metro Red Line (802). The Metro Purple Line route provides a connection between Mid-Wilshire/Koreatown and Downtown Los Angeles. Currently under construction, the future Purple Line Extension will extend westward for about nine miles, adding stations at the Miracle Mile area, the City of Beverly Hills, Century City, and Westwood. The Metro Red Line route provides a connection between Downtown Los Angeles and North Hollywood via the districts of Hollywood and Mid-Wilshire. Both lines provide a direct link to the 7th & Metro Center. The 7th & Metro Center provides access to the majority of the regions rail lines with links to several job centers, including Long Beach, Culver City, Koreatown, the Wilshire Corridor, Hollywood, North Hollywood, San Fernando Valley, Culver City and Santa Monica. The Project Site is also in close proximity to several bus lines including the DASH Pico Union/Echo Park line stop located one block to the east of the Project Site at the intersection of Union Avenue and Beverly Boulevard. Metro Bus lines 14 and 37 run along Beverly Boulevard with stops at Bonnie Brae Street and Union Avenue.

As shown in **Figure 2**, *Aerial Photograph of the Project Site and Vicinity*, the Project Site is in a highly urbanized location surrounded by a mix of land uses, including commercial, retail, office, institutional, and residential uses as well as religious and school facilities. Immediately to the east, along South Burlington Drive, is the Wat Khmer Buddhist Temple and the Los Angeles Unified School District (LAUSD) Union Avenue Elementary School. To the north of the project site, along West Beverly Boulevard, parcels are developed with various commercial uses including the Joy Christian Church, the Moses Yu Acupuncture/Chiropractic Center, the East Gate Korean Presbyterian Church, and the Central Adult Day Health Care Center. To the west, along South Bonnie Brae Street, parcels are developed with various commercial uses including, but not limited to a drycleaner, key copy center, a café, and multi-family residential uses. To the south of the Project Site, are multi-family and single-family residences. Further southeast of the Project Site is the San Castro Middle School.



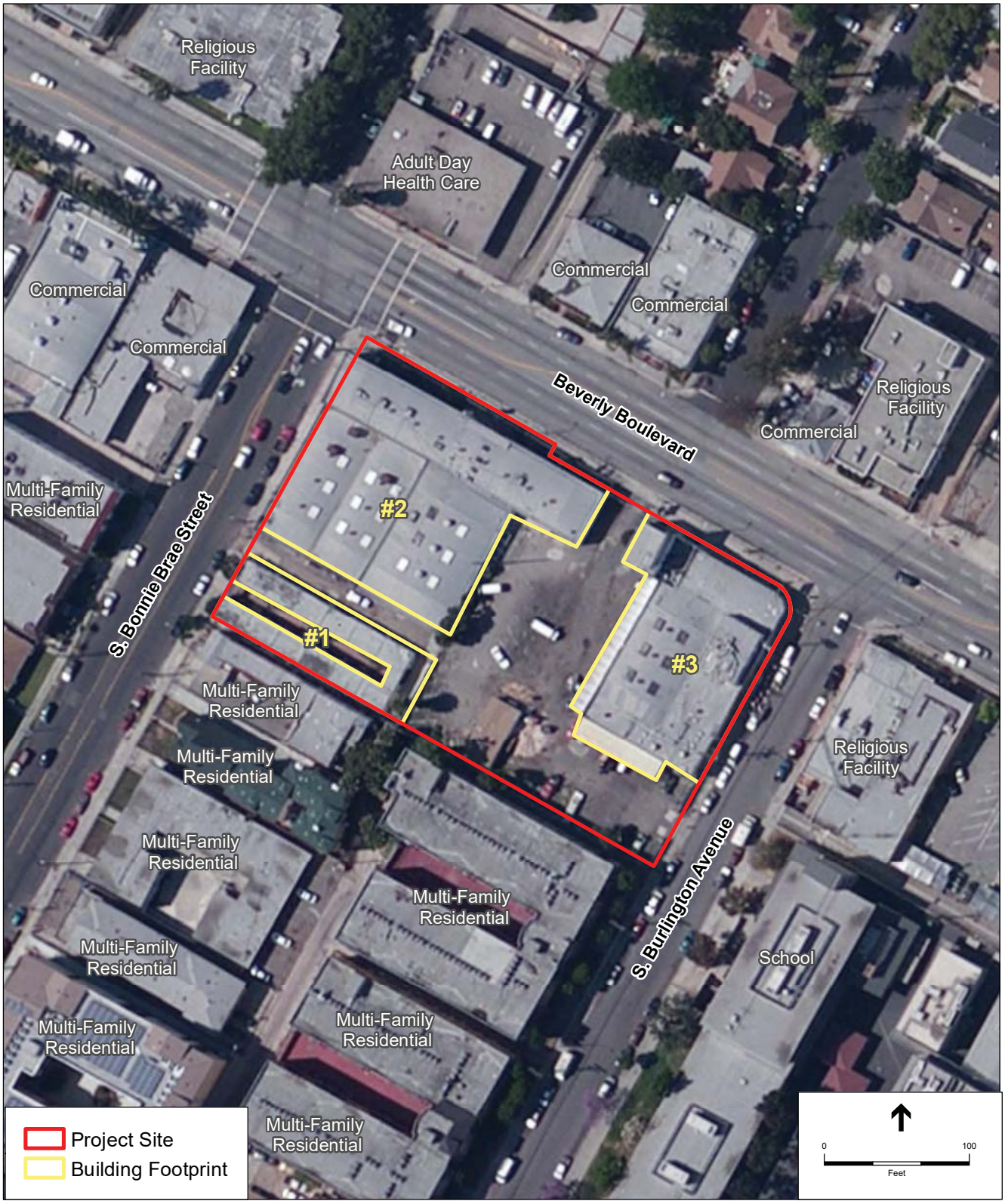
SOURCE: Open Street Map, 2016.

1800 W. Beverly Boulevard

Figure 1

Regional and Project Vicinity Map

ESA PCR



SOURCE: NAIP, 2014 (Aerial).

1800 W. Beverly Boulevard

Figure 2

Aerial Photograph of Project Site and Vicinity

ESA PCR

C. Site Background and Existing Site Conditions

The Project Site consists of six lots and three assessor's parcel numbers (APN). APN 5154-001-003 consists of one lot located at 114-118 ¾ South Burlington Avenue. APN 5154-001-020 consists of four lots located at 1820-1850 West Beverly Boulevard. APN 5154-001-019 consists of one lot located at 1800 West Beverly Boulevard and 101-111 South Burlington Avenue. The full Project address is 1800-1850 West Beverly Boulevard, 114-118 ¾ South Bonnie Brae Street, and 101-111 South Burlington Avenue. A dead-end alley with access from South Bonnie Brae Street and bordered on all other sides by the Project Site terminates 150 feet east of South Bonnie Brae Street within the Project Site. Together, the parcels contain a total of 72,150 sf. The Project Site has a slope of approximately 16 feet descending from South Burlington Avenue down to South Bonnie Brae Street. The Project Site is currently developed with three buildings including a 23,189 sf vacant commercial building used for storage, a 13,226 sf occupied commercial building, and a 6,137 sf, 12-unit apartment building. Also located on the Project Site is a small 1,088 sf shed, internal driveways, and a surface parking lot. The existing structures on the Project Site were constructed between 1923 to 1951. The sf of the buildings totals 42,552 sf. Photographs of the Project Site are provided on **Figure 3** and **Figure 4**, *Photographs of the Project Site*. As further described in Attachment B, Explanation of Checklist Determinations, Checklist Question 5.a, none of the existing improvements within the Project Site are eligible as a historical resource under CEQA. The occupied commercial building includes a variety of existing uses including, barber shop, second hand store, community church, local market/store, and storage. The apartment building consists of 12 units, with six of the 12 units currently occupied.[3]

Each of the buildings is listed below:

Building 1: 114-118 ¾ South Bonnie Brae Street: 12-unit apartment complex (6,137 sf)

Building 2: 1820-1850 West Beverly Boulevard, vacant commercial building, approximately 23,189 sf

Building 3: 1800 West Beverly Boulevard, commercial building, approximately 13,226 sf

A small shed located is also the south end of the parcel that is used for storage**.**

The existing buildings are identified in **Figure 2,** *Aerial Photograph of the Project Site and Vicinity*, above. Existing landscaping on the Project Site is limited and consists of 21 non-native, and non-protected trees. All of the existing trees are in poor health or are not capable of being transplanted[4]. The Project would remove existing trees and would provide 61 new trees on the Project Site and surrounding street frontage, a net increase of 40 trees.

3 As of March 2017.

4 Appendix C: Humphreys & Partners, Native Tree Protection Report. May 25, 2017.

PHOTOGRAPH 1. View of Project Site's northwest corner facing southeast across the intersection of W. Beverly Boulevard and S. Bonnie Brae Street.

PHOTOGRAPH 2. View of Project Site fronting W. Beverly Boulevard facing south.

PHOTOGRAPH 3. View of the Project Site fronting W. Beverly Boulevard facing southeast across the intersection of W. Beverly Boulevard and S. Burlington Avenue.

PHOTOGRAPH 4. View of Project Site's northeast corner facing southwest across the intersection of W. Beverly Boulevard and S. Burlington Avenue.

SOURCE: ESA PCR, 2017

1800 W. Beverly Boulevard

Figure 3

Photographs of the Project Site

ESA PCR

PHOTOGRAPH 5. View of Project Site fronting S. Bonnie Brae Street facing northeast.

PHOTOGRAPH 6. View of Project Site facing S. Bonnie Brae Street facing east.

PHOTOGRAPH 7. View of Project Site fronting S. Burlington Avenue facing northwest.

PHOTOGRAPH 8. Rear View of Project Site facing north.

SOURCE: ESA PCR, 2017

1800 W. Beverly Boulevard

Figure 4

Photographs of the Project Site

ESA PCR

D. Planning and Zoning

The Project Site is located within the Westlake Community Plan. The existing zoning for the Project Site is C2-1 (Commercial) and R4-1 (Multiple Residential). The C2-1 zone allows for a FAR of 1.5:1, while the R4-1 zone allows for a FAR of 3:1, imposed by the Height District 1 designation. Specifically, the parcel located at 114 – 118 ¾ South Burlington Avenue is located in the R4-1 zone and has a General Plan Land Use designation of High Medium Residential. The parcel located at 1820 – 1850 West. Beverly Boulevard, is located in two zones, the C2-1 zone and the R4-1 zone, with a corresponding General Plan Land Use designation of Highway Oriented Commercial and High Medium Residential. The parcel located at 1800 West Beverly Boulevard and 101 – 111 South Burlington Avenue is also located in two zones, the C2-1 zone and the R4-1 zone, with a corresponding General Plan Land Use designation of Highway Oriented Commercial and High Medium Residential.

E. Description of the Project

The Project would demolish the existing buildings on the Project Site and construct a mixed-use building with four stories of residential use above an upper ground floor level with amenity space and parking, a lower ground level with commercial and parking, and a half level of fully subterranean parking. Access to residential parking would be from South Bonnie Brae Street and South Burlington Avenue with access to parking for commercial uses from South Bonnie Brae Street.

As described in more detail below, residential uses would include approximately 219,507 sf of floor area and up to 243 units, with approximately 3,500 sf of commercial retail/restaurant space provided at the ground level. Overall, the Project would include up to a maximum of approximately 223,007 sf of floor area (FAR of 3.19:1). The proposed uses are summarized in **Table 1**, *Project Summary*.

1. Commercial (Retail and/or Restaurant Use)

New commercial space with retail and/or restaurant uses, totaling up to approximately 3,500 sf would be located at the ground level at the intersection of West Beverly Boulevard and South Bonnie Brae Street. The ground level commercial uses would be accessible from the sidewalk and pedestrian-oriented plaza area at the corner of West Beverly Boulevard and South Bonnie Brae Street. Dedicated commercial parking would be provided within the parking structure with access from a driveway off of South Bonnie Brae Street.

TABLE 1
PROJECT SUMMARY

Lot Area			
Existing –pre-dedicated (excluding alley)	72,150 sf (1.66 acres)		
Existing –pre-dedicated (including. alley)	75,150 sf (1.73 acres)		
Proposed-post dedication (including alley)	73,397 sf (1.68 acres)		
Floor Area (FAR)	Permitted By Right[a]	Density Bonus 35%	Proposed
C2-1 Zone	74,953 sf (1.5:1)	101,187 sf	3,500 sf (Commercial)[b]
R4-1 Zone	59,526 sf (3:1)	80,360 sf	219,507 sf [c] (Residential) (Averaged over both zones)
Total	134,479 sf	181,547 sf (2.6:1)	223,007 sf (3.19:1)
Density	Permitted By Right	Density Bonus 35%	Proposed
C2-1 Zone	125 units	169 units	147 units
R4-1 Zone	59 units	80 units	96 units
Total	184 units	249 units	243 units
Open Space	Required	20% Reduction	Proposed
Useable Open Space	25,525 sf	20,420 sf	23,115 sf
Common Open Space		12,763 sf	17,265 sf
Landscaped Area		2,958 sf	2,998 sf
Total	25,525 sf	20,420	
Trees[d]			61

Notes:

a) Permitted by right based on an assumption of no density bonus.
b) For the purposes of the water and wastewater analysis, the commercial use would include up to 150 seats for restaurant use and 2,458 sf retail
c) Located in both zones per density bonus incentive
d) In total, 21 trees will be removed as part of the Project.

SOURCE: Humphreys & Partners Architects, L.P. 2017

2. Residential Uses

Residential uses would include approximately 219,507 sf of floor area and up to 243 dwelling units on floors two through five consisting of 80 studios, 114 one-bedroom units, and 49 two-bedroom units. Of these units, 21 units would be restricted for Very Low Income Households.[5] Access to the residential uses would be through one of two residential lobbies. The main building lobby and lounge area would be located along West Beverly Boulevard near the corner of South Burlington Avenue, and would include the Project's mailroom and package lockers. Immediately adjacent to lobby on the east, would be the Project's leasing office. The second lobby would be located along South Bonnie Brae Street near the Project's southern boundary. Indoor amenity areas that would include fitness uses would be located on the ground floor along West Beverly Boulevard to further activate the Project's street frontage. Other indoor amenities including a dog wash area and a resident workshop area for crafts or other do it yourself activities that would front South Bonnie Brae Street at the ground level.

3. Project Design, Open Space, and Landscaping

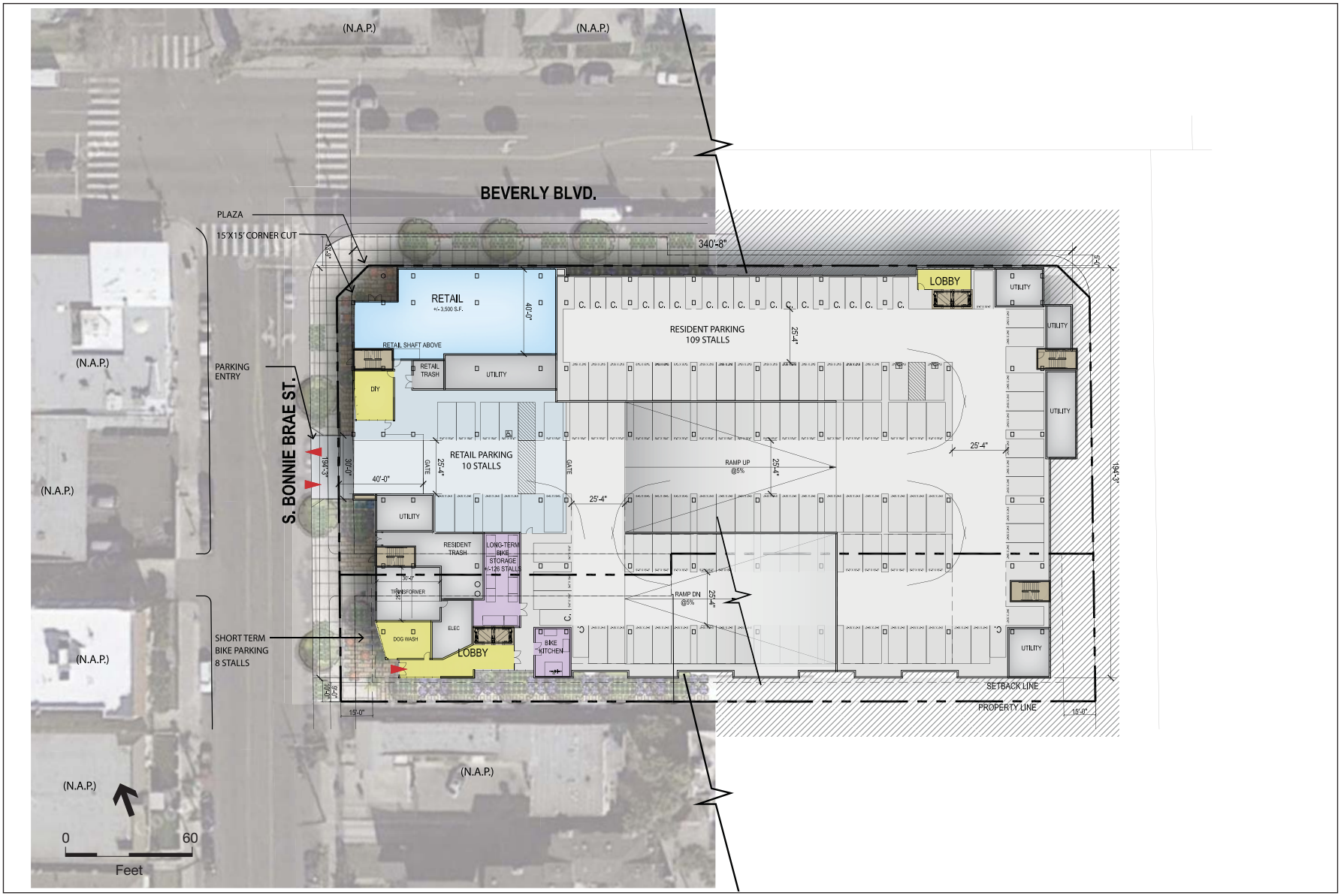
Plans, conceptual renderings and elevations of the Project are shown in **Figure 5**, *Lower Ground Level*, **Figure 6**, Upper Ground Level, **Figure 7**, *Level 2- Podium*, **Figure 8**, *Conceptual Building Design – West Beverly Boulevard,* **Figure 9***, Conceptual Building Design – South. Burlington Avenue and South. Bonnie Brae Street,* **Figure 10***, Concept Elevations (North and West),* and **Figure 11**, *Concept Elevations (South and East).*

Along West Beverly Boulevard, the main façade of the building is subdivided into three sections with varying scales, materials, and rhythms of openings distinguishing one from another. Exterior building materials consist primarily of plaster, with accents of textured cementitious siding panels, and porcelain panels and tiles, particularly at the ground level. Use of classic accent colors provide emphasis to select areas of the facades.

The building has been designed to activate the pedestrian environment with the inclusion of ground level commercial uses, resident amenities, and the main lobby/lounge areas and leasing center.

Two street-level public plazas located at the corner of West Beverly Boulevard and South Burlington Avenue and at the corner of West Beverly Boulevard and South Bonnie Brae Street would include seating areas and landscape amenities that would activate the street front while complementing the proposed commercial uses and indoor amenity areas. The Project would provide new trees, landscaping, and pedestrian amenities such as seating and benches along the Project's street frontages to create an inviting pedestrian environment. Landscaped open spaces would include new trees, planters, and planting beds with a variety of plant materials, as well as hardscape areas with special paving and outdoor furniture along the Project's street frontages and outdoor plazas.

5 The 21 very low income units represents 11 percent of the base density of 183 residential units.

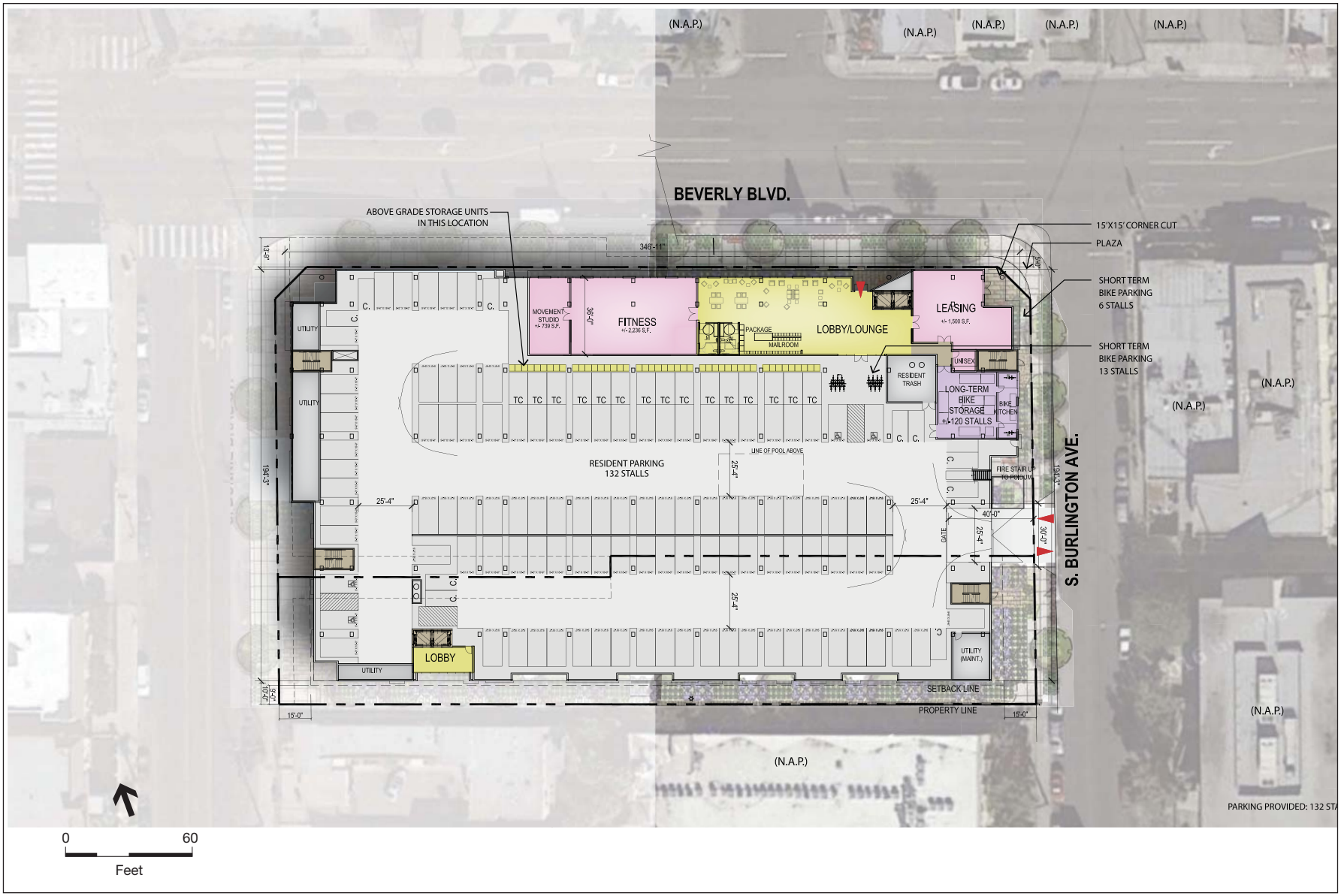


SOURCE: Humphreys & Partners Architects, L.P., 2017

1800 W. Beverly Boulevard

Figure 5
Conceptual Site Plan

ESA PCR



SOURCE: Humphreys & Partners Architects, L.P., 2017

1800 W. Beverly Boulevard

Figure 6

Level 1 - Upper Ground

ESA PCR

SOURCE: Humphreys & Partners Architects, L.P., 2017

1800 W. Beverly Boulevard

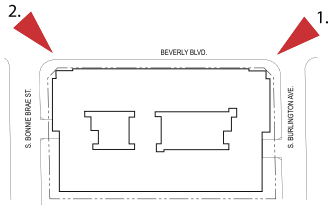
Figure 7

Level 2 - Podium

ESA PCR

1. VIEW SW FROM BEVERLY BLVD

2. VIEW SE FROM BEVERLY



KEY PLAN

SOURCE: Humphreys & Partners Architects, L.P., 2017

1800 W. Beverly Boulevard

Figure 8

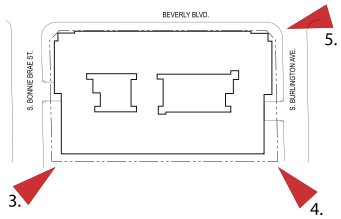
Conceptual Building Design – Beverly Boulevard

ESA PCR

5. VIEW W TO BURLINGTON ELEVATION

3. VIEW NE FROM BONNIE BRAE ST

4. VIEW NW FROM BURLINGTON AVE



KEY PLAN

SOURCE: Humphreys & Partners Architects, L.P., 2017

1800 W. Beverly Boulevard

Figure 9

Conceptual Building Design – Burlington Avenue and Bonnie Brae Street

ESA PCR

SOURCE: Humphreys & Partners Architects, L.P., 2017

1800 W. Beverly Boulevard

Figure 10

Concept Elevations (North and West)

ESA PCR

SOURCE: Humphreys & Partners Architects, L.P., 2017

1800 W. Beverly Boulevard

Figure 11

Concept Elevations (South and East)

ESA PCR

At the roof line, a roof deck is located at each end of the West Beverly Boulevard façade. One roof deck is located at the corner of West Beverly Boulevard and South Bonnie Brae Street; the other at the corner of West Beverly Boulevard and South Burlington Avenue. The roof decks will include landscaping and seating areas with views of the City. The roof decks allow the building facade to step down toward each of the corners.

Open space amenities for future residents would include two courtyards located on level two of the building. The largest courtyard would include a pool, spa, seating area, barbecue area, fire pits, and landscaping with an adjacent clubroom. The second, smaller courtyard, would include an outdoor kitchen and barbeque area, and an artificial lawn area. In total, the Project would provide up to approximately 23,115 sf of open space of which 5,850 sf would be private balconies.

While there are currently 21 non-native (unprotected) trees on the Project Site, including one existing street tree on West Beverly Boulevard, which would be removed as part of the Project, as a result of the project, 61 new trees would be provided, inclusive of new street trees. Overall, compared to existing conditions, the project would result in a substantial increase in landscaped open space on the Project Site. Landscaped areas would be comprised of native and drought tolerant vegetation, supported by water efficient irrigation systems. The Project's landscape plan would be subject to final review by the City of Los Angeles Department of City Planning.

4. Access and Circulation

Security controlled, gated vehicle access to the residential parking area would be from driveways located on South Bonnie Brae Street and South Burlington Avenue. Specifically, access to the lower ground floor and one-half level of subterranean parking (totaling 151 residential parking spaces) would be provided from a driveway on South Bonnie Brae Street. Access to the upper ground floor parking level (totaling 132 residential parking spaces) would be from South Burlington Avenue. Access to the 10 commercial parking spaces on the lower ground level would be from the driveway on South Bonnie Brae Street.

Pedestrian access to the residential units would be from the two lobby entrances. The Project's main lobby entrance would be at the corner of West Beverly Boulevard and South Burlington Avenue. The second residential lobby would be from South Bonnie Brae Street near the Project's southern boundary. Pedestrian entrances for commercial visitors would occur at the main entrance lobby at the corner of West Beverly Boulevard and South Bonnie Brae Street. Access to residential areas would be available via elevators and stairways in the parking levels. Long-term parking for bicycles would be located on South Burlington Avenue and South Bonnie Brae Street. Short-term bicycle parking would be located on South Burlington Avenue and South Bonnie Brae Street as well as within the upper ground level parking level.

5. Parking

The Project proposes to provide 292 automobile parking spaces on site within a parking structure. The parking requirements for automobiles and bicycles are summarized in Table 2. The following outlines the applicable parking standards/policies for the Project's commercial and residential uses:

Commercial Uses

The Project Site is located within the State Enterprise Area and requires a parking ratio of two spaces per 1,000 gross sf of retail, restaurant and other commercial uses, pursuant to LAMC Section 12.21-A,4(x)(3). The Project would be required seven parking spaces for the 3,500 sf of commercial uses but would provide a total of ten parking spaces. Controlled access to the commercial parking would include a ticket based operational system. A roll down gate would secure the commercial entrance during non-business hours.

Residential Uses

Pursuant to the California Government Code Section 65915(p)(2), amended by Assembly Bill 744 (AB 744), a mixed-use development with 11 percent for Very Low Income dwelling units within ½ mile of a major transit stop to which the Project has unobstructed access, the parking requirement is 0.5 spaces per bedroom.

The Project Site is located less than ½ mile of numerous bus transit lines and is less than a mile from the Westlake/MacArthur Park Metro Rail Station. Pursuant to AB 744, the Project would be required to provide 40 parking spaces for the 80 studio units, 57 parking spaces for the 114 one-bedroom units, and 49 parking spaces for the 49 two-bedroom units, for a total of 146 residential parking spaces. At a ratio of two parking spaces per 1,000 sf, 7 commercial parking spaces would be required for a total of 153 parking spaces. The Project's 292 automobile spaces would exceed the 153 automobile parking space requirements (i.e., 10 spaces for commercial and 282 for residential). The Applicant is requesting permission to deviate from the number of parking spaces defined in the Advisory Agency policy memo AA-2000-1. This memo requires 2.25 parking spaces per condominium unit. The Applicant proposes to provide parking consistent with State of California Assembly Bill No. 744 to allow parking spaces based on 0.5 spaces per bedroom.

Bicycle Parking

Pursuant to LAMC Section 12.21-A,16 the Project would be required to provide a minimum of 272 bicycle parking spaces. The Project would provide two short-term and two long-term bicycle parking spaces for commercial uses, for a total of four bicycle parking spaces. The proposed 243 residential units would require 25 short-term bicycle parking spaces and 243 long-term bicycle parking. The Project would meet these requirements and would provide 272 bicycle parking spaces (268 spaces for residential uses and four spaces for commercial uses). Short-term bicycle stalls would be located along South Bonnie Brae Street and South Burlington Avenue and within the upper parking level. A long-term bicycle storage area and a bicycle kitchen would directly front South Burlington Avenue. An additional long-term bicycle storage and associated bicycle kitchen would be located off the residential lobby on South Bonnie Brae Street.

TABLE 2
PARKING SUMMARY

	Space/Units	No. of Units	No. of Spaces
Automobile Parking			
Required (Advisory Agency Parking Policy)			
Studio	2.25	80	180
One Bedroom	2.25	114	257
Two Bedroom	2.25	49	111
Total Residential Required		*243*	*548*
Parking Required per AB 744			
Residential	0.5	292 Bedrooms	**146**
Commercial Parking	3,500	2: 1,000	7
Total Required per AB 744			**153**
Total Residential Proposed			282
Total Commercial Proposed			10
Total Parking Proposed			**292**
Bicycle Parking			
Required	**Short Term (1 per 10 residential unit) (1 per 2,000 sf commercial)**	**Long Term (1 per residential unit) (1 per 2,000 sf commercial)**	**Total**
Residential	25	243	268
Commercial	2	2	4
Total Bicycle Parking Required			**272**
Proposed	**Short Term**	**Long Term**	**Total**
Residential	25	243	268
Commercial	2	2	4
Total Bicycle Parking			**272**

6. Lighting and Signage

New lighting would include building identification, commercial accent lighting, wayfinding, balcony lighting, and security lighting. Pedestrian areas including pathways and entryways into the Project would be well-lit for security and ground-mounted. Light fixtures would be shielded and directed towards the areas to be lit and away from adjacent light-sensitive residential land uses.

Building identification signage for the ground level commercial use would be visible from West Beverly Boulevard and South Bonnie Brae Street. The building would also include street address and identification/wayfinding signage for the vehicular and pedestrian entries to the building. Building identification signs at the roof level would be visible from South Burlington Avenue and West Beverly Boulevard. Lighting would be designed in conformance with LAMC requirements and would not exceed the footcandle light intensity level required at the property line of the nearest sensitive receptor.

7. Site Security

The Project would incorporate security measures for the safety of residents and visitors to the Project Site. During construction of the Project, the Project Site would be fenced and gated with surveillance cameras to monitor the site during off hours. During operation of the Project, access to the parking structure would be controlled through gated entries, and the entry areas would be well illuminated. Site security would include controlled keycard access to residential areas, parking areas, secured entry and exit points to all buildings, security lighting within common areas and entryways, and closed circuit TV monitoring (CCTV).

8. Sustainability Features

Energy saving and sustainable design would be incorporated throughout the Project. The Project would be designed to meet Cal Green and Title 24 Building Standards Code (CALGreen Code). The Project would emphasize energy and water conservation, which would be achieved through the use of energy efficient Heating Ventilation and Air Conditioning (HVAC) and lighting systems, energy star appliances, and low flow plumbing fixtures. Building envelopes would be highly insulated, and employ shading strategies to avoid unnecessary solar gain. In addition, the Project may include storm water collection for irrigation purposes and potential solar photovoltaics or solar hot water supply systems. The applicant proposes to incorporate five percent of the parking spaces as electric vehicle (EV) ready with metal conduit and electric wire pulled ready for charging station equipment installation. An additional 20 percent of the proposed parking spaces would be roughed-in with metal conduit only for future wiring to support future growth of EV charging stations. The electric vehicle-ready spaces would not restrict gas powered vehicles from parking in the spaces.

9. Construction Schedule

Construction is anticipated to begin in early 2018 with an estimated duration of approximately 24 months.

Grading activities would include cut and fill with approximately 31,000 cubic yards being exported from the project site. Construction hours would occur in accordance with the LAMC requirements, which prohibit construction between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, 6:00 P.M. and 8:00 A.M. on Saturday, and at any time on Sunday. Parking for the construction workers would be provided on the Project Site or will be leased from near-by off-site parking areas.

F. Project Requests

The Project Site consists of a pre-dedicated lot area (including alley) of 75,150 sf (1.73 acres) on property currently zoned C2-1 (52,143 sf) and R4-1 (23,007 sf). The Applicant requests a Density Bonus on-menu incentive to permit up to 20% decrease from open space requirement and averaging of FAR, density, parking, open space and vehicular access. The Applicant also requests an off-menu incentive to permit a 3.19:1 FAR for the Project Site.

The Project includes a request for Site Plan Review for 243 residential units and approval of a Vesting Tentative Tract Map for the merger and resubdivision of the Project Site, including the merger of the existing alley that dead ends into the Project Site. As part of the discretionary application for the Vesting Tentative Tract Map, the Project would merge and re-subdivide the site into a single ground lot and three airspace lots, as well as a merger of seven feet of previously dedicated land and existing public alley. As the result, the Project Site would have a post-dedicated lot area of 73,397 sf (1.68 acres). Discretionary entitlements, reviews, and approvals required for implementation of the Project would include, but would not necessarily be limited to, the following:

- Pursuant to L.A.M.C. Section 17.06 and Section 17.15 approval of Vesting Tentative Tract Map 74771 for the merger and resubdivision of the project site into a single ground lot (Lot 1) and three (3) airspace lots, and the merger of seven-feet of previously dedicated land and existing public alley into the project site for a mixed-use project containing up to 243 residential dwelling units and approximately 3,500 square feet of commercial space.

    a. The Applicant requests permission to deviate from the number of parking space defined in the Advisory Agency policy memo AA-2000-1. This memo requires 2.25 parking spaces per residential unit. The Applicant requests permission to provide residential parking consistent with California Government Code Section 65915 (p)(2) for a ratio of 0.5 parking spaces per bedroom.

    b. The Applicant requests approval of a haul route in conjunction with the Vesting Tentative Tract Map approval.

- Pursuant to LAMC Section 12.22.A.25 the Applicant proposes 11% of the base maximum density units for “Very Low Income” restricted affordable housing. The Applicant seeks to provide parking consistent with California Government Code Section 65915 (p)(2). The Applicant requests the following incentives:

    On-Menu Incentives pursuant to LAMC Section 12.22.A.25.g.2:

    a. Pursuant to LAMC Section 12.22.A.25(f)(8) averaging of the site’s permitted floor area, density, open space, parking and vehicular access.

    b. Pursuant to LAMC Section 12.22.A.25(f)(6) a 20% reduction in the open space requirement.

Off-Menu Incentive pursuant to LAMC Section 12.22.A.25.g.3:

c. Pursuant to LAMC Section 12.22.A.25(g)(3) a 3.19 floor area ratio ("FAR") in lieu of the 1.5:1 FAR in the C2-1 Zone and 3:1 FAR in the R4-1 Zone.

- Pursuant to LAMC Section 16.05, Site Plan Review for a project which creates more than 50 residential dwelling units.
- Construction permits, including building permits, grading, excavation, foundation, and associated permits.
- Other approvals as needed and as may be required.

ATTACHMENT B
Explanation of Checklist Determinations

The following discussion provides responses to each of the questions set forth in the City of Los Angeles Initial Study Checklist. Where applicable, project design features (PDFs) and/or mitigation measures are identified in the analysis to help reduce or avoid significant impacts on the environment.

The California Environmental Quality Act (CEQA) requires that the analysis of potential project impacts include cumulative impacts. CEQA defines cumulative impacts as "two or more individual effects which, when considered together are considerable or which compound or increase other environmental impacts." The analysis of cumulative impacts need not be as in-depth as what is performed relative to the proposed project, but instead is to "be guided by the standards of practicality and reasonableness." The analysis of cumulative impacts provided herein is based on an assessment of reasonably foreseeable growth associated with a list of past, present, and anticipated future projects. The list of related projects was provided by the City of Los Angeles Department of Transportation (LADOT) and also includes other projects in the area based recent studies. A list of 167 related projects and four related infrastructure projects in the Project study area is provided in **Table B-40**, *Summary of Related Projects* in Section 10, *Mandatory Findings of Significance*. Related Projects are mapped in **Figure B-2**, *Related Projects Map*. Although these projects serve as the primary bases for evaluation of cumulative impacts, analyses may vary among certain environmental issues due to the unique characteristics and geographic context of certain impacts. The cumulative analyses for each environmental issue are provided below following the assessments of Project impacts.

1. Aesthetics

On September 27, 2013, Governor Brown signed Senate Bill (SB) 743, which became effective on January 1, 2014. The purpose of SB 743 is to streamline the review under CEQA for several categories of development projects including the development of infill projects in transit priority areas (TPAs). A TPA is an area located within one-half mile (2,640 feet) of a major transit station. Specifically, Section 21099(d)(1) of the Public Resources Code (PRC) states that a project's aesthetic impacts shall not be considered a significant unavoidable impact on the environment if:

1. The project is a residential, mixed-use residential or employment center project, and
2. The project is located on an infill site within a transit priority area.

Consistent with SB 743, City of Los Angeles Zoning Information File ZI No. 2451 indicates that visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within TPA pursuant to CEQA.

The Project Site is a mixed-use, infill project in a TPA located close to numerous bus transit lines and is less than a mile from the Westlake/MacArthur Park Metro Rail Station. Bus lines adjacent to the Project Site are operated by Metro, LADOT Downtown Area Shuttle (DASH), and Foothill Transit. Specifically, Metro Bus Line 14 runs along West Beverly Boulevard with stops at South Bonnie Brae Street and Union Avenue and travels from Downtown Los Angeles to Beverly Hills via Beverly Boulevard. LA Metro Bus Line 200 travels along Alvarado Street and provides service to the Metro Red and Purple Line Westlake/MacArthur Park Station and the University of Southern California. The DASH Pico Union/Echo Park bus stop is located one block to the east of the Project Site and travels along Beverly Boulevard, Alvarado Street, and 3rd Street and provides access to the Westlake / MacArthur Park Metro Rail Station. All the above bus routes have a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Other bus lines located near the Project Site include LA Metro Lines 10, 16, 17, 20, 603, 720, and Foothill Transit 481.

Because of the mixed-use residential character of the Project and its location within an urban TPA, the Project's aesthetic impacts are not considered significant. Nonetheless, the Project is herein compared to the respective CEQA thresholds for disclosure/informational purposes only.

Would the project:

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

Less Than Significant Impact. The existing visual setting of the Project area is characterized by a mix of urban uses. The area immediately surrounding the Project Site consists of buildings of various architectural styles, and uses with most structures in the area ranging from one to two stories. Immediately to the east along South Burlington Avenue is the Wat Khmer Buddhist Temple and the Los Angeles Unified School District (LAUSD) Union Avenue Elementary School. To the north along West Beverly Boulevard, are various commercial uses including the Joy Christian Church, the Moses Yu Acupuncture/Chiropractic Center, the East Gate Korean Presbyterian Church, and the Central Adult Day Health Care Center. To the west, along South Bonnie Brae Street, are various commercial uses such as a drycleaner, key copy center, a café, and multi-family residential uses. To the south of the Project Site, are multi-family and single family residences. Further southeast of the Project Site is the San Castro Middle School.

The Project Site is currently developed with a vacant commercial building used for storage, an occupied commercial building, a 12-unit apartment building, a small shed, internal driveways, and a surface parking lot. The commercial building located near the intersection of West Beverly Boulevard and South Burlington Avenue includes multiple individual retail storefronts including vacant tenants, limited windows, rolled-down gates, hand painted signs and gated doors. The vacant commercial warehouse building located at the corner of West Beverly Boulevard and

South Bonnie Brae Street is surrounded by white iron fencing behind the sidewalk on West Beverly Boulevard and has a largely blank façade along South Bonnie Brae Street. To the south of the vacant commercial building, fronting South Bonnie Brae street is a 12-unit bungalow apartment with a gated arched opening that is largely obscured behind two mature trees. The one-to-two story buildings on the Project Site have construction dates ranging from 1923 to 1951. As discussed in Section 5, a. *Cultural Resources*, none of the existing on-site buildings are considered historically significant. The existing buildings on the Project Site are not considered valued scenic resources.

Although located in a highly urbanized setting, there are a number of open space and parks in the area that are scenic resources. These include Rockwood Community Park located 0.25 miles to the northeast and Unidad Park, a small pocket park located 700 feet to the east that fronts West Beverly Boulevard. Unidad Park includes the scenic Gintong Kasaysayan, Gintong Pamana (Filipino Americans: A Glorious History, A Golden legacy) the nation's largest Filipino American mural, on the Park's western boundary.[1]

Overall, no notable views of scenic resources are currently available across the Project Site. Due to distance, topography, and intervening development, there are no public views across the Project Site of scenic resources such as Rockwood Park and Unidad Park.

As discussed in Section 5, a. Cultural Resources, there are 20 historical resources within a quarter mile radius of the Project Site. Of these 20 resources, only one resource, the Yu Acupuncture Clinic, located across from the Project Site to the north at 1807 West Beverly Boulevard, would be within the viewshed of the Project Site. However, as discussed in Section 5, a. Cultural Resources, the eligibility of Yu Acupuncture clinic as a historic resource is not tied to its architecture or aesthetic qualities; rather, the property is eligible for its historical associations as an early acupuncture clinic operated by the Yu family. As such, the Yu Acupuncture Clinic is not considered a scenic resource.

As such, the Project would have a less than significant impact with respect to scenic vistas. [2] As stated previously, consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, impacts to scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

1 http://historicfilipinotown.weebly.com/about.html. Accessed March 2017.

2 This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors regarding obstruction of views, including the nature and quality of recognized or valued views (such as natural topography, settings, man-made or natural features of visual interest, and resources such as mountains or the ocean); whether the project affects views from a designated scenic highway, corridor, or parkway; the extent of obstruction (e.g., total blockage, partial interruption, or minor diminishment); and the extent to which the project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

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

No Impact. The Project is located within a dense, urban setting. There are no designated scenic highways in the vicinity of the Project Site.[3] Furthermore, no scenic resources are located on the Project Site and there are no landmark trees, historic buildings, rock outcroppings or other scenic natural features in the Project vicinity.

As discussed in Section 5.a, *Cultural Resources*, a *Historical Resources Assessment Report (HRA) and Environmental Impact Analysis* was prepared for the Project and included a historic records search within a quarter-mile radius to identify all known historical resources within the Project vicinity. The records search identified 20 historical resources within the Project vicinity. Of these, 19 of the historical resources would not have either direct or indirect views of the Project Site. Therefore, the Project would not have an impact on these 19 historic resources.

One historical resource, the Yu Acupuncture Clinic, is located directly north of the Project Site across from West Beverly Boulevard. The Project would not demolish or materially alter the Yu Acupuncture Clinic., which is not considered a scenic resource (see 1.b. above). As such, there would be no impact to existing scenic resources. Furthermore, as stated previously, consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, impacts to scenic resources any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

c. Substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact.

Construction Impacts

Construction Impacts

Construction activities typically result in site disturbance, movement of construction equipment, import and export of materials, views of incomplete buildings and other activities that generally contrast with the aesthetic character of an area. Construction activities would be primarily visible from West Beverly Boulevard, South Bonnie Brae Street, and South Burlington Avenue with construction also visible from residential properties immediately south of the Project Site. Construction would entail demolition of the three on-site buildings, shed, and surface parking. Other construction activities would include grading of the lot, staging of construction vehicles, storage of materials, and building construction. Demolition, grading and construction of new buildings, sidewalk improvements, and installation of landscaping would be temporarily disruptive. Construction would occur over an approximately 24-month period.

[3] City of Los Angeles Department of City Planning, Mobility Plan 2035, 2016.

Because of the short-term, temporary nature of the construction activities, construction activities would not substantially alter, degrade, or generate long-term contrast with the visual character of the surrounding area. In addition, construction fencing would be provided for safety, and would also serve to screen views of grading and other site disturbance from adjacent streets and sidewalks. Construction fencing for the Project is proposed along the perimeter of the Project Site with a minimum height of 8 feet as set forth in PDF AES-1. As construction fencing has the potential to attract graffiti or posting of unauthorized materials, PDF AES-1 also includes visual inspections of the fence, temporary barriers, and walkways, and the requirement to remove any observed graffiti or unauthorized materials. Therefore, given the temporary nature of these impacts and implementation of PDF AES-1 as part of the Project, impacts on visual character during construction would be less than significant. As stated previously, consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, impacts to visual character or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

Operational Impacts

As stated earlier, the Project Site is currently developed with a vacant commercial building, a partially occupied commercial building, storage shed, internal driveways, apartment building, and a surface parking lot. The commercial building located near the intersection of West Beverly Boulevard and South Burlington Avenue includes non-cohesive individual retail storefronts including vacant tenants, limited windows, rolled-down gates, hand painted signs, graffiti, and gated doors. The vacant commercial warehouse building located at the corner of West Beverly Boulevard and South Bonnie Brae Street is surrounded by white iron fencing includes boarded windows, graffiti, and a largely blank façade along South Bonnie Brae Street. Limited landscaping is located within the Project Site or along the perimeter. The 12-unit bungalow apartment that is largely obscured behind existing vegetation. As such, the Project Site's existing buildings and features do not convey a high level of visual quality, and as previously stated, there are no scenic natural or urban features on the Project Site and no historic buildings.

Upon completion, the Project would include an approximately 79-foot-tall mixed-use building with four stories of residential use above an upper ground floor level with amenity space and parking, a lower ground level with commercial and parking, and a half level of fully subterranean parking. Due to the 16-foot grade difference, from the lower elevation along South Bonnie Brae Street to the higher elevation along South Burlington Avenue, the Project has six above grade levels along the west side of the Project Site and five above grade levels along the east side of the Project Site. The Project includes a contemporary, modern building, designed to support compatibility with the surrounding neighborhood. As shown in **Figure 8**, *Conceptual Building Design* – West *Beverly Boulevard,* **Figure 9***, Conceptual Building Design – South Burlington Avenue and South Bonnie Brae Street,* **Figure 10***, Concept Elevations (North and West),* and **Figure 11**, *Concept Elevations (South and East)*, the Project would include commercial uses, amenity areas, open space, plazas, and landscaping at the ground level. Specifically, the more active, and commercially-oriented street of West Beverly Boulevard would include street level commercial uses, the Project's main lobby and leasing area and indoor amenities with large windows and doors to help activate the streetfront and provide visual transparency to the Project.

Along South Bonnie Brae Street, ground level commercial uses, indoor amenities including a dog wash area, a resident workshop area for crafts or other do it yourself activities, and the Project's second lobby would front South Bonnie Brae Street at the ground level. These uses would include large windows and doors and would be visible from the streetfront. Along South Burlington Avenue, large windows would frame the Project's main lobby, and bicycle kitchen area. The parking structure would be internal to the Project and not be visible from the surrounding streets. Two street-level public plazas located at the corner of West Beverly Boulevard and South Burlington Avenue and at the corner of West Beverly Boulevard and South Bonnie Brae Street would include seating areas and landscape amenities that would activate the streetfront while complementing the proposed commercial uses and indoor amenity areas. South of the vehicle entryways along South Bonnie Brae and South Burlington Avenue, 15 feet setbacks with landscaping would be provided along the street frontage.

At the roof line, a roof deck is located at each end of the West Beverly Boulevard façade above the ground level plazas. The roof decks add visual interest and also allow the building facade to step down toward each of the corners to emphasize the corners of the block.

Landscaped open spaces would include new trees, planters, and planting beds with a variety of plant materials, as well as hardscape areas with special paving and outdoor furniture along the Project's street frontages and outdoor plazas to create an active pedestrian environmental along all street frontages.

While there are 21 non-native trees currently on the property, most of the existing trees are located interior to the Project Site and are not currently visible from public vantage points. The Project would remove existing trees and would provide 61 new trees on the Project Site and surrounding street frontage. Overall, compared to existing conditions, there would be a substantial increase in landscaped open space on the Project Site and its surrounding streets, including a net increase of 40 trees.

As the Project Site does not currently reflect a high level of visual quality, and because the Project has been designed with a unified architectural aesthetic, the Project would not degrade the visual character and quality of the site and its surroundings. Furthermore, the Project would promote the pedestrian experience through a new streetscape design that would substantially increase landscape amenities, including the provision of ground level commercial uses, street trees, outdoor plazas, and landscaping. Thus, impacts on visual quality would be less than significant.

While the proposed structure would be taller and greater in mass than the existing buildings on the Project Site, the height of the Project would not be out of scale with other recent construction in the surrounding neighborhood, such as the three story Union Avenue Elementary school and the four story Burlington Apartment located immediately to the east and southeast along South Burlington Avenue and the three to four story apartment buildings to the west along South Bonnie Brae Street. Visual character impacts in terms of scale and compatibility with the

neighborhood would therefore be less than significant.[4] As stated previously, consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, impacts to visual character or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

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

Light and Glare

Less Than Significant Impact. The Project Site is currently occupied by surface parking and one-and two-story commercial buildings and a one story bungalow style apartment building. The Project Site is located in a highly urbanized area with a mix of commercial, residential and public facility land uses, characterized by buildings of varying heights. Wall lights and streetlights provide illumination near the existing buildings and associated parking lot.

The mix of land uses in the immediate Project Site vicinity include a variety of structures from low-rise to mid-rise buildings. The area is characterized by high ambient light levels from street front commercial uses, streetlights, architectural and security lighting, indoor building illumination, and vehicle lights along adjacent roadways.

The Project's mix of uses would generate levels of interior and exterior lighting for security, parking entrances, signage and architectural highlighting, similar to other uses in the area. Soft accent lighting used for signage, and architectural highlighting would be directed to permit visibility of the highlighted elements but, would not be so bright as to cause substantial light spill off the Project Site.

Outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the Project Site and not on adjacent residential properties as set forth in PDF AES-2. Proposed signage and outdoor lighting would be subject to applicable regulations contained within the LAMC. Most notably, LAMC Section 93.0117(b) limits lighting intensity or direct glare onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

[4] This finding also took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors regarding aesthetics including the amount or relative proportion of existing features or elements that substantially contribute to the valued visual character or image of a neighborhood, community, or localized area, which would be removed, altered or demolished; the amount of natural open space to be graded or developed; the degree to which proposed structures in natural open space areas would be effectively integrated into the aesthetics of the site, through appropriate design, etc; the degree of contrast between proposed features and existing features that represent the area's valued aesthetic image; the degree to which a proposed zone change would result in buildings that would detract from the existing style of the area due to density, height, bulk, setbacks, signage, or other physical elements; the degree to which the project would contribute to the area's aesthetic value; and applicable guidelines and regulations.

LAMC Section 14.4.4.E, requires that no sign shall be arranged and illuminated in a manner that would produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

Existing glare in the Project area is not substantial and is typical of a highly urbanized area, with sunlight reflected off of reflective materials utilized in buildings and from vehicle windows and other surfaces. Building materials for the Project would include plaster, cement fiber board, glass, metal, and cast-in-place concrete. In accordance with City requirements, the exterior of the proposed structure would use materials such as, high-performance and/or low-reflective glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces that would minimize glare and reflected heat (see PDF AES-3). To the extent glare is experienced by adjacent uses or the occupants of vehicles on nearby streets it would be temporary, changing with the movement of the sun throughout the course of the day and the seasons of the year. Based on the above, glare impacts are not expected to be substantial or to adversely affect day or night views. Therefore, glare impacts are considered less than significant.[5] As stated previously, consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, impacts to light and glare or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

Project Design Features

PDF AES-1: The Applicant shall provide and maintain a construction fence along the perimeter of the Project Site during construction. The fence shall be a minimum height of 8 feet and up to 14 feet as appropriate for purposes of noise mitigation. The construction management company's name and telephone number(s) shall be posted at multiple locations along the perimeter of the Project Site. The Applicant shall ensure through appropriate postings and frequent visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

PDF AES-2: Outdoor lighting shall be designed, shielded and directed toward the areas of the Project Site to be lit to limit spill-over onto adjacent residential uses.

PDF AES-3: The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance low reflective glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces, that would avoid substantial glare and reflected heat.

Shade/Shadow

Less Than Significant Impact. Facilities and operations sensitive to the effects of shading include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented

[5] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors regarding nighttime illumination, including the change in ambient illumination levels as a result of project sources; and the extent to which project lighting would spill off the project site and effect adjacent light-sensitive areas.

outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. Shade sensitive uses in the Project area include residential uses to the north, west, and south of the Project Site and outdoor play areas associated with Union Avenue Elementary School to the southeast of the Project Site.

For purposes of this analysis, and consistent with City CEQA guidance, a Project impact would normally be considered significant if shadow-sensitive uses would be shaded by Project-related structures for more than three hours between the hours of 9:00 A.M. and 3:00 P.M. between late October and early April, or for more than four hours between the hours of 9:00 A.M. and 5:00 P.M. between early April and late October.[6] Shading diagrams are presented for winter and summer solstices as well as the spring and fall equinoxes in Appendix A and are presented in **Figure, A-1-** *Winter Solstice Shadows-December 21*, **Figure A-2**-*Spring Equinox Shadows-March 21*, **Figure A-3**-*Summer Solstice Shadows-June 21*, and **Figure A-4** -*Fall Equinox Shadows-September 21*. Shadows for all other times of the year can be interpolated between these four seasons and would not exceed the shadow effects identified at these four points in time. Shadow lengths, based on the Project's building height, are identified for specific times of the day and vary according to the season of the year.

As shown in in Figures A-1 to A- 4 in Appendix A, during the Winter Solstice, shadows would reach a small portion of the multi-family uses to the east, but the shadow would be gone before 11:00 A.M. and therefore would occur for less than two hours. Similarly, a small portion of residential uses to the north would be shaded, at 3:00 P.M, but the shadow would last for less than two hours. No other shading to sensitive receptors would occur during the Winter Solstice.

During the Spring Equinox and Fall Equinox, shadows would pass over the multi-family building to the west and a portion of the multi-family residential uses to the south starting at 9:00 A.M. Both shadows would be gone before 11:00 A.M and therefore would occur for less than two hours. During the Summer Solstice, shadows would reach a small portion of residential uses to the south; however, shadows would be of a duration of less than two hours.

Therefore, the proposed buildings on the Project Site would not significantly increase the shading of nearby shadow-sensitive uses based on the significance thresholds stated above, and a less than significant impact would occur. As stated previously, consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, impacts to shade and shadow or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

6 Shadow impacts thresholds based on criteria set forth in the City of LA CEQA Thresholds Guide (2006).

Cumulative Impacts

Aesthetics

Development of the Project in conjunction with related projects would result in an incremental intensification of land uses in a heavily urbanized area of the City of Los Angeles. Because of the area's dense urban fabric, public scenic views are generally available only through public street corridors and from public parks that have street corridor views or are set back from existing buildings.

Related projects in combination with the Project are located within designated urban lots planned for development and would not encroach upon public views through street corridors. Although some views of architecturally or historically important buildings could be obscured by taller buildings constructed within a line of sight over existing low rise development and parking lots, there would be limited potential for such occurrences and views of primary facades of architecturally or historically important buildings would not likely be affected. In addition, most development of a larger scale would be subject to environmental review and indirect impacts on historic resources or other scenic resources would be mitigated to the degree feasible. Accordingly, as the Project would not have direct or indirect impacts on scenic resources, its contribution to impacts on views of scenic resources from other related projects would not be cumulatively considerable and cumulative impacts would be less than significant.

Because the visual character of the area is defined by a range of diverse architecture that is generally not cohesive, and in many areas, like the Project Site, lacks a high level of visual quality, it is anticipated that new development would in general upgrade the visual quality of the area. New development subject to discretionary approval would conform to the City's design standards, and it is therefore anticipated that new development would reflect high quality design and would not degrade the visual character of the area. Accordingly, as the related projects and the Project would not degrade the visual character of the Project area, the Project's contribution to impacts on visual character would not be cumulatively considerable and cumulative impacts would be less than significant.

Cumulative light and glare effects would be consistent with the existing urban environment, which is characterized by high ambient light levels. Because lighting, including illuminated signage and outdoor lighting would be subject to regulations contained within the LAMC, compliance would ensure that impacts regarding lighting for the Project and related projects would not significantly impact sensitive uses. In addition, PDF AES-2 would also help ensure a less than significant lighting impact. Accordingly, the Project's contribution to impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

None of the related projects are within close proximity to the Project such that they would contribute to cumulative glare impacts. As the Project would not have a significant glare impact due to PDF AES-3 and impacts from related projects would not be proximate enough to result in combined glare effects, the Project's contribution to glare impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

Downtown Los Angeles and the Westlake area are heavily developed areas with an array of building volumes where varied shading conditions occur throughout the day. With regard to shading at a particular shade sensitive resource, shading is a localized phenomenon and cumulative shading impacts would only occur when development projects are in the immediate vicinity of one another. Due to the locations of the related projects, which are a considerable distance from the Project Site, there would not be overlapping shadow effects on sensitive receptors in association with the Project. Thus, the Project would not contribute to cumulative shadow effects and cumulative impacts would be less than significant. Furthermore, consistent with SB 743 and the City of Los Angeles Zoning Information File ZI No. 2451, visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.Overall, cumulative aesthetics impacts would be less than significant.

2. Agricultural and Forest 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.

Would the project:

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, 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 Project Site is located within a highly urbanized area and is currently developed with three buildings, a shed, and a surface parking lot. No agricultural uses, or related farmland operations are present within the Project Site or surrounding area. The Project Site is not located on designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program (FMMP).[7] The urban character of the Project Site would be consistent with the FMMP's definition of "Urban and Built-Up Land," which does not constitute farmland. Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses. No impact would occur and no mitigation measures are required.

7 State of California Department of Conservation, California Important Farmland Finder, http://maps.conservation.ca.gov/ciff/ciff.html, Accessed January 2017.

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

No Impact. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use. The Project Site is not zoned for agricultural uses presently and will not be rezoned to permit agricultural uses and is not subject to a Williamson Act contract. Therefore, the Project would not conflict with any zoning for agricultural uses or a Williamson Act Contract and, thus, no impacts would occur.

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

No Impact. The Project Site is currently developed with commercial and industrial buildings and paved parking and is not zoned for forestry or timberland uses. The existing zoning for the Project Site is C2-1 (Commercial) and R4-1 (Multiple Residential). Thus, the Project would not conflict with forest land or timberland zoning or result in the loss of forest land or conversion of forest land or timberland to non-forest uses. Therefore, no impact would occur and no mitigation measures would be required.

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

No Impact. Refer to Response No. 2.c, above.

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?

No Impact. The Project Site does not contain farmland, forest land, or timberland. Accordingly, the Project would not result in the conversion of farmland to non-agricultural uses or forest land to non- forest uses. Therefore, no impacts would occur and no mitigation measures would be required.

Cumulative Impacts

Agricultural and Forest Resources

As with the Project, related projects are located within a developed, urbanized area of the City of Los Angeles generally zoned for commercial and residential uses and do not support existing farming, agricultural or forest-related operations. Development of the related projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. Therefore, impacts on agriculture and forest resources would be no impact. Furthermore, as the Project would not result in the conversion of State-designated agricultural land from agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use, its

contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

3. Air Quality

Where available and applicable, the significance criteria established by the South Coast Air Quality Management District (SCAQMD) may be relied upon to make the following determinations.[8] The analysis is based on the information provided in the project-specific air quality technical emissions modeling worksheets in Appendix B as well as the project-specific traffic study in Appendix L.

Would the project:

a. Conflict with or obstruct implementation of the South Coast Air Quality Management District Plan or Congestion Management Plan?

Less Than Significant Impact. The Project Site is located within the South Coast Air Basin (Basin). Air quality planning for the Basin is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). The Project would be subject to the SCAQMD's Air Quality Management Plan (AQMP), which contains a comprehensive list of pollution control strategies directed at reducing emissions and achieving ambient air quality standards. These strategies are developed, in part, based on regional population, housing, and employment projections prepared by the Southern California Association of Governments (SCAG).

Project construction would result in an increase in short-term or temporary employment compared to existing conditions. Construction jobs under the Project would generally be small in number, temporary in nature, and filled by local construction workers already living in the Basin, and therefore, would not conflict with the long-term employment projections upon which the AQMP are based.

Control strategies in the AQMP, potentially applicable to control temporary emissions from construction activities, include ONRD-04 and OFFRD-01,[9] which are intended to reduce emissions from on-road and off-road heavy-duty vehicles and equipment by accelerating the replacement of older, emissions-prone engines with newer engines that meet more stringent emission standards. In accordance with such strategies, the Project would use construction

[8] The air quality analysis also took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors regarding construction emissions, including combustion emissions from construction equipment; fugitive dust; grading, excavation and hauling; heavy-duty equipment on unpaved roads; and other mobile source emissions. Significance thresholds related to operational emissions were also considered, as well as screening factors related to toxic air contaminants, including the regulatory framework for the toxic material(s) and process(es) involved; the proximity of the toxic air contaminants to sensitive receptors; the quantity, volume and toxicity of the contaminants expected to be emitted; and the degree to which project design will reduce the risk of exposure.

[9] AQMP measure ONRD-04 applies to on-road mobile sources and is the accelerated retirement of older on-road heavy-duty vehicles to reduce emissions of NO_X and particulate matter. AQMP measure OFFRD-01 applies to off-road mobile sources and is the extension of the Surplus Off-Road Opt-In for NO_X (SOON) provision for construction/industrial equipment to encourage the accelerated retirement of older off-road heavy-duty equipment to reduce emissions of NO_X.

contractors that are in compliance with state regulations to reduce emissions from heavy-duty equipment including the California Air Resources Board (CARB) Air Toxics Control Measure (ATCM) that limits diesel powered equipment and vehicle idling to no more than five minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation that aims to reduce emissions through the installation of diesel particulate matter filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models. Under the In-Use Off-Road Diesel Vehicle Regulation, construction equipment fleet operators are required to replace higher emitting models with lower emitting models based on a phased-in schedule with full compliance by 2023 for large and medium fleets (fleets with greater than 5,000 total equipment horsepower or with 2,501 to 5,000 horsepower, respectively) and by 2028 for small fleets (fleets with 2,500 or less total equipment horsepower). The Project would also comply with SCAQMD regulations for controlling fugitive dust pursuant to SCAQMD Rule 403 (Fugitive Dust). Compliance with these requirements is consistent with and meets or exceeds the AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities.

As discussed in greater detail in Sections 1, Aesthetics and 16, *Transportation/Circulation*, the Project Site is located within a designated City of Los Angeles Transit Priority Area (TPA). The Project would locate a mixed-use development close to numerous bus transit lines and is less than a mile from the Westlake / MacArthur Park Metro Rail Station. The Project Site is located adjacent to numerous bus lines operated by Metro, LADOT Downtown Area Shuttle (DASH), and Foothill Transit. Specifically, LA Metro Bus Line 14 runs along West Beverly Boulevard with stops at South Bonnie Brae Street and Union Avenue and travels from Downtown Los Angeles to Beverly Hills via Beverly Boulevard. LA Metro Bus Line 200 travels along Alvarado Street and provides service to the Metro Red and Purple Line Westlake/MacArthur Park Station and the University of Southern California. The DASH Pico Union/Echo Park bus stop is located one block to the east of the Project Site and travels along Beverly Boulevard, Alvarado Street, and 3rd Street and provides access to the Westlake / MacArthur Park Metro Rail Station. All the above bus routes have a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods. Other bus lines located near the Project site include LA Metro Lines 10, 16, 17, 20, 603, 720, and Foothill Transit 481. As such, the Project would support growth and sustainability policies of SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), which seeks to improve mobility and access by placing destinations closer together connected by public transportation. The Project would directly induce residential population growth by up to approximately 673 residents (based on a net 231 dwelling units and an average 2.82 persons per housing unit for the Westlake Community Plan area); however, it would also replace existing commercial and industrial uses, thereby reducing total employees by approximately 15 persons (based on estimated employment levels of 24 employees under existing conditions and 9 employees under project conditions). Refer to Section 13, *Population and Housing*, for additional details.

The Project is located within a highly urban area with existing roads and services and would not indirectly increase population through new roads or other infrastructure. As discussed in Section 13, *Population and Employment*, Project-related population and employment growth would represent a small percentage (1.0 percent) of SCAG's projected 2016 - 2020 population growth for the City of Los Angeles and 24.7 percent of the SCAG's projected, short timeframe, 2016 - 2020 population growth for the Westlake Community Plan area. For the 2040 horizon year, the Project would constitute 0.1 percent of the City's growth and 3.1 percent of the Community Plan area's projected increase. The Project would represent a small percentage (0.5 percent) of the SCAG's projected 2017 - 2020 household growth for the City of Los Angeles and 13.2 percent of the SCAG's projected 2017 - 2020 population growth for the Westlake Community Plan area. For the 2040 horizon year it would constitute 0.1 percent of the City's household growth and 2.1 percent of the Community Plan's projected increase.

According to the City, the Los Angeles area is experiencing a severe market-rate and affordable housing shortage and the Mayor has called for 100,000 new housing units by 2021.[10] The Project would make progress towards the City's goal and would provide market-rate and affordable housing units to help ameliorate the housing shortage in the City (21 of the Project's residential units would be designated as affordable housing). SCAG's RTP/SCS establishes general goals for land use planning and seeks improved access and mobility by placing "destinations closer together, thereby decreasing the time and cost of traveling between them."[11] According to SCAG, giving people more transportation choices and providing greater opportunities for biking and walking reduces the number of people who drive alone and encourages people to use alternative modes of travel.[12] Additionally, the SCAG RTP/SCS seeks better "placemaking," defined as "the process of developing options for locations where [people] can live and work that include a pleasant and convenient walking environment that reduces their reliance on their car."[13] Because the Project is located within a designated City of Los Angeles TPA and provides for needed housing and affordable housing, the population growth generated by the Project is considered consistent with the City's and SCAG's growth policies. In addition, the Project would be consistent with the applicable control strategies of the 2012 AQMP. Thus, construction and operation of the Project would have no significant impacts related to consistency with the 2012 AQMP.

In March 2017 the SCAQMD and CARB approved the 2016 AQMP. United States Environmental Protection Agency (USEPA) approval is pending, but is a necessary requirement before the 2016 AQMP can be incorporated into the State Implementation Plan. Until such time as the 2016 AQMP is approved by the USEPA, the 2012 AQMP remains the applicable AQMP.

---

10 City of Los Angeles, Mayor's Office, "Garcetti says housing shortage, minimum wage linked in Los Angeles," October 30, 2014. https://www.lamayor.org/garcetti-says-housing-shortage-minimum-wage-linked-los-angeles. Accessed October 2016.

11 Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, (2016), page 16. Available at: http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf. Accessed May 2017.

12 Ibid, page 14.

13 Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, (2012) 112.

Key elements of the 2016 AQMP include implementing fair-share emissions reductions strategies at the federal, state, and local levels; establishing partnerships, funding, and incentives to accelerate deployment of zero and near-zero-emissions technologies; and taking credit from air quality co-benefits for greenhouse gas (GHG) reduction plans, energy, transportation and other planning efforts. The strategies included in the 2016 AQMP are intended to demonstrate attainment of the NAAQS for the federal O_3 and PM2.5 standards. The Project would be not conflict with the ability of federal, state, and local agencies to implement fair-share emissions strategies. The Project would also be consistent with goals to reduce VMT and associated vehicles emissions given that the Project Site is located within a designated City of Los Angeles TPA. Therefore, the Project would also be consistent with the 2016 AQMP should the USEPA approve the plan.

The Congestion Management Program (CMP) was enacted by Metro to address traffic congestion issues that could impact quality of life and economic vitality. An analysis is required at all CMP monitoring intersections for which a project is projected to add 50 or more trips during any peak hour. In addition, analysis is required for all freeway segments for which a project is projected to add 150 or more hourly trips, in each direction, during the peak hours analyzed. As discussed in Section 16, *Transportation/Circulation*, the Project is not expected to exceed thresholds at any CMP intersection or freeway segments during any peak hour. As a result, the Project would not exceed any CMP thresholds, and no impact to CMP intersections would occur. Thus, the Project would not conflict with or obstruct implementation of the CMP.

Based on the above discussion of the applicable air quality plans, implementation of the Project would result in a less than significant impact.

b. Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. As indicated above, the Project Site is located within the South Coast Air Basin, which is characterized by relatively poor air quality. State and federal air quality standards are often exceeded in many parts of the Basin, including those monitoring stations nearest to the Project's location. The Project would contribute to local and regional air pollutant emissions during construction (short-term or temporary) and Project occupancy (long-term). However, based on the following analysis, construction and operation of the Project would result in less than significant impacts relative to the daily significance thresholds for criteria air pollutant emissions established by the SCAQMD for construction and operational phases.

Criteria Pollutants

Certain air pollutants have been recognized to cause notable health problems and consequential damage to the environment either directly or in reaction with other pollutants, due to their presence in elevated concentrations in the atmosphere. Such pollutants have been identified and regulated as part of the overall endeavor to prevent further deterioration and facilitate improvement in air quality. The following pollutants are regulated by the USEPA and CARB and are subject to emissions control requirements adopted by federal, state and local regulatory

agencies. These pollutants are referred to as "criteria air pollutants" as a result of the specific standards, or criteria, which have been adopted for them. A brief description of the health effects of these criteria air pollutants are provided below.

Ozone (O_3): Ozone is a secondary pollutant formed by the chemical reaction of volatile organic compounds (VOCs) and nitrogen oxides (NO_X) under favorable meteorological conditions such as high temperature and stagnation episodes. Ozone concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of ozone irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, 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 scarring of lung tissue and may lower the lung efficiency.[14]

Volatile Organic Compounds (VOCs): VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids and internal combustion associated with motor vehicle usage and consumer products (e.g., architectural coatings, etc.), and are the major sources of hydrocarbons.[15] Some VOCs are also classified by the State as toxic air contaminants (TACs).[16] VOCs are compounds comprised primarily of atoms of hydrogen and carbon. VOCs themselves are not "criteria" pollutants; however, they combine with NO_X to form O_3 and are therefore regulated as O_3 precursor emissions.

Nitrogen Dioxide (NO_2) and Nitrogen Oxides: NO_X is a term that refers to a group of compounds containing nitrogen and oxygen. The primary compounds of air quality concern include NO_2 and nitric oxide (NO), which can quickly oxidize in the atmosphere to form NO_2. Ambient air quality standards have been promulgated for NO_2, which is a reddish-brown, reactive gas. The principal form of NO_X produced by combustion is NO, but NO reacts quickly in the atmosphere to form NO_2, creating the mixture of NO and NO_2 referred to as NO_X. Major sources of NO_X emissions include power plants, large industrial facilities, and motor vehicles. Emissions of NO_X are a precursor to the formation of ground-level ozone. NO_2 can potentially irritate the nose and throat, aggravate lung and heart problems, and may increase susceptibility to respiratory infections, especially in people with asthma. According to the California Air Resources Board (CARB), "NO_2 is an oxidizing gas capable of damaging cells lining the respiratory tract. Exposure to NO_2, along with other traffic-related pollutants, is associated with respiratory symptoms, episodes of respiratory illness and impaired lung functioning. Studies in animals have reported biochemical, structural, and cellular changes in the lung when exposed to NO_2 above the level of the current state air quality standard. Clinical studies of human subjects suggest that NO_2 exposure to levels near the current standard may worsen the effect of allergens in allergic asthmatics, especially in children."[17] NO_2 also contributes to the formation of particulate matter.

14 California Air Resources Board, Ozone and Ambient Air Quality Standards, (2015). Available at: https://www.arb.ca.gov/research/aaqs/caaqs/ozone/ozone.htm. Accessed March 2017.

15 California Air Resources Board, Toxic Air Contaminants Monitoring (2016). Available at: https://www.arb.ca.gov/aaqm/toxics.htm. Accessed March 2017.

16 Ibid.

17 California Air Resources Board, Nitrogen Dioxide – Overview, (2011). Available at: http://www.arb.ca.gov/research/aaqs/caaqs/no2-1/no2-1.htm. Accessed March 2017.

The terms NO_X and NO_2 are sometimes used interchangeably. However, the term NO_X is primarily used when discussing emissions, usually from combustion-related activities. The term NO_2 is primarily used when discussing ambient air quality standards. More specifically, NO_2 is regulated as a criteria air pollutant under the Clean Air Act (CAA) and is subject to the ambient air quality standards, whereas NO_X and NO are not.[18] Where NO_X emissions are discussed in the context of the thresholds of significance or impact analyses, the discussions are based on the conservative assumption that all NO_X emissions would oxidize in the atmosphere to form NO_2.

Carbon Monoxide (CO): CO is primarily emitted from combustion processes and motor vehicles due to incomplete combustion of fuel. Elevated concentrations of CO weaken the heart's contractions and lower the amount of oxygen carried by the blood. It is especially dangerous for people with chronic heart disease. Inhalation of CO can cause nausea, dizziness, and headaches at moderate concentrations and can be fatal at high concentrations.[19]

Sulfur Dioxide (SO_2): Major sources of SO_2 include power plants, large industrial facilities, diesel vehicles, and oil-burning residential heaters. Emissions of sulfur dioxide aggravate lung diseases, especially bronchitis. It also constricts the breathing passages, especially in asthmatics and people involved in moderate to heavy exercise. Sulfur dioxide potentially causes wheezing, shortness of breath, and coughing. High levels of particulates appear to worsen the effect of SO_2, and long-term exposures to both pollutants leads to higher rates of respiratory illness.[20]

Particulate Matter (PM10 and PM2.5): The human body naturally prevents the entry of larger particles into the body. However, small particles including fugitive dust, with an aerodynamic diameter equal to or less than ten microns (PM_{10}) and even smaller particles with an aerodynamic diameter equal to or less than 2.5 microns ($PM_{2.5}$), can enter the body and are trapped in the nose, throat, and upper respiratory tract. These small particulates could potentially aggravate existing heart and lung diseases, change the body's defenses against inhaled materials, and damage lung tissue. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates could become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids. The elderly, children, and those with chronic lung or heart disease are most sensitive to PM_{10} and $PM_{2.5}$. In children, studies have shown associations between PM exposure and reduced lung function and increased respiratory symptoms and illnesses. Lung impairment can persist for two to three weeks after exposure to high levels of particulate matter. Some types of particulates could become toxic after inhalation due to the presence of certain chemicals and their reaction with internal body fluids.[21]

18 United States Environmental Protection Agency, Basic Information about NO2, (2016). Available at: https://www.epa.gov/no2-pollution/basic-information-about-no2. Accessed March 2017.

19 California Air Resources Board, Carbon Monoxide, (2009). Available at: https://www.arb.ca.gov/research/aaqs/caaqs/co/co.htm. Accessed March 2017.

20 California Air Resources Board, History of Sulfur Dioxide Air Quality Standard, (2009). Available at: https://www.arb.ca.gov/research/aaqs/caaqs/so2-1/so2-1.htm. Accessed March 2017.

21 California Air Resources Board, Particulate Matter – Overview, (2005). Available at: http://www.arb.ca.gov/research/aaqs/caaqs/pm/pm.htm. Accessed March 2017.

Lead (Pb): Lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting or processing the metal is the primary source of lead emissions, which is primarily a regional pollutant. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.[22] Project construction and operation would not include sources of lead emissions and would not exceed the established thresholds for lead. Unleaded fuel and unleaded paints have virtually eliminated lead emissions from commercial and residential land use projects such as the Project. As a result, lead emissions are not further evaluated.

Construction Impacts

Construction has the potential to create regional air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers and haul trips traveling to and from the Project Site. In addition, fugitive dust emissions would result from construction activities. During the finishing phase, the application of architectural coatings (i.e., paints) and other building materials would release volatile organic compounds (VOCs). Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, the prevailing weather conditions.

Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to construction emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 75 pounds a day for VOCs, (2) 100 pounds per day for nitrogen oxides (NO_X), (3) 550 pounds per day for carbon monoxide (CO), (4) 150 pounds per day for sulfur oxides (SO_X), (5) 150 pounds per day for respirable particulate matter (PM10), and (6) 55 pounds per day for fine particulate matter (PM2.5).[23]

The Project would involve demolition of existing uses (i.e., surface parking lot and existing buildings) and construction of a mixed use building with four stories of residential uses above an upper ground floor level with amenity space and parking, a lower ground level with commercial uses and parking, and a half level of fully subterranean parking. Construction activities would include demolition, excavation, grading, building construction, architectural coatings and paving. Heavy-duty off-road equipment, such as excavators, loaders, cranes, and paving equipment would be used during construction. Approximately 48 haul truck trips would occur per day during demolition. Site grading and excavation would result in approximately 31,000 cubic yards of soil export with approximately 100 haul trucks per day (which generates 100 incoming and 100 outgoing haul truck trips per day) during excavation.

22 California Air Resources Board, History of Lead Air Quality Standard, (2009). Available at: https://www.arb.ca.gov/research/aaqs/caaqs/pb-1/pb-1.htm. Accessed March 2017.

23 South Coast Air Quality Management District, Air Quality Significance Thresholds, (March 2015), http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2. Accessed April 2017.

Construction is anticipated to begin in 2018. The expected duration of construction is approximately 24 months. The Project is anticipated to be fully operational in 2020. Construction may commence on a later date or construction could occur over a longer period of time than that analyzed in this air quality impact analysis. If either or both of these occur, construction impacts would be less than those analyzed, because a more energy-efficient and cleaner burning construction equipment fleet mix would be expected in the future, pursuant to State regulations that require construction equipment fleet operators to phase-in less polluting heavy-duty equipment. Furthermore, construction impacts would be spread out for a longer period of time, which is likely to reduce peak daily emissions. As a result, should the Project commence construction on a later date, or occur over a longer period of time than that analyzed in this air quality impact analysis, air quality impacts would be less than the impacts disclosed herein.

During construction, a variety of heavy-duty diesel powered equipment would be used on-site. Building construction and finishing activities would require equipment such as excavators, cranes, and air compressors. Construction-related emissions associated with construction equipment were calculated using the SCAQMD-recommended California Emissions Estimator Model (CalEEMod), which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and greenhouse gas (GHG) emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Default data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[24]

Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest potential date) and applying the mobile source emissions factors. The emissions estimated from the CalEEMod (Version 2016.3.1) software is based on outputs from the CARB off-road equipment emissions (OFFROAD) and on-road vehicle emission factor (EMFAC) models, which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles and equipment. The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. Model results are provided in Appendix B of this MND.

The Project would implement the following project design feature (PDF) to minimize construction-related emissions:

Project Design Feature

> **PDF AIR-1** The Project will provide on-site electric or solar-powered generators, where feasible, to provide power for electric construction equipment such as handheld tools and temporary lights.

[24] See http://www.aqmd.gov/caleemod/, Accessed April 2017.

This emissions analysis for all construction activities includes compliance with mandatory SCAQMD Rule 403 measures regarding the control of fugitive dust. For modeling purposes within CalEEMod, compliance with Rule 403 is accounted for by incorporating watering three times daily, which the SCAQMD estimates a 61 percent control efficiency. A summary of maximum daily regional emissions resulting from construction of the Project is presented in **Table B-1**, *Maximum Regional Construction Emissions*, along with the regional significance thresholds for each air pollutant.

TABLE B-1
MAXIMUM REGIONAL CONSTRUCTION EMISSIONS (POUNDS PER DAY) [A]

Construction Activity	VOC	NO_X	CO	SO_X	PM10 [B]	PM2.5 [B]
Demolition	1	17	24	<1	2.5	0.6
Site Preparation	1	1	14	<1	4.7	2.5
Grading/ Excavation & Drainage/ Utilities/ Sub-grade	3	3	39	<1	6.2	2.4
Foundation/ Concrete Pour	2	8	27	<1	3.1	0.9
Building Construction & Architectural Coating	62	8	35	<1	3.6	1.0
Paving	<1	1	16	<1	<1	<1
Maximum Regional Emissions	**62**	**17**	**39**	**<1**	**6.2**	**2.5**
SCAQMD Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Over/(Under)	(13)	(83)	(511)	(150)	(144)	(53)
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.

[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.

SOURCE: ESA PCR 2017

As shown in Table B-1, maximum regional emissions would not exceed the thresholds for VOC, NO_X, CO, SO_X, PM10, or PM2.5. Therefore, regional construction impacts would be less than significant, and mitigation measures would not be required.

Operational Impacts

The SCAQMD has separate significance thresholds to evaluate potential impacts associated with the incremental increase in criteria air pollutants associated with long-term project operations. Based on criteria set forth in the SCAQMD CEQA Air Quality Handbook, a project would have the potential to violate an air quality standard or contribute substantially to an existing violation and result in a significant impact with regard to operational emissions if regional emissions from both direct and indirect sources would exceed any of the following SCAQMD prescribed threshold levels: (1) 55 pounds a day for VOCs, (2) 55 pounds per day for NO_X, (3) 550 pounds

per day for CO, (4) 150 pounds per day for SO_X, (5) 150 pounds per day for PM10, and (6) 55 pounds per day PM2.5.[25]

Regional air pollutant emissions associated with Project operations would be generated by the consumption of electricity and natural gas, and by the operation of on-road vehicles. Pollutant emissions associated with energy demand (i.e., natural gas consumption) are classified by the SCAQMD as stationary source emissions while emissions associated with on-road vehicles are classified as mobile source emissions.

Operational emissions for the Project were estimated using CalEEMod for the existing land uses on the Project Site (existing emissions) and for the land uses proposed by the Project (project emissions) to determine the net incremental change in emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC and the trip length values for the existing and Project land uses in CalEEMod, which are Basin-wide average trip distance values. To estimate the total vehicle miles traveled (VMT) for existing trips and proposed Project trips, trip generation rates provided in the Project traffic study were used.[26] The trips take into account trip reductions from internal capture from co-locating different land uses on the site and from nearby access to public transportation. As discussed previously, the Project Site is located in close proximity to Metro bus routes and rail service. Reductions in VMT are calculated based on site-specific characteristics, such as increased housing density and fewer employees on the site compared to existing conditions and proximity to regional job centers, using the equations and methods prescribed in the California Air Pollution Control Officers Association guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for transportation characteristics and measures.[27]

With regard to energy usage, the consumption of natural gas to provide heating and hot water generates emissions. Future fuel consumption rates are estimated based on specific square footage of the existing and Project land uses. The energy use from residential land uses is calculated within CalEEMod based on the California Energy Commission (CEC) Residential Appliance Saturation Survey (RASS), which incorporates correction factors to account for compliance with the current Title 24 Building Standards Code. The energy use from commercial uses is calculated within CalEEMod based on the CEC California Commercial End Use Survey (CEUS) data set for nonresidential uses, which lists energy demand by building type.[28] Since the data from the CEUS is from 2002, the emissions modeling using the CalEEMod software incorporates correction factors to account for compliance with the current Title 24 Building Standards Code. The existing site uses were modeled using historical energy factors based on previous Title 24 standards.

---

25 South Coast Air Quality Management District, Air Quality Significance Thresholds, (March 2015), http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2. Accessed October 2016.

26 Gibson Transportation Consulting, Inc., Traffic Study for the 1800 Beverly Project, (2017).

27 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010).

28 California Energy Commission, California Commercial End-Use Survey, http://capabilities.itron.com/CeusWeb/Chart.aspx. Accessed October 2016.

Stationary-source emissions are estimated separately outside of the CalEEMod software. Stationary sources may include charbroiling of meat that may occur on-site during food preparation activities in the restaurant kitchen. Stationary source emissions are calculated based on emissions factors available from the SCAQMD. In order to provide a conservative analysis, it was assumed that the restaurant would charbroil meat with relatively high emission factors (i.e., hamburger meat and chicken). The quantity of meat charbroiled in the restaurant is based on survey data from the SCAQMD. The estimated emissions account for reductions from compliance with emissions control requirements consistent with SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations).

Other sources of emissions from operation of the existing site uses and Project uses include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod tool uses landscaping equipment GHG emission factors from the CARB OFFROAD2011 model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003)*.[29] The CalEEMod software estimates that landscaping equipment operate for 250 days per year in the South Coast Air Basin. Emissions of VOCs from the use of consumer products and architectural coatings are based on SCAQMD-specific emission factors for land uses in the Basin. The Project does not include any fireplaces or hearths within the residential units; therefore, the Project would not result in fireplace emissions.

Emissions calculations for the Project include credits or reductions for energy efficiency measures that are required by regulation, such as reductions in energy from the current Title 24 standards and the California Green Building Standards (CALGreen) Code. The Project is also subject to the City's Green Building Code, which incorporates by reference the CALGreen Code, as well as additional City requirements. A summary of maximum daily regional emissions resulting from Project operation is presented in **Table B-2**, *Maximum Regional Operational Emissions*, along with the regional significance thresholds.

As shown in Table B-2, the Project would not generate air pollutant emissions exceeding the SCAQMD thresholds of significance listed above. Therefore, the Project would have a less than significant impact on air quality resulting from long-term operational emissions, and no mitigation measures would be necessary.

[29] California Air Resources Board, OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, (6/13/2003), http://www.arb.ca.gov/msei/2001_residential_lawn_and_garden_changes_in_eqpt_pop_and_ act.pdf. Accessed October 2016.

TABLE B-2
MAXIMUM REGIONAL OPERATIONAL EMISSIONS (POUNDS PER DAY)[A]

Operational Activity	VOC	NO_X	CO	SO_X	PM10	PM2.5
Project						
Area (Consumer Products, Landscaping, Natural Gas Fireplaces)	5	<1	20	<0.1	0.1	0.1
Energy (Natural Gas)	<1	1	<1	<0.1	0.1	0.1
Stationary (Charbroiling)	<1	—	—	—	0.9	0.9
Motor Vehicles	2	12	30	0.1	8.1	2.2
Project Total	**8**	**13**	**50**	**0.1**	**9.2**	**3.3**
Existing Site						
Area (Consumer Products, Landscaping)	<1	<0.1	1	<0.1	<0.1	<0.1
Energy (Natural Gas)	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1
Motor Vehicles	<1	2	4	<0.1	1	0.3
Existing Site Total	**1**	**2**	**5**	**<0.1**	**1**	**0.3**
Maximum Net Regional Emissions	**7**	**11**	**45**	**0.1**	**8.2**	**3.0**
SCAQMD Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Over/(Under)	(48)	(44)	(505)	(150)	(142)	(52)
Exceeds Threshold?	**No**	**No**	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix B.

SOURCE: ESA PCR 2017

c. 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 SCAQMD's approach for assessing cumulative impacts related to operations is based on attainment of ambient air quality standards in accordance with the requirements of the Federal and State Clean Air Acts. As discussed earlier, the SCAQMD AQMP addresses the region's cumulative air quality condition.

A significant impact may occur if a project were to add a cumulatively considerable contribution of a federal or state non-attainment pollutant. The Basin is currently in non-attainment for ozone (federal and state standards), PM10 (state standards only) and PM2.5 (federal and state standards); therefore, related projects could cause ambient concentrations to exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD.

In particular, CEQA Guidelines Sections 15064(h)(3) provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

> *A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.*

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the Project's incremental contribution to cumulative air quality impacts is determined based on compliance with the applicable AQMP. As discussed previously under Issue a., the Project would be consistent with the AQMP and would not have a cumulatively considerable air quality impact.

As the Project is not part of an ongoing regulatory program, the SCAQMD also recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality. As discussed above under Issue b., peak daily emissions of construction and operation-related pollutants would not exceed SCAQMD regional significance thresholds. By applying SCAQMD's cumulative air quality impact methodology, implementation of the Project would not result in an addition of criteria pollutants such that cumulative impacts would occur, in conjunction with related projects in the region. In addition, as discussed in Issue d., below, construction of the Project is not expected to result in a cumulatively considerable net increase of any criteria pollutant for which the SCAQMD has established a localized impact threshold. Therefore, the emissions of non-attainment pollutants and precursors generated by the Project in excess of the SCAQMD project-level thresholds would be less than significant and would not result in a cumulatively considerable air quality impact.

d. Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact with Mitigation Incorporated. Certain population groups are especially sensitive to air pollution and should be given special consideration when evaluating potential air quality impacts. These population groups include children, the elderly, persons with pre-existing respiratory or cardiovascular illness, and athletes and others who engage in frequent exercise. As defined in the SCAQMD CEQA Air Quality Handbook, a sensitive receptor to air quality is defined as any of the following land use categories: (1) long-term health care facilities; (2) rehabilitation centers; (3) convalescent centers; (4) retirement homes; (5) residences; (6) schools; (7) parks and playgrounds; (8) child care centers; and (9) athletic fields.

Air quality sensitive receptors located in close proximity to the Project Site include the following land uses:

- North – Land uses north of the Project Site consists of non-air quality sensitive church and commercial uses. However, residential uses are located further to the north behind the row of church and commercial uses along Beverly Boulevard.
- East – Land uses immediately east of the Project Site along South Burlington Drive consists of air quality-sensitive Los Angeles Unified School District (LAUSD) Union Avenue Elementary School.
- South – Land uses south of the Project Site consists of multi-family and single-family residences and further southeast of the Project Site is the San Castro Middle School.
- West – Land uses west of the Project Site include multi-family residential uses west of the Project Site.

Localized Construction Impacts

The localized air quality analysis was conducted using the methodology described in the SCAQMD *Localized Significance Threshold Methodology* (June 2003, revised July 2008).[30] The screening criteria provided in the *Localized Significance Threshold Methodology* were used to determine localized construction and operational emissions thresholds for the Project. The closest existing sensitive receptors to the Project are single- and multi-family residential uses to the immediate south and west of the Project Site and the school use to the east of the Project Site. Therefore, thresholds used for the LST analysis were based on the approximately 1.65-acre Project Site in the Central Los Angeles Source-Receptor Area with sensitive receptors located adjacent to the Project Site (i.e., 25 meters).

The localized effects from the on-site portion of daily emissions were evaluated at sensitive receptor locations potentially impacted by the Project according to the SCAQMD's localized daily significance threshold (LST) methodology. Daily localized emissions caused by the Project were compared to the LSTs in the SCAQMD's look-up tables to determine whether the emissions would cause violations of ambient air quality standards. A summary of maximum localized construction emissions resulting from Project construction is presented in **Table B-3**, *Maximum Localized Construction Emissions*, along with the localized significance thresholds.

As shown in Table B-3, Maximum Localized Construction Emissions, maximum daily localized emissions would not exceed the thresholds for NO_X, CO, PM10, or PM2.5 and localized construction impacts would be less than significant.

30 South Coast Air Quality Management District, Localized Significance Thresholds, (2003, revised 2008), http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds. Accessed October 2016.

TABLE B-3
MAXIMUM LOCALIZED CONSTRUCTION EMISSIONS (POUNDS PER DAY)[A]

Construction Activity	NO_X	CO	PM10 [B]	PM2.5 [B]
Demolition	2	20	1	<1
Site Preparation	1	11	4	2
Grading/ Excavation & Drainage/ Utilities/ Sub-grade	1	24	2	1
Foundation/ Concrete Pour	1	13	<1	<1
Building Construction & Architectural Coating	2	22	<1	<1
Paving	1	15	<1	<1
Maximum Localized Emissions	**2**	**24**	**4.1**	**2.3**
SCAQMD Threshold [c]	**96**	**919**	**7.0**	**4.3**
Over/(Under)	(94)	(895)	(2.9)	(2.0)
Exceeds Threshold?	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations Detailed emissions calculations are provided in Appendix B.
[b] Emissions include fugitive dust control measures consistent with SCAQMD Rule 403.
[c] LSTs are based on a Project Site area of 1.65 acres in Source-Receptor Area 1 (Central Los Angeles) with sensitive receptors located adjacent to the Site (i.e., 25 meters).

SOURCE: ESA, 2017

Construction Health Impacts

In addition to criteria pollutants, the SCAQMD has established health-based standards for toxic air contaminants (TACs) in the Air Basin. A TAC is defined by California Health and Safety Code Section 39655:

> *"Toxic air contaminant" means an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health. A substance that is listed as a hazardous air pollutant pursuant to subsection (b) of Section 112 of the federal act (42 U.S.C. Sec. 7412(b)) is a toxic air contaminant.*

The greatest potential for TAC emissions during construction would be related to diesel particulate matter (DPM) emissions associated with heavy-duty equipment during demolition, excavation and grading, and building construction activities. Construction activities associated with the Project would be sporadic, transitory, and short term in nature (approximately 24 months).

The California Office of Environmental Health Hazard Assessment (OEHHA) is responsible for developing and revising guidelines for performing health risk assessments (HRAs) under the State's the Air Toxics Hot Spots Program Risk Assessment (Assembly Bill 2588) regulation. In March 2015, OEHHA adopted revised guidelines that update the previous guidelines by incorporating advances in risk assessment with consideration of infants and children using Age

Sensitivity Factors (ASF). These changes also take into account the sensitivity of children to TAC emissions, different breathing rates, and time spent at home. Children have a higher breathing rate per unit body mass compared to adults. On June 5, 2015, SCAQMD incorporated these guidelines in to relevant rules designed for permitting of stationary sources. Although construction would be temporary, construction impacts associated with TACs are addressed quantitatively in a refined HRA, with detailed calculation worksheets provided in Appendix B (refer to Appendix B-6, Construction Health Risk Assessment Worksheets). The HRA was performed in accordance with the revised OEHHA *Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments* (OEHHA Guidance).[31]

During long-term operations, TACs could be emitted as part of periodic maintenance operations, cleaning, painting, etc., and from periodic visits from delivery trucks and service vehicles. However, these uses are expected to be occasional and result in minimal exposure to off-site sensitive receptors. As the Project consists of residential and commercial/restaurant uses, the Project would not include sources of substantive TAC emissions identified by the SCAQMD or CARB siting recommendations. Thus, a qualitative approach to evaluate operational impacts is appropriate.

The siting of the Project itself is located over 2,000 feet from the U.S. 101 freeway, which is outside of 1,000-foot distance in the City of Los Angeles Planning Commission advisory notice to alert applicants to consider public health implications of freeway-adjacent projects.[32] It is also outside of the CARB *Air Quality and Land Use Handbook* 500-foot recommendation for siting sensitive uses near freeways.[33] Therefore, a freeway health risk impact assessment for future on-site Project sensitive receptors is not necessary.

Source Identification (Construction)

Construction would result in DPM emissions associated with heavy equipment operations during demolition, grading and excavation, and building construction activities. In addition, haul trucks transporting debris and soil to and from the Project Site would generate DPM emissions. The Project would be subject to several SCAQMD rules designed to limit exposure to TACs during construction activities. The Project would be required to comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than 5 minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation that requires construction fleet owners and operators to phase in cleaner equipment through retirement, replacement, or repowering of older, dirtier engines with newer emission controlled models. Compliance with these would minimize emissions of TACs during construction.

---

31 Office of Environmental Health Hazard Assessment, Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments, (2015). Available: http://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0. Accessed April 2017.

32 City of Los Angeles, Zoning Information (Z.I.) No. 2427, Freeway Adjacent Advisory Notice for Sensitive Uses, Effective November 8, 2012. Available: http://zimas.lacity.org/documents/zoneinfo/ZI2427.pdf. Accessed April 2017.

33 California Air Resources Board, Air Quality and Land Use Handbook: A Community Health Perspective, (2005). Available: https://www.arb.ca.gov/ch/handbook.pdf. Accessed April 2017.

Emissions Calculations (Construction)

Construction DPM emissions from heavy-duty off-road equipment were modeled using the exhaust PM10 emissions estimated from CalEEMod and characterized as volume sources within the USEPA AMS/EPA Regulatory Model (AERMOD). The volume sources were located throughout the Project Site to represent on-site construction emissions. Off-site DPM emissions from haul trucks traveling within one-quarter mile of the Project Site were estimated using the CARB on-road vehicle emissions factor (EMFAC) model. The most recent version is EMFAC2014, which "represents ARB's current understanding of motor vehicle travel activities and their associated emission levels."[34] On-road trucks were characterized as line-volume sources within AERMOD.

Dispersion Modeling (Construction)

Dispersion modeling was performed using AERMOD, version 16216r. Meteorological data from the SCAQMD's Downtown Los Angeles monitoring station within Source Receptor Area 1 was used to represent local weather conditions and prevailing winds data. Terrain data from U.S. Geological Survey (USGS) was used to assign elevations to sources and modeling receptors. Sensitive receptors used for modeling were placed at the location of sensitive receptor (i.e., residential) buildings near to the Project Site. Heavy-duty equipment and trucks were modeled as volume sources and were located on the Project Site and on roadways that trucks would travel on within a 0.25-mile distance of the Project Site.

Cancer Risk and Health Calculations (Construction)

Health risk calculations were performed using a spreadsheet tool consistent with the OEHHA Guidance and CARB Hotspots Analysis and Reporting Program (HARP) version 2 spreadsheet methodology. The SCAQMD significance threshold for determining a significant cancer risk is 10 per one million. The SCAQMD significance threshold for non-cancer health impacts is a Hazard Index of 1.0. The Hazard Index is calculated by dividing the maximum modeled concentration of a TAC at the maximum impacted sensitive receptor by the Reference Exposure Level (REL). The REL is the concentration at or below which no adverse non-cancer health effects are known or expected to occur for that TAC. Therefore, a Hazard Index of less than 1.0 means that the maximum impacted sensitive receptor would be exposed to TAC concentrations at a level in which adverse non-cancer health effects would not be known or expected to occur.

[34] California Air Resources Board, Mobile Source Emissions Inventory, http://www.arb.ca.gov/msei/categories.htm#emfac2014. Accessed April 2017.

Off-Site Cancer Risk Impacts from Construction Emissions

Health risk impacts (cancer risk) were assessed for existing and future off-site sensitive receptors (residential uses). The maximum unmitigated carcinogenic risk for off-site sensitive receptors from DPM emissions from construction of the Project is shown in **Table B-4**, *Maximum Unmitigated Carcinogenic Risk for Off-Site Sensitive Receptors from Construction*. The maximum impact would occur at sensitive land uses (residences) directly south of the Project Site. Other sensitive residential receptors in the project vicinity would result in lower residential risk values than shown in Table B-4. As discussed previously, the lifetime exposure under OEHHA Guidance takes into account early life (infant and children) exposure. It should be noted that the calculated cancer risk conservatively assumes sensitive receptors (residential uses) would not have any mitigation such as mechanical filtration. As the maximum impact would potentially exceed the risk threshold of 10 in one million, impacts would be considered potentially significant and mitigation measures would be required. Implementation of the recommended Mitigation Measure AIR-1 would reduce Project construction impacts to less than significant.

TABLE B-4
MAXIMUM UNMITIGATED CARCINOGENIC RISK FOR OFF-SITE SENSITIVE RECEPTORS FROM CONSTRUCTION

Maximum Impacted Sensitive Receptor	Maximum Cancer Risk (# in one million)
Residential – South of Project Site	349
School – East of Project Site	31
Maximum Individual Cancer Risk Threshold	10
Exceeds Threshold?	Yes

SOURCE: ESA PCR 2017

Off-Site Non-Cancer Impacts from Construction Emissions

Potential non-cancer effects of chronic (i.e., long term) DPM exposures were evaluated using the Hazard Index approach as described in the OEHHA Guidance. Non-cancer health impacts for DPM are associated with include chronic (annual) exposures. A hazard index equal to or greater than 1.0 represents a significant chronic health hazard. For non-cancer chronic (annual) exposures, the maximum chronic (annual) health impact from Project construction is shown in **Table B-5**, *Maximum Unmitigated Non-Cancer Chronic Impacts for Off-Site Sensitive Receptors from Construction*. The maximum impact would occur at sensitive land uses (residences) directly south of the Project Site. Other sensitive residential receptors in the project vicinity would result in lower residential hazard values than shown in Table B-5. As the maximum impact would not exceed the threshold of 1.0, impacts would be considered less than significant.

TABLE B-5
MAXIMUM UNMITIGATED NON-CANCER CHRONIC IMPACTS FOR OFF-SITE SENSITIVE RECEPTORS FROM CONSTRUCTION

Maximum Impacted Sensitive Receptor	Chronic Hazard Index
Residential – South of Project Site	0.273
School – East of Project Site	0.094
Maximum Hazard Index Threshold	1.0
Exceeds Threshold?	No

SOURCE: ESA PCR 2017

Mitigation Measures

The Project is recommended to implement the following mitigation measure to minimize criteria air pollutant emissions:

> **MM AIR-1** The Project shall utilize off-road diesel-powered construction equipment that meets or exceeds the CARB and USEPA Tier 4 off-road emissions standards for equipment rated at 50 horsepower (hp) or greater during Project construction. Equipment, such as tower cranes and welders shall be electric-powered. To the extent possible, pole power shall be made available for use with electric tools, equipment, lighting, etc. These requirements shall be included in applicable bid documents and successful contractor(s) must demonstrate the ability to supply such equipment. A copy of each unit's certified tier specification or model year specification and CARB or SCAQMD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

Implementation of Mitigation Measure AIR-1 would substantially reduce emissions of DPM from on-site heavy duty equipment. Equipment certified to the Tier 4 standards are commercially available and construction fleet operators and owners are in the process of incorporating Tier 4 equipment into their fleets as part of compliance with the CARB emission standards for off-road diesel construction equipment regulation, adopted on July 26, 2007, which aims to reduce emissions by installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission controlled models (Title 13 California Code of Regulations, Section 2449). The maximum mitigated carcinogenic risk for off-site sensitive receptors from the mitigated DPM emissions from construction of the Project is shown in **Table B-6**, *Maximum Mitigated Carcinogenic Risk for Off-Site Sensitive Receptors from Construction*. As shown in Table B-6, the maximum impact would be 8.7 per one million, which would be less than the risk threshold of 10 in one million. The maximum impact would occur at sensitive land uses (residences) directly south of the Project Site. Impacts at all other sensitive receptors, including at the LAUSD Union Avenue Elementary School, would be less than 8.7 per one million. As the maximum mitigated impact would not exceed the risk threshold of 10 in one million, impacts would be mitigated to less than significant. The less-than-significant non-cancer chronic (annual) health impact from Project construction would also be further reduced to a

Hazard Index of approximately 0.007 (respiratory irritant) or less compared to the threshold of 1.0, as shown in **Table B-7**, *Maximum Mitigated Non-Cancer Chronic Impacts for Off-Site Sensitive Receptors from Construction*. Detailed mitigated health risk modeling output and calculation results are provided in Appendix B.

TABLE B-6
MAXIMUM MITIGATED CARCINOGENIC RISK FOR OFF-SITE SENSITIVE RECEPTORS FROM CONSTRUCTION

Maximum Impacted Sensitive Receptor	Maximum Cancer Risk (# in one million)
Residential – South of Project Site	8.7
School – East of Project Site	0.8
Maximum Individual Cancer Risk Threshold	10
Exceeds Threshold?	No

SOURCE: ESA PCR 2017

TABLE B-7
MAXIMUM MITIGATED NON-CANCER CHRONIC IMPACTS FOR OFF-SITE SENSITIVE RECEPTORS FROM CONSTRUCTION

Maximum Impacted Sensitive Receptor	Chronic Hazard Index
Residential – South of Project Site	0.0069
School – East of Project Site	0.0025
Maximum Hazard Index Threshold	1.0
Exceeds Threshold?	No

SOURCE: ESA PCR 2017

Localized Operational Impacts

The screening criteria provided in the *Localized Significance Threshold Methodology* were used to determine localized operational emissions thresholds for the Project. With regard to on-site sources of emissions, the Project would generate emissions resulting from sources such as natural combustion (on-site natural gas consumption for cooking and heating, such as natural gas combustion in commercial boilers and water heaters) and landscaping equipment. A summary of maximum localized operational emissions resulting from Project operations is presented in **Table B-8**, *Maximum Localized Operational Emissions*, along with the localized significance thresholds.

TABLE B-8
MAXIMUM LOCALIZED OPERATIONAL EMISSIONS [A]

Operational Activity	NO_X	CO	PM10	PM2.5
Project				
Area (Consumer Products, Landscaping, Natural Gas Fireplaces)	5	<1	0.1	0.1
Energy (Natural Gas)	<1	1	0.1	0.1
Stationary (Charbroiling)	—	—	0.9	0.9
Motor Vehicles	5	1	1.1	1.1
Existing Site				
Area (Consumer Products, Landscaping)	<1	<0.1	<0.1	<0.1
Energy (Natural Gas)	<0.1	<0.1	<0.1	<0.1
Motor Vehicles	<1	<0.1	<0.1	<0.1
Maximum Net Regional Emissions	**5**	**<1**	**1.1**	**1.1**
SCAQMD Threshold	**96**	**919**	**2.0**	**1.7**
Over/(Under)	(91)	(1048)	(0.9)	(0.6)
Exceeds Threshold?	**No**	**No**	**No**	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations Detailed emissions calculations are provided in Appendix B.
[b] LSTs are based on a Project Site area of 1.65 acres in Source-Receptor Area 1 (Central Los Angeles) with sensitive receptors located adjacent to the Site (i.e., 25 meters).

SOURCE: ESA PCR 2017

As shown in Table B-8, on-site sources of emissions would remain below SCAQMD LST thresholds and localized operational impacts would be less than significant.

Carbon Monoxide Hotspots

Within an urban setting, vehicle exhaust is the primary source of CO. Consequently, the highest CO concentrations are generally found in proximity to congested roadway intersections. Under typical meteorological conditions, CO concentrations tend to decrease as the distance from the emissions source (i.e., congested intersection) increases. For the purposes of providing a conservative, worst-case impact analysis, CO concentrations are typically analyzed at congested intersections, because if impacts are less than significant in proximity of the congested intersections, impacts will also be less than significant at more distant sensitive receptor locations.

Carbon monoxide decreased dramatically in the Basin with the introduction of the automobile catalytic converter in 1975. No exceedances of CO have been recorded at monitoring stations in the Basin in recent years and the Basin is currently designated as a CO attainment area for both

the CAAQS and NAAQS. Thus, it is not expected that CO levels at Project-impacted intersections would rise to such a degree as to cause an exceedance of these standards.

Localized areas where ambient concentrations exceed state and/or federal standards are termed "CO hotspots." Emissions of CO are produced in greatest quantities from motor vehicle combustion and are usually concentrated at or near ground level because they do not readily disperse into the atmosphere, particularly under cool, stable (i.e., low or no wind) atmospheric conditions.

Project traffic has the potential to create local area CO impacts. The potential for the Project to cause or contribute to CO hotspots is evaluated by comparing impacted Project intersections (both intersection geometry and traffic volumes) with prior studies conducted by the SCAQMD in support of their AQMPs. As discussed below, this comparison provides evidence that the Project would not cause or contribute to the formation of CO hotspots, that CO concentrations at Project impacted intersections would remain well below the ambient air quality standards, and that no further CO analysis is warranted or required.

The SCAQMD recommends a hotspot evaluation of potential localized CO impacts when vehicle to capacity (V/C) ratios are increased by two percent or more at intersections with a level of service (LOS) of D or worse. Based on the traffic impact analysis prepared for the Project (summarized in Section 16, *Transportation/Circulation*), several intersections operate at LOS D or worse during A.M. and P.M. peak hours. However, the Project would not meet the SCAQMD criterion of hotspot evaluation because it would not increase the V/C ratio by 2 percent. Therefore, additional localized CO analysis was performed qualitatively.

The SCAQMD conducted CO modeling for the 2003 AQMP for the four worst-case intersections in the Basin. These included: (a) Wilshire Boulevard and Veteran Avenue; (b) Sunset Boulevard and Highland Avenue; (c) La Cienega Boulevard and Century Boulevard; (d) Long Beach Boulevard and Imperial Highway. In the 2003 AQMP, the SCAQMD notes that the intersection of Wilshire Boulevard and Veteran Avenue is the most congested intersection in Los Angeles County with an average daily traffic volume of about 100,000 vehicles per day.[35] This intersection is located near the on- and off-ramps to Interstate 405 in West Los Angeles. The evidence provided in Table 4-10 of Appendix V of the 2003 AQMP shows that the peak modeled CO concentration due to vehicle emissions at these four intersections was 4.6 ppm (one-hour average) and 3.2 (eight-hour average) at Wilshire Boulevard and Veteran Avenue.[36] When added to the existing background CO concentrations, the screening values would be 7.6 ppm (one-hour average) and 5.6 ppm (eight-hour average).

In comparison, based on the Traffic Study prepared for the Project, of the studied intersections that are predicted to operate at a Level of Service ("LOS") of D, E, or F under future year 2020 plus Project conditions, average daily traffic volumes would result in fewer than 100,000 vehicles

35 South Coast Air Quality Management District, 2003 Air Quality Management Plan, Appendix V: Modeling and Attainment Demonstrations, (2003) V-4-24.

36 The eight-hour average is based on a 0.7 persistence factor, as recommended by the SCAQMD.

per day.[37] Therefore, CO concentrations are expected to be less than the CO concentrations measured as part of the AQMP CO attainment demonstration and would not exceed SCAQMD significance thresholds. This comparison provides evidence that the Project would not contribute to the formation of CO hotspots and no further CO analysis is required. Therefore, the Project would result in less than significant impacts with respect to CO hotspots.

The proposed parking structure would be built in accordance with applicable City of Los Angeles Municipal Code requirements, and as such, would be required to provide adequate ventilation, such as mechanical air circulation and/or openings in the walls to allow for air circulation, and dispersion of potential emissions to acceptable ambient concentrations so as not pose any public health hazards. Therefore, the parking structure would result in less than significant impacts with respect to CO hotspots.

Operational Health Impacts

Project operations would generate only minor amounts of diesel fuel emissions from delivery trucks and incidental maintenance activities. Trucks would comply with applicable provisions of the CARB Truck and Bus regulation to reduce PM and NO_X emissions from existing diesel trucks. Therefore, Project operations are not considered a substantial source of diesel particulates.

In addition, Project operations would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as from the use of architectural coatings and other products. The Project's restaurant uses could potentially generate TACs if charbroiling activities occur at the restaurant, which has the potential to generate small amounts of chemicals that are known or suspected by the State of California to cause human health impacts.[38] However, restaurant charbroiling in the Basin would be required to comply with SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations), which requires the installation of emissions controls on charbroilers. The emissions controls would reduce the already small amounts of TAC emissions associated with charbroiling by approximately 83 percent,[39] such that adverse health impacts are not expected to occur at nearby sensitive receptors. Barbeque grills that may be located within the proposed residential common areas would not pose a substantial risk because the quantity of meat would be orders of magnitude lower than at charbroiling restaurants, including fast food restaurants with charbroiling equipment that can go through hundreds of pounds of meat per day, seven days per week.[40]

37 Gibson Transportation Consulting, Inc., Transportation Impact Study for the 1800 Beverly Project, (2017).

38 U.S. Environmental Protection Agency, Polycyclic Aromatic Hydrocarbons (PAHs), January 2008, http://www.epa.gov/osw/hazard/wastemin/minimize/factshts/pahs.pdf. Accessed April 2017.

39 U.S. Environmental Protection Agency, Methods for Developing a National Emission Inventory for Commercial Cooking Processes: Technical Memorandum, (2003).

40 South Coast Air Quality Management District, Proposed Amended Rule 1138 – Control of Emissions from Restaurant Operations, 2009. Available at http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1138/par1138pdsr.pdf?sfvrsn=2. Accessed March 2017.

Project-related natural gas combustion for cooking and heating would not generate a measurable net increase in TAC emissions that would contribute to an increase in health risk impacts.[41] As a result, toxic or carcinogenic air pollutants are not expected to occur in any meaningful amounts in conjunction with operation of the proposed land uses within the Project Site. Based on the uses expected on the Project Site, potential long-term operational impacts associated with the release of TACs would be minimal and would not be expected to exceed the SCAQMD thresholds of significance. Therefore, impacts would be less than significant.

e. Create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. The closest existing sensitive receptors to the Project are multi-family residential uses to the south and Union Avenue Elementary School to the southeast. The closest future sensitive receptors to the Project are the proposed residential uses on the Project Site. Potential sources that may emit odors during Project construction activities include diesel trucks and equipment and the use of architectural coatings and solvents. According to the SCAQMD CEQA Air Quality Handbook, construction equipment is not a listed source of odors. Compliance with existing regulations, including the CARB anti-idling regulation that limits idling to five minutes or less at any location would minimize the potential for odorous emissions. SCAQMD Rule 1113 (Architectural Coatings) limits the amount of VOCs from architectural coatings and solvents.

The Project's proposed uses are not expected to generate nuisance odors at nearby sensitive receptors during operation. According to the SCAQMD CEQA Air Quality Handbook, land uses associated with odor complaints typically include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding. The Project would not involve elements related to these types of uses. Restaurant uses could generate odors from cooking operations; however, the use of standard range hoods and proper cleaning of cooking equipment and housekeeping practices would prevent adverse odors. If charbroiling would occur in the restaurant uses, emissions control requirements consistent with SCAQMD Rule 1138 would minimize the potential for odorous emissions. Additionally, the existing Project Site is currently developed with commercial uses. The Project would not introduce odors that are not already characteristic of the uses present on the Project Site. Barbeque grills that may be located within the proposed residential common areas would not be expected to generate objectionable odors affecting a substantial number of people because the quantity of meat would be orders of magnitude lower than at restaurants that can go through hundreds of pounds of meat per day, seven days per week.[42] While there is a potential for odors to occur, compliance with industry standard odor control practices, SCAQMD Rule 402

41 Natural gas is considered Best Available Control Technology (BACT) for boilers. Refer to SCAQMD Best Available Control Technology Guidelines, Part D: Non-Major Polluting Facilities. Available: http://www.aqmd.gov/docs/default-source/bact/bact-guidelines/part-d---bact-guidelines-for-non-major-polluting-facilities.pdf?sfvrsn=4. Accessed July 2016.

42 South Coast Air Quality Management District, Proposed Amended Rule 1138 – Control of Emissions from Restaurant Operations, 2009. Available at http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1138/par1138pdsr.pdf?sfvrsn=2. Accessed March 2017.

(Nuisance) and Rule 1138, and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts to a less than significant level.

Cumulative Impacts

Air Quality

There are a number of related projects in the project area that have not yet been built or are currently under construction. Since the Applicant has no control over the timing or sequencing of the related projects, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. The SCAQMD recommends that project-specific construction air quality impacts be used to determine the potential cumulative impacts to regional air quality.

With regard to project operations, SCAQMD's approach for assessing cumulative impacts related to operations or long-term implementation is based on attainment of ambient air quality standards in accordance with the requirements of the federal and State Clean Air Acts. As discussed earlier, the SCAQMD has developed a comprehensive plan, the AQMP, which addresses the region's cumulative air quality condition.

A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. Because the Los Angeles County portion of the Air Basin is currently in non-attainment for ozone, PM10, and PM2.5, related projects could exceed an air quality standard or contribute to an existing or projected air quality exceedance. Cumulative impacts to air quality are evaluated under two sets of thresholds for CEQA and the SCAQMD. In particular, Section 15064(h)(3) of the CEQA Guidelines provides guidance in determining the significance of cumulative impacts. Specifically, Section 15064(h)(3) states in part that:

> *A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem (e.g., water quality control plan, air quality plan, integrated waste management plan) within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.*

For purposes of the cumulative air quality analysis with respect to CEQA Guidelines Section 15064(h)(3), the project's incremental contribution to cumulative air quality impacts is determined based on compliance with the SCAQMD adopted 2012 AQMP.

The Project Site is located in two zones, C2-1 (Commercial) and R4-1 (Multiple Residential) with a General Plan designation of Highway Oriented Commercial and High Medium Residential. The Project's residential population growth is within SCAG's population growth for the Community

Plan area, which forms the basis of the 2012 AQMP growth projections. Therefore, the Project would be consistent with the overall Westlake Community Plan Area growth that is accounted for in the AQMP. The Project's housing and population when combined with the related projects in the Community Plan Area would result in projected growth in the 2020 Project build-out year and the RTP/SCS 2040 horizon year of 10,747 housing units and 21,457 people. The Project would represent a small percentage (1.0 percent) of the SCAG's projected 2017 - 2020 population growth for the City of Los Angeles and 27.4 percent of the SCAG's projected, short timeframe, 2017 - 2020 population growth for the Westlake Community Plan area. For the 2040 horizon year it would constitute 0.1 percent of the City's growth and 3.1 percent of the Community Plan area's projected increase (see Section 13, *Population and Housing*, of this MND for additional details regarding population growth projections). Therefore, this population is accounted for and falls within the growth projections for the Community Plan Area. Therefore, the Project would not conflict with or obstruct implementation of AQMP and would be consistent with the overall Community Plan Area growth projections in the AQMP. In addition, as discussed previously, because the Project is located within a designated City of Los Angeles TPA and provides for needed housing and affordable housing, the population growth generated by the Project is considered consistent with the City's and SCAG's growth policies.

Nonetheless, SCAQMD no longer recommends relying solely upon consistency with the AQMP as an appropriate methodology for assessing cumulative air quality impacts. The SCAQMD recommends that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality.

As displayed in Tables B-1 and B-2, regional emissions calculated for Project construction and operations would be less than the applicable SCAQMD daily significance thresholds, which are designed to assist the region in attaining the applicable State and national ambient air quality standards. These standards apply to both primary (criteria and precursor) and secondary pollutants (ozone). Although the Project Site is located in a region that is in non-attainment for ozone, PM10, and PM2.5, the emissions associated with the Project would not be cumulatively considerable as the emissions would fall below SCAQMD daily significance thresholds. In addition, the project would be consistent with the AQMP, which is intended to bring the Basin into attainment for all criteria pollutants.

With respect to health impacts, implementation of Mitigation Measure AIR-1 would ensure Project construction health risks would be less than significant and related projects would also be required to implement similar measures, as necessary under CEQA, to mitigate impacts to less than significant. Compliance with applicable SCAQMD rules would ensure Project operational health risks would be less than significant and related projects would also be required to comply with applicable rules as well as implement mitigation measures, as necessary under CEQA, to mitigate impacts to less than significant. As a result, the Project would not result in cumulatively considerable health impacts. Compliance with applicable rules would odors would also ensure that the Project and related projects would not result in cumulatively considerable odor impacts.

4. Biological Resources

Would the project:

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

No Impact. The Project Site is located in a highly urbanized area and is currently developed with a commercial building, vacant warehouse, an apartment building, a small shed, internal driveways, and a surface parking lot. As stated in the *Native Tree Letter* provided by Humphreys & Partners, Landscape Architecture, LLC on March 9, 2017, there are no native or protected trees within the property lines of the Project Site. Trees that are designated as "protected trees" as defined by Section 17.02 of the Los Angeles Municipal Code includes oak trees (Quercus spp.), southern California black walnuts (Juglans californica), western sycamores (Platanus racemosa), and California bay laurels (Umbellularia californica), that have a trunk dbh at least four inches.

There are 21 non-native and non-protected trees on the Project Site. These trees include:

Beverly Avenue Frontage: Four (4) California Italian Cypress and two (2) Podocarpus that are located against the existing building foundations of the existing commercial building and vacant warehouse. The trees are in poor health and not capable of being transplanted. There is one (1) California Bauhinia variegate purple orchid tree at located on the sidewalk at corner of West Beverly Boulevard and South Burlington Avenue. The tree presently located too close to existing curb and trunk is heavily abused.

Bonnie Brae Street Frontage: One (1) Tipu and (1) Crape Myrtle located up against the building and curb. Due to their close proximity to the building foundation, these trees are not capable of being transplanted.

Interior Parking Lot: One (1) Ficus tree which is located adjacent to the building wall and foundation and cannot be transported. Furthermore, the species is undesirable due to its high water use and invasive root structure. Three (3) Mexican Fan Palms. The palms are growing out of the crevice of the building wall and parking lot. The root system on the palms is compromised and growth structure is unbalanced due to its current location. It is not possible to transport the palms out of their current location. Eight (8) Ailanthus altissima (Tree of Heaven) that are considered to be are in poor health and not capable of being transplanted. The Project would remove existing trees and would provide 61 new trees on the Project Site and surrounding street frontage. Overall, compared to existing conditions, there would be a substantial increase in landscaped open space on the Project Site and its surrounding streets, including a net increase of 40 trees.

As the Project Site does not contain habitat suitable for native species and does not contain candidate, sensitive or special status species, no impacts to candidate, sensitive, or special status species would occur.[43]

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

No Impact. The Project Site is developed with existing commercial, industrial, and residential buildings, as well as a surface parking lot, and does not contain riparian habitat or sensitive natural communities. The Project Site is not located within or adjacent to a significant ecological area (SEA).[44] Therefore, implementation of the Project would not result in any adverse effect on riparian habitat or other sensitive natural community and no mitigation measures are required.[45]

c. Have a substantial adverse effect on Federally protected wetlands as defined by Section 404 of the Clean Water Act (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 developed and the pervious areas are landscaped with non-native species and do not contain wetlands defined by Section 404 of the Clean Water Act. Therefore, Project implementation would not impact Federally protected wetlands. No impacts would occur and no mitigation measures are required.[46]

---

43 This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds related to biological resources, including the loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, or candidate specie, or a Species of Special Concern or federally listed critical habitat; the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species; the alteration of an existing wetland habitat; or interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

44 City of Los Angeles General Plan Conservation Element, Exhibit B2, SEAs and other Resources, March 2001. http://planning.lacity.org/cwd/gnlpln/consvelt.pdf. Accessed January 2017.

45 This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds related to biological resources, including the loss of individuals, or the reduction of existing habitat, of state of federal listed endangered, threatened, rare, protected, or candidate specie, or a Species of Special Concern or federally listed critical habitat; the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species; the alteration of an existing wetland habitat; or interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

46 Ibid

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

Less Than Significant Impact with Mitigation Incorporated. The Project Site is currently developed and located in a highly urbanized area in the City of Los Angeles. No wildlife corridors or native wildlife nursery sites are present on the Project Site or in the surrounding area. Further, due to the urbanized nature of the Project area, the potential for native resident or migratory wildlife species movement through the Site is negligible.

Nonetheless, the Project Site does include ornamental trees that could support raptor and/or songbird nests. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). The removal of vegetation with nesting birds during the breeding season is considered a potentially significant impact. However, while the Project would remove existing trees and would provide 61 new trees on the Project Site, resulting in a net increase of 40 trees, the Project would provide greater habitat area for birds. Nevertheless, mitigation provided below would reduce this impact to a less than significant level.[47]

Mitigation Measures

MM BIO-1: Any construction activities that occur during the nesting season (February 15 to August 31) shall require that all suitable habitat (i.e., trees and shrubs) be surveyed for the presence of nesting birds by a qualified biologist, retained by the Applicant as approved by the City of Los Angeles Department of Building and Safety, before commencement of clearing and prior to grading permit issuance. The survey shall be conducted within 72 hours prior to the start of construction. A copy of the pre-construction survey shall be submitted to the City of Los Angeles Department of Building and Safety. If any active nests are detected, an appropriate buffer as determined by the biological monitor, shall be delineated, flagged, and avoided until the qualified biological monitor has verified that the young have fledged or the nest has otherwise become inactive.

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

Less Than Significant Impact. There are no native tree species within the Project Site that would be subject to the protection of Ordinance No. 177404 of the City of Los Angeles Municipal Code (Section 1. Subdivision 12 of Subsection A of Section 12.21, as amended).

47 Ibid.

However, there are 21 existing non-native, non-protected trees that would be removed as part of the Project. The Project would include a total of 61 new trees, including new street trees and trees on the Site. The final number and location of street trees would be determined in consultation with the City's Urban Forestry Division. Compliance with applicable City requirements would ensure that impacts are less than significant. [48]

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

No Impact. As discussed above, the Project Site is not located within a SEA.[49] Additionally, there is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan in place for the Project Site.[50] [51] [52] Therefore, implementation of the Project would not conflict with a habitat conservation plan and no mitigation measures are necessary.[53]

Cumulative Impacts

Biological Resources

With regard to cumulative biological resources impacts, the Project Site is located in an urbanized area and like the Project, the majority of developments occurring in the Project area would occur on previously disturbed, urbanized land. The Project does not contain sensitive biological resources or habitat, including wetlands, and is not part of a wildlife corridor and therefore could not contribute to a cumulative effect in these regards. The Project would fully comply with City ordinances pertaining to tree removal. Further, potentially significant impacts to nesting birds would be reduced to a less than significant level with implementation of the prescribed mitigation measure. Related projects would also be required to comply with the City's tree requirements and to adhere to the MBTA and Fish and Game code, therefore cumulative impacts to nesting birds

48 Ibid.

49 Los Angeles County Significant Ecological Areas and Coastal Resource Areas Policy Map, http://planning.lacounty.gov/assets/upl/project/gp_2035_2014-FIG_9-3_significant_ecological_areas.pdf, Accessed January 2017.

50 California Regional Conservation Plan, August 2015, https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline, Accessed January 2017.

51 Habitat Conservation Plans – Region 8, http://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP,Accessed January 2017.

52 Habitat Conservation Plan Documents, https://www.fws.gov/carlsbad/hcps/HCP_Docs.html, Accessed January 2017.

53 This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds related to biological resources, including the loss of individuals, or the reduction of existing habitat, of state of federal listed endangered, threatened, rare, protected, or candidate specie, or a Species of Special Concern or federally listed critical habitat; the loss of individuals or the reduction of existing habitat of a locally designated species or a reduction in a locally designated natural habitat or plant community; interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species; the alteration of an existing wetland habitat; or interference with habitat such that normal species behaviors are disturbed (e.g., from the introduction of noise, light) to a degree that may diminish the chances for long-term survival of a sensitive species.

would be less than significant. Therefore, cumulative impacts to biological resources would be less than significant.

5. Cultural Resources

Would the project:

a. Cause a substantial adverse change in the significance of a historical resources as defined in State CEQA §15064.5?

No Impact. The analysis of impacts to historic resources is based on the *Historical Resources Assessment (HRA) Report and Environmental Impact Analysis*, prepared by ESA PCR in March 2017, included as Appendix C of this MND. A Project Site visit was conducted by qualified ESA PCR architectural historians to identify the potential for historical resources over 45 years in age on the Project Site and vicinity and to assess potential Project impacts on such resources. The Project Site is currently developed with surface parking and an altered Mid-Century Modern commercial and industrial building constructed in 1949 and a Mid-Century Modern industrial building constructed in 1951/1952. Also located on the Project Site is a Spanish Colonial Revival bungalow court constructed in 1923 (Bungalow Court).

A historical resource is defined in Section 15064.5(a)(3) of the CEQA Guidelines as any object, building, structure, site, area, place, record, or manuscript determined to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Historical resources are further defined as those associated with significant events, important persons, or distinctive characteristics of a type, period or method of construction; representing the work of an important creative individual; or possessing high artistic values. Resources listed in or determined eligible for the California Register of Historical Resources ("California Register" or "CR"), included in a local register, or identified as significant in a historic resource survey are also considered historical resources under CEQA.

A substantial adverse change in the significance of a resource is considered a potentially significant impact on the environment. Substantial adverse change is defined as physical demolition, relocation, or alteration of a resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. Direct impacts are those that cause substantial adverse physical change to a historic property. Indirect impacts are those that cause substantial adverse change to the immediate surroundings of a historic property such that the significance of a historical resource would be materially impaired.

Existing Buildings on the Project Site

The HRA included in Appendix C, analyzed the structures located on the Project Site. These structures include a commercial and industrial building located at the southwest corner of the intersection of West Beverly Boulevard and South Burlington Avenue (1800 West Beverly Boulevard). Originally designed in the Mid-Century Modern style, the building has had numerous alterations since the original construction date of 1949. A commercial/industrial building is located at the southeast corner of the intersection of Beverly Boulevard and South Bonnie Brae Street (1850 West Beverly Boulevard). This building was originally designed in a Mid-Century Modern style in 1955. A one-story Spanish Colonial Revival bungalow court apartment building containing twelve units is located immediately to the south of the 1850 West Beverly Boulevard building and was constructed in 1923.

As further described in the HRA, the current structures on the Project Site are ineligible for listing, both individually and as contributors to a potential historic, under all of the applicable federal, state, and local criteria. The buildings located at 1800-1850 West Beverly Boulevard and 114 South Bonnie Brae Street do not appear to have a significant association with early development patterns in the Westlake area and the productive lives of historic personages. Furthermore, they lack architectural merit. 1800 West Beverly also lacks sufficient integrity to convey its historical associations. As such, the current improvements on the Project Site do not qualify as historical resources under CEQA. Therefore, the Project, which includes demolition of the current improvements on the subject property, would have no direct impact to historical resources on the Project Site.

Historical Resources in the Project Vicinity

Indirect impacts were analyzed to determine if the Project would result in a substantial material change to the integrity of historical resources and their immediate surroundings within the Project vicinity and detract from their eligibility. Located within a dense, urban setting, with limited visibility, the archival records search was conducted within a quarter-mile radius to capture all known resources within the Project vicinity that may have views of the Project Site for the purpose of analyzing potential indirect impacts. The analysis indicated that there were twenty previously surveyed historical resources within a quarter-mile radius of the Project Site. Of these twenty resources, only one would have a direct view of the Project Site: 1807 West Beverly Boulevard, analyzed below. The remaining nineteen historical resources would not have direct or indirect views of the Project Site and are not considered further in this assessment because without any direct or indirect view, there would be no impact.

The eligibility of 1807 West Beverly Boulevard is not tied to its architecture or neighborhood setting; rather, the property is eligible for its historical associations as an early acupuncture clinic operated by the Yu family, including acupuncture pioneer Moses Yu, since 1977. Upon Project completion, 1807 West Beverly Boulevard (Yu Acupuncture Clinic) would retain its eligibility as a potential historical resource at the state and local levels. The Project would not demolish or materially alter any of the character-defining features that contribute to the eligibility of 1807

West Beverly Boulevard as a historical resource. Therefore, the Project would result in no indirect impacts to historic resources in the Project vicinity.

Therefore, indirect impacts to historical resources are considered less than significant under CEQA.[54]

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

Less Than Significant Impact With Mitigation Incorporated. When a project will impact an archaeological site, a lead agency shall first determine whether the site is a historical resource, as defined in Public Resources Code (PRC) Section 15064.5(a). This section defines historical resources as any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets one of the criteria for listing on the California Register of Historical Resources, which include:

3. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
4. Is associated with the lives of persons important in our past;
5. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
6. Has yielded, or may be likely to yield, information important in prehistory or history.

If a resource does not meet the criteria for a historical resource as define above, the lead agency shall determine if the resource meets the definition as a unique archaeological resources. As defined in PRC Section 21083.2, a "unique" archaeological resource is an archaeological artifact, object, or site, about which it can be clearly demonstrated that without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.

54 This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds related to historical resources, including whether a substantial adverse change would occur due to the demolition f a significant resource; relocation that does not maintain the integrity and significance of a significant resources; conversion, rehabilitation, or alteration of a significant resource which does not conform to the Secretary of Interior's Standards for Rehabilitation and Guidelines for Rehabilitation of Historic Buildings; or construction that reduces the integrity or significance of important resources on the site or in the vicinity.

- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

A project may cause a significant impact on the environment if would impact an archaeological resource that is considered a historical resource or unique archaeological resource.

The analysis of archaeological resources is based on a cultural resources records search through the California Historical Resources Information System South Central Coastal Information Center (CHRIS-SCCIC), a Sacred Lands File (SLF) search (requested on January 27, 2017) from the Native American Heritage Commission (NAHC) in Sacramento, review of Sanborn Fire Insurance (Sanborn) maps, review of the *Historic Resources Assessment and Impact Analysis* (HRA) report (provided in Appendix D), review of current Google Earth aerial imagery, and a review of the geotechnical report for the Project. The Project Site is located in a highly urbanized area of the City and is currently developed with a commercial and industrial building constructed in 1949, an industrial building constructed in 1951, a bungalow court constructed in 1923, and surface parking lots, which allowed for no direct observation of the native ground surfaces.

Results of the cultural resources records search conducted through the CHRIS-SCCIC indicate that a total of 26 cultural resource studies have been conducted within a one-half mile radius of the Project Site. None of these studies previously encompassed the Project Site; therefore, it appears that an archaeologist has not conducted a pedestrian survey of the Project Site. The nearest study was conducted 200 feet west of the Project Site and consisted of a field reconnaissance and records search for the Royal Street Communications LLC Wireless Telecommunications Site LA0179B. This study yielded negative results for historic period and prehistoric archaeological resources; however, one built environment resource was identified that was recommended as not eligible for the National Register of Historic Places.

A total of five historic-period built resources (buildings), one historic-period district (Echo Park) and two historic-period archaeological resources (consisting of artifacts related to Echo Park and the structural remains of an old trolley system) were recorded within the one-half mile radius of the Project Site. No known prehistoric archaeological resources have been recorded within the Project Site or half-mile radius. The closest known archaeological resource to the Project Site is 19-100429, located approximately 1,200 feet east of the Project Site along Beverly Blvd. Resource 19-100429 is described as consisting of rails, ties, straps, pikes and the ballast for the roadbed that were encountered 6 to 8 feet below the existing road surface of Beverly Blvd. The Department of Parks and Recreation (DPR) Site Form for the resource indicates that the resource may represent a segment of the old Los Angeles "Red Car" trolley system.[55] The Second Street Cable Railway opened in 1885 and was known as L.A.'s first mechanical street railway. The railway route began at Spring Street and ran west along First Street/Beverly Boulevard until the present-day intersection of Second Street and Glendale Boulevard (located approximately 2,300 feet east of the Project Site). Due to mechanical problems and an 1889 storm which buried part of

[55] Martorana, Dean, 2001. DPR Site Form for Resource 19-100429.

the railway in mud, the line was closed.[56] As a result, it is possible that resource 19-100429 includes remnants of the former Second Street Cable Railway.

Review of the earliest available Sanborn map from 1906 indicates that the eastern portion of the Project is undeveloped while the western the portion of the Project Site was developed with two dwellings that fronted West 1st Street (now Beverly Blvd.) and a third structure of unknown function on a separate parcel. One of the dwellings has a small structure labeled as "shed" located at the back of the property line while the adjacent dwelling has two small structures located at the back of the property line that are labeled as "hen house" while the other is unnamed.[57] It is unknown whether the "shed" or unlabeled structure were utilized as an outhouse by the dwelling occupants, but it was common to position outhouse structures at the back of property line in Los Angeles at this time. The 1955 Sanborn map depicts this particular portion of the Project Site (located at 1850 West Beverly Blvd.) as developed with offices, a machine shop and a printing warehouse which exist today.[58] This particular building currently does not have a basement while the other larger commercial building (1800 West Beverly Blvd.) at the Project Site does.

Review of the 1951 Sanborn map indicates that former dwellings in the western portion of the Project Site are longer present. The northeast portion of the Project Site (1800 West Beverly Boulevard) was developed by this time with a rectangular building with a square projection on its northwest corner. This building consisted of a large store fronting West Beverly Boulevard, a total of six smaller stores overlooking South Burlington Avenue and a machine shop and trailer equipment warehouse located at the southwest corner.[59] According to the HRA report, the original footprint of 1800 West Beverly Boulevard within the Project Site has not undergone substantial alteration since its original construction date of 1949. The 1951 Sanborn map also depicts a U-shaped structure (consisting of 12 residential dwellings) at 114 South Bonnie Brae Street, located on the southwest corner of the Project Site. According to the HRA report, this structure is a Bungalow Court made up of two buildings that were constructed in 1923. Review of Google Earth aerial imagery indicates that the Bungalow Court is still extant in the southwest corner of the Project Site. The 1955 Sanborn map depicts the northwest portion of the Project Site (located at 1850 West Beverly Boulevard.) as developed with offices, a machine shop and a printing warehouse.[60] According to the HRA report, the northwest portion of the Project Site was constructed between 1951 and 1952. Based on a comparison of the 1951 Sanborn map and current Google Earth aerial imagery (dated February 2, 2016), the footprint of the northwest portion of the Project Site is still the same. The 1951 Sanborn map also depicts the middle and southeastern portion of the Project Site as developed with surface parking lots, as it is today.

56 Masters, Nathan, 2012. "L.A. Once Had Cable Cars, Too" https://www.kcet.org/shows/lost-la/la-once-had-cable-cars-too, accessed online, February 2017.
57 Sanborn Fire Insurance Map 1906
58 Sanborn Fire Insurance Map 1955
59 Sanborn Fire Insurance Map 1951
60 Sanborn Fire Insurance Map 1955

The SLF search conducted through the NAHC yielded negative results for Native American cultural resources within the Project Site or immediate vicinity.[61]

Review of the geotechnical report indicates that artificial fill materials were encountered in all four of the test pits and borings at the Project Site and ranged in thickness from one to ten (10) feet. The fill materials appear to have been placed during pad grading and construction of the existing buildings and consist of silty clay to sandy clay intermixed with "abundant rock and asphalt fragments" that range in length from one to seven inches. Bedrock from the marine late Miocene-aged [i.e., 11.6 to 5.3 million years ago (MYA)] Puente Formation was found from 1.5 to 31 feet below the surface throughout the Project Site.[62] Excavations for the subterranean parking associated with the Project are expected to reach depths of 30 feet below the surface. Given their old age, sediments within the Project Site associated with the Puente Formation would not be conducive to retaining archaeological resources. The apartment and commercial buildings that currently exist in the Project Site are not likely to have produced buried archaeological deposits (privies, refuse pits, bottle dumps, etc.). Moreover, if the small structures located at the back of the property line in 1906 were outhouse/privy structures, it is likely that the original construction of the industrial and commercial buildings in the area between 1951 and 1952 have displaced buried archeological deposits associated with these former uses. Therefore, the potential to encounter buried archaeological resources in the Project Site is considered low. However, in the event that previously unknown prehistoric or historic archaeological resources (e.g., bottles, foundations, refuse dumps/privies, Native American artifacts, etc.) are encountered during construction excavations, Mitigation Measure CULT-1 is prescribed to ensure that potentially significant impacts would be reduced to a less than significant level.

Mitigation Measures

> **MM CULT-1:** In the event that historic (e.g., bottles, foundations, refuse dumps/privies, etc.) or prehistoric (e.g., hearths, burials, stone tools, shell and faunal bone remains, etc.) archaeological resources are unearthed during ground-disturbing activities, the Applicant shall halt or redirect ground-disturbing activities away from the vicinity of the find so that the find can be evaluated by a qualified archaeologist. A buffer area shall be established by the qualified archaeologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. All archaeological resources unearthed by project construction activities shall be evaluated by an archaeologist. The Applicant shall coordinate with the qualified archaeologist and the City to develop an appropriate treatment plan for the resources if they are determined to be potentially eligible for the California Register of Historical Resources or potentially qualify as unique archaeological resources pursuant to CEQA. If the resources are or appear to be Native American, Tribal Cultural, or prehistoric in origin, a Gabrieleno Tribe shall be contacted and consulted with regarding treatment and curation of the resources. Preservation in place (i.e., avoidance) shall be considered as a treatment measure first. If preservation in place is not feasible, treatment may include the implementation of archaeological data recovery excavations to remove the resource from

61 Totton, Gayle, 2017. Re: Proposed 1800 West Beverly Boulevard Project, City of Los Angeles, Hollywood USGS Quadrangle, Los Angeles County, California

62 GeoConcepts, Inc., 2016. Preliminary Geologic and Geotechnical Engineering Investigation, Proposed Mixed Use Development, 1800 W. Beverly Boulevard, Los Angeles, California

the Project Site along with subsequent laboratory processing and analysis. Any archaeological material collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County or the Fowler Museum, if such an institution agrees to accept the material. If no institution accepts the archaeological material, they shall be donated to a local school or historical society or similar organization for educational purposes. The qualified archaeologist shall determine the need for archaeological construction monitoring in the vicinity of the find thereafter.

The qualified archaeologist shall prepare a final report and appropriate California Department of Parks and Recreation Site Forms at the conclusion of treatment and/or the any follow-up archaeological construction monitoring. The report shall include a description of resources unearthed, if any, treatment of the resources, results of the artifact processing, analysis, and research, and evaluation of the resources with respect to the California Register of Historical Resources. The report and the Site Forms shall be submitted by the Applicant to the City, the South Central Coastal Information Center, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the project and required mitigation measures.

c. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

Less Than Significant Impact With Mitigation Incorporated. The analysis of paleontological resources is based on a review of the geotechnical report and a paleontological records search that was commissioned through the Natural History Museum of Los Angeles County (NHMLAC). The Project Site is completely developed and there is no visible soil/sediment or rock outcrops to examine for paleontological resources or fossiliferous geological formations.

As discussed earlier, review of the geotechnical report indicates that artificial fill materials were encountered in all four of the test pits and borings at the Project Site and ranged in thickness from one to ten (10) feet. Bedrock from the marine late Miocene-aged (i.e., 11.6 to 5.3 MYA) Puente Formation was found from 1.5 to 31 feet below the surface throughout the Project Site.[63] Excavations for the subterranean parking associated with the Project are expected to reach depths of 30 feet below the surface. Results of the paleontological resources record search revealed that the Project Site has exposures of the fossiliferous Puente Formation. The closest vertebrate localities (LACM 6198-6201 and 6254) from the Puente Formation are located approximately 0.90 miles southwest of the Project Site and yielded fossil fish specimens of the families deep sea smelt, needlefishes, moras, lanternfishes and mackerels; as well as a fossil whale rib fragment at depths between 40 and 80 feet below the surface. Another fossil locality (LACM 5961) is located approximately 1.40 miles southeast of the Project Site which yielded specimens of the fossil bristlemouth fish.[64] The paleontological resource records search results letter from the NHMLAC is provided in Appendix D.

63 GeoConcepts, Inc., 2016. Preliminary Geologic and Geotechnical Engineering Investigation, Proposed Mixed Use Development, 1800 W. Beverly Boulevard, Los Angeles, California

64 McLeod, Samuel A., 2017. Paleontological Resources for the Proposed 1800 West Beverly Boulevard Project, in the City of Los Angeles, Los Angeles County, California, Project Area

Based on the paleontological findings near the Project Site and given that the proposed excavations for the subterranean parking would extend into fossiliferous native soils (i.e., Puente Formation), the potential to encounter paleontological resources during construction excavations extending past artificial fill is considered high. As a result, Mitigation Measures CULT-2 to CULT-4 are prescribed to ensure that potentially significant impacts to previously unknown paleontological resources that are unexpectedly discovered during project implementation are reduced to a less than significant level.

Mitigation Measures

MM CULT-2: Prior to the issuance of a demolition permit, the Applicant shall retain a qualified Paleontologist to develop and implement a paleontological monitoring program for construction excavations that would encounter Puente Formation sediments (associated with sediments below 1.5 to 10 feet deep across the Project Site). The qualified Paleontologist shall attend a pre-grading/excavation meeting to discuss the paleontological monitoring program. A qualified Paleontologist is defined as a paleontologist meeting the criteria established by the Society for Vertebrate Paleontology. The qualified Paleontologist shall supervise a paleontological monitor who shall be present at such times as required by the Paleontologist during construction excavations into Puente Formation sediments. Monitoring shall consist of visually inspecting fresh exposures of rock for larger fossil remains and, where appropriate, collecting wet or dry screened sediment samples of promising horizons for smaller fossil remains. The frequency of monitoring inspections shall be determined by the qualified Paleontologist and shall be based on the rate of excavation and grading activities, the materials being excavated, and the depth of excavation, and if found, the abundance and type of fossils encountered. Full-time monitoring can be reduced to part-time inspections, or ceased entirely, if determined adequate by the qualified Paleontologist.

MM CULT-3: If a potential fossil is found, the paleontological monitor shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed fossil to facilitate evaluation of the discovery. An appropriate buffer area shall be established by the qualified Paleontologist around the find where construction activities shall not be allowed to continue. Work shall be allowed to continue outside of the buffer area. At the qualified Paleontologist's discretion, and to reduce any construction delay, the grading and excavation contractor shall assist in removing rock/sediment samples for initial processing and evaluation. If preservation in place is not feasible, the qualified Paleontologist shall implement a paleontological salvage program to remove the resources from the project site. Any fossils encountered and recovered shall be prepared to the point of identification and catalogued before they are submitted to their final repository. Any fossils collected shall be curated at a public, non-profit institution with a research interest in the materials, such as the Natural History Museum of Los Angeles County, if such an institution agrees to accept the fossils. If no institution accepts the fossil collection, they shall be donated to a local school in the area for educational purposes. Accompanying notes, maps, and photographs shall also be filed at the repository and/or school.

MM CULT-4: Prior to the release of the grading bond, the qualified Paleontologist shall prepare a report summarizing the results of the monitoring and salvaging efforts, the methodology used in these efforts, as well as a description of the fossils collected and

their significance. The report shall be submitted by the Applicant to the City, the Natural History Museum of Los Angeles County, and representatives of other appropriate or concerned agencies to signify the satisfactory completion of the Project and required mitigation measures.

d. Disturb any human remains, including those interred outside of formal cemeteries.

Less Than Significant Impact With Mitigation Incorporated. The analysis of human remains is based on the cultural resources records search from the SCCIC and a SLF search (requested on January 27, 2017) from the NAHC in Sacramento. The results of the records search from the SCCIC and the NAHC did not reveal the presence of known human remains within the Project Site or a half-mile radius.[65] Moreover, it is possible that the original construction of the existing uses on the Project Site have displaced human remains or other types of cultural resources. However, the negative results of the SCCIC and NAHC records search and the developed nature of the Project Site does not preclude the existence of buried human remains that may be encountered during construction. As a result, in the event that previously unknown human remains are encountered during construction excavations, Mitigation Measure CULT-5 is prescribed to ensure that potentially significant impacts to them are reduced to a less than significant level. The results of the SLF records search through the NAHC is provided in Appendix D.

Mitigation Measure

MM CULT-5: If human remains are encountered unexpectedly during implementation of the project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the land owner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the land owner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human

65 Totton, Gayle, 2017. Re: Proposed 1800 West Beverly Boulevard Project, City of Los Angeles, Hollywood USGS Quadrangle, Los Angeles County, California

remains. The landowner shall discuss and confer with the descendants on all reasonable options regarding the descendants' preferences for treatment.

Whenever the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner or his or her authorized representative rejects the recommendation of the descendants and the mediation provided for in Subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance

Cumulative Impacts

Cultural Resources

Impacts related to cultural resources are site-specific and as such, are assessed on a site-by-site basis.

Cumulative impacts would occur if the Project and related projects have combined significant adverse effects on historic resources in the immediate vicinity, contribute to changes within a historic district, but on-site there are no historic resources. Of the 167 related projects and four related infrastructure projects, none are within the immediate vicinity of the Project and are isolated by intervening development and located in a number of locations of varying character and context. As discussed above, the Project would not result direct or indirect impacts to historic resources, as such the Project's cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Many of the related projects would require excavation that could potentially expose or damage potential archaeological and paleontological and resources or disturb human remains. However, the related projects are located in developed urban areas with sites that have been previously disturbed, and the potential to encounter and cause a significant impact on surface resources is unlikely. Further, in association with CEQA review, and depending on the depth of excavation and sensitivity of respective sites, mitigation measures would be required for related projects that have the potential to cause significant impacts to undiscovered archaeological and paleontological resources or disturb human remains. Implementation of such mitigation measures for related projects would avoid significant impacts to archaeological and paleontological resources and human remains.

Similarly, as the related projects identified would require redevelopment of properties in urban areas that are currently developed and have been previously disturbed, and the potential to encounter and cause a significant impact on tribal cultural resources is unlikely. As discussed previously, mitigation measures would ensure the Project does not cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines, that Project does not directly or indirectly destroy a unique paleontological resource and that the Project does not adversely affect human remains. Thus, the Project's contribution to cumulative impacts would not be cumulatively considerable

6. Geology and Soils

The following geology and soils discussion is based, in part, on the technical report for the Project entitled, Preliminary Geologic and Geotechnical Engineering Investigation for the Proposed Mixed Use Development, 1800 West Beverly Boulevard, Los Angeles, California (Geotechnical Report) prepared by GeoConcepts Inc., dated April 25, 2017. The Geotechnical Report was prepared to evaluate the nature, distribution, and engineering properties of the earth materials underlying the Project Site with respect to the design and construction of the proposed Project. The Geotechnical Report is attached herein as Appendix E.

Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.

Less Than Significant Impact. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The California Geological Survey (CGS) has established earthquake fault zones known as Alquist-Priolo Earthquake Fault Zones around the surface traces of active faults to assist cities and counties in planning, zoning, and building regulation functions. These zones identify areas where potential surface rupture along an active fault could prove hazardous and identify where special studies are required to characterize hazards to habitable structures. In addition, the City of Los Angeles General Plan Safety Element has designated fault rupture study areas extending along each side of active and potentially active faults to establish areas of hazard potential due to fault rupture.

The Geotechnical Report notes that no currently known active or potentially active surface faults traverse the Project Site and the Project Site is not located within a currently designated Alquist-Priolo Earthquake Fault Zone. As a result, there are no active or potentially active faults close enough to the site to produce surface expression at the site. Furthermore the Project is a mixed-use development that would include residential and commercial uses. The Project would not contain uses or activities that would exacerbate the activity of a known earthquake fault. [66]

[66] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds related to geologic hazards, including whether a project would have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

Therefore, impacts from fault rupture are less than significant and no mitigation measures are required.

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. A significant impact would occur if the Project would cause personal injury or death or property damage as a result of seismic ground shaking. The entire Southern California region is susceptible to strong ground shaking from severe earthquakes. Seismic activities associated with a number of nearby faults (e.g., Hollywood, Raymond, Verdugo, Newport-Inglewood, Santa Monica, Simi, Mission Hills, Chatsworth and Palos Verdes Hills Faults). Although the Project Site is located within the seismically active Southern California region, it is not exposed to a greater than normal seismic risk than other properties in the City. The level of ground shaking that would be experienced at the Project Site from active or potentially active faults, or blind thrust faults, in the region would be a function of several factors including earthquake magnitude, type of faulting, distance from the epicenter, earthquake depth, duration of shaking, site topography, and site geology.

While it is likely that future earthquakes produced in southern California would shake the Project Site, modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels and other forms of building reinforcement. As with any new project development in the State of California, building design and construction are required to conform to the current seismic design provisions of the City's Building Code, which incorporates relevant provision of the 2016 California Building Code (CBC).

The 2016 edition of the CBC is based on the 2015 International Building Code (IBC) published by the International Code Council, which replaced the Uniform Building Code. The 2016 CBC contains California amendments based on the American Society of Civil Engineers (ASCE) Minimum Design Standard ASCE/SEI 7-16, Minimum Design Loads for Buildings and Other Structures, provides requirements for general structural design and includes means for determining earthquake loads as well as other loads (such as wind loads) for inclusion into building codes. Seismic design provisions of the building code generally prescribe minimum lateral forces applied statically to the structure, combined with the gravity forces of the dead and live loads of the structure, which the structure then must be designed to withstand. The prescribed lateral forces are generally smaller than the actual peak forces that would be associated with a major earthquake. Consequently, structures should be able to: (1) resist minor earthquakes without damage, (2) resist moderate earthquakes without structural damage but with some nonstructural damage, and (3) resist major earthquakes without collapse, but with some structural as well as nonstructural damage.

The 2016 CBC, as amended by the City's Building Code, incorporates the latest seismic design standards for structural loads and materials to provide for the latest in earthquake safety.

Compliance with such requirements would reduce seismic ground shaking impacts to the maximum extent practicable under current engineering practices. The Project would not contain

uses or activities that would exacerbate existing environmental conditions. Therefore, impacts related to strong seismic ground shaking 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?

Less Than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subject to high-intensity ground shaking. This fluid-like state can result in horizontal and vertical movements of soils and building foundations from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction occurs when three general conditions exist: 1) shallow groundwater; 2) low density non-cohesive (granular) soils; and 3) high-intensity ground motion.

The State of California has prepared Seismic Hazard Zone Reports to regionally map areas where historic occurrence of liquefaction, or local geological, geotechnical and groundwater conditions indicate a potential for permanent ground displacement. The maps may not identify all areas that have potential for liquefaction, strong ground shaking, and other earthquake and geologic hazards. The Project Site is not located within a liquefaction hazard zone on the State of California Seismic Hazard Zone Map.

As recommended in the Geotechnical Report prepared for the Project, based upon field observations, laboratory testing and analysis, the liquefaction potential at the Project Site is considered low due the dense nature of the bedrock underlying the Project Site. The Project would not contain uses or activities that would exacerbate existing environmental conditions.

As such, the potential for liquefaction at the Project Site, and impacts with respect to liquefaction and cohesive soils would be less than significant.[67] No mitigation would be required.

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

No Impact. The Project Site is relatively flat with little topography with little likelihood of landslides or earthquake-induced landslides. As shown in the State's Landslide Inventory, shown in the Seismic Hazard Zone Report for the Hollywood Quadrangle, the Project Site is not located within a landslide inventory area.[68] Further, the Project Site is not located within an area of historically earthquake-induced landslides identified on the Earthquake-Induced Landslides Zones map prepared City of Los Angeles.[69] Therefore, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death

67 Ibid.

68 California Department of Conservation, Division of Mines and Geology, Seismic Hazard Zone Map for the Hollywood Quadrangle, Los Angeles County, California March 25, 1999.

69 City of Los Angeles, Bureau of Engineering, Department of Public Works, Navigate LA website: http://navigatela.lacity.org/common/mapgallery/pdf/geotechnical/landslide.pdf Earthquake-Induced Landslides Zones Map. September 2006, Accessed January 2017.

involving landslides.[70] The Project would not contain uses or activities that would exacerbate existing environmental conditions. No impact would occur and no mitigation is required.

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

Less Than Significant Impact. The Project Site is currently developed with existing warehouse, commercial, residential building, a small shed, and a paved surface parking lot. There are limited areas of ornamental landscaping within the Project Site**.** During construction, the Project would be subject to ground-disturbing activities (e.g., excavation, grading, and foundation construction). These activities would expose soils for a limited time, allowing for possible erosion.

The potential for erosion would be reduced by implementation of standard erosion controls imposed during site preparation and grading activities. Specifically, all grading activities would require grading permits from the LADBS, which would include requirements and standards designed to limit potential impacts associated with erosion. In addition, on-site grading and site preparation would also comply with all applicable provisions of Chapter IX, Division 70 of the LAMC which addresses grading, excavations, and fills. This LAMC section requires that all grading activities occur in accordance with grading permits issued by LADBS. The permits typically require that excavation and grading activities be scheduled during dry weather periods. Should grading activities occur during the rainy season (October 1st to April 14th), a Wet Weather Erosion Control Plan (WWECP) would be prepared pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the Los Angeles Board of Public Works. The WWECP would include measures such as diversion dikes to channel runoff around the site. Division 70 of the LAMC also requires that stockpiles, excavated, and exposed soil be covered with secured tarps, plastic sheeting, erosion control fabrics, or treated with a bio-degradable soil stabilizer. A deputy grading inspector is required to be on-site during grading operations to ensure adhered to applicable regulations. Lastly, as Project construction would require greater than one acre of ground-disturbing activities, the applicant would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES) permit. The SWPPP incorporates best-management practices (BMPs) in accordance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities to control erosion and to protect the quality of surface water runoff during the Project's construction period.

Regarding soil erosion during Project operations, the potential is relatively low due to the fact that the Project Site would be developed with a building and would include landscaping. The use of hardscape and landscape plantings would act as an effective barrier to soil erosion by impeding direct contact between precipitation/irrigation and on-site soils.

[70] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds related to geologic hazards, including whether a project would have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

The Project would be designed to comply with the City of Los Angeles's Low Impact Development (LID) design standard. To facilitate this, the Project proposes as a BMP, EPIC[71] planters with stormwater capture and reuse capabilities. EPIC planters are a water management system which accommodates the City of Los Angeles' capture and reuse criteria and LID design standards. It uses the properties of capillary attraction to provide a system of sub-surface irrigation and drainage. Stormwater runoff is retained and held in the system for re-use or slowly released in a controller manner. The entirety of the building's roof drains would be diverted to the EPIC planters with storage and the overflow discharge will be discharged to South Bonnie Brae Street via a curb drain or parkway drain. Therefore, after completion of the Project, the existing drainage pattern would be similar to the pre-construction conditions, and therefore would not include substantial new amounts of soil subject to erosion.

With conformance to applicable regulations, including implementation of an erosion control plan as part of a SWPPP, impacts regarding wind or waterborne erosion during construction and operation of the Project would be less than significant.[72]

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

Less Than Significant Impact. Impacts related to liquefaction and landslides are addressed above in Response Nos. 6.a.iii and 6.a.iv, respectively. As indicated above, the Project Site is not located within a liquefaction hazards zone on the State of California Hazard Zone Map of the Hollywood Quadrangle. Lateral spreading results from earthquake-induced liquefaction, causing landslides associated with gentle slopes that flow laterally, like water. Land subsidence occurs when large amounts of groundwater have been withdrawn from certain types of sediments, causing the land to subside. When the water is withdrawn the sediments collapse in on themselves. Based upon the criteria set forth by the City's *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it could cause or accelerate geologic hazards causing substantial damage to structures or infrastructure, or expose people to substantial risk of injury.[73] For the purpose of this specific issue, a significant impact may occur if the Project were to be built in an unstable area without proper Site preparation or design features to provide adequate foundations for buildings, thus posing a hazard to life and property.

According to the Geotechnical Report, as the Project is not located in a liquefaction area, does not contain drainage channels or streams, and contains underlying bedrock material. Therefore, the risk for lateral spreading, the risk for landslides, lateral spreading, subsidence, liquefaction, or

71 EPIC Planters is the product name; and an acronym is not associated with the product.

72 This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds related to sedimentation and erosion including whether significant project-related sedimentation and erosion impacts would constitute a geologic hazard to other properties by causing or accelerating instability from erosion; or accelerate natural processes of wind and water erosion and sedimentation, resulting in sediment runoff or deposition which would not be contained or controlled on-site.

73 *L*.A. CEQA Thresholds Guide, Chapter E.1, page E.1-4, 2006.

collapse is low. Furthermore, unconsolidated fill materials would have to be removed or compacted, as required by the City of Los Angeles Uniform Building Code standards. The Project would not contain uses or activities that would exacerbate existing environmental conditions. Therefore, potential impacts from lateral spreading, subsidence, liquefaction, or collapse would be less than significant.[74]

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

Less Than Significant Impact. Expansive soils are characterized by their ability to undergo significant volume changes (shrink or swell) due to variations in moisture content. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors and may result in unacceptable settlement or heave of structures or concrete slabs to support on grade. As stated in the Geotechnical Report, expansive soils were not encountered on the Project Site. The Project would not contain uses or activities that would exacerbate existing environmental conditions. Therefore, impacts related to substantial risk to life or property as a result of expansive soils would be less than significant.

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?

No Impact. The Project Site is located in a highly urbanized area, where wastewater infrastructure is currently in place. The Project would connect to existing sewer lines that serve the Project Site and would not use septic tanks or alternative waste disposal systems. Therefore, no impact would occur.

Cumulative Impacts

Geology and Soils

Impacts associated with geologic and soil issues are typically confined to a Project Site or within a very localized area. Cumulative development in the area would, however, increase the overall potential for exposure to seismic hazards by potentially increasing the number of people exposed to seismic hazards. Related projects would be subject to established guidelines and regulations and construction procedures pertaining to seismic hazards. The Los Angeles Building Code would require consideration of seismic loads in structural design for all related projects. Related projects would be required to implement Los Angeles Municipal Code regulations for grading and excavations during construction, including SWPPP and LID requirements. In addition, the

[74] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds related to geologic hazards, including whether a project would have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury.

related project sites are located in a highly urbanized area and would connect to existing wastewater infrastructure. Thus, the related projects would not need to use septic tanks or alternative waste disposal systems.

The Project Site is not located within a State-designated hazard zone for earthquake induced liquefaction or landslides. The Project would be required to comply with guidelines and regulations pertaining to seismic hazards and with approved geotechnical recommendations, risks associated with seismic rupture, lateral spreading, subsidence, liquefaction, or collapse would also be less than significant. The Project would comply with Los Angeles Municipal Code Regulations related to excavation and grading and would not require the need for septic tanks or alternative waste disposal systems. As such, the Project's contribution to cumulative geology and soils impacts would not be cumulatively considerable and cumulative geology and soil impacts would be less than significant.

7. Greenhouse Gas Emissions

Would the project:

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

Less Than Significant Impact. State regulated GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF_6). CO_2 is the most abundant greenhouse gas (GHG) in the atmosphere. Not all GHGs exhibit the same ability to induce climate change; as a result, GHG contributions are commonly quantified in equivalent mass of CO_2, denoted as CO_2e. Mass emissions are calculated by converting pollutant specific emissions to CO_2e emissions by applying the proper global warming potential (GWP) value. These GWP ratios are available from the United Nations Intergovernmental Panel on Climate Change (IPCC) and are published in the *Fourth Assessment Report* (AR4). By applying the GWP ratios, project related CO_2e emissions can be tabulated in metric tons (MT) per year.

Neither the City of Los Angeles nor the SCAQMD have adopted a numerical significance threshold for assessing impacts related to GHG emissions, and the City of Los Angeles has not formally adopted a local plan for reducing GHG emission. Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. Consistent with developing practice, this Guideline section urges lead agencies to quantify GHG emissions of projects where possible. In addition to quantification, this section recommends consideration of qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions compared to the existing environment; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). The amendments do not establish a threshold of significance. Lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by

other experts, so long as any threshold chosen is supported by substantial evidence (see Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see Section 15130(f)).[75]

When no guidance exists under CEQA, the lead agency may look to and assess general compliance with comparable regulatory schemes.[76] In its January 2008 *CEQA and Climate Change* white paper, the California Air Pollution Control Officers Association (CAPCOA) identified a number of potential approaches for determining the significance of GHG emissions in CEQA documents. In its white paper, CAPCOA suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency.

The SCAQMD released draft guidance regarding interim CEQA GHG thresholds of significance in October 2008, proposing a tiered approach whereby the level of detail and refinement needed to determine significance increases with a project's total GHG emissions. "Tier 3," the primary tier by which SCAQMD currently determines the significance of stationary emission sources, relies on Executive Order S-3-05 as the basis for a screening level, and was established at a level that captures 90 percent of Air Basin-wide land use GHG emissions.

The SCAQMD proposed a screening level of 3,000 MT of CO_2e per year for commercial or mixed-use residential projects under which project impacts are considered less than significant, "to achieve the same policy objective of capturing 90 percent of the GHG emissions from new development projects in the residential/commercial sectors."[77] In CAPCOA's January 2008 CEQA and Climate Change white paper, CAPCOA suggested a possible quantitative threshold option that would capture 90 percent of GHG emissions from future discretionary development projects. According to CAPCOA, the "objective was to set the emission threshold low enough to capture a substantial fraction of future residential and nonresidential development that will be constructed to accommodate future statewide population and job growth, while setting the emission threshold high enough to exclude small development projects that will contribute a relatively small fraction of the cumulative statewide GHG emissions."[78]

---

75 See generally Section 15130(f); see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, April 13, 2009, https://www.opr.ca.gov/docs/Transmittal_Letter.pdf, accessed December 2016.

76 See *Protect Historic Amador Waterways v. Amador Water Agency (2004) 116 Cal. App. 4th 1099, 1107* ["'[A] lead agency's use of existing environmental standards in determining the significance of a project's environmental impacts is an effective means of promoting consistency in significance determinations and integrating CEQA environmental review activities with other environmental program planning and resolution.'"]. Lead agencies can, and often do, use regulatory agencies' performance standards. A project's compliance with these standards usually is presumed to provide an adequate level of protection for environmental resources. See, e.g., *Cadiz Land Co. v. Rail Cycle (2000) 83 Cal.App.4th 74, 99* (upholding use of regulatory agency performance standard).

77 South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, Appendix E, p. 2-6, (2008). Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2. Accessed May 2017.

78 California Air Pollution Control Officer's Association, CEQA and Climate Change, (2008) 42-43.

A 90 percent capture rate would "exclude the smallest proposed developments from potentially burdensome requirements … to mitigate GHG emissions."[79] The SCAQMD's proposed screening level of 3,000 $MTCO_2e$ per year is a South Coast Air Basin-specific level that would meet CAPCOA's intent for the suggested quantitative threshold option. It should be noted that the SCAQMD has formally adopted a GHG significance threshold of 10,000 $MTCO_2e$ per year for industrial/stationary source projects where the SCAQMD is the lead agency based on a 90 percent capture rate for the industrial/stationary source sector. Given the lack of a formally adopted numerical significance threshold applicable to this Project, the significance of the Project is evaluated based on the SCAQMD's proposed screening level of 3,000 $MTCO_2e$, which as explained above is a South Coast Air Basin-specific level that would meet CAPCOA's intent for the suggested quantitative threshold option.

For purposes of this analysis, it is considered reasonable and consistent with criteria pollutant calculations to consider those GHG emissions, occurring both on- and off- the Project Site, resulting from Project-related incremental (net) increase in the use of on-road mobile vehicles, electricity, natural gas, and wastewater and solid waste generation compared to existing conditions. CEQA Guidelines Section 15126.2 requires that a lead agency should assess the impact of a proposed project by evaluating "changes in the existing physical conditions in the affected area as they exist at the time the notice of preparation is published, or where no notice of preparation is published, at the time environmental analysis is commenced." Consistent with CEQA Guidelines Section 15126.2, the IS/MND evaluated the Project's GHG emissions by properly considering the changes to the existing uses in the affected area of the Project site as they existed at the time the environmental analysis commenced. The SCAQMD's *Draft Guidance Document* also uses the term "incremental" throughout, which has the same meaning as a Project's "net" change in GHG emissions.[80] Therefore, it is clear that the analysis of the Project's net GHG emissions is an appropriate comparison metric, supported by substantial evidence, and consistent with CEQA Guidelines Section 15126.2.

This includes Project construction activities such as demolition, hauling, and construction worker trips. This analysis also considers indirect GHG emissions from water conveyance, wastewater generation, and solid waste handling. Since potential impacts resulting from GHG emissions are long-term rather than acute, GHG emissions are calculated on an annual basis. In order to report total GHG emissions using the CO_2e metric, the GWP ratios corresponding to the global warming potential of CO_2 over a 100-year period is used in this analysis.

Construction emissions are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source emissions factors. The emissions estimated from the CalEEMod (Version 2016.3.1) software are based on outputs from the OFFROAD and EMFAC models, which are emissions estimation models developed by the CARB and used to calculate emissions from

79 California Air Pollution Control Officer's Association, CEQA and Climate Change, (2008) 43-44.

80 South Coast Air Quality Management District, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, Appendix E, p. 2-6, (2008). Available at: http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgattachmente.pdf?sfvrsn=2. Accessed May 2017.

construction activities, including on- and off-road vehicles and equipment. The output values used in this analysis were adjusted to be Project-specific based on equipment types and the construction schedule. These values were then applied to the same construction phasing assumptions used in the criteria pollutant analysis (see Section 3, *Air Quality*,) to generate GHG emissions values for each construction year. CalEEMod outputs construction-related GHG emissions of CO_2, CH_4, N_2O, and CO_2e. These values are reported in units of metric tons for consistency with general state, federal, and global GHG emission inventories. The CO_2e emissions are calculated for the construction period and future Project build-out conditions in order to estimate the net change in GHG emissions from Project construction and operation. Emissions of GHGs from construction activities occur over a relatively short-term period of time and contribute a relatively small portion of the overall lifetime project GHG emissions. Furthermore, according to the SCAQMD, "GHG emission reduction measures for construction equipment are relatively limited."[81] Therefore, SCAQMD staff recommends that construction emissions be amortized over a 30-year project lifetime, so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. In order to consider Project construction GHG emission in the larger operational context, GHG emissions from construction have been amortized over a 30-year lifetime of the Project (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate comparable to operational emissions) consistent with SCAQMD recommendations.

Operational emissions were estimated using CalEEMod for the existing site uses and the Project in order to determine the net incremental change in GHG emissions. Mobile source emissions are based on the vehicle emission factors from EMFAC, which accounts for Air Basin-specific vehicle fleet characteristics such as the range of vehicle model years and vehicle fuels, and the trip length values for the existing and Project land uses in CalEEMod, which are South Coast Air Basin-wide average trip distance values. To estimate the total vehicle miles traveled (VMT) generated by existing site and Project trips, trip generation rates provided in the Project traffic study were used.[82] The trips take into account trip reductions from internal capture from co-locating different land uses on the site and from nearby access to public transportation. The Project Site is located in close proximity to the Metro Red and Purple Line Westlake/MacArthur Park Station and Metro bus routes.

With regard to energy usage, the consumption of fossil fuels to generate electricity and to provide heating and hot water generates GHG emissions. Future fuel consumption rates are estimated based on specific square footage of the existing and Project land uses, as well as estimated water supply needs taking into account the Title 24 Building Standards Code. Energy usage (off-site electricity generation and on-site natural gas consumption) for the Project is calculated within CalEEMod using the California Energy Commission (CEC) California Commercial End Use

81 South Coast Air Quality Management District, Board Meeting, December 5, 2008, Agenda No. 31, Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, Attachment E – E. Draft Guidance Document – Interim CEQA Greenhouse (GHG) Significance Threshold Document. Available: http://www.aqmd.gov/home/governing-board/agendas-minutes. Accessed October 2016.

82 Gibson Transportation Consulting, Inc., Traffic Study for the 1800 Beverly Project, October 2017.

Survey (CEUS) data set for nonresidential uses, which lists energy demand by building type.[83] Since the data from the CEUS is from 2002, the emissions modeling using the CalEEMod software incorporates correction factors to account for compliance with the current Title 24 Building Standards Code. This assessment also includes electricity-related GHG emissions from the proposed parking structure, which includes elevators, lighting, and a ventilation system. The parking structure was modeled as fully enclosed. The energy use from residential land uses is calculated based on the CEC Residential Appliance Saturation Survey (RASS) from 2009, which also incorporates correction factors to account for compliance with the current Title 24 Building Standards Code. The existing site uses were modeled using historical energy factors based on previous Title 24 standards.

Water and wastewater generated from the existing site and Project requires energy to supply, distribute and treat. The CalEEMod software uses the electrical intensity factors from the 2006 CEC report *Refining Estimates of Water-Related Energy Use in California*.[84] The emissions of GHGs associated with the wastewater treatment process emissions are also calculated using the CalEEMod software as described in the *California Emissions Estimator Model User's Guide, Appendix A*.[85]

Emissions from solid waste handling generated from the existing site and Project are also accounted for in the GHG emissions inventory. The GHG emission factors, particularly for CH_4, are based on the default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery).

Other sources of GHG emissions from operation of the existing site uses and Project uses include equipment used to maintain landscaping, such as lawnmowers and trimmers. The CalEEMod tool uses landscaping equipment GHG emission factors from the CARB OFFROAD2011 model and the CARB *Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment (6/13/2003)*.[86] The CalEEMod software conservatively estimates that landscaping equipment operate for 250 days per year in the South Coast Air Basin. The Project does not include fireplaces in any residential units; therefore, the Project would not result in fireplace emissions.

Emissions calculations for the Project include credits or reductions for GHG reducing measures that are required by regulation, such as reductions in energy and water demand from the current Title 24 standards and the California Green Building Standards (CALGreen) Code. The Project is also subject to the City's Green Building Code, which incorporates by reference the CALGreen Code, as well as additional City requirements.

---

83 California Energy Commission, California Commercial End-Use Survey, http://capabilities.itron.com/CeusWeb/Chart.aspx. Accessed October 2016.

84 California Energy Commission, Refining Estimates of Water-Related Energy Use in California, PIER Final Project Report, CEC-500-2006-118, (2006).

85 California Air Pollution Control Officers Association, California Emissions Estimator Model User's Guide, (2013).

86 California Air Resources Board, OFFROAD Modeling Change Technical Memo: Change in Population and Activity Factors for Lawn and Garden Equipment, (6/13/2003), http://www.arb.ca.gov/msei/2001_residential_lawn_and_garden_changes_in_eqpt_pop_and_act.pdf. Accessed May 2017.

In addition, the Project would represent an urban infill development, since it would be undertaken on a currently developed site, and would be located near existing off-site commercial and retail destinations and in close proximity to existing public transit stops. These characteristics are analyzed below to demonstrate that the Project would result in reduced vehicle trips, VMT, and associated transportation-related GHG emissions, as well as air pollutant emissions, compared to the statewide and South Coast Air Basin average. The CAPCOA has provided guidance for mitigating or reducing emissions from land use development projects. In September 2010, CAPCOA released a guidance document titled *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for recommended reduction measures.[87] The CAPCOA guidance document was utilized in this analysis for quantifying reductions due to land use characteristics and Project Design Features in CalEEMod. The land use characteristics of the Project listed below are consistent with those shown in the CAPCOA guidance document to reduce vehicle trips and VMT to and from the Project Site compared to the statewide and Air Basin average. They would, therefore, result in a corresponding reduction in VMT and associated GHG and air pollutant emissions.

- **Increased 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. This measure corresponds to CAPCOA guidance measure LUT-1.[88] The Project would increase the Project Site density to approximately 146 dwelling units per acre and 6 jobs per acre (refer to Section 13, *Population and Housing*, which provides population and employment data used to estimate the number of dwelling units and jobs per acre).

- **Location Efficiency:** Location efficiency describes the location of a project relative to the type of urban landscape such as an urban area, compact infill, or suburban center. In general, compared to the statewide average, a project could realize VMT reductions up to 65 percent in an urban area, up to 30 percent in a compact infill area, or up to 10 percent in a suburban center for land use/location strategies.[89] This characteristic corresponds to CAPCOA guidance measure LUT-2.[90] The Project Site represents an urban infill location within the Westlake Community Plan Area and is served by numerous existing public transportation options. The location efficiency of the Project Site would result in synergistic benefits that

87 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010).

88 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010) 155-158.

89 CalEEMod, by default, assumes that trip distances in the South Coast Air Basin are slightly longer than the statewide average. This is due to the fact that commute patterns in the South Coast Air Basin involve a substantial portion of the population commuting relatively far distances, which is documented in the Southern California Association of Governments 2016 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS). The RTP/SCS shows that, even under future Plan conditions, upwards of 50 percent of all work trips are 10 miles or longer (SCAG, Performance Measures Appendix, p. 7, 2012). The RTP/SCS does not specify the current percentage of work trips greater than 10 miles in the region, but it can be assumed that the percentage is currently greater than 50 percent since the goal of the RTP/SCS is to reduce overall VMT in the region. It is thus reasonable to assume that the trip distances in South Coast Air Basin are analogous to the statewide average given that the default model trip distances in the South Coast Air Basin are slightly longer but still generally similar to the statewide average. Therefore, projects could achieve similar levels of VMT reduction (65 percent in an urban area, 30 percent in a compact infill area, or 10 percent for a suburban center) compared to the South Coast Air Basin average.

90 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010) 159-161.

would reduce vehicle trips and VMT compared to the statewide and Air Basin average and would result in corresponding reductions in transportation-related emissions.

- **Increased Destination Accessibility:** This characteristic corresponds to CAPCOA guidance measure LUT-4.[91] The Project would be located in an area that offers access to multiple other nearby destinations, including restaurants, office, retail, and residential uses. The Project Site is also located near other job centers in the region and close to the commercial center of Downtown Los Angeles. The access to multiple destinations in close proximity to the Project Site would reduce vehicle trips and VMT compared to the statewide and Air Basin average, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.

- **Increased Transit Accessibility:** Locating a project with high density near transit facilities encourages the use of transit by people traveling to or from a project site. This characteristic corresponds to CAPCOA guidance measure LUT-5.[92] The Project would be located less than a mile from the Westlake / MacArthur Park Metro Rail Station. The Project Site is located adjacent to numerous bus lines operated by Metro, LADOT Downtown Area Shuttle (DASH), and Foothill Transit. These bus lines include Metro Bus Lines 14, 200, 10, 16, 17, 20, 603, 720, and Foothill Transit 481. The DASH Pico Union/Echo Park bus stop is located one block to the east of the Project Site and travels along Beverly Boulevard, Alvarado Street, and 3rd Street and provides access to the Westlake / MacArthur Park Metro Rail Station. The transit accessibility would reduce vehicle trips and VMT versus the statewide and Air Basin average, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.

- **Improve Design of Development:** Improved street network characteristics within a neighborhood enhances walkability and connectivity. Characteristics include street accessibility usually measured in terms of number of intersections (e.g., four-way intersections) per square mile. This characteristic corresponds to CAPCOA guidance measure LUT-9.[93] The Project is located in an urban infill location that is highly street-accessible. Therefore, this characteristic applies to the Project and would reduce vehicle trips and VMT versus the statewide and Air Basin average, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in emissions.

The emissions of GHGs associated with construction of the Project were calculated for each year of construction activity. Results of the GHG emissions calculations are presented on **Table B-9**, *Estimated Unmitigated Construction Greenhouse Gas Emissions*. The maximum annualized GHG emissions for the existing site and Project (including Project construction amortized over 30 years) are shown in **Table B-10**, *Estimated Project Annual Greenhouse Gas Emissions*. Detailed GHG emissions estimates for the existing site and Project are provided in Appendix E. As shown in Table B-10, the incremental net change in Project GHG emissions would not exceed the threshold

91 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010) 167-170.

92 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010) 171-175.

93 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010) 182-185.

of significance. As a result, the Project would have a less than significant impact with respect to construction and operational GHG emissions.

TABLE B-9
ESTIMATED UNMITIGATED CONSTRUCTION GREENHOUSE GAS EMISSIONS

Emissions Source	CO_2e (metric tons) [a]
Construction Year 1	1,172
Construction Year 2	1,065
Total	**2,237**
Annual (Amortized over 30 years)	**75**

[a] Totals may not add up exactly due to rounding in the modeling calculations

SOURCE: ESA PCR 2017

TABLE B-10
ESTIMATED PROJECT ANNUAL GREENHOUSE GAS EMISSIONS (BUILDOUT YEAR 2020)

Emissions Source	Existing Site CO_2e (metric tons) [a]	Project CO_2e (metric tons) [a]
Construction (Amortized)	—	75
On-Road Mobile	205	1,671
Area	<1	4
Electricity	86	1,025
Natural Gas	8	165
Water and Wastewater	14	73
Solid Waste	6	77
Total	**319**	**3,090**
Project Net Total	—	**2,771**
Significance Threshold	—	**3,000**
Over/(Under)	—	**(229)**
Exceeds Threshold?	—	**No**

[a] Totals may not add up exactly due to rounding in the modeling calculations

SOURCE: ESA PCR 2017

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

Less Than Significant Impact. The Global Warming Solutions Act of 2006, also known as AB 32 and codified into law in Health and Safety Code (HSC) Division 25.5, requires the State to achieve 1990 GHG emission levels by 2020 by setting statewide GHG reduction targets. To

achieve these goals, the CARB has established an emissions cap and developed a *Climate Change Scoping Plan* to identify mandatory strategies for reducing statewide GHG emissions. In addition, the California Climate Action Team (CAT) was formed which consists of members of various state agencies tasked with identifying strategies to reduce GHG emissions. Several other bills have been passed as a companion to AB 32 which include Senate Bill (SB) 1368 (electricity generation standards), SB 97 (CEQA analysis for GHGs), Low Carbon Fuel Standards, SB 375 (Regional Transportation Planning and GHG emissions), CALGreen building standards and others plans to achieve the goals of AB 32. Since AB 32 sets statewide targets for future GHG emissions, the Scoping Plan and other implementing tools of the law are clear that the reductions are not expected to occur uniformly from all sources or sectors. In 2014, CARB released the First Update to the *Climate Change Scoping Plan*, which provided updated GHG reduction goals for the state accounting for regulations set in place by the Legislature and the Governor up through 2011. In 2016, the California State Legislature adopted Senate Bill (SB) 32 and its companion bill AB 197; both were signed into law by the Governor. SB 32 and AB 197 amends HSC Division 25.5 and establishes a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and includes provisions to ensure the benefits of state climate policies reach into disadvantaged communities. CARB is in the process of preparing the second update to the *Climate Change Scoping Plan* to reflect the 2030 target established in SB 32 and AB 197. In addition, SB 350 (Chapter 547, Statues of 2015), assigned into law in October 2015, increased the Renewables Portfolio Standard from 33 percent by 2020 to 50 percent by 2030. The legislation also included interim targets of 40 percent by 2024 and 45 percent by 2027.

The GHG emissions analysis in this MND was performed in accordance with SCAQMD and CARB guidance developed in compliance with, and as a result of, those regulations and programs to ensure that new development complies with those same regulations and programs. The result of the analysis of the project's potential impacts in terms of GHG and global climate change indicates that the construction- and operational-related GHG emissions from the Project alone would not be expected to cause a direct physical change in the environment.

In support of AB 32, the State has promulgated laws and strategies aimed at reducing GHG emissions, some of which are applicable to the Project. According to CARB in its First Update to the *Climate Change Scoping Plan*, infill development that offers a mix of uses can reduce dependence on motor vehicles, thus reducing associated GHG emissions.[94] Thus, the Project would be consistent with reducing GHG emissions via infill development strategies in close proximity to public transportation and other nearby off-site land uses. Consistent with AB 32, the Project would minimize construction-related GHG emissions by using equipment that meet stringent USEPA emissions standards, and prohibiting diesel-fueled commercial motor vehicle idling consistent with CARB requirements. The Project would minimize operational-related GHG emissions by focusing on energy and water conservation, which would be achieved through the use of energy efficient heating, ventilation, and air conditioning (HVAC) and lighting systems, Energy Star-rated appliances, and low-flow plumbing fixtures. The proposed building envelopes would be highly insulated, and employ shading strategies to avoid unnecessary solar gain. The

94 California Air Resources Board, First Update to the Climate Change Scoping Plan, (2014) 104.

Project would also provide bicycle parking and electric vehicle charging spaces capable of supporting future electric vehicle supply equipment (EVSE) in accordance with City and CALGreen requirements.

With respect to the Project's transportation-efficient location, as discussed in greater detail in Section 16, *Transportation/Circulation*, the Project Site is located within a designated City of Los Angeles TPA, which is defined as an area located within one-half mile (2,640 feet) of an existing transit station. The Project is located approximately 300 feet from numerous Metro bus lines (e.g. 14, 37, and DASH Pico Union/Echo Park). The closest Metro Rail station is Westlake MacArthur Park Station located less than a mile southwest of the Project Site. SCAG's RTP/SCS establishes general goals for land use planning and seeks improved "mobility and access by placing destinations closer together and decreasing the time and cost of traveling between them."[95] According to SCAG, incorporating "smart land use strategies encourages walking, biking, and transit use, and therefore reduces vehicular demand" and associated pollutants.[96] Additionally, the SCAG RTP/SCS seeks better "placemaking," defined as "the process of developing options for locations where [people] can live and work that include a pleasant and convenient walking environment that reduces their reliance on their car."[97] Because the Project is located within a designated City of Los Angeles TPA and provides for needed housing and affordable housing, the population growth generated by the Project is considered consistent with SCAG RTP/SCS goals.

The Project would be consistent with GHG reduction measures from applicable plans. **Table B-11**, *Project Consistency with Applicable GHG Reduction Strategies*, contains a list of other state, regional, and local GHG-reduction strategies applicable to the project, the identified related projects, and future development similar in scope and location. Included are the regulations or guidelines from which the strategies were developed. The Project-level analysis highlights the manner by which the Project intends to meet the applicable strategies. Because the Project would not conflict with strategies to reduce GHG emissions, it would be consistent with the overarching regulation to reduce GHG emissions and impacts would be less than significant.

As discussed previously, in 2016, the California State Legislature adopted SB 32 and its companion bill AB 197, which amends HSC Division 25.5 and establishes a new climate pollution reduction target of 40 percent below 1990 levels by 2030 and includes provisions to ensure the benefits of state climate policies reach into disadvantaged communities. However, studies have shown that, in order to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its Climate Change Scoping Plan, CARB acknowledged that the "measures needed to meet the 2050 goal are too far in the future to define in detail."[98]

95 Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, (2012) 113.

96 Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, (2012) 39.

97 Southern California Association of Governments, 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy, (2012) 112.

98 CARB, Climate Change Scoping Plan, p. 117, December 2008.

TABLE B-11
PROJECT CONSISTENCY WITH APPLICABLE GHG REDUCTION STRATEGIES

Strategy	Description	Demonstration of Project Consistency
AB 1493	Reduces GHG emissions in new passenger vehicles from 2012 through 2016. Also reduces gasoline consumption to a rate of 31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020	**Consistent.** This measure applies to all new vehicles and the Project would not conflict with its implementation.
SB 1368	Establishes an emissions performance standard for power plants within the State of California.	**Consistent.** Los Angeles Department of Water and Power provided power is subject to the performance standards. The Project would not conflict with the implementation of this measure.
Low Carbon Fuel Standard	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	**Consistent.** This measure applies to transportation fuels utilized by vehicles in California. The Project would not conflict with the implementation of this measure. Construction and operational vehicles association with the Project would utilize low carbon transportation fuels as required under this measure.
CALGreen (2016) Requirements	Comply with applicable site development planning and design measures such as bicycle parking and light pollution reduction for nonresidential development.	**Consistent.** The Project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen Code. The Project will include a minimum of 272 bicycle parking spaces. Outdoor lighting would be designed and installed per the LAMC, with shielding, such that lighting would be directed and focused on the Project Site and not on adjacent residential properties as set forth in PDF AES-2 thus minimizing light pollution.
	Comply with applicable electric vehicle charging space requirements. For new multi-family dwellings (17 or more on a site), 3 percent of the total number of parking spaces provided for all types of parking facilities, but in no case less than one, shall be electric vehicle charging spaces capable of supporting future electric vehicle supply equipment (EVSE) (calculations shall be rounded up to the nearest whole number). For new nonresidential development, the number of EVSE-capable parking spaces shall be based on Table 5.106.5.3.3 in Chapter 5 (Nonresidential Mandatory Measures). The number of EVSE-capable spaces ranges from 0 to 10 for actual parking spaces of 0 to 200 and 6 percent of the total spaces (rounded up to the nearest whole number) for actual parking spaces of 201 or more.	**Consistent.** The Project would exceed these requirements and would incorporate five percent of the parking spaces as electric vehicle (EV) ready with metal conduit and electric wire pulled ready for charging station equipment installation. An additional 20 percent of the proposed parking spaces would be roughed-in with metal conduit only for future wiring to support future growth of EV charging stations.
	Comply with indoor water usage requirements by using low-flow water fixtures that meet the prescribed flow rates (residential and non-residential). Comply with outdoor water usage requirements as prescribed (residential and non-residential).	**Consistent.** The Project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen Code.
	Comply with material conservation and resource efficiency measures including applicable weather resistance and moisture management measures.	**Consistent.** The Project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen Code.

Strategy	Description	Demonstration of Project Consistency
	Comply with VOC emissions limits for carpet systems, composite wood products, and flooring.	**Consistent.** The Project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen Code.
	Requires a minimum of 65 percent recycle or reuse of nonhazardous construction and demolition debris.	**Consistent.** The Project would be consistent with this requirement via compliance with City ordinances and/or the CALGreen Code.
CARB ATCM	Reduce diesel-fueled commercial motor vehicle idling.	**Consistent.** The Project is committed to implementing this action to the extent feasible. Construction trucks would comply with CARB's anti-idling measure.
Climate Action Team	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.	**Consistent.** The CALGreen Code implements a more stringent requirement, and the Project would be consistent with or exceed this requirement.
	Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	**Consistent.** The Project would provide appropriate landscaping on the Project site including vegetation and trees. The Project would include a total of 61 new trees.
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	**Consistent.** CALGreen Code implements this goal, and the Project would be consistent with the requirements.
	The California Energy Commission updates building energy efficiency standards that apply to newly constructed buildings and additions to and alterations to existing buildings. Both the Energy Action Plan and the Integrated Energy Policy Report call for ongoing updating of the standards.	**Consistent.** CALGreen Code implements this goal, and the Project would be consistent with the requirements.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	**Consistent.** CALGreen Code implements this goal, and the Project would be consistent with the requirements
	Apply strategies that integrate transportation and land use decisions, including but not limited to promoting jobs/housing proximity, high-density residential/commercial development along transit corridors, and implementing intelligent transportation systems.	**Consistent.** The Project would be located in an infill location in proximity to existing residential and commercial businesses and numerous public transportation options, which would minimize trip lengths and associated emissions.

Strategy	Description	Demonstration of Project Consistency
City of Los Angeles LA Green Plan	Promote walking and biking to work.	**Consistent.** The Project would meet or exceed this requirement as part of the incorporated physical and operational Project characteristics to reduce vehicle trips and VMT and encourage alternative modes of transportation for residents and employees. These characteristics include designing the Project with increased density relative to the existing Project Site, locating residents in a compact infill/urban infill area close to other multiple nearby destinations, including restaurants, office, retail, and residential uses, and close to numerous existing public transportation options. As discussed in Section 16, Transportation/Circulation, within the Study Area, Rampart Boulevard, Sunset Boulevard, and Glendale Boulevard are designated for Tier 1 bicycle lanes. Beverly Boulevard and Union Avenue between Temple Street and Beverly Boulevard are designated for Tier 2 bicycle lanes, and Alvarado Street and Temple Street are designated for Tier 3 bicycle lanes. The close proximity of other destinations and public transit options, in combination with the prevalence of bicycle lanes, would encourage people to walk and bike to work or to other destinations. Bicycle parking would be provided pursuant to City ordinance.
	Reduce or recycle 70 percent of trash by 2015.	**Consistent.** The Project would be required to contract with City-approved waste haulers that meet the City's waste diversion goals and regulatory mandated waste reduction targets.

SOURCE: ESA PCR, 2017

In the First Update, however, CARB generally described the type of activities required to achieve the 2050 target: "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 rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately."[99] Due to the technological shifts required and the unknown parameters of the regulatory framework in 2030 and 2050, quantitatively analyzing the Project's impacts further relative to the 2030 and 2050 goals currently is speculative for purposes of CEQA. Moreover, CARB has not calculated and released the future emissions projections for 2030 or 2050, which are necessary data points for quantitatively analyzing a CEQA Project's consistency with these

99 CARB, First Update, p. 32, May 2014.

targets. Although the Project's operational emissions are estimated for the buildout year of 2020, the Project's operational emissions levels for future years 2030 and 2050 cannot yet be reliably quantified because they are dependent on future yet-to-be adopted GHG reduction regulations, CARB strategies under the yet-to-be-released *Second Update to the Climate Change Scoping Plan*, and future actions by utility providers and vehicle and equipment manufacturers, statewide efforts are underway to facilitate the State's achievement of the 2030 and 2050 goals and it is reasonable to expect the Project's emissions level to decline as the regulatory initiatives identified by CARB in the First Update and forthcoming Second Update are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at build-out represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the Executive Orders' and HSC Division 25.5 goals.

Cumulative Impacts

Greenhouse Gas Emissions

GHG emissions impacts are cumulative. As such, the impact discussions included above in Responses 7.a-b, address the Project's potential to result in a cumulatively considerable GHG impact. As discussed therein, impacts would be less than significant.

8. Hazards and Hazardous Materials

The following hazardous materials discussion is based, in part, on the *Environmental Site Assessment – Phase 1: Beverly and South Bonnie Brae 1800-1850 Beverly Boulevard and 114 South Bonnie Brae Street Los Angeles, California 90057* (Phase 1 ESA), prepared by Partner Engineering and Science, dated August 10, 2016. The Phase I ESA was performed in conformance with the scope and limitations of American Society for Testing and Materials (ATSM) practice (Standard E 1527-13) for the Project Site. The Phase I ESA, which is included as Appendix G, was conducted to evaluate the presence of known or suspected hazardous materials or wastes on the Project Site.

A previous Phase I Environmental Site Assessment Report was complete by Andersen Environmental (AE) in June 19, 2014 that is included as Appendix B in the Phase I ESA. The previous Phase I report did exclude the multi-family residential property at 114 South Bonnie Brae Street. The following discussion is also based on the *Phase II Subsurface Investigation Report at 1800-1850 Beverly Boulevard and 114 South Bonnie Brae Street, Los Angeles, California* (Phase II Investigation), prepared by Partner Engineering and Science, Inc., dated June 20, 2017. The purpose of the investigation was to evaluate the presence of chemicals of concern stemming from historical uses identified during the Phase I ESA. A Soil and Groundwater Management Plan was also prepared for the Project. The Phase II Investigation and Soil and Groundwater Management Plan is also included in Appendix G.

Would the project:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. Construction of the Project would involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions. Also, all construction work would be performed consistent with applicable Federal Occupational Safety and Health Administration (OSHA) Safety and Health Standards and Cal/OSHA requirements to ensure the safety and well-being of construction workers. Operation of the residential and commercial uses would involve the use and storage of small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance. The use of these materials would be in small quantities and in accordance with the manufacturers' instructions for use, storage, and disposal of such products. Therefore, operation of the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.[100] Impacts would be less than significant.

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

Less Than Significant Impact With Mitigation Incorporated. Project construction would not involve the use of hazardous materials in substantial amounts such that a measurable risk to on-site workers or off-site residents would result from temporary construction activities. However, short-term construction activities or excavation activities associated with the development of a mixed-use residential building could expose construction workers or the public to unknown hazardous materials in Site soil and/or groundwater should such materials be present.

As noted above, operation of the Project would not involve the routine use, storage, transport, or disposal of notable quantities of hazardous materials. Hazardous materials to be used in association with operation of the Project such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, would be

[100] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors regarding risk or upset/emergency preparedness, including the regulatory framework; the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; the degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance. This finding also considered screening factors related to human health hazards, including the regulatory framework for the health hazard; the probable frequency and severity of consequences to people from exposure to the health hazard; and the degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations.

The Phase I ESA and Phase II Investigation prepared for the Project identified the following items of potential environmental concern:

Asbestos Containing Materials

The Project Site is currently developed with a vacant warehouse, a commercial building occupied by multiple tenants, and a residential building. The onsite structures were built before the 1978 federal regulations banning the use of asbestos containing building materials ACBMs. Therefore, there is a potential for the presence of ACBMs in the onsite buildings, and if released into the environment, ACBMs could pose a significant hazard to construction workers or the public. If ABCM materials are encountered, Mitigation Measure HAZ-1 would require remediation or abatement of these materials in accordance with all applicable regulations and standards before building demolition commences. Adherence with Mitigation Measure HAZ-1 would reduce risk associated with ACBMs to acceptable levels and associated impacts would be less than significant.

Lead-Based Paint

Lead and lead compounds can be found in many types of paint. In 1978, the Consumer Product Safety Commission set the allowable lead levels in paint at 0.06 percent by weight in a dry film of newly applied paint. In the 1970s, the chief concern of lead paint was its cumulative effect on bodily systems, primarily when paint chips containing lead were ingested by children. As discussed above, the existing onsite buildings were constructed prior to the 1978 federal regulations banning the use of lead-based paints (LBPs). Therefore, there is potential for the presence of LBPs in the onsite buildings, which could pose a significant hazard to construction workers or the public. If LBPs are encountered, Mitigation Measure HAZ-2 would require remediation or abatement of these materials in accordance with applicable regulations and standards before building demolition commences. Adherence to Mitigation Measure HAZ-2 would reduce risks associated with lead-based paints to an acceptable level and associated impacts would be less than significant.

PCBs

Polychlorinated biphenyls (PCBs) were once used as industrial chemicals whose high stability contributed to both their commercial usefulness and their long-term deleterious environmental and health effects. These substances have been listed as carcinogens by the Environmental Protection Agency (EPA). PCBs were banned from general commercial use in 1977. PCBs are regulated by the EPA under the Toxic Substances Control Act (TSCA). The TSCA contains provisions controlling the continued use and disposal of existing PCB-containing equipment. Items which may potentially impact the Project site with PCBs include electrical capacitors and transformers, fluorescent light ballasts, hydraulic oils used in hydraulic lifts and elevators, vacuum pumps, gas turbines, and other petroleum products manufactured prior to the 1977 ban.

At the Project Site, dismantled aboveground hydraulic lifts were observed at the existing vacant warehouse structure during the site reconnaissance, as well as small quantities of hydraulic oil within a vacuum pump radiator. The age of this equipment is not known, therefore there is the potential that the hydraulic fluid may contain PCBs. Based the small quantity observed, the Phase 1 ESA determined that any impacts related to PCBs would be less than significant.

No other potential PCB-containing equipment (transformers, oil-filled switches, hoists, lifts, dock levelers, hydraulic elevators, etc) was observed on the subject property during Phase I ESA investigation.

Methane

The Project Site has been identified by the City of Los Angeles Department of Building and Safety to be within a "Methane Zone." These areas have a risk of methane intrusion emanating from geologic formations. Due to the potential environmental risk associated with construction in a Methane Zone, the Project would be subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City of Los Angeles. Development would occur per the provisions of the City of Los Angeles Building Code, Chapter 71 Methane Mitigation Standards Ordinance. This ordinance provides information describing the installation procedures, design parameters and test protocols for methane gas mitigation systems. More specifically, the Methane Mitigation Standards ordinance defines requirements for site testing, methane mitigation systems, and ventilation systems. Site Design Levels are categorized as Level I through Level V. As part of the Phase II analysis and testing, methane was detected in each of the soil gas probes conducted on the Project Site with methane detected between 2,000 and 3,000 ppmv. These concentrations coincide with LADBS Level III Minimum Methane Mitigation Requirements. Per Chapter 71, the Project would be subject to the design and permitting requirements established by LADBS as defined in Section 91.7102 of the Municipal Code for a Project Site located within a Methane Zone.

Compliance with City requirements would ensure that the Project would not result in reasonably foreseeable upset or accident conditions involving the release of methane gas into the environment, with impacts being less than significant. Therefore, impacts related to methane would be less than significant.

Radon Gas

Radon is a colorless, odorless, naturally occurring, radioactive, inert, gaseous element formed by radioactive decay of radium (Ra) atoms. The US EPA has prepared a map to assist National, State, and local organizations to target their resources and to implement radon-resistant building codes. The map divides the country into three Radon Zones, according to the list below:

EPA RADON ZONES

EPA Zones	Average Predicted Radon Levels	Potential
Zone 1	*Exceed 4.0 pCi/L*	*Highest*
Zone 2	*Between 2.0 and 4.0 pCi/L*	*Moderate*
Zone 3	*Less than 2.0 pCi/L*	*Low*

The Project Site within the EPA classification as Zone 2 (Moderate). Due to the Zone 2 classification and the design of the Project which would include a half level of fully subterranean parking and ground floor commercial development and parking, radon is not considered to be a significant environmental concern for the Project Site. Therefore, impacts related to radon would be less than significant.

Recognized Environmental Conditions

The Phase I ESA evaluated the presence of Recognized Environmental Conditions (RECs) through a Project Site reconnaissance, interviews, Sanborn Maps, research of land use records, and aerial photography review. The Phase I ESA also contained a database search of government record sources, (e.g., EDR Radius Report, U.S. Protection Agency, Department of Health Services, and Regional Quality Control Board other sources for preliminary indications of hazardous material use, storage, or disposal at the Project Site and within a one-mile radius of the Project Site).

The Phase I ESA identified the following recognized environmental conditions (REC):

According to the review of regulatory and historical records, the Project Site was historically occupied by numerous tenants with known or suspected hazardous substance use. The commercial building on the northeast portion of the Project Site included tenants with a machine shop, auto repair facilities and auto repair uses.

The currently vacant warehouse building on the northwest portion of the Project Site was identified as historically occupied by printing operations, and machine shop operations. While no auto repair tenant was identified at this location, the presence of a reported in ground hydraulic lifts and observed dismantled aboveground hydraulic lifts is indicative that auto repair operations may have been conducted. A Limited Soil and Soil Vapor Investigation report (dated August 18, 2014) was conducted to assess the impacts of these former operations. The soil vapor samples analyzed identified evidence of volatile organic compounds (VOCs). These concentrations present a preliminary possibility of vapor intrusion into the vacant warehouse building and a potential concern to groundwater based upon a depth to groundwater. The prior automotive, printing, and mechanical services typically include the use, storage, generation, and/or disposal of petroleum products; solvents; waste ink and ink sludge with solvents; waste oil; and solvents. The presence of historic tenants with operations of environmental concern for at least 58 years and documented VOC impacted soil vapor beneath the vacant warehouse building considered to represent a recognized environmental condition.

According to the regulatory database report, a review of regulatory records, and a previous Phase I report (2014), a 12,000-gallon underground storage tank (UST) containing motor vehicle fuel was installed on the subject property in 1979. The UST was reportedly steel construction and a permit for a gasoline storage and dispensing facility with one nozzle was issued to this former tenant in 1981. No other information about this UST was identified in the regulatory database report or regulatory records reviewed. No indications of a former UST were observed onsite, during the site reconnaissance of the Phase I ESA. The previous subsurface investigation conducted in 2014 as part of the previous Phase I report included a geophysical survey to attempt to identify the location of the UST. The location of the UST was not identified during that assessment. Based on the limited subsurface sampling conducted, the 12,000-gallon is considered to be a REC.

According to information in the previous Phase I report, seven 55-gallon drums and one approximately 30-gallon drum containing waste oil and waste oil mixed with water, and waste oil filters with minimal liquid were observed in the southern portion of the Project Site (southeastern perimeter of the storage shed). Stained soil was observed around the drums. The outer surfaces of the drums and surrounding ground surfaces were observed to be stained with oil. These circumstances have the potential to impact the Project Site and are considered to be a REC.

A former drycleaning business occupied the Project Site in the commercial building from as early as 2006 to 2012. Dry cleaning operations typically use chlorinated solvents, particularly tetrachloroethylene (PCE), during the dry cleaning process. Based on the duration of dry cleaning operations on-site, the lack of previous subsurface investigations, and the nature of dry cleaning chemicals, the presence of the dry cleaning business is considered a REC.

As such, the Phase I ESA deemed that these historic uses constituted a REC which warranted further investigation. As indicated in the Phase II, a Phase II Subsurface Investigation at the Project Site was conducted to investigate the potential impact of VOCs and/or methane to soil gas, soil, and/or groundwater as a consequence of a release or releases from the above discussed RECs.

As part of the Phase II investigation,12 soil borings for the collection of representative soil, soil gas and groundwater samples were collected. Seven soil samples, 23 soil gas samples, and five soil gas samples were analyzed for VOCs. Soil gas probes were additionally monitored for methane. Four duplicate soil samples were also collected from geotechnical borings and analyzed for TPH-cc, VOCs, and CAM 17 metals.

Based on borings conducted at the Project Site, the stabilized groundwater level at the Project Site is between 20 and 22 feet below ground surface (bgs) TPH-cc and VOCs were not detected in the analyzed duplicate soil samples that were collected from the geotechnical borings. None of the detected metals in the analyzed duplicate soil samples exceeded residential or commercial screening levels.

None of the seven analyzed soil samples contained detectable concentrations of VOCs above residential or industrial screening levels and none of the five analyzed groundwater samples

contained detectable concentrations of VOCs above laboratory Practical Quantitation Limits (PQLs) and the PQLs did not exceed the screening levels.

Five soil gas samples contained detectable concentrations of VOCs above residential screening levels; however, none of the detected concentrations were above commercial/industrial screening levels.

Based on the proposed Project's lower level parking/commercial use, the lack of ground floor residential tenants, the lack of detections in soil above direct-contact screening levels, and the lack of detections in groundwater, the concentrations of VOCs in soil gas above residential screening levels do not represent a human health risk to the Project through the vapor intrusion pathway.

As such, the Phase II investigation recommended no further investigation with respect to the on-site RECs. However, given the historic operations at the Project Site that used or stored chemical compounds, it is possible some contaminated soil, USTs or other associated infrastructure could be encountered during construction of the Project. To minimize this risk, the Project would include PDF-HAZ 1, which would include a Soil Management Plan (SMP). The SMP would provide safety guidance to contractors for on the appropriate screening and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. The SMP would also include procedures for the safe handling and transportation of soils that could potentially impact nearby sensitive receptors such as the Union Avenue Elementary School. The SMP would also include protocols in the event that USTs or other associated infrastructure are encountered during grading or construction activities.

As groundwater is presently underlying the Project near the proposed lower parking level subgrade elevation, a program of pre-construction dewatering may be required in order to allow the excavation and installation of the subgrade parking level and would continue throughout the construction. To minimize the risk of potentially impacted soils from contacting and contaminating groundwater during construction, the Project would include PDF HAZ-2, which would include a Groundwater Management Plan (GWMP). The GWMP would include training and protocols for contractors for segregating potentially impacted soils and avoiding contact with groundwater during excavation and construction of the subterranean parking.

In conjunction with the SMP and GWMP, a health and safety plan (HASP) (PDF HAZ-3) would be prepared that would include safety requirements to reduce impacts for construction workers when handling soil potentially contaminated soils or encountering undocumented subsurface features of potential environmental concern (e.g., USTs, abandoned oil wells, sumps, hydraulic lifts, clarifiers, buried drums).

With implementation of PDF HAZ-1 impacts related to potentially contaminated soils or undocumented subsurface features of potential environmental concern during construction would remain less than significant. With implementation of PDF HAZ-2, impacts on groundwater would remain less than significant. With implementation of the PDF HAZ-3, hazard impacts to construction workers would remain less than significant.

Project Design Features

PDF HAZ-1: A Soil Management Plan (SMP) shall be prepared that will provide guidance to contractors for appropriate handling, screening, and management of potentially impacted or impacted soils from historical operations that may be encountered at the Project Site during grading and excavation activities. These procedures would include training for construction personnel on the appropriate procedures for identification of suspected impacted soils; requirements for testing and collection of potentially contaminated soils; segregation of potentially impacted soils; and applicable soil handling and disposal procedures. The SMP shall also contain procedures to be followed in the event that undocumented subsurface features of potential environmental concern (e.g., USTs, abandoned oil wells, sumps, hydraulic lifts, clarifiers, buried drums) are encountered during the excavation grading, and/or other earthmoving activities. These procedures would include safety training, testing protocols, decontamination and decommission standards, and notification to the appropriate relevant regulatory oversight agency or agencies.

The SMP would also include procedures for handling and transportation of soils with respect to nearby sensitive receptors, such as nearby residential uses, religious uses, and schools. In accordance with SCAQMD Rule 1166 requirements, impacted soil removed from the Project Site shall comply with the following:

- Be transported to an approved treatment/disposal facility.
- When loading into trucks is completed, and during transportation, no excavated material shall extend above the sides or rear of the truck or trailer.
- Prior to covering/tarping, loaded impacted soil shall be wetted by spraying with dust inhibitors.
- The trucks or trailers shall be completely covered/tarped prior to leaving the Project Site to prevent particulate emissions to the atmosphere.
- The exterior of the trucks (including the tires) shall be cleaned off prior to the trucks leaving the excavation location.

With implementation of the SMP, impacts related to potentially contaminated soils or undocumented subsurface features of potential environmental concern during construction would remain less than significant.

PDF HAZ-2: A Groundwater Management Plan (GWMP) shall be prepared that includes training and protocol procedures to contractors for segregating potentially impacted soils and avoiding contact with groundwater during excavation and construction of the subterranean parking. In the unlikely event that groundwater contamination occurs, the GWMP includes remedial efforts that may include batch extraction of groundwater using an on-site dewatering system or application of a chemical amendment, such as oxygen or hydrogen source depending on the type of contamination impact. With implementation of the GWMP, impacts on groundwater would remain less than significant.

PDF-HAZ-3: In conjunction with the SMP and GWMP, a health and safety plan (HASP) would be prepared that would include safety requirements to reduce impacts for construction workers when handling soil potentially contaminated soils or encountering undocumented subsurface features of potential environmental concern (e.g., USTs, abandoned oil wells, sumps, hydraulic lifts, clarifiers, buried drums). The HASP shall include guidelines and/or procedures for controlling/minimizing exposures to hazards, including worker safety training and standards for the appropriate level(s) of personal protective equipment (PPE) that may be required. With implementation of the HASP, hazard impacts to construction workers would remain less than significant.

Mitigation Measures

HAZ-1: Prior to the issuance of any permit for the demolition or alteration of the existing on-site building, a comprehensive ACBMs survey of the buildings shall be performed. If no ACBMs are found, the project applicant shall provide a letter to the City of Los Angeles Building and Safety Division from a qualified asbestos consultant indicating that no ACBMs are present in the onsite buildings. If ACBMs are found to be present, they should be abated in compliance with the South Coast Air Quality Management District's Rule 1403 as well as other applicable State and Federal rules and regulations.

HAZ-2: Prior to issuance of any permit for the demolition or alteration of the existing structures, a comprehensive lead-based paint materials survey shall be performed to the written satisfaction of the City of Los Angeles Building and Safety Division. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

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

Less Than Significant Impact. The nearest schools to the Project Site are the Union Avenue Elementary School located approximately 70 feet to the east and the Sal Castro Middle School located 0.24 miles to the southeast. To minimize the risk of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities, the Project would include PDF HAZ-1 that would include the preparation of a SMP. The SMP would include guidance to contractors for appropriate screening, and management of potentially impacted or impacted soils that may be encountered during grading and excavation activities. The SMP would also include procedures for the safe handling and transportation of soils on the Project Site that may impact sensitive receptors such as schools.

Construction of the Project would also involve the temporary use of hazardous substances in the form of paint, adhesives, surface coatings and other finishing materials, and cleaning agents, fuels, and oils. All construction materials would be used, stored, and disposed of in accordance with applicable laws and regulations and manufacturers' instructions and are not expected to cause risk to the public or nearby schools. With implementation of PDF HAZ-1, construction impacts would be considered less than significant.

The types of hazardous materials to be used in association with the operation of the Project such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, operation of the Project would not create a significant risk of exposure to hazardous materials for the public or the environment, including schools.[101]

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

Less Than Significant Impact. Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992 and information regarding the Cortese List is now compiled on the websites of the Department of Toxic Substances Control (DTSC), the State Water Board, and CalEPA. The DTSC maintains the EnviroStor database, which includes sites on the Cortese List and also identifies potentially hazardous sites where cleanup actions (such as a removal action) or extensive investigations are planned or have occurred. The database provides a listing of Federal Superfund sites [National Priorities List (NPL)]; State Response sites; Voluntary Cleanup sites; and School Cleanup sites. Geotracker is the State Water Resources Control Board's data management system for managing sites that impact groundwater, especially those that require groundwater cleanup [USTs, Department of Defense, Site Cleanup Program] as well as permitted facilities such as operating USTs and land disposal sites. CalEPA's database includes lists of sites with active Cease and Desist Orders (CDO) or Cleanup and Abatement Orders (CAO) from the State Water Board.

As part of the Phase I ESA, a search was conducted for available Federal, State, and local environmental database records for the Project Site and where practicable, adjoining properties and nearby properties or surrounding areas within approximate minimum search distances from the Project Site. According to the review of environmental database records the Project Site has been occupied by various businesses included automotive, printing, and mechanical services on-site from at 1951 through 2012. In addition, one of the tenants on the Project Site has been occupied by a dry cleaning business from as early as 2006 to 2012.

Specifically, uses on the Project Site have been identified as a SWRCY (Recycling facilities in California), Historic UST (HIST UST), California Facility Inventory Database (CA FID UST), Statewide Environmental Evaluation and Planning System (SWEEPS UST), Resource Conservation and Recovery Act (RCRA) Non-Generator (NonGen), Facility Index System

[101] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors related to human health hazards, including the regulatory framework for the health hazard; the probable frequency and severity of consequences to people from exposure to the health hazard; and the degree to which project design would reduce the frequency of exposure or severity of consequences of exposure to the health hazard.

(FINDS), Enforcement and Compliance History Online (ECHO), EDR Hist Auto, EDR Hist Cleaner, and Facility and Manifest Data (HAZNET) site in the regulatory database report. These uses are detailed below:

- Fela Recycling located at 1800 West Beverly Boulevard is reported as a SWRCY site. This facility is reported began operations in 2012 and was operating at the time of the Phase I analysis. This tenant serves as a collection point for recyclable goods (plastic, aluminum, and glass) and is not documented as handling hazardous waste. Based on the nature of operations, the Phase I analysis determined that this listing did not represent a significant environmental concern.
- The Project Site was identified as having been formerly occupied by Auto Smog Agency/New Yucatan Transmission at 1800 West Beverly Boulevard, from 2002 to 2006. Air Doc Plus at 1800 West Beverly Boulevard reportedly disposed of aqueous solution with total organic residues less than 10 percent during 1999, and other organic solids and tank bottom wastes during 2014. The building addressed at 1800 West Beverly Boulevard has also been occupied by auto repair facilities from at least 1990 to 2008. Auto repair use may have been conducted since at least 1971 as RV AIRCO was identified in the 1971 city directories, but the nature of operations is not known. Auto repair operations typically include the storage and handling of petroleum, petroleum-based products, solvent, and waste oil.
- KM Laundry at 107 South Burlington Avenue, and is reported as an EDR Hist Cleaner site. According to a review of historical and regulatory records and the site reconnaissance, tenant space 111 South Burlington Avenue, was identified as formerly occupied by KM Coin Laundry and Dry Cleaners. This tenant reportedly occupied the property from as early as 2006 to 2012. According to regulatory information and information contained in the previous report, no listings of the use, storage, or disposal of hazardous substances were identified in association with the former dry cleaning tenant.

  Additionally, no regulatory records identified the installation, removal of operation of dry cleaning equipment at this location. This tenant operated during a time of strict regulatory oversight when the undocumented use of chlorinated solvents is not expected. Based on this information, this former tenant is not expected to represent a significant environmental concern
- In addition, according to the regulatory database report, a 12,000-gallon underground storage tank (UST) containing motor vehicle fuel was installed on the Project Site in 1979. . The regulatory database lists Pacific Bell as the operator of this UST, producing both large and small quantities of unnamed hazardous wastes. No information pertaining to the exact location, removal dates, or tank construction was available.

The adjacent property to the west-northwest was identified as an EDR Hist Cleaner site; the adjacent property to the northwest was identified as a RCRA- Small Quantity Generator (SQG), FINDS, ECHO site; and the adjacent property to the northwest was identified as an EDR Hist Cleaner site in the regulatory database. These uses are summarized below:

- Chavez Cleaning Concepts at 119 South Bonnie Brae Street, is located adjacent to the west-northwest of the subject property. This site is reported as an EDR Hist Cleaners site during 2004. No other listings were identified for this address associated with the use, storage, disposal, or release of hazardous substances. Based on the lack of reported releases, this listing is not expected to represent a significant environmental concern.

- The adjacent property to the northwest identified as Apollo Magnetics at 1900 West Beverly Boulevard, is reported as a RCRA-SQG, FINDS, and ECHO site. This facility was listed as a SQG in 1992 for unreported type(s) of waste. No other listings were identified for this address associated with the release of hazardous substances. Based on the lack of a reported release, this listing is not expected to represent a significant environmental concern.
- Union Avenue Elementary School at 150 South Burlington Avenue, is located adjacent to the south-southwest of the subject property. This site is was identified as a RCRA-LQG in 2009 and was also identified in the ECHO and FINDS databases. This facility reported the generation of lead wastes. No violations are reported. Based on the type of waste reported, and lack of a reported release, this listing is not expected to represent a significant environmental concern.

As discussed in Response 8.b., as part of the Phase II investigation, a Phase II Subsurface Investigation at the Project Site was conducted to investigate the potential impact of VOCs and/or methane to soil gas, soil, and/or groundwater as a consequence of a release or releases from the above discussed historic uses. Analysis in the Phase II investigation indicated that TPH-cc and VOCs were not detected in the analyzed duplicate soil samples that were collected from the geotechnical borings. None of the detected metals in the analyzed duplicate soil samples exceeded residential or commercial screening levels.

None of the seven analyzed soil samples contained detectable concentrations of VOCs above residential or industrial screening levels and none of the five analyzed groundwater samples contained detectable concentrations of VOCs above laboratory Practical Quantitation Limits (PQLs) and the PQLs did not exceed the screening levels.

Five soil gas samples contained detectable concentrations of VOCs above residential screening levels; however, none of the detected concentrations were above commercial/industrial screening levels.

Based on the proposed Project's lower level parking/commercial use, the lack of ground floor residential tenants, the lack of detections in soil above direct-contact screening levels, and the lack of detections in groundwater, the concentrations of VOCs in soil gas above residential screening levels do not represent a human health risk to the Project through the vapor intrusion pathway.

Furthermore, the Project would not contain uses that would exacerbate existing environment conditions. No off-site facilities were listed on the databases reviewed that would appear to present an environmental concern for the project site. As such, impacts with respect to hazardous materials lists would be less than significant.

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

f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact (e and f). The Project Site is not located within an airport land use plan or within two miles of a public or private airport. The nearest airports are the Hollywood Burbank Airport, Hawthorne Municipal Airport and Santa Monica Municipal Airport, located approximately10.1, 10.5 and 11.1 miles from the Project Site, respectively. Therefore, the Project would not result in an airport-related safety hazard for people residing or working in the Project area, and no impact would occur in this regard.[102]

g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Project Site is located in an established urban area that is well served by a roadway network. As shown the City of Los Angeles Safety Element, Critical Facilities and Lifeline Systems, Temple Street and Alvarado Street are Selected Disaster Routes that could be utilized during a disaster event.[103] Beverly Boulevard is an identified secondary disaster route per the Los Angeles County Department of Public Works.[104] While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In addition, in accordance with City of Los Angeles requirements, the Project would develop a Construction Management Plan (PDF TRAF-1), to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Project operation would generate traffic in the Project vicinity and would result in some modifications to access from the streets that surround the Project Site. However, emergency access to the Project Site and surrounding area would continue to be provided as under existing conditions. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. Project Site access and circulation plans would be subject to review and approval by the Los Angeles Fire Department (LAFD).

Since the Project would not cause an impediment along the City's designated emergency evacuation route, and the proposed residential and commercial uses would not impair implementation of the City's emergency response plan, the Project would have a less than

[102] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors regarding risk or upset/emergency preparedness, including the regulatory framework; the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; the degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance. Significance thresholds relating to fire protection and emergency medical services were also taken into account, as a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

[103] City of Los Angeles General Plan Safety Element Exhibit H, Critical Facilities and Lifeline Systems, November *26,* 1996.

[104] https://dpw.lacounty.gov/dsg/DisasterRoutes/

significant impact with respect to these issues.[105] As such, no further evaluation of this topic or mitigation measures are necessary.

h. Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands caused in whole or in part from the project's exacerbation of existing environmental conditions?

No Impact. The Project Site is highly urbanized and does not contain wildland features. In addition, the Project Site is not located adjacent to any wildland areas. Therefore, development of the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.[106] No impacts would occur in this regard.

Cumulative Impacts

Hazards and Hazardous Materials

Many of the related projects would use, handle, store, and/or transport hazardous materials or require demolition of structures containing such materials. Related projects would be required to use, store, and transport all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with Federal, State, and local health and safety standards and regulations. Compliance with existing standards and regulations would ensure that the related projects would not result in significant impacts to the public or the environment through the routine transport, storage, use, or handling of hazardous materials. Some of the related project may be on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, each related project would be required to comply with existing Federal, State, and local regulations related to hazardous materials sites, including cleanup sites, and hazardous materials generators. Some of the related projects also would be constructed within Methane Zones.

Related projects in the area located within Methane Zones would be subject to developmental regulations pertaining to ventilation and methane gas detection systems that are mandated by the City of Los Angeles and would reduce impacts with respect to releases or accidents related to methane gas to less than significant. Some of the related projects may also include the use of hazardous materials within one-quarter mile of a school. However, related projects would be

[105] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors regarding risk or upset/emergency preparedness, including the regulatory framework; the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; the degree to which the project may require a new, or interfere with an existing, emergency response or evacuation plan, and the severity of the consequences; and the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance. Significance thresholds relating to fire protection and emergency medical services were also taken into account, as a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

[106] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds relating to fire protection and emergency medical services, as a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

subject to environmental review to evaluate potential impacts from hazardous materials releases within one-quarter mile of a school, reducing impacts to less than significant.

Related projects are all located highly urbanized areas, would not contain wildland features, and are not located adjacent to any wildland areas. Therefore, development of related projects would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires.

Operation of related projects would generate traffic in the Project vicinity and would result in some modifications to access from the streets that surround the Project Site. However, any changes to access and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. All access and circulation plans would be subject to review and approval by the LAFD. Accordingly, impacts related to interference with an adopted emergency response plan or emergency evacuation plan from related projects would be less than significant.

The Project would also be required to use, store, and transport all potentially hazardous materials in accordance with the manufacturers' instructions and handle materials in accordance with Federal, State, and local health and safety standards and regulations. Compliance with existing standards and regulations would ensure that the Project impacts to the public or the environment through the routine transport, storage, use, or handling of hazardous materials would be less than significant. The Project would also be required to comply with existing Federal, State, and local regulations related to hazardous materials sites, including cleanup sites, and hazardous materials generators.

To minimize the risk of potentially contaminated soil during construction of the Project or the potential for encountering USTs or other associated the Project would include PDF HAZ-1, which would include a SMP that would provide safety guidance to contractors for on the appropriate screening and management of potentially impacted or impacted soils that may be encountered at the Project Site during grading and excavation activities. SMP would also include protocols in the event that USTs or other associated infrastructure are encountered during grading or construction activities.

To minimize the risk of potentially impacted soils from contacting and contaminating groundwater during construction, the Project would include PDF HAZ-2, which would include a GWMP. The GWMP would include training and protocols for contractors for segregating potentially impacted soils and avoiding contact with groundwater during excavation and construction of the subterranean parking.

In conjunction with the SMP and GWMP, PDF HAZ-3, includes preparation HASP that would include safety requirements to reduce impacts for construction workers when handling soil potentially contaminated soils or encountering undocumented subsurface features of potential environmental concern (e.g., USTs, abandoned oil wells, sumps, hydraulic lifts, clarifiers, buried drums). The HASP shall include guidelines and/or procedures for controlling/minimizing exposures to hazards, including worker safety training and standards for the appropriate level(s) of personal protective equipment (PPE) that may be required.

Adherence to Mitigation Measures HAZ-1 and HAZ-2 along with adherence to regulations would reduce Project related risks associated with ACBMs and LBPs, to less than significant. With implementation of PDF HAZ-1, PDF HAZ-2, and PDF HAZ-3, hazards related to potentially contaminated soils or undocumented subsurface features of potential environmental concern would remain less than significant.

As mentioned previously, as the Project Site is located within a Methane Zone, it would be subject to the requirements of the City of Los Angeles Building Code, Chapter 71, and would be required to implement a methane mitigation system. Compliance with City requirements would ensure that the Project would not result in reasonably foreseeable upset or accident conditions involving the release of methane gas into the environment.

The Project is located within one-quarter mile of a school. The Project would include PDF HAZ-1 that would include the preparation of a SMP. The SMP would also include procedures for the safe handling and transportation of soils on the Project Site that may impact sensitive receptors such as schools close to the Project Site. The types of hazardous materials to be used in association with operation of the Project such as small quantities of potentially hazardous materials in the form of cleaning solvents, painting supplies, pesticides for landscaping, and pool maintenance would be contained, stored, would be used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Therefore, impacts would be less than significant. The Project is in a highly urbanized area and does not contain wildland features and is not located adjacent to any wildland areas. Therefore, development of the Project would not expose people or structures to a significant risk of loss, injury, or death involving wildland fires. Since the Project would not cause an impediment along the City's designated emergency evacuation route, and the proposed residential and commercial uses would not impair implementation of the City's emergency response plan, the Project would have a less than significant impact with respect to these issues.

As such, the Project's contribution to cumulative hazards and hazardous materials impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

9. Hydrology and Water Quality

The following impact analysis pertaining to hydrology and water quality includes information on the existing and proposed topography/drainage and infrastructure for the Project Site prepared by Brandow & Johnston, Inc. These are included in Appendix H of this MND.

Would the project:

a. Violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. The approximately 1.65-acre Project Site is currently developed with three buildings and related surface parking and limited areas of landscaping. The Project Site generally slopes generally slopes northwest toward the corner of South Bonnie Brae Street and West Beverly Boulevard at a rate of about 3.4 percent. There does not appear to be any existing on-site storm drainage system and therefore, nearly all storm drainage flows to curbs and gutters along the adjacent streets to an existing curb opening catch basin located at the intersection of Bonnie Brae Street and 2nd Street. This catch basin connects to an existing 16-inch main line within 2nd Street to the south of the Project Site that is owned and maintained by the City of Los Angeles.

Construction of the Project would require earthwork activities, including grading of the Project Site. During precipitation events in particular, construction activities associated with the Project have the potential to result in soil erosion during grading and soil stockpiling, subsequent siltation, and conveyance of other pollutants into municipal storm drains. In addition, groundwater is present underlying the site near the proposed lower parking level subgrade elevation. Therefore, a program of pre-construction dewatering may be required in order to allow the excavation and installation of the subgrade parking.

Dewatering, treatment, and disposal of groundwater would be conducted in accordance with permitted requirements set forth by the Los Angeles Regional Water Quality Control Board (LARWQCB)'s Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit specifies groundwater discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater discharges. In addition, to minimize potential hazards associated with potentially impacted or impacted soils contacting and contaminating groundwater during construction, the Project would include PDF HAZ-2, which would include the development of a Groundwater Management Plan (GWMP). The GWMP would include training and protocols to contractors for segregating potentially impacted soils and avoiding contact with groundwater during excavation and construction of the subterranean parking. In the unlikely event that groundwater contamination occurs, the GWMP includes remedial efforts. Compliance with the applicable groundwater regulatory requirements and implementation of PDF HAZ-2 would avoid adverse effects on groundwater quality.

Construction would occur in accordance with City Building Code Chapter IX, which requires necessary permits, plans, plan checks, and inspections to reduce the effects of sedimentation and erosion. In addition, the Project would require approval of an erosion control plan and would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the National Pollutant Discharge Elimination System (NPDES) permit. The SWPPP incorporates best-management practices (BMPs) in accordance with the City of Los Angeles' Best

Management Practices Handbook, Part A Construction Activities to control erosion including grading and dust control measures.

For any grading projects occurring during the rainy season (October 1st to April 14th), a Wet Weather Erosion Control Plan (WWECP) is required pursuant to the "Manual and Guideline for Temporary and Emergency Erosion Control," adopted by the City of Los Angeles Board of Public Works (BPW). The WWECP addresses water pollution control from grading activities during the wet weather season by specifying the use of appropriate temporary erosion and sediment control BMPs. Compliance with the City of Los Angeles requirement to prepare a WWECP would ensure that impacts to water quality during the rainy season would be less than significant.

The Project would be designed to comply with the City of Los Angeles's Low Impact Development (LID) design standard. To facilitate this, the Project proposes as a BMP, EPIC planters with storage. EPIC planter systems use capillary attraction to provide a system of sub-surface irrigation and drainage. Stormwater runoff is retained and held in the EPIC system for re-use or slowly released in a controller manner. The entirety of the building's roof drains would be diverted to the EPIC planters with storage and the overflow discharge would be discharged to South Bonnie Brae Street via a curb drain or parkway drain.

The design of structural BMP(s) would be in accordance with the City of Los Angles Development Best Management Practices Handbook, Part B Planning Activities which summarizes the City's review and permitting process, identifies stormwater mitigation measures, and references source and treatment control BMP information. The final selection of any BMPs would be completed through coordination with the City of Los Angeles. Compliance with the applicable stormwater regulatory requirements would ensure impacts to water quality during Project operation would be less than significant.[107]

b. Substantially deplete groundwater supplies or interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?

Less Than Significant Impact. The Project Site is located in the northern edge of the Central Groundwater Basin. The Basin covers approximately 270 square miles and is bordered on the north by the Santa Monica Mountains and to the north and east by the Elysian Hills.

The Project Site is located in a highly urbanized area of Los Angeles and is currently developed with three buildings, a shed, and an associated asphalt-paved surface parking lot. As such, the site does not currently provide a substantial opportunity for recharge of groundwater. According to

[107] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds relating to surface water quality, as a project would could have a significant impact on a surface water quality if discharges associated with the project would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

the Preliminary Geologic and Geotechnical Engineering Investigation prepared for the Project, no active surface groundwater seeps or springs were observed on the Project Site. Based on borings conducted at the Project Site, the stabilized groundwater level at the Project Site is between 20 and 22 feet below ground surface (bgs). The Project does not propose the development of long-term groundwater production wells.

During construction, groundwater may be encountered near the proposed lower parking level subgrade elevation. Therefore, a program of pre-construction dewatering may be required in order to allow the excavation and installation of the subgrade parking. The dewatering would continue throughout the construction, but permanent dewatering would not occur. Construction of lower subterranean parking level would be designed for the potential impacts of the water. The retaining walls and slab would be designed for hydrostatic pressures below this level.

Given the size of the Project Site at approximately 1.65 acres and the temporary nature of construction activities, while some dewatering could be necessary during construction activities, such dewatering activities would be temporary and would not be of an extent that would substantially alter groundwater supplies.

Operation of the Project would decrease the amount of impervious surface area on the Project Site from 99 percent under existing conditions to 95 percent after development is completed. This would create a negligible increase in the opportunity for potential increases in recharge. Therefore, the proposed building and paved surfaces would not substantially deplete groundwater supplies nor interfere with groundwater recharge. With implementation of City of Los Angeles LID requirements, including those described under Response No. 9.a, above, impacts with respect to the depletion of the groundwater table would be less than significant.

Therefore, operation of the Project would not substantially affect groundwater levels beneath the Project Site, including depleting groundwater supplies or resulting in substantial net deficit in the aquifer volume or lowering of the groundwater table. Impacts on groundwater during operation of the Project would be considered less than significant, and no mitigation measures are required.[108]

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The Project Site's existing impervious area is approximately 99 percent of the Project Site. There does not appear to be any existing on-site storm drainage

[108] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds relating to surface water quality, as a project would could have a significant impact on a surface water quality if discharges associated with the project would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. This finding also considered significance thresholds regarding groundwater levels, as a project would normally have a significant impact if it would change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or to respond to emergencies and drought; or reduce yields of adjacent wells or well fields (public or private); or adversely change in demonstrable and sustained reduction of groundwater recharge capacity.

system and nearly all drainage sheet flows to curb and gutter along the adjacent streets to an existing public curb opening catch basin located at the intersection of South Bonnie Brae Street and 2nd Street.

The existing Site runoff for a 50-year storm event is 5.31 cubic feet per second (cfs). After development of the Project, the amount of impervious area would decrease slightly to 95 percent Project would result in a Site runoff for a 50-year storm event of 4.70 cfs.

As discussed in Response No. 9.a above, the Project would be designed to comply with the City of Los Angeles's LID design standard. The proposed stormwater BMP would require EPIC planters with water storage and the overflow discharge will be discharged to South Bonnie Brae Street via a curb drain or parkway drain. The Project would have an impervious area percentage of 95 percent, a decrease of four percent from existing conditions. Therefore, compared to the existing peak flow rate of 5.31cfs, the Project would lessen the overall stormwater runoff. Further, Project construction would comply with applicable NPDES and City requirements including those regarding preparation of a Project-specific Stormwater Pollution Prevention Plan (SWPPP and Standard Urban Stormwater Management Plan (SUSMP)). Pursuant to the City's LID Ordinance, the Project would be required to capture and manage the first three-quarters of an inch of runoff flow during storm events as defined in the City's SUSMP BMPs. As described earlier, the EPIC planters meet the City of Los Angeles' stormwater capture and reuse criteria and LID design standards. The EPIC planter system uses capillary attraction to provide a system of sub-surface irrigation and drainage. Stormwater runoff would be retained and held in the EPIC system for re-use or slowly released in a controller manner. As such, less than significant impacts associated with alterations to existing drainage patterns would occur with Project implementation. [109]

d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?

Less Than Significant Impact. As discussed in Response No. 9.c, the Project would reduce the amount of impervious surface area on the Site and, thus, would not result in substantial increases in surface water runoff quantities. With implementation of the Project, EPIC planters with water storage would be provided and the overflow discharge will be discharged to South Bonnie Brae Street via a curb drain or parkway drain. With implementation of the Project, existing drainage

[109] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds relating to surface water hydrology, as a project could have a significant impact on water hydrology if it would cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources; substantially reduce or increase the amount of surface water in a water body; or result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow. This finding also considered significance thresholds related to surface water quality, as a project would could have a significant impact on a surface water quality if discharges associated with the project would create pollution, contamination or nuisance as defined in Section 13050 of the California Water Code or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body.

patterns would not be substantially altered, and the Project would include appropriate on-site drainage improvements to convey anticipated stormwater flows. Thus, Project implementation would not result in a substantial increase in the rate or amount of surface water runoff that would result in flooding on- or off-site. Because existing drainage patterns would not be altered, the Project would result in less than significant impact with respect to the alteration of existing drainage patterns.[110]

e. 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. As discussed above, the Project would increase the Project Site's permeability and would, thus, decrease surface water runoff. The City Los Angeles Bureau of Engineering requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. Dewatering, treatment, and disposal of groundwater would be conducted in accordance with permitted requirements set forth by the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit specifies groundwater discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater discharges. In addition, the Project would include appropriate on-site drainage improvements to accommodate anticipated stormwater flows. With implementation of the Project, EPIC planters with water storage would be provided and the overflow discharge will be discharged to South Bonnie Brae Street via a curb drain or parkway drain. Similar to existing conditions, operation of the proposed uses would generate pollutant constituents commonly associated with urban uses to surface water runoff. However, required water quality control measures would be implemented as described in Response No. 9.a, above. Therefore, the Project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.[111]

f. Otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed above, the Project would comply with the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. The Project would comply with applicable NPDES and City requirements, which

[110] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds relating to surface water hydrology, as a project could have a significant impact on water hydrology if it would cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources; substantially reduce or increase the amount of surface water in a water body; or result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

[111] Ibid.

would include the use of BMPs during construction and operation of the Project as detailed in a SWPPP and SUSMP. In addition, the Project would include PDF HAZ-2 which would include a GWMP. The GWMP would include training and protocols to contractors for segregating potentially impacted soils and avoiding contact with groundwater during excavation and construction of the subterranean parking.

Compliance with the PDF and regulatory requirements would ensure that construction and operation of the Project would not substantially degrade water quality. Impacts would be less than significant.[112]

g. Place housing within a 100-year flood plain as mapped on Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

No Impact. According to the City of Los Angeles General Plan Safety Element, the Project Site is not located with a 100-Year or 500-Year flood plain.[113] As such, Project development would not place housing within a 100-year flood plain. No impact would occur in this regard.

h. Place within a 100-year flood plain structures which would impede or redirect flood flows?

No Impact. According to the City of Los Angeles General Plan Safety Element, the Project Site is not located with a 100-Year or 500-Year flood plain, and as such, would not place structures within a 100-year flood plain or cause impediment or redirection of flood flows. No impact would occur in this regard.

i. Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?

No Impact. According to the City of Los Angeles General Plan Safety Element, the Project Site is not located with a 100-Year or 500-Year flood plain. Also, according to the City of Los Angeles General Plan Safety Element, the Project Site is not located within an inundation area associated with the failure of a levee or dam.[114] The Project Site is approximately 1.90 miles southeast of the Silverlake Reservoir. Due to distance and topography the Project Site is not within an inundation area of the Silverlake Reservoir. As such, no impacts associated with the exposure of people or structures to a significant risk of loss, injury, or death involving flooding would occur under the Project.[115]

---

[112] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds regarding groundwater levels, as a project would normally have a significant impact if it would change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or to respond to emergencies and drought; or reduce yields of adjacent wells or well fields (public or private); or adversely change in demonstrable and sustained reduction of groundwater recharge capacity.

[113] City of Los Angeles General Plan, Safety Element Exhibit F, 100-Year & 500-Year Floodplains, March 1994.

[114] City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994.

[115] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds relating to surface water hydrology, as a project could have a significant impact on water hydrology if it would

j. Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant undersea disturbance such as tectonic displacement of the sea floor associated with large, shallow earthquakes. Mudflows result from the downslope movement of soil and/or rock under the influence of gravity.

The Project Site is located more than 12 miles northeast of the Pacific Ocean and is not shown to be located within a tsunami hazard area in the Los Angeles General Plan Safety Element.[116] In addition, the Project Site is not located within the proximity of an enclosed body of water. The nearest enclosed bodies of water are Echo Park Lake located 0.5 miles northeast of the Project Site and MacArthur Lake located approximately 0.6 miles southwest of the Project Site surrounded by intervening development.

The Project Site is at a higher elevation (410 ft above mean sea level (MSL)) than both MacArthur Lake (260 ft MSL) and Echo Park Lake (385 MSL) and therefore, the Project Site is not downstream of either water bodies. For these reasons, there is no potential for exposure of people to a seiche or a tsunami. In addition, the Project Site is not positioned on a hillside or landslide area that could be prone to potential mudflow.[117] Thus, no impacts associated with inundation by seiche, tsunami, or mudflows would occur under the Project.[118]

Cumulative Impacts

Hydrology and Water Quality

The related projects would potentially increase the volume of stormwater runoff and contribute to pollutant loading in stormwater runoff within the local vicinity of the Project Site. Pursuant to the City's LID Ordinance, related projects would be required to capture and manage the first three-quarters of an inch of runoff flow during storm events as defined in the City's SUSMP BMPs, through one or more of the City's preferred SUSMP improvements: on-site infiltration, capture and reuse, or biofiltration/biotreatment BMPs, to the maximum extent feasible.

cause flooding during the projected 50-year developed storm event, which would have the potential to harm people or damage property or sensitive biological resources; substantially reduce or increase the amount of surface water in a water body; or result in a permanent, adverse change to the movement of surface water sufficient to produce a substantial change in the current or direction of water flow.

116 City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994.

117 City of Los Angeles General Plan, Safety Element Exhibit C, Landslide Inventory & Hillside Areas, March 1994.

118 This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds related to geologic hazards, including whether a project would have a significant geologic hazard impact if it would cause or accelerate geologic hazards, which would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. This finding also considered significance thresholds regarding groundwater levels, as a project would normally have a significant impact if it would change potable water levels sufficiently to reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or to respond to emergencies and drought; or reduce yields of adjacent wells or well fields (public or private); or adversely change in demonstrable and sustained reduction of groundwater recharge capacity

Further, the related projects would be subject to State NPDES permit requirements for both construction and operation. Each project greater than one-acre in size would be required to develop a SWPPP and would be evaluated individually to determine appropriate BMPs and treatment measures to avoid or minimize impacts to water quality. Smaller projects would be minor infill projects with drainage characteristics similar to existing conditions, with negligible impacts. In addition, the City of Los Angeles Department of Public Works reviews all construction projects on a case-by-case basis to ensure that sufficient local and regional drainage capacity is available.

The cumulative context for flood hazards is the corporate boundary of City of Los Angeles, which provides emergency response services for flood events and participates in the National Flood Insurance Program (NFIP). The NFIP is a Federal program enabling property owners in participating communities to purchase protection against property losses due to flooding.

All related projects are subject to restrictions and requirements as part of the City's existing permitting process and a detailed review of the City of Los Angeles General Plan Safety Element would be conducted as part of the plan check process. Related projects within the 100-year flood plain or floodway would be required to implement appropriate flood plain management measures in the design of new buildings. Compliance with these existing regulatory requirements would ensure the any related projects would not place housing within a flood hazard area without incorporating proper measures and reducing this impact to less than significant.

Similarly, the Project would comply with applicable NPDES and City requirements, which would include the use of BMPs during construction and operation of the Project as detailed in a SWPPP and SUSMP. The Project would have less runoff than existing conditions. In addition, the Project would include EPIC planters as a BMP and would include PDF HAZ-2 which would include a GWMP that would minimize any potential contamination to groundwater during construction of the Project. The Los Angeles Department Public Works would review the Project to ensure that sufficient local and regional drainage capacity is available. The Project would not be located in a 100-Year or 500-Year flood plain or near an inundation area subject to seiche, tsunami, or mudflow. Therefore, the Project's contribution to cumulative impacts to hydrology and water quality and flooding hazards would not be cumulatively considerable, and cumulative impacts would be less than significant.

10. Land Use and Planning

Would the project:

a. Physically divide an established community?

No Impact. The Project Site is currently developed with existing warehouse, commercial, and residential buildings and a surface parking lot. The Project vicinity is highly urbanized and generally built out. The local vicinity is characterized by a blend of commercial, restaurant, light industrial, residential uses, and school, hospital, religious institutions, and government facilities. The Project would provide a new mixed-use development that would include residential uses and

ground floor commercial uses that may include restaurant and retail uses. As such, the Project would be an infill project providing uses in keeping with the mixed-use character of the surrounding area. Given the type of uses in the Project vicinity, and the infill character of the Project, it would not physically divide an established community. The Project would not disrupt or divide an established community through a change in street or land use patterns on surrounding streets.

Thus, given the existing mix of uses in the Project vicinity and the location of the Project Site within an existing developed Site, the Project would not physically divide, disrupt, or isolate an established community. Therefore, there would be no impact with respect to the division of an established community.

b. Conflict with 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, coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact.

Los Angeles General Plan Framework Element

The City of Los Angeles General Plan Framework Element (General Plan Framework) establishes the conceptual basis for the City's General Plan. The General Plan Framework sets forth a citywide comprehensive long-range growth strategy and defines Citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. General Plan Framework land use policies are further guided at the community level through community plans and specific plans. The General Plan Framework sets forth a conceptual relationship between land use and transportation and encourages new development to be developed near transit. The Framework Element also calls for commercial development along the City's arterial corridors to be intensified with new projects that integrate commercial and residential uses.

As discussed below in **Table B-12,** *Comparison of the Project to the Applicable Land Use Policies of the Framework Element,* the Project would be consistent with applicable objectives, goals, and policies, of the General Plan Framework. In particular, the Project would be consistent the Framework Element as follows:

- The Project would be consistent with objectives of the Housing Chapter by providing a mix of apartment sizes and affordability levels, including units restricted very low income units. In addition, the Project would be consistent with the objective to locate new multi-family housing in proximity to transit and to provide adequate buffers between higher intensity uses and adjacent residential neighborhoods. Although 12 residential units exist on the Project Site, only six units are currently occupied. The Project's 243 units, including 21 units restricted to very low income levels would create a notable increase in housing stock, including housing units that can meet the needs of very low income residents.

- The Project would provide its mix of uses in proximity to a broad range of land uses within walking distance which would stimulate pedestrian activity. The Project would be integrated with the surrounding area through new ground level commercial uses and amenities, including new street trees and landscaping.

- The Project Site is located within a Los Angeles State Enterprise Zone and a Transit Priority Area, and would meet the objectives of the land use, economic and housing policies of the General Plan Framework to provide a diversity of uses, including restaurants, commercial, residential uses (including affordable housing), in proximity to transit. The Project's mixed uses would the meet the Framework objectives to support the General Plan Framework's land use, economic and housing goals to enhance urban lifestyles with proximity to services, retail, and transit.

Because the Project would support and not conflict with the General Plan Framework land use designation and objectives, impacts with respect to the Framework would be less than significant.

Westlake Community Plan

Adopted in 1992 and last amended in 2016, the Westlake Community Plan identifies and established goals and polices for land use within the Community Plan Area. As discussed below in **Table B-13,** *Comparison of the Project to the Applicable Land Use Policies of the Westlake Community Plan,* the Project would be consistent with applicable objectives and policies of the Westlake Community Plan. In particular, the Project would be consistent the Westlake Community Plan as follows:

- The Project would be consistent with goals and policies that aim to provide a balance of development that promotes an improved quality of life by facilitating a reduction of vehicular trips, vehicle miles traveled, and air pollution. The Project's mixture of commercial and residential development would be developed at an infill location in close proximity to transit and surrounding residential, commercial, services and public facilities which would help reduce vehicle trip lengths and emissions associated with the Project.

- The Project would provide neighborhood serving commercial uses that would front West Beverly Boulevard, an existing commercial corridor. The new residential population and surrounding neighborhood would have access to the on-site commercial development within walking distance and via bus and rail services. The Project would be consistent with goals and objectives that aim to locate neighborhood serving commercial facilities along commercial corridors and near existing neighborhoods.

- The Project would include 243 new housing units including studio, one-bedroom, and two-bedroom units that include substantial resident amenities. The Project would include market rate units and 21 units affordable for very low income households. The Project would be consistent with objectives and policies that aim to provide housing of types, sizes, and densities required to satisfy the varying needs and desires of all segments of the community's population.

Because the Project would not conflict with the Westlake Community Plan goals and objectives, impacts with respect to the Westlake Community Plan would be less than significant.

TABLE B-12
COMPARISON OF THE PROJECT TO THE APPLICABLE LAND USE POLICIES OF THE FRAMEWORK ELEMENT

Policy	Analysis of Project Consistency
Land Use Chapter	
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, preservation 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.	**Consistent**: The introduction of new residential and commercial uses would provide new services and would provide new housing opportunities that would serve a variety of income levels. One existing commercial building is vacant and the second is partially occupied. Although 12 studio residential units currently exist on the Project Site, only six units are occupied, which would be replaced by the Project that includes 243 units, with 21 units restricted to very low income levels. Therefore, there would be an increase in new housing units including units for very low income residents. Project vehicle trips would be reduced by residents having ready access to multiple transit options that serve the greater Los Angeles region which include Metro, LADOT Downtown Area Shuttle (DASH), and Foothill Transit bus lines. The Project is also less than one mile from the Westlake/MacArthur Park Metro Station.
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.	**Consistent:** The Project would be developed at an infill location in proximity to existing residential and commercial businesses and numerous public transportation options.Specifically, the Project is in close proximity to numerous bus lines operated by Metro, LADOT DASH, and Foothill Transit. The Project is also less than one mile from the Westlake/MacArthur Park Metro Station. The new residential population would have access to commercial development on site as well as retail and services within walking distance.
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.	**Consistent:** The Project would provide new residents, jobs and services within close proximity of pedestrian, roadway and transit networks. The new residential population would have access to commercial development on-site as well as a considerable amount of retail, restaurant, and public services activities within walking distance and via bus and rail services. The Project would provide housing opportunities outside of existing (and particularly single-family) neighborhoods, thereby helping to preserve those neighborhoods.
Objective 3.16: Accommodate land uses, locate and design buildings, and implement streetscape amenities that enhance pedestrian activity.	**Consistent.** The Project orients ground-level commercial and ground level amenities towards along West Beverly Boulevard and ground floor amenities along South Burlington Avenue and South Bonnie Brae Street. The Project would also provide new street-level landscaping and 61 new street trees. Two outdoor plazas at the corner of West Beverly Boulevard and South Bonnie Brea Street and West Beverly Boulevard and South Burlington Avenue would provide a pedestrian-oriented space with landscaping.

Policy	Analysis of Project Consistency
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. **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.	Consistent: The Project would provide 243 new housing units to meet housing needs established in the periodically updated SCAG RHNA as implemented through the Housing Element of the General Plan. The new units would include a range of sizes from studios to two bedrooms. Although 12 studio residential units currently exist on the Project Site, only six units are occupied, where the Project would include 243 units, with 21 units restricted to very low income levels. Therefore, the provision of 231 net new housing units would be a notable increase in housing stock including housing for very low income residents. The Project's residential units would be provided in close proximity to several transit options. The Project would be located within a dense mixed use area, with similar uses as the Project.
Economic Development	
Objective 7.6: Maintain a viable retail base in the City to address changing resident and business shopping needs	**Consistent.** The Project would include 3,500 sf of commercial uses open to the public that would complement nearby commercial, service, and residential uses.
Policy 7.2.2: Concentrate commercial development entitlements in areas best able to support them, including community and regional centers, transit stations, and mixed-use corridors. This concentration prevents commercial development from encroaching on existing residential neighborhoods.	**Consistent.** The Project would provide new mixed-use development in an area served by multiple bus lines and in close proximity to the Westlake/MacArthur Park Metro Station. Commercial uses would be oriented to public streets with commercial uses rather than residential neighborhoods.
Urban 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.	**Consistent:** The Project would provide a new mixed-use development that would include residential and commercial uses and new ground level commercial uses and notable increase in landscaping. The Project would increase the housing choices for residents residing in the Westlake Los Angeles community and throughout the City of Los Angeles. The location of the Project adjacent to rail and bus service would increase housing opportunities for those wishing to reside near public transportation. As such, the Project would support the policy of creating a livable City for existing and future residents and attract further investment in the area.
Policy 8.3.13: Enhance pedestrian circulation in neighborhood districts, community centers, and appropriate locations in regional centers and mixed-use boulevards.	**Consistent.** The Project would activate the streetscape by orienting ground-level commercial and ground level amenities towards along West Beverly Boulevard and ground floor amenities along South Burlington Avenue and South Bonnie Brae Street. The Project would also provide new street-level landscaping and street trees and an overall increase in landscaping on the Project Site.

SOURCE: ESA PCR 2017

TABLE B-13
COMPARISON OF THE PROJECT TO THE APPLICABLE LAND USE POLICIES OF THE ADOPTED WESTLAKE COMMUNITY PLAN

Goal/ Policy/Objective	Analysis of Project Consistency
Residential Policies	
Objective 1. To designate a supply of residential land adequate to provide housing of the types, sizes, and densities required to satisfy the varying needs and desires of all segments of the community's population.	**Consistent:** The Project would provide a range of housing units in that would be affordable to a range of income levels. The Project would include 243 new housing units including studio, one-bedroom, and two-bedroom units that include substantial resident amenities. The Project would include market rate units and 21 units affordable for very low income households.
Objective 3. To sequence housing development so as to provide a workable, efficient, and adequate balance between land use, circulation, and service system facilities at all times. **Policy 2.** That medium density housing be located near commercial corridors where access to public transportation and shopping services is convenient and where a buffer from or a transition between low density housing can be achieved.	**Consistent:** The Project would be well served by existing infrastructure, roadways, and public transit. The Project would provide new housing and commercial uses directly adjacent to an active commercial corridor, within close proximity to transit bus routes, job centers, businesses and services. The use and character of the Project is consistent with the surrounding active urban land uses and would provide housing opportunities outside of any low density neighborhoods.
Commercial Policies	
Objective 1: To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services **Objective 2**: To provide a range of commercial facilities at various locations to accommodate the shopping needs of residents and to provide increased employment opportunities within the community. **Objective 3**: To improve the compatibility between commercial and residential uses.	**Consistent**: The Project would provide a mixture of commercial uses and housing in close proximity to light rail stations and bus line options. This compatible mix of uses would expand commercial development and services in the area, while also increasing employment opportunities
Policy 1: That commercial facilities be located on existing traffic arteries and commercial corridors. **Policy 3:** That the neighborhood commercial areas along Temple Street, Beverly Boulevard, and Third Street continue to serve the everyday shopping needs of residents providing supermarkets, drugstores, retail shops, and other neighborhood oriented services. **Policy** 4: That neighborhood markets and retail and service establishments oriented to the residents be retained throughout the community, within walking distance of residents.	**Consistent:** The Project would be a mixed-use development with ground floor commercial uses and amenities, landscaping and pocket plazas. The new commercial development would include neighborhood-serving retail/restaurant uses that would front West Beverly Boulevard, an existing commercial corridor. The Project would provide new residents, jobs and services within close proximity of pedestrian, roadway and transit networks. The new residential population and surrounding neighborhood would have access to the on-site commercial development well as retail, restaurant, and public services uses within walking distance and via bus and rail services.
Policy 5: That Highway-Oriented commercial uses such as drive-thru establishments, auto-repair, and other similar uses be located away from pedestrian oriented areas. **Policy** 6: That development of new high intensity uses activities be designed to emphasize service or employment of local residents	**Consistent:** The Project is a mixed-use development that includes residential and commercial uses located in close proximity to alternative transit modes, including regional rail and bus line services. The commercial uses included in the Project would be neighborhood-serving retail/restaurant uses. The Project would not include a drive-thru, auto-repair shop, or similar non-pedestrian oriented uses.

Goal/ Policy/Objective	Analysis of Project Consistency
Policy 7: That new commercial development be oriented so as to facilitate pedestrian access by locating parking to the rear of structures. **Policy 8**: That adequate parking be provided for all types of retail and office commercial development, and that all parking areas adjacent to residential lands be appropriately buffered by a wall and/or landscaped setback.	**Consistent:** Parking provided by the Project would be in compliance with AB 744, as well as LAMC for the commercial component. The Project would replace existing surface parking with a mixed-use Project that would include upper ground floor level with amenity space and parking, a lower ground level with commercial and parking, and a half level of fully subterranean parking. The parking levels would be internal to the Project and would not occupy prime street frontage and would not be visible from the surrounding streets.
Circulation	
Objective 4: To encourage alternate modes of travel and provide an integrated transportation system that is coordinated with land uses and which can accommodate the total travel needs of the community. Policy 2: That any unique character of a community street be maintained and enhanced by improved design characteristics such as street trees, landscaped median strips, traffic islands, and special paving.	**Consistent:** Project Site is served by a network of regional transportation facilities providing connectivity to the larger metropolitan area. The Project would be developed an infill location in close proximity to by multiple bus lines and in close proximity to the Westlake/MacArthur Park Metro Station. The Project would be a mixed-use development that would enhance the pedestrian environment that includes ground floor commercial uses and amenities, new sidewalk improvements, street trees and landscaping.

SOURCE: ESA PCR 2017

Draft North Westlake Design District Ordinance

Although not yet adopted, the City of Los Angeles is in process of developing the North Westlake Design District Ordinance. The intent of the Ordinance is to ensure that future development is compatible with and enhances existing neighborhoods; creates a friendly experience for pedestrians; and promotes mixed-use and small local businesses. The Ordinance addresses parking and driveway locations, lighting, building and site design and details, ground floor design and use, walls, and signs. The area of the proposed ordinance includes commercially-zoned parcels along Temple Street, Beverly Boulevard, and the north side of 3rd Street between Hoover Street and Glendale Boulevard, and Alvarado Street between Third Street and Temple Street.

The proposed ordinance would include the Project Site and surrounding properties that front Beverly Boulevard. The Project is protected by Vesting Rights and as such, the Project would not be subject to the proposed Ordinance. Nevertheless, the Project has been designed to support consistency with the intent of the Ordinance which is to promote pedestrian-oriented mixed-use development and neighborhood serving uses that contribute to a walkable neighborhood. The Project has been designed to respond to the context and character of the surrounding active, urban neighborhood, which is adjacent to residential, commercial, schools and other services. The Project is a mixed-use development that would activate the streetscape by orienting ground-level commercial and amenities towards along West Beverly Boulevard. The parking structure would be internal to the Project and would not occupy prime street frontage and would not be visible from the surrounding streets. The Project would also provide new landscaping and 61 street trees. Two outdoor plazas at the corner of West Beverly Boulevard and South Bonnie Brea Street and West Beverly Boulevard and South Burlington Avenue would provide a pedestrian-oriented

space with landscaping that would activate the street front and would enhance pedestrian activity. As such, the Project would be consistent with intent of the North Westlake Design District Ordinance and impacts would be less than significant.

Los Angeles General Plan Housing Element

The Housing Element of the General Plan is prepared pursuant to State law and provides planning guidance in meeting the housing needs identified in SCAG's RHNA. The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides the array of programs the City intends to implement to create sustainable, mixed-income neighborhoods. The 2013-2021 Housing Element, an update to the previous 2006-2014 Housing Element that is based on the updated 2012 RHNA, was adopted by the City Council on December 3, 2013. Policies of note include Policy 1.1.3, which states the City should "[f]acilitate new construction and preservation of a range of housing types that address the particular needs of the city's households." Also, Policy 1.1.4 states that the City should "[e]xpand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards." The Housing Element carries forward the goals of the Framework Element Housing chapter to encourage infill development and increase density in higher-intensity commercial and mixed-use districts, centers and boulevards, and in proximity to transit.

The Housing Element encourages new construction of a range of different housing types that address the needs of the City's households. Chapter 1, Housing Needs Assessment, identifies the City's share of the housing needs established in the RHNA. In particular, Table 1.29, City of Los Angeles Regional Housing Needs Assessment Allocation, indicates that the City's needs assessment allocation includes 82,002 housing units of which 35,412 units, or 43.2 percent, would be for above moderate income households.

The remaining 56.8 percent of the needed housing units consist of 13,728 moderate-income units (16.8 percent), 12,435 low-income units (15.2 percent), 10,213 very low-income units (12.5 percent), and 10,213 extremely low-income units (12.5 percent).[119]

The Project is a mixed-income project that would offer a mixture of studio, one- and two-bedroom units. The Project would provide 243 new residential units, of which 21 units would be reserved for Very Low Income households. Although 12 residential studio units exist on the Project Site, only six units are currently occupied, which would be replaced by the Project that includes 243 units, with 21 units restricted to very low income levels. Therefore, the 231 net new housing units would contribute to a notable increase in housing stock, including housing units that can meet the needs of very low income residents. Thus, the Project would support the RHNA by contributing to both the overall need for housing as well as contributing to the availability of housing for very-low-income households. The Project is in close proximity to multiple transit options that serve the greater Los Angeles region which include Metro, LADOT Downtown Area

[119] Ibid, Table 1.29 (pg. 1-79)

Shuttle (DASH), and Foothill Transit bus lines. The Project is also less than one mile from the Westlake/MacArthur Park Metro Station.

Therefore, the Project would be consistent with the Los Angeles General Plan Housing Element and impacts would be less than significant.

City of Los Angeles Mobility Plan 2035

Mobility Plan 2035 (Mobility Plan), which was adopted in January 2016, is a comprehensive update of the Transportation Element, which in part includes the City's classification system for roadways. The Mobility Plan provides revised street standards in an effort to provide a more enhanced balance between traffic flow and other important street functions including transit routes and stops, pedestrian environments, bicycle routes, building design, and site access. Various modes of travel are encouraged by the Mobility Plan, including walking, biking and using public transit. Key objectives within the Mobility Plan are as follows:

Policy 2.3: Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.

Policy 3.1: Recognize all modes of travel, including pedestrian, bicycle, transit and vehicular modes – including goods movement – as integral components of the City's transportation system.

Policy 3.3: Promote equitable land use decisions that result in fewer vehicle trips by providing greater proximity and access to jobs, destinations, and other neighborhood services.

Policy 3.4: Provide all residents, workers and visitors with affordable, efficient, convenient and attractive transit services.

Policy 3.8: Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.

Policy 4.13: Balance on-street and off-street parking supply with other transportation and land use objectives.

Policy 5.2: Support ways to reduce vehicle miles traveled (VMT) per capita.

The Project would support the Mobility Plan policies listed above as it promotes a balanced transportation system by locating a mixed-use, mixed-income project in an area that has an existing mix of commercial, residential, office, public facility, and light industrial uses. The Project Site is also located within a TPA and is within walking distance of Westlake/MacArthur Park Metro Station and Metro, LADOT DASH, and Foothill Transit bus lines. The Project encourages pedestrian and bicycle activity by locating new residents, employees and visitors in close proximity to public transit and services. Project residents, employees and visitors would have the option to walk, ride bicycles or use public transit to access jobs and services in the surrounding neighborhood and in Downtown Los Angeles.

The Project would provide bicycle parking for both residential and the commercial purposes, adhering to the Code requirements for bicycle parking. As such, the Project would provide convenient, secure and well-maintained bicycle parking facilities.

Because the Project would be consistent with these applicable policies of the Mobility Plan, impacts would be less than significant. Additional discussion of the Mobility Plan is provided in Section 16, *Transportation and Circulation*.

City of Los Angeles Noise Element (1999)

The City of Los Angeles Noise Element references the City of Los Angeles's noise standards, which are contained in Los Angeles Municipal Code Section 111. The Noise Element addresses noise issues, noise sources, and contains noises guidelines, mitigation strategies and regulations. The Project's compliance with the Noise Element is described in Section 12, *Noise* of this MND.

Do Real Planning

The City Planning Commission's Do Real Planning document includes fourteen guidelines intended to set the City on a course toward sustainability. Many of the guidelines address procedures for the operation of the Department of City Planning or issues isolated to specific settings and types of projects that are different from the proposed Project. However, of the fourteen guidelines, several address planning concepts that are relevant to the Project. Guidelines of particular note are those that pertain to location of land uses and density (Guidelines 3 and 6), walkability/site design/parking location (Guidelines 1, 2, 9, and 12), improvement of housing stock for every income (Guideline 5), and green design with abundant landscaping (Guidelines 7 and 8). Guideline 1, Demand a Walkable City, has led to the development of the Walkability Checklist, discussed below. Guidelines that would be applicable to the Project include the following:

- Guideline 2, *Offer Basic Design Standards*, Guideline 8, *Landscape in Abundance*, and Guideline 9, *Arrest Visual Blight,* apply to the appearance of the City. The Project would replace the existing vacant warehouse, underutilized commercial and older residential uses and surface parking with a new mixed-use residential and commercial development. The Project has been designed to respond to the context and character of the surrounding active, urban neighborhood, which is adjacent to residential, commercial, schools and other services. The Project would provide substantial new landscaping, 61 new street trees, pocket plazas, and ground-floor commercial and amenities that would enhance the pedestrian experience.
- Guideline 3, *Require Density Around Transit*, and Guideline 6, *Locate Jobs Near Housing*, address the location of new development within the City. The Project would be supportive of these Guidelines as it would increase population density and provide new and substantially greater amount of housing than currently exists on the Project Site, including housing for Very Low Income households in an area that is well served by public transit. The Project would provide new employment opportunities and would also be located near existing employment centers.
- Guideline 5, *Advance Homes for Every Income*, addresses the value of up-zoning land to accommodate higher densities and the need to address housing for the poor and middle class as a component of such up-zoning. The Project would increase housing stock with a variety of unit sizes and unit costs, including housing affordable to Very Low Income households.

- Guideline 12, *Identify Smart Parking Requirements*, addresses smart parking guidelines intended to avoid parking lots that occupy prime street frontage. The Project would replace existing surface parking with a mixed use Project that would include upper ground floor level with amenity space and parking, a lower ground level with commercial and parking, and a half level of fully subterranean parking. The parking would be provided internal to the Project and would not occupy prime street frontage.

Because the Project would be consistent with these applicable Guidelines, the Project would be in compliance with the Planning Commission's Do Real Planning Guidelines and impacts would be less than significant.

SCAG's 2016 RTP/SCS

In April 2016, SCAG's Regional Council adopted the 2016 - 2040 Regional Transportation Plan/Sustainable Communities Strategy (2016 RTP/SCS). The 2016 RTP/SCS presents the transportation vision for the region through the year 2040 and provides a long-term investment framework for addressing the region's transportation and related challenges. Also, the 2016 RTP contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. The RTP/SCS includes goals and policies that pertain to economic development, mobility, accessibility, travel safety, productivity of the transportation system, protection of the environment and health through improved air quality, energy efficiency, and land use and growth patterns that complement the state and region's transportation investments, and security of the regional transportation system.

SCAG's 2016 RTP/SCS incorporates several policies that are applicable to the Project. These SCAG policies are discussed below. **Table B-14**, *Consistency of the Project with Applicable Policies of the 2016–2040 Regional Transportation Plan*, below, provides a detailed analysis of the proposed Project's consistency with applicable RTP policies in a side-by-side comparison.

Based on the analysis presented in Table B-14, the Project would be consistent with RTP/SCS goals to improve regional economic development, maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, maximize the productivity of the transportation system, protect the environment, encourage energy efficiency, and facilitate the use of alternative modes of transportation. As discussed in Section 13, Population, the Project contributions to growth fall within the range of growth accounted for in the SCAG projections that are used for future planning activities and provision of services. These projections include development that is anticipated over a horizon period that extends to 2040. The projections are revised on four year intervals so as to stay current with current growth trends and changes in land use activity. Changes to planning and zoning designations can be incorporated in timely fashions so long as the growth does not exceed the amount anticipated within the service timelines. Growth at specific sites may vary while the overall growth patterns are sufficient for planning purposes.

TABLE B-14
CONSISTENCY OF THE PROJECT WITH APPLICABLE POLICIES OF THE 2016–2040 REGIONAL TRANSPORTATION PLAN

Policy	Analysis of Project Consistency
Align the plan investments and policies with improving regional economic development and competitiveness	**Consistent.** This policy pertains to SCAG funding and policies. The Project would not adversely affect the capacity to align plan investments and policies with economic development and competitiveness. As the Project does provide regional economic benefits and does so in a manner consistent with other RTP policies as discussed below, the Project would support SCAG choices regarding this policy.
Maximize mobility and accessibility for all people and goods in the region.	**Consistent.** The location of the proposed development, within close proximity to and numerous bus lines, a Metro Rail Line transit station as well as the regional freeway system, would maximize mobility and the accessibility to the Project Site.
Ensure travel safety and reliability for all people and goods in the region.	**Consistent.** The Project would be designed in compliance with City Standards. As shown in Section 8, Hazards and Hazardous Materials; Section 14, Public Services; and Section 16, Transportation/Traffic of this MND, there are no significant impacts related to traffic, emergency access, or hazards. Therefore, the Project is in compliance.
Preserve and ensure a sustainable regional transportation system.	**Consistent.** The close proximity of the Project within walking distance of alternative transit modes, including regional rail and bus line services, would support the region's transportation investment and the sustainability of the regional transportation system.
Maximize the productivity of our transportation system.	**Consistent.** The Project would locate a residential development in an area served by a range of existing local and regional bus lines and Metro Rail transit. The proximity of residential uses to transit systems would maximize the productivity of the transportation system and, as such, would be consistent with this policy.
Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	**Consistent.** The Project would be located in an infill location in close proximity to existing residential and commercial businesses and numerous public transportation options.The Project would comply with the Los Angeles Green Building Code and 2013 CalGreen Code. The Project's commercial development would be along a mixed-use corridor that would provide opportunities for pedestrian and bicycle transit. The Project would include up to 272 bicycle parking spaces.
Actively encourage and create incentives for energy efficiency, where possible.	**Consistent.** As noted above, the Project would support a land use pattern that provides increased opportunity for use of alternative transportation which would contribute to reductions in vehicle miles traveled with resulting benefits to energy efficiency. The Project would comply with the Los Angeles Green Building Code and 2013 CalGreen Code.
Encourage land use and growth patterns that facilitate transit and non-motorized transportation.	**Consistent.** The Project would intensify development in an area served by the Metro rail service and numerous regional Metro bus lines. Furthermore, the Project would provide housing and commercial uses in an area with pedestrian access to a range of commercial development, services and housing.
Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	**Consistent.** This policy pertains to security provided by regional service agencies. The Project would not adversely affect the ability of the service agencies to perform their duties. By providing a mixed-use development, the Project would contribute towards economic growth and increased use of public transportation systems that would generate revenue that could be used to support security of the regional transportation system.

SOURCE: ESA PCR, 2017

Therefore, the Project would result in a less than significant impact with regard to 2016 RTP/SCS consistency.

Los Angeles Municipal Code

Zoning

The Project Site is located in two zones, the C2-1 zone and the R4-1 zone with a General Plan designation of Highway Oriented Commercial and High Medium Residential. The C2-1 zone permits commercial activity including retail and restaurant uses as well as residential development. The R4-1 Zone permits residential uses. The existing zoning would allow for the mixed-use project with ground floor commercial and residential uses above within the C2 portion of the Project Site. The Project would be consistent with the underlying land uses and zoning. Therefore, the Project would result in a less than significant impact with regard to zoning consistency.

Floor Area

The FAR permitted on the Project Site varies by zone. The C2-1 zone allows an FAR of 1.5 times the buildable area of the site (FAR 1.5:1). The C2-1 zoned portion of the Project Site maintains a buildable area of approximately 49,969 square feet, and permits a total floor area of 74,953 square feet. The R4-1 zoned portion of the site allows an FAR of 3:1 and maintains a buildable area of approximately 19,842 square feet. Therefore, a total floor area of 59,526 square feet is permitted within the R4-1 zoned portion of the site. Without any density bonus, the total combined floor area permitted over the site is 134,479 square feet.

The Project would provide a total floor area of 223,007 square feet (FAR 3.19:1) over the entire site with 219,507 square feet dedicated to residential uses and 3,500 square feet dedicated to ground floor commercial uses. The Project would designate 11 percent of the base maximum density (183) as restricted affordable units (21 units) at the very low income level.

Table 15, *Permitted and Proposed Floor Area,* below identifies the permitted and proposed floor area:

TABLE B-15
PERMITTED AND PROPOSED FLOOR AREA

Permitted	FAR	Floor Area	35% Density Bonus
C2-1	1.5:1	74,953 sf	101,187 sf
R4-1	3:1	59,526 sf	80,360 sf
Total		**134,479 sf**	**181,547 sf**
Proposed	FAR	Floor Area	
Residential	3.14:1	219,507 sf	
Commercial	0.05:1	3,500 sf	
Total	**3.19:1**	**223,007 sf**	

Height

The Project Site is located in Height District 1, which does not limit height in the C2 or R4 Zones. Per the LAMC, the Project would achieve a maximum building height of 79 feet above grade.

Density

The density regulations of the R4 and C2 zones apply to the Project Site. In accordance with the LAMC, the minimum lot area per dwelling unit in both the R4 and C2 zones is 400 square feet per unit. The total lot area of the Project has approximately 73,397 square feet after street dedications, for a base maximum density of 183 units. The Project would include 11 percent of the 183 units restricted to very low income households. Therefore, the Project qualifies for a mandatory 35 percent density bonus pursuant to California Government Code Section 65915 and LAMC 12.22-A,25. The Project would include a 33 percent density increase (60 units) for a total of 243 residential dwelling units. **Table B-16***, Density Calculation*, shows the dwelling units allowed on the project site with the proposed density bonus.

TABLE B-16
DENSITY CALCULATION

Lot Area	Min Lot Area Per Dwelling Unit	Units Allowed	33% Density Bonus	Total with Density Bonus
73,397 sf	400 sf/Unit	183	60	243

SOURCE: Craig Lawson and Co. LLC, 2016

Setbacks

The Project Site has approximately 350 feet of frontage on West Beverly Boulevard, 220 feet of frontage on South Bonnie Brae Street, and 211 feet of frontage on South Burlington Avenue. Pursuant to LAMC Section 12.03, the Project Site is considered a "Through Lot," with front yards along South Bonnie Brae Street and South Burlington Avenue. The side yards are located along West Beverly Boulevard and the southern property line. There are no rear yards for the Project Site.

The C2 zoned portion of the Project Site does not require front yards to be provided pursuant to LAMC Section 12.14-C,1. Additionally, LAMC Section 12.22-A,18(c)(3), exempts side yards for the portion of the Project Site fronting along West Beverly Boulevard, within the C2 zone.

However, side and front yard setback requirements of the R4 zone do apply to those portions of the project site pursuant to LAMC Section 12.11-C. Therefore, a 15-foot front yard is required along the R4 portion of the Project Site as it fronts along South Bonnie Brae Street and South Burlington Avenue. Additionally, a side yard setback requirement of nine feet is required along the southern property line. The Project would provide a front yard setback of 15-feet 6-inches along the R4 portion of the Project Site fronting South Bonnie Brae Street, 18-feet 3-inches along the R4 portion of the Project Site fronting along South Burlington Avenue and a 10-foot setback

along the southern property line. Therefore, the Project conforms with the setback requirements of the LAMC.

Open Space

Section 12.21-G of the LAMC requires that all residential developments containing six or more dwelling units on a lot provide, at a minimum, the following usable open space area per dwelling unit: 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms. Without a density bonus incentive, the total open space required for the Project would be 25,525 square feet. Pursuant to LAMC 12.22-A,25(f)(6), a 20 percent open space reduction is permitted as part of the Project's Density Bonus on-menu incentive to create additional floor area for affordable housing. After the on-menu density bonus open space reduction is applied, the required open space is 20,420 square feet.

Accounting for an on-menu density bonus, the Project would exceed the LAMC requirements by providing 23,115 sf of open space and amenities, rather than the 20,420 square feet required. Open space amenities would include two courtyards, on the podium level (level 2) and two roof decks. The Project would provide 5,850 sf of open space in private balconies. The Project would also provide resident amenities including a clubroom and fitness facilities.

Pursuant to LAMC Section 12.21-G,2, one tree per four units is required to be provided on site (street trees may be included). Therefore, the Project would provide 61 trees for the proposed 243 residential dwelling units, a net increase in trees on and around the Project Site of 40.

Parking

The Project proposes to provide a minimum of 292 automobile parking spaces on site. The following discussion outlines the applicable parking standards/policies for the Project's commercial and residential uses.

Commercial Uses

The Project Site requires a parking ratio of two spaces per 1,000 gross sf of retail, restaurant and other commercial uses, pursuant to LAMC Section 12.21-A,4(x)(3). Therefore, 7 parking spaces are required for commercial uses. The Project would exceed the LAMC requirements and would provide 10 parking spaces for the 3,500 sf of commercial uses.

Residential Uses

Pursuant to AB 744, the Project would be required to provide 40 parking spaces for the 80 studio units, 57 parking spaces for the 114 one-bedroom units, and 49 parking spaces for the 49 two-bedroom units, for a total of 146 residential parking spaces. At a ratio of two spaces per 1,000 sf, 7 commercial parking spaces would be required for a total of 153 parking spaces. The Project's 292 automobile spaces would exceed the 153 automobile parking space requirements (i.e., 10 spaces for commercial and 282 for residential). Therefore, impacts related to parking would be considered less than significant notwithstanding the provisions of AB 744.

Bicycle Parking

Pursuant to LAMC Section 12.21-A.16, the Project would be required to provide a minimum of 243 long term and 25 short term residential bicycle parking spaces. For commercial uses, the Project is required to provide two short-term and two long-term bicycle parking spaces for a total of four bicycle parking spaces for commercial uses. The Project would meet the LAMC requirements and provide 272 bicycle spaces (268 residential bicycle spaces and four commercial bicycle spaces).

Based on the above, the Project, with approval of the requested discretionary approvals, would not conflict with an applicable land use plan, policy or adopted for the purpose of avoiding or mitigating an environmental effect. Thus, less than significant impacts would occur with Project implementation.[120]

c. Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The Project Site is located within the highly urbanized Westlake Los Angeles Community Plan Area. The Project Site is currently developed with existing commercial, industrial, and residential buildings and a paved surface parking. The Project Site is not located within or adjacent to a significant ecological area (SEA).[121] No designated riparian habitat or natural communities exist on the Project Site or in the surrounding area. Additionally, there is no adopted Habitat HCP, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan in place for the Project Site. Therefore, the Project would not conflict with any habitat conservation plan or natural community conservation plan. No impact would occur in this regard.

Cumulative Impacts

Land Use and Planning

Related projects would be located primarily within the Westlake Community Plan area or the Central City Community Plan area and would have general access or proximity to transit. The intensification of development within this area would be consistent with the intent of the General Plan Framework, which is encourage a diversity of uses, including restaurants, commercial, residential uses, including affordable housing, in close proximity to transit. In addition, many related projects feature mixed-use components that provide housing and street-oriented commercial uses that would enliven the street front and enhance pedestrian activity in accordance

[120] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors regarding land use consistency, including whether the proposal is inconsistent with the adopted land use/density designation in the Community Plan, redevelopment or specific plan for the site; and whether the proposal is inconsistent with the General Plan or adopted environmental goals or policies contained in other applicable plans. Screening factors regarding land use compatibility were also considered, including the extent of the area that would be impacted, the nature and degree of impacts, and the type of land uses within that area; the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided or isolated, and the duration of the disruptions; and the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the proposed project.

[121] City of Los Angeles General Plan Conservation Element, Figure B-2, SEAs and other Resources, March 2001.

with the objectives of the General Plan Framework and other adopted plans. Because it is anticipated that development of the related projects would be consistent with the objectives of the General Plan and other plans that support intensification and redevelopment, land use impacts would be less than significant. Any related projects requesting discretionary approvals, such as changes to General Plan or zoning would be vetted through environmental review and only allowed at discretion of the City and with consideration of consistency with applicable plans.

The related projects are in urbanized areas that are nearly fully developed and therefore most opportunities to build involve infill development or recycling previously developed property. As the related projects are in-fill development and, while increasing density, the project would not alter the basic land use patterns.

The Project would be consistent with the policies and objectives of the Los Angeles Framework Element, Los Angeles General Plan Housing Element, Los Angeles General Plan Mobility Plan 2035, Los Angeles General Plan Noise Element, the City Planning Commission's Do Real Planning document, the SCAG's 2016 RTP/SCS, and the Westlake Community Plan. Specifically, the Project is consistent with goals and policies to contained within these plans that aim to provide new housing, improve the pedestrian environment, support mixed use development near transit, improve air quality and active transportation (e.g., bicycling and walking), and encourage new high quality development that is compatible with existing uses and development.

Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative land use and planning impacts would be less than significant.

11. Mineral Resources

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?

Less Than Significant Impact. Oil and gas, mineral resources of value to the region and State, are the primary mineral resources within the City of Los Angeles. The Project is not located in a designated surface mining district or mineral resource zone.[122] Oil resource areas are designated as Oil Drilling Districts or State Designated Oil Fields, which often overlap. Generally State Designated Oil Fields are broader than the drilling districts and follow specific streets and other geographic markers. Within the City of Los Angeles, oil drilling districts and oil fields are concentrated in an area reaching from downtown Los Angeles to just west of the 405 Freeway, and in the north San Fernando Valley. As shown in the Los Angeles General Plan Safety Element, Exhibit E, Oil Field and Oil Drilling Areas, the Project Site is within the LA City Oil Drilling District and its respective State Designated Oil Field, which extends to the west of Vermont Avenue on its west edge and to the east to approximately Figueroa Street on its east

[122] City of Los Angeles General Plan, Conservation Element, 2001.Appendix A.

edge.[123] The Union Station Oil Field is located to the southeast of the Project Site north of Whittier Boulevard and south of Beverly Boulevard near Alameda Street. Both of these fields are designated as "major drilling areas." As noted in the Phase I Environmental Site Assessment Report, prepared August 10, 2016, no oil or gas wells are located on the Project Site. According to records reviewed, the adjacent properties, and surrounding properties to the south, southeast, and southwest of were historically developed with multiple oil and gas wells within a 1,000 radius of the Project Site. [124]All of the off-site wells are currently buried, plugged, or idle and not in active use.[125] Therefore, as the Project Site does not have any wells and no active wells are located in its immediate vicinity, the Project would not result in the loss of availability of this known mineral resource. As stated earlier, the Project is not in a designated surface mining district or mineral resource zone. Therefore, there would be a less than significant to mineral resources.[126]

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

No Impact. In addition to oil and gas resources, mineral resources of local value in the City of Los Angeles include sand and gravel deposits and mining operations. Sand and gravel resources and mining operations are concentrated in the Sylmar community of the north San Fernando Valley.[127] Sand and gravel resources do not occur in the section of the Los Angeles basin occupied by the Project Site. Because the Project would not encroach on the City's existing sand and gravel mining operations or known sand and gravel resources, it would not result in the loss of availability of these locally-important mineral resources. Therefore, there would be no impact to locally-important mineral resources.[128]

Cumulative Impacts

Mineral Resources

Because of the large number and broad extent of City oil drilling districts and State-designated oil fields in the Project study area, including the LA City Oil Drilling District and its respective State Designated Oil Field, some of the related projects would be located within these designated areas.

[123] City of Los Angeles General Plan Safety Element, Exhibit E, Oil Fields and Oil Drilling Areas in the City of Los Angeles, May 1994. Accessed April 2017.

[124] California Department of Conservation, Division of Oil, Gas, and Geothermal Resources Well Finder. Accessed April 2017.

[125] California Department of Conservation, Division of Oil, Gas, and Geothermal Resources Well Finder. Accessed April 2017.

[126] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors regarding mineral resources, including whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a MRZ-2 or other known or potential mineral resource area; and whether the mineral resource is of regional or statewide significance, or is noted in the conservation element as being of local importance.

[127] City of Los Angeles General Plan Conservation Element, Exhibit A, Mineral Resources, March 2001.

[128] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors regarding mineral resources, including whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a MRZ-2 or other known or potential mineral resource area; and whether the mineral resource is of regional or statewide significance, or is noted in the conservation element as being of local importance.

However, with implementation new methodologies, such as slant drilling, related projects would not substantially reduce extraction capabilities, impede exploratory operations, or would cumulatively result in the significant loss of availability of oil resources. As discussed above, the Project would have a less than significant on mineral resources. As Project would have no incremental contribution to the potential cumulative impact on mineral resources, Project impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

12. Noise

Would the project result in:

a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact With Mitigation Incorporated. Noise is defined as unwanted sound; however, not all unwanted sound rises to the level of a potentially significant noise impact. To differentiate unwanted sound from potentially significant noise impacts, the City has established noise regulations that take into account noise-sensitive land uses. The following analysis evaluates the potential noise impacts at nearby noise-sensitive land uses resulting from construction and operation of the Project. As discussed below, implementation of mitigation measures would ensure a less than significant impact with respect to construction noise.

Noise Principles and Descriptors

Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is generally defined as unwanted sound (i.e., loud, unexpected, or annoying sound). Acoustics is defined as the physics of sound. In acoustics, the fundamental scientific model consists of a sound (or noise) source, a receiver, and the propagation path between the two. The loudness of the noise source and obstructions or atmospheric factors affecting the propagation path to the receiver determines the sound level and characteristics of the noise perceived by the receiver. Acoustics addresses primarily the propagation and control of sound.

Sound, traveling in the form of waves from a source, exerts a sound pressure level (referred to as sound level) that is measured in decibels (dB), which is the standard unit of sound amplitude measurement. The dB scale is a logarithmic scale (i.e., not linear) that describes the physical intensity of the pressure vibrations that make up any sound, with 0 dB corresponding roughly to the threshold of human hearing and 120 to 140 dB corresponding to the threshold of pain. Pressure waves traveling through air exert a force registered by the human ear as sound.

The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that deemphasizes the frequencies below 1,000 hertz (Hz) and above 5,000 Hz in a manner corresponding to the human ear's decreased sensitivity to extremely low and extremely high

frequencies. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA). A-weighting follows an international standard methodology of frequency de-emphasis and is typically applied to community noise measurements.

An individual's noise exposure is a measure of noise over a period of time, whereas a noise level is a measure of noise at a given instant in time. Community noise varies continuously over a period of time with respect to the contributing sound sources of the community noise environment. Community noise is primarily the product of many distant noise sources, which constitute a relatively stable background noise exposure, with the individual contributors unidentifiable. The background noise level changes throughout a typical day, but does so gradually, corresponding with the addition and subtraction of distant noise sources such as traffic. What makes community noise variable throughout a day, besides the slowly changing background noise, is the addition of short-duration, single-event noise sources (e.g., aircraft flyovers, motor vehicles, sirens), which are readily identifiable to the individual. These successive additions of sound to the community noise environment change the community noise level from instant to instant, requiring the measurement of noise exposure over a period of time to legitimately characterize a community noise environment and evaluate cumulative noise impacts.

The time-varying characteristic of environmental noise over specified periods of time is described using statistical noise descriptors in terms of a single numerical value, expressed as dBA. The most frequently used noise descriptors are summarized below:

L_{eq}: The L_{eq}, or equivalent sound level, is used to describe the noise level over a specified period of time, typically 1-hour, i.e., $L_{eq(1)}$, expressed as L_{eq}. The L_{eq} may also be referred to as the "average" sound level.

L_{max}: The maximum, instantaneous noise level.

L_{min}: The minimum, instantaneous noise level.

L_x: The noise level exceeded for specified percentage (x) over a specified time period; i.e., L_{50} and L_{90} represent the noise levels that are exceeded 50 90 percent of the time specified, respectively.

L_{dn}: The L_{dn} is the average noise level over a 24-hour day, including an addition of 10 dBA to the measured hourly noise levels between the hours of 10:00 p.m. to 7:00 a.m. to account nighttime noise sensitivity. L_{dn} is also termed the day-night average noise level or DNL,

CNEL: Community Noise Equivalent Level (CNEL), is the average noise level over a 24-hour day that includes an addition of 5 dBA to the measured hourly noise levels between the evening hours of 7:00 p.m. to 10:00 p.m. and an addition of 10 dBA to the measured hourly noise levels between the nighttime hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity during the evening and nighttime hours, respectively.

City of Los Angeles Municipal Code

Section 41.40 of the Los Angeles Municipal Code (LAMC) prohibits any construction or repair work of any kind, or any excavating for, any building or structure, between the hours of 9:00 p.m. and 7:00 a.m. of the following day, and also prohibits construction activities before 8:00 a.m. or after 6:00 p.m. on any Saturday or national holiday or at any time on any Sunday.

Section 91.1207.11.2 limits interior noise levels, attributable to exterior sources not to exceed 45 dBA CNEL in any habitable room.

Section 91.1207.11.4 states that noise sensitive structures located where CNEL exceeds 60 dBA, shall require an acoustical analysis showing that the proposed residential design will limit exterior noise to achieve the prescribed allowable interior noise level.

Section 111.02 provides procedures and criteria for the measurement of the sound level of "offending" noise sources. To account for people's increased tolerance for short-duration noise events, Section 111.02 provides a 5 dBA allowance for a noise source occurring more than five but less than 15 minutes in any one-hour period and an additional 5 dBA allowance (total of 10 dBA) for a noise source occurring five minutes or less in any one-hour period between the hours of 7:00 a.m. and 10:00 p.m. of any day.

Section 112.02 prohibits operating any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property or if a condominium, apartment house, duplex, or attached business, within any adjoining unit to exceed the ambient noise level by more than five (5) decibels.

Section 112.05 defines maximum noise level limits for powered equipment or powered hand tools. The noise level is limited to 75 dBA L_{max} at 50 feet between the hours of 7:00 a.m. and 10:00 p.m., in any residential zone of the City or within 500 feet for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment. However, noise limitations shall not apply where compliance is technically infeasible, which means that noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

Section 114.03 prohibits loading/unloading activities within 200 feet of any residential building between the hours of 10:00 p.m. and 7:00 a.m. of the following day, including operation of dollies, carts, forklifts, or other wheeled equipment, which causes any impulsive sound, raucous or unnecessary noise.

City of Los Angeles General Plan Noise Element (1999)

In addition to the previously described LAMC provisions, the City has also established noise guidelines in the Noise Element of the City's General Plan that are used for planning purposes. These guidelines are based in part on the community noise compatibility guidelines established by the California State Governor's Office of Planning and Research and are intended for use in assessing the compatibility of various land use types with a range of noise levels.[129] **Table B-17**, *Guidelines for Noise Compatible Land Use,* provides the guidelines of land use compatibility for community noise sources. The CNEL noise levels for specific land uses are classified into four categories: (1) "normally acceptable" (2) "conditionally acceptable" (3) "normally unacceptable" and (4) "clearly unacceptable." A CNEL value of 70 dBA is considered the dividing line between a "conditionally acceptable" and "normally unacceptable" noise environment for noise sensitive land uses, including residences, transient lodgings, schools, and library.

TABLE B-17
GUIDELINES FOR NOISE COMPATIBLE LAND USE

	Day-Night Average Exterior Sound Level (CNEL, dB)						
Land Use Categories	**50**	**55**	**60**	**65**	**70**	**75**	**80**
Residential Single-Family, Duplex, Mobile Homes	A	C	C	C	N	U	U
Residential Multi- Family	A	A	C	C	N	U	U
Transient Lodging, Hotel, Motel	A	A	C	C	N	U	U
School, Library, Church, Hospital, Nursing Home	A	A	C	C	N	N	U
Auditorium, Concert Hall, Amphitheater	C	C	C	C/N	U	U	U
Sports Arena, Outdoor Spectator Sports	C	C	C	C	C/N	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
Agriculture, Industrial, Manufacturing, Utilities	A	A	A	A	A/C	C/N	N

Based on the Governor's Office of Planning and Research, "General Plan Guidelines", 1990. To help guide determination of appropriate land use and mitigation measures vis-a-vis existing or anticipated ambient noise levels.
A = Normally Acceptable: Specified land use is satisfactory, based upon the assumption buildings involved are conventional construction, without any special noise insulation.
C = Conditionally Acceptable: New construction or development only after a detailed analysis of noise mitigation is made and needed noise insulation features are included in project design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will suffice.
N – Normally Unacceptable: New construction or development generally should be discouraged. A detailed analysis of the noise reduction requirements must be made and noise insulation features included in the design of a project.
U – Clearly Unacceptable: New construction or development should generally not be undertaken.

SOURCE: City of Los Angeles General Plan, Noise Element, 1999.

[129] *State of California*, General Plan Guidelines, Governor's Office of Planning and Research, 2003.

Thresholds of Significance

With respect to the community noise assessment, changes in noise levels of less than 3 dBA are generally not discernable to most people, while changes greater than 5 dBA are readily noticeable and would be considered a significant increase.

Therefore, the significance threshold for mobile source noise is based on human perceptibility to changes in noise levels (increases) with consideration of existing ambient noise conditions and City's land use noise compatibility guidelines. Therefore, the Project would result in a significant noise impact if:

- Construction-related noise levels exceed 75 dBA at distance of 50 feet from equipment when construction activities are located within 500 feet of a residential area unless technically feasible mitigation measures are incorporated;
- Project on-site stationary sources (i.e., air conditioning units, parking structure, loading activity, refuse collection area, etc.) increase existing ambient noise levels at adjacent sensitive receptors by 5 dBA or more; or
- Project-related off-site traffic increase ambient noise levels by 5 dBA CNEL or more along roadway segments with sensitive receptors, and the resulting noise level occurs on a noise-sensitive land use within an area categorized as either "normally acceptable" or "conditionally acceptable"; or causes ambient noise levels to increase by 3 dBA CNEL or more and the resulting noise occurs on a noise-sensitive land use within an area categorized as either "normally unacceptable" or "clearly unacceptable."

Existing Conditions

The Project Site consists of a through lot bounded by South Bonnie Brae Street to the west, West Beverly Boulevard to the north, South Burlington Avenue on the east, and an existing multi-family development to the south. The Project Site is in a highly urbanized location surrounded by a mix of land uses, including commercial, retail, office, institutional, and residential uses as well as religious and school facilities. To the south of the Project Site, are multi-family and single-family residences. Further southeast, of the Project Site is the San Castro Middle School. The following land uses are located in close proximity to the Project Site:

- North – Land uses immediately north of the Project Site across Beverly Boulevard, consist of noise-sensitive uses such as the Joy Christian Church, the East Gate Korean Presbyterian Church, the Central Adult Day Health Care Center, and non-noise sensitive commercial uses.
- East – Land uses immediately east of the Project Site along South Burlington Avenue consist of noise-sensitive uses such as the LAUSD Union Avenue Elementary School and Wat Khmer Buddhist Temple.
- South – Land uses south of the Project Site consist of noise sensitive uses such as the multi-family and single-family residences, and further to the southeast of the Project Site, the San Castro Middle School.
- West – Land uses west of the Project Site include a noise-sensitive multi-family residential uses and non-noise sensitive commercial uses.

To quantify the existing noise environment of the Project Site, long-term (24-hour) measurement were conducted at the location R1. Short-term (15-minute) noise measurements were conducted at the locations R2 through R5. Ambient sound measurements were conducted from Tuesday, February 28, to Wednesday March 1, 2017, to characterize the existing noise environment in the Project vicinity, as shown on **Figure B-1**, *Noise Measurement Locations.*

The ambient noise measurements were conducted in accordance with the City's standards.[130] The ambient noise measurements were conducted using a Larson-Davis Model 820 Precision Integrated Sound Level Meter (SLM). The Larson-Davis 820 SLM is a Type 1 standard instrument, as defined in the American National Standard Institute (ANSI) S1.4. The SLMs were calibrated and operated according to manufacturer specifications. The SLM microphone was placed at a height of 5 feet above the ground level.

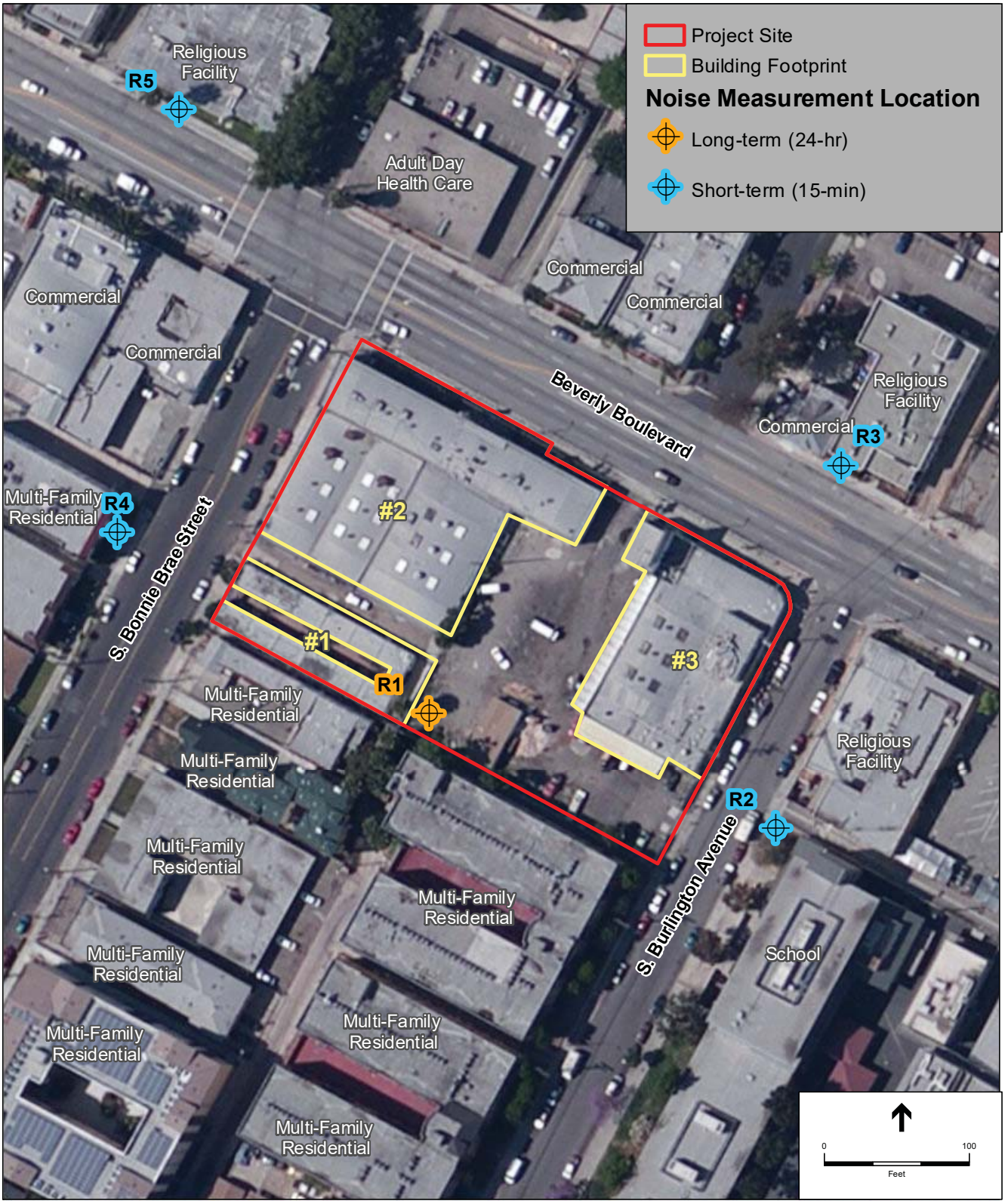
These monitoring locations provide a representative characterization of the existing noise conditions within the vicinity of the Project Site. The results of the ambient noise measurement data are summarized in **Table B-18**, *Summary of Ambient Noise Measurements*. As shown in Table B-18, the measured L_{eq} ranged from 55 to 70 dBA.

TABLE B-18
SUMMARY OF AMBIENT NOISE MEASUREMENTS

Site ID	Monitoring Date(s)	Start Time	End Time	L_{eq}	L_{max}	L_{min}	L_{10}	L_{50}	L_{90}	CNEL
R1 On-Site Res.	2/28-3/1/2017	11:00 a.m.	11:00 a.m. (next day)	55	76	47	56	52	49	61
R2 S. Burlington (School)	2/28/2017	10:33 a.m.	10:48 a.m.	60	81	48	63	56	52	--
R3 North Side of Beverly (Religious)	2/28/2017	10:53 a.m.	11:08 a.m.	68	83	50	72	65	56	--
R4 West Side Bonnie Brae (MFR)	2/28/2017	11:27 a.m.	11:52 a.m.	64	81	48	67	60	55	--
R5 NW Beverly (Religious)	2/28/2017	11:10 a.m.	11:25 a.m.	70	86	48	73	65	55	--

SOURCE: ESA PCR, 2017.

[130] Los Angeles Municipal Code, Section 111.01.



SOURCE: NAIP, 2014 (Aerial).

1800 W. Beverly Boulevard

Figure B-1

Noise Measurement Locations

ESA PCR

Construction Noise

Construction is anticipated to begin in early 2018 with an estimated duration of approximately 24 months.

Total cut and fill would be approximately 31,000 cubic yards that would be exported. Construction hours would occur in accordance with the LAMC requirements, which prohibit construction between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, 6:00 p.m. and 8:00 a.m. on Saturday, and at any time on Sunday. Parking for the construction workers would be provided on the Project Site or leased from near-by off-site parking areas.

The analysis includes consideration of construction noise effects on noise sensitive receivers in the vicinity of the Project Site due to the operation of construction equipment (on-site construction activities) and haul trucks (off-site construction activities).

Project Design Features

The Project would implement PDFs based on common industry standards to minimize the generation of noise from the Project.

> **PDF NOISE-1** The Project shall limit construction and demolition to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays or holidays (City observed).

On-Site Construction Activities

Noise from construction activities would be generated by the operation of vehicles and equipment involved during various stages of construction: demolition, excavation, foundation construction, and building construction. The noise levels generated by construction equipment would vary depending on factors such as the type and number of equipment, the specific model (horsepower rating), the construction activities being performed, and the maintenance condition of the equipment. Construction noise associated with the Project was analyzed using a mix of typical construction equipment, estimated durations, and construction phasing, based on construction equipment data provided by the Applicant's contractor. Consistent with Section 112.05 of the LAMC, the construction noise levels estimated at a distance of 50 feet, conservatively assuming that multiple equipment would operate simultaneously. In reality equipment would likely be dispersed throughout the Project Site; therefore, the noise levels represent a conservative maximum and actual noise levels could be lower. **Table B-19**, *Construction Equipment and Estimated Noise Levels*, presents the list of construction equipment including approximate quantities per construction phase with reference noise levels.

TABLE B-19
CONSTRUCTION EQUIPMENT AND ESTIMATED NOISE LEVELS

Construction Phase and Equipment	Noise Level L_{max} at 50 ft (dBA)	Equipment Usage Factor (%)	Hourly Quantity	Estimated Hourly Noise Level L_{eq} at 50 ft (dBA) per Phase
Demolition				
Tractor/Loader (Dozers)	80	40	2	87
Concrete/Industrial Saw	90	20	1	
Tractor/Loader/Backhoe	80	40	2	
Excavator	85	40	1	
Site Preparation				
Tractor/Loader/Backhoe	80	40	2	82
Tractor/Loader (Dozers)	80	40	2	
Grading/Drainage/Utilities/Sub-Grade				
Excavator	85	40	1	88
Grader	85	40	1	
Rubber Tired Loader	80	40	1	
Tractor/Loader/Backhoe	80	40	2	
Trencher	85	25	1	
Bore/Drill Rig	85	20	2	
Foundation/Concrete Pour				
Crane	85	16	1	86
Pump	81	50	1	
Forklift	85	20	2	
Generator Sets	82	50	1	
Tractor/Loader/Backhoe	80	40	2	
Welders	74	40	1	
Building Construction				
Crane	85	16	1	87
Forklift	85	20	2	
Generator Sets	82	50	4	
Tractor/Loader/Backhoe	80	40	1	
Welders	74	40	1	
Paving				
Air Compressor	80	40	1	87
Pavers	85	50	2	
Rollers	85	20	2	
Paving Equipment	80	20	2	

Note: Noise Levels at 50 ft and Usage Factor are derived from Federal Highway Administration's Roadway Construction Noise Model User's Guide. Usage factors are the ratio of the time that a piece of equipment is in use to the total time that it could be in use. Usage factors are typically attributable to multiple pieces of equipment operating simultaneously.

SOURCE: ESA PCR, 2017

These estimated noise levels, shown in Table B-19, assumes that the Project contractor(s) would equip the construction equipment, fixed or mobile, with properly operating and maintained noise mufflers, consistent with manufacturers' standards. Also, the Project would be required to comply with City of Los Angeles Noise Ordinance Nos. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible. The estimated noise levels represent a conservative worst-case noise scenario where the construction activities are analyzed with several of the equipment simultaneously in use in close proximity to off-site sensitive receptors, whereas construction typically would involve equipment in use throughout the Project Site maintaining safe equipment operating distances, and resulting in most equipment in use further away from noise-sensitive receptors.

As shown in Table B-19, estimated construction noise levels at 50 feet from each phase would range from 82 to 88 dBA L_{eq}. The LAMC limits construction noise levels to 75 dBA L_{max} at 50 feet from the source 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. In accordance with PDF NOISE-1, the Project would limit construction and demolition to the hours of 7:00 a.m. to 7:00 p.m. Monday through Friday, and 8:00 a.m. to 6:00 p.m. on Saturdays or holidays (City observed), which is more restrictive that the LAMC. However, the Project Site is located within 500 feet of residential uses; the perimeter of the Project construction area is approximately 5 feet from the nearest residential uses. The Project construction noise levels per phase would exceed 75 dBA L_{max} at 50 feet from the source. Therefore, Project construction noise would be considered a potentially significant impact due to the potential exceedance of the 75 dBA L_{max} standard at 50 feet. Therefore, Mitigation Measures NOISE-1 to NOISE-4 are prescribed for the Project.

Mitigation Measures

MM NOISE-1 Noise-generating equipment operated at the Project Site shall be equipped with the most effective noise control devices, i.e., mufflers, lagging, and/or motor enclosures. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated.

MM NOISE-2 The Applicant shall designate a construction relations officer to serve as a liaison with surrounding residents and property owners who is responsible for responding to any concerns regarding construction noise and vibration. The liaison's telephone number(s) shall be prominently displayed at the Project Site. Signs shall also be posted at the Project Site that includes permitted construction days and hours.

MM NOISE-3 Construction and demolition activities shall be scheduled so as to avoid operating several heavy pieces of equipment simultaneously.

MM NOISE-4 The Project shall provide a temporary 14-foot-tall construction barrier along property lines facing adjacent off-site residential buildings, adult day care, school, and religious facilities and be equipped with noise blankets capable of achieving sound level reductions of at least 15 dBA between the Project construction site and the off-site residential, adult day care facility, school, and religious facilities. Temporary noise barriers shall be used to block the line-of-sight between the construction equipment and

the noise-sensitive receptors. The temporary barrier shall remain in place until windows have been installed. Standard construction protective fencing with green screen or pedestrian barricades for protective walkways shall be installed along property lines facing streets or commercial buildings. All temporary barriers, fences, and walls shall have gate access as needed for construction activities, deliveries, and site access by construction personnel.

Implementation of MM NOISE-1 through NOISE-4, would require the implementation of noise reduction devices and techniques during construction at the Project Site, which would reduce noise levels generated by the construction of the Project to the maximum extent that is technically feasible. As previously discussed, the construction noise level limitations of Section 112.05 shall not apply where compliance is technically infeasible, i.e., noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

Implementation of MM NOISE-4 would reduce the construction noise levels of 88 dBA to 73 dBA at the nearest noise sensitive receptor locations. MM NOISE-1 and MM NOISE-3 would provide at least 5 dBA noise reduction at off-site sensitive receptor locations.[131] MM Noise-2 would help to ensure the proper implementation of MM NOISE-1, MM NOISE-3, and MM NOISE-4. Therefore, with implementation of these mitigation measures, the potentially significant noise impacts during Project construction would be reduced to a less than significant level.

The Project would comply with Sections 41.40 of the LAMC; the Project's construction activities, including delivery and haul routes, would be restricted to hours between 7:00 A.M. and 7:00 P.M. Monday through Friday and 8:00 a.m. and 6:00 p.m. on Saturdays and City-observed holidays (PDF NOISE-1), and no noise-generating construction activities would take place on Sundays, per LAMC requirements.

Therefore, with respect to a violation of the noise standards and regulations established in the LAMC, potentially significant noise impacts during Project construction would be reduced to a less than significant level through compliance with applicable regulations, PDFs, and implementation of the prescribed mitigation measures.

Off-Site Construction Activities

During the excavation/grading phase of construction, there would be approximately 200 haul truck trips per day. Because the construction hours are limited to between 7:00 a.m. and 7:00 p.m. from Monday to Friday, the daily maximum of 200 haul truck trips, 6 vendor truck trips, and 53 worker vehicle trips would be assumed to occur during the excavation phase.

Haul trucks would travel on approved truck routes designated within the City. Given the Project Site's proximity to US 101, it is anticipated that haul truck traffic would depart the Project by traveling westbound on Beverly Boulevard, a designated Boulevard II, then northbound on

[131] Worker's Compensation Board of BC, Engineering Section Report, ARCS Reference No: 0135-20, February. 2000.

Alvarado Street, a designated Avenue II, to access US 101. Haul trucks arriving to the Project Site would travel southbound on Union Avenue, a designated Avenue III, from US 101 then travel westbound on Beverly Boulevard to access the Project Site. The haul route would be reviewed and approved by the City.

The Project's truck trips would generate noise levels of approximately 62.1dBA L_{eq} along Beverly Boulevard, 61.5 dBA along Alvarado Street, and 64.5 dBA along Union Avenue. As shown in **Table B-21**, *Off-Site Traffic Noise Impact,* the existing noise levels along streets are 72.5 dBA L_{eq} along Beverly Boulevard, 73.8 dBA, along Alvarado Street, and 67.9 dBA along Union Avenue.

Construction traffic noise levels generated by truck trips would increase traffic noise levels along Beverly Boulevard by up to 0.4 dBA, along Alvarado Street by up to 0.2 dBA, along Union Avenue by up to 1.6 dBA. The noise level increases by truck trips would be below the significance threshold of 3 dBA. Therefore, off-site construction traffic noise impacts would be less than significant

Operational Noise

The existing noise environment in the Project vicinity is dominated by traffic noise from nearby roadways, as well as nearby commercial and residential activities. Long-term operation of the Project would have a minimal effect on the noise environment in proximity to the Project Site. Noise generated by the Project would result primarily from the added operation of the building mechanical equipment and the added off-site traffic.

Off-Site Operational Traffic Noise

Vehicle trips attributed to operation of the Project would increase average daily traffic (ADT) volumes along the major thoroughfares within the Project vicinity, which was analyzed to determine if any traffic-related noise impacts would result from Project development. The street segments chosen for this analysis have residential land uses which are the most affected by traffic increases generated by the Project.

FHWA's TNM model, version 2.5, was used to predict the noise level due to vehicular traffic. The Project's TNM model run was validated by comparing the measured ambient noise levels at R2, R3, R4, and R5 to the noise levels predicted using TNM, for the same traffic conditions observed during the measurements. **Table B-20**, *Traffic Noise Model Validation Results*, presents the results of model validation.

Caltrans *Technical Noise Supplement* guidance document states that the model is considered validated when the measured and calculated noise levels are within ±3 dB.[132] As indicated in Table B-20, the validation is within 3 dB and therefore, is considered validated.

[132] California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

TABLE B-20
TRAFFIC NOISE MODEL VALIDATION RESULTS

Measurement Location	Measured Noise Level dBA L_{eq}	Calculated Noise Level dBA L_{eq}	Net Difference dBA L_{eq}
R2	59.8	60.6	-0.8
R3	68.1	N/A	N/A
R4	63.8	62.3	1.5
R5	69.7	68.7	1.0

NOTE: R3 could not be validated as the traffic count was too low to be modeled with TNM.

SOURCE: ESA PCR, 2017.

Table B-21 shows the change in mobile source noise resulting from Project implementation. As shown in Table B-21, the off-site roadway traffic volumes associated with the Project would result in a maximum increase in CNEL of 0.8 dBA along the segments of South Burlington Avenue, between West Beverly Boulevard and 3rd Street. The largest cumulative (Project plus ambient growth plus other known related projects in the vicinity of the Project Site) roadway noise impact would be 1.5 dBA CNEL, which is predicted to occur along Lucas Avenue, between Beverly Boulevard and 3rd Street. Therefore, the noise level on local roadways due to the Project's off-site traffic would not exceed the 3 dBA threshold, and impacts would be less than significant and no mitigation measures are necessary.

On-Site Operational Noise

The operation of mechanical equipment typical for developments like the Project, such as air conditioners, fans, generators, and related equipment, generate noise levels which may be audible. Therefore, mechanical equipment would be typically located on rooftops or within buildings, and shielded from nearby land uses to attenuate noise and avoid conflicts with adjacent uses. In addition, all mechanical equipment would be designed with appropriate noise control devices, such as sound attenuators, acoustics louvers, or sound screen/parapet walls to comply with noise limitation requirements provided in Section 112.02 of the LAMC, which limits the noise from such equipment causing an increase in the ambient noise level by more than five decibels. Therefore, operation of mechanical equipment would not exceed the City's thresholds of significance and impacts would be less than significant.

The Project proposes to provide 292 automobile parking spaces on site within a parking structure. Sources of noise associated with parking facilities typically include engines accelerating, doors slamming, car alarms, and people talking. Noise levels at these facilities would fluctuate throughout the day with the amount of vehicle and human activity. Noise levels would generally be the highest in the early morning and evening hours when the largest number of people would enter and exit the parking facility.

TABLE B-21
OFF-SITE TRAFFIC NOISE IMPACTS

		Calculated Traffic Noise Levels, dBA CNEL				
Roadway	**Roadway Segment**	**Existing (A)**	**Future Without Project [a] (B)**	**Future With Project [b] (C)**	**Project Increment [c] (C-B)**	**Cumulative Increment [d] (C-A)**
Beverly Boulevard	Reno Street and Rampart Boulevard	72.5	72.9	72.9	0.0	0.4
	Rampart Boulevard and Alvarado Street	72.5	72.9	72.9	0.0	0.4
	Alvarado Street and Bonnie Brae Street	72.5	72.9	73.0	0.1	0.5
	Bonnie Brae Street and Burlington Avenue	72.7	73.1	73.1	0.0	0.4
	Burlington Avenue and Union Avenue	72.7	73.1	73.2	0.1	0.5
	Union Avenue and Lucas Avenue	69.8	70.4	70.4	0.0	0.6
Alvarado Street	Sunset Boulevard and US 101 Northbound Ramps	73.6	74.0	74.1	0.1	0.5
	US 101 Southbound Ramps and Temple Street	74.3	74.7	74.8	0.1	0.5
	Temple Street and Beverly Boulevard	73.8	74.2	74.2	0.0	0.4
	Beverly Boulevard and 3rd Street	73.3	73.7	73.7	0.0	0.4
	3rd Street and 6th Street	73.5	73.9	73.9	0.0	0.4
	6th Street and Wilshire Boulevard	73.4	73.8	73.8	0.0	0.4
3rd Street	Rampart Boulevard and Alvarado Street	73.9	74.2	74.2	0.0	0.3
	Alvarado Street and Bonnie Brae Street	72.8	73.2	73.3	0.1	0.5
	Bonnie Brae Street and Burlington Avenue	72.9	73.3	73.3	0.0	0.4
	Burlington Avenue and Lucas Avenue	72.7	73.1	73.2	0.1	0.5
	Lucas Avenue and Boylston Street	72.6	73.1	73.1	0.0	0.5
Bonnie Brae Street	North of Beverly Boulevard	67.6	68.1	68.1	0.0	0.5
	Beverly Boulevard and 3rd Street	68.6	69.0	69.1	0.1	0.5
	South of 3rd Street	70.5	70.5	71.0	0.5	0.5
Burlington Avenue	Beverly Boulevard and 3rd Street	62.7	62.8	63.6	0.8	0.9
	South of 3rd Street	64.1	64.2	64.2	0.0	0.1
Union Avenue	Temple Street and Beverly Boulevard	67.9	69.1	69.2	0.1	1.3
	South of Beverly Boulevard	69.3	70.0	70.0	0.0	0.7
Temple Street	Alvarado Street and Union Avenue/ Belmont Avenue	73.3	73.6	73.6	0.0	0.3
	Union Avenue/Belmont Avenue and Glendale Boulevard	74.2	74.4	74.4	0.0	0.2
Lucas Avenue	Beverly Boulevard and 3rd Street	71.6	73.1	73.1	0.0	1.5

[a] Includes future growth plus related (cumulative) projects identified in the Traffic Study.
[b] Includes future growth plus related (cumulative) projects and Project traffic.
[c] Increase due to Project-related traffic only at Project build-out.
[d] Increase due to future growth, related (cumulative) projects, and Project traffic.

Noise calculations are provided in Appendix _ of this MND.

SOURCE: ESA PCR, 2017.

For the purpose of providing a quantitative estimate of the noise levels that would be generated from the Project's parking area, the methodology recommended by FTA for the general assessment of stationary transit noise sources is used. Using the methodology, the Project's peak hourly noise level that would be generated by the onsite parking levels was estimated using the following FTA equation for a parking lot:

$L_{eq}(h) = SEL_{ref} + 10\log(NA/1000) - 35.6$, where

$L_{eq}(h)$ = hourly L_{eq} noise level at 50 feet

SEL_{ref} = reference noise level for stationary noise source represented in sound exposure level (SEL) at 50 feet

N_A = number of automobiles per hour

Based on the Project's transportation impact study, the Project is forecasted to generate 1,661 total daily vehicle trips, with an anticipated 134 trips and 150 trips during the a.m. and p.m. peak hours, respectively.[133] Using the FTA's reference noise level of 92 dBA SEL[134] at 50 feet from the noise source for a parking lot, it was determined that the Project's highest peak hour vehicle trips, which would be 150 trips during the p.m. peak hour, would generate noise levels of approximately 48 dBA L_{eq} at 50 feet from the Project's parking entrance, which would not exceed the ambient noise level of 60 dBA along South Bonnie Brae Street by 5 dBA. During other hours of the day when less overall vehicles arrive and depart from the Project Site, the noise levels at the nearest offsite sensitive land uses would be even lower. Thus, this impact would be less than significant.

Loading and unloading activities would occur on South Bonnie Brae Street and South Burlington Avenue. Loading for move-ins would occur through the lobby areas and trash receptacles would be rolled out from interior trash areas. Loading area activities including truck movements, idling, and loading/unloading operations would generate noise levels that have the potential to adversely impact adjacent land uses during Project operations. Based on measured noise levels, delivery truck idling (at loading area) would generate noise levels of approximately 75 dBA (L_{eq}) at a 5-foot distance. The nearest sensitive receptors including multi-family residential uses adjacent to the south of the Project Site (R1), Union Avenue Elementary School (R2) along South Burlington Avenue, and multi-family residential uses (R4) along South Bonnie Brae Street, are located approximately 60 feet from the area with potential loading activities. Based on a noise level source strength of 75 dBA at a reference distance of 5 feet, and accounting for distance loss from 5 feet to 60 feet for noise propagation (minimum 22 dBA insertion loss[135]), loading dock noise would be 53 dBA at the residential and school property lines and would not exceed the

[133] Gibson Transportation Consulting, Transportation Impact Study for The 1800 Beverly Project, April 2017.

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

[135] Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as "spherical spreading." Stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate (i.e., reduce) at a rate between 6 dBA for acoustically "hard" sites for each doubling of distance from the reference measurement, Caltrans, Technical Noise Supplement, September, 2013.

significance threshold of 65 dBA at the Union Avenue Elementary School (R2) and 69 dBA at the multi-family residential uses (R4), impacts to surrounding uses would be less than significant.

On-site refuse and recycling related activities, such as trash compacting, if applicable, would occur within an enclosed area at the lower ground level (Level B1) and upper ground level (Level 1). As such the noise generated from these activities would be shielded from surrounding off-site residential uses, there would be no perceptible increases in noise. However, the moving of trash and recycling bins generate noise levels that have a potential to adversely impact adjacent land uses during long-term Project operations. Dumpsters would be wheeled manually. The moving of trash and recycling bins manually would generate noise levels approximately 60 dBA L_{max} at 3 feet distance. The nearest noise-sensitive uses, the Union Avenue Elementary School (R2) along Burlington Avenue and multi-family residential uses (R4) along South Bonnie Brae Street, are located approximately 40 feet from the proposed loading area. Based on a noise level source strength of 60 dBA at a reference distance of 3 feet, and accounting for distance attenuation (minimum 22 dBA insertion loss[136]), moving trash bin noise would be 38 dBA at the school (R2) and residential uses (R4) property lines and would not increase existing ambient noise levels of 60 dBA at the Union Avenue Elementary School (R2) and 64 dBA at the multi-family residential uses (R4) by 5 dBA. Therefore, noise from refuse collection areas at off-site sensitive receptor locations would not exceed the threshold. As such, operational noise impacts would be less than significant.

Noise from open spaces and roof decks are addressed in Section 12.d.

b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact With Mitigation Incorporated. The Project would be constructed using typical construction techniques. As such, it is anticipated that the equipment to be used during construction would not expose persons to or generate excessive groundborne vibration. Post-construction on-site activities would be limited to residential and commercial uses that would not generate excessive groundborne vibration.

Vibration Principles and Descriptors

Ground-borne vibration from development is primarily generated from the operation of construction equipment and from vehicle traffic. Ground-borne vibration propagates from the source through the ground to adjacent buildings by surface waves. Vibration energy dissipates as it travels through the ground, causing the vibration amplitude to decrease with distance away from the source. Vibration in buildings is typically perceived as rattling of windows, shaking of loose items, or the motion of building surfaces. The vibration of building surfaces also can be radiated as sound and heard as a low-frequency rumbling noise, known as ground-borne noise.

[136] Noise from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, referred to as "spherical spreading." Stationary point sources of noise, including stationary mobile sources such as idling vehicles, attenuate (i.e., reduce) at a rate between 6 dBA for acoustically "hard" sites for each doubling of distance from the reference measurement, Caltrans, Technical Noise Supplement, September, 2013.

Vibration levels for potential structural damage is described in terms of the peak particle velocity (PPV) measured in inches per second (in/sec).

Ground-borne vibration is generally limited to areas within a few hundred feet of certain types of industrial operations and construction/demolition activities such as pile driving. Road vehicles rarely create enough ground-borne vibration amplitude to be perceptible to humans unless the receiver is in immediate proximity to the source or the road surface is poorly maintained and has potholes or bumps. If traffic, typically heavy trucks, does induce perceptible building vibration, it is most likely an effect of low-frequency airborne noise or ground characteristics.

Building structural components also can be excited by high levels of low-frequency airborne noise (typically less than 100 Hz). The many structural components of a building, excited by low-frequency noise, can be coupled together to create complex vibrating systems. The low-frequency vibration of the structural components can cause smaller items such as ornaments, pictures, and shelves to rattle, which can cause annoyance to building occupants.

Human sensitivity to vibration varies by frequency and by receiver. Generally, people are more sensitive to low-frequency vibration. Human annoyance also is related to the number and duration of events; the more events or the greater the duration, the more annoying it becomes. Ground-borne vibration related to human annoyance is generally related to root mean square (rms) velocity levels, and expressed as velocity in decibels (VdB).

Regulatory Framework

The City of Los Angeles does not address vibration either in the LAMC or in the Noise Element of the General Plan. With respect to ground-borne vibration from construction activities, Caltrans has adopted guidelines/recommendations to limit ground-borne vibration based on the age and/or condition of the structures that are located in close proximity to construction activity. With respect to residential and commercial structures, Caltrans' technical publication, titled Transportation- and Construction-Induced Vibration Guidance Manual,[137] provides a vibration damage potential threshold criteria of 0.5 inches per second PPV for historic and older buildings, 1.0 inch-per-second PPV for newer residential structures, and 2.0 inches per second PPV for modern industrial/commercial buildings. In addition, the guidance also sets 0.035 PPV as the threshold for "Distinctly Perceptible" human response to steady state vibration

According to the Federal Transit Administration (FTA), ground vibrations from construction activities very rarely reach the level that can damage structures. A possible exception is the case of old, fragile buildings of historical significance where special care must be taken to avoid damage. The construction activities that typically generate the most severe vibrations are blasting and impact pile driving, which would not be utilized for the Project. The Project would utilize construction equipment such as use of bulldozers and excavators, which would generate ground-borne vibration during excavation and foundation activities. Based on the vibration data by the

[137] Transportation- and Construction-Induced Vibration Guidance Manual, June 2004.

FTA, typical vibration velocities from the operation of a large bulldozer would be approximately 0.089 inches per second PPV at 25 feet from the source of activity.

Construction Vibration

The nearest residential building contains the multi-family residences (R1) to the south of the Proposed Project, which is approximately 5 feet from the Project Site. These residences would be exposed to vibration velocities up to 0.99 inches per second PPV. These values would exceed the 0.5 inches per second PPV significance threshold (potential building damage for an older residential building), therefore vibration impacts during excavation phase would be potentially significant without implementation of mitigation measures.

With respect with human perception, as discussed above, the nearest off-site residential uses are the multi-family residential building located adjacent to the south of the Project Site, which would be exposed to vibration velocities up to 0.99 inches per second PPV. As this value exceeds the 0.035 inches per second (PPV) perception threshold, vibration impacts during excavation phase would be potentially significant without implementation of a mitigation measure.

School and religious uses (R2) east of the Project, religious uses (R3) north of the Project across West Beverly Boulevard, and multi-family residential uses (R4) west of the Project and would be located approximately 45 feet, 80 feet, and 77 feet, respectively. These religious uses and school uses would be exposed to vibration levels of up to 0.037 inches per second PPV which would be well below the 0.5 inches per second PPV significant threshold for potential building damage for an older residential building. The multi-family residential uses would be exposed to vibration levels of up to 0.016 inches per second PPV which would be below the 0.035 inches per second (PPV) perception threshold for human perception. Therefore, vibration impacts would be less than significant on the multi-family residential uses and religious uses (R2), religious uses (R3), and school use (R4).

Mitigation Measures

> **MM NOISE-5** Heavy equipment, such as use of a large bulldozer (greater than 600 horsepower), shall not be used within 50 feet of the neighboring residential structures. If such proximate construction is required, alternative equipment and methods such as small construction equipment (less than 300 horsepower), a small dozer, a small excavator, or a small grader shall be used to ensure that vibration effects on adjacent residential uses.

Small construction equipment would generate vibration velocity of 0.075 inches per second PPV at 25 feet from the small construction equipment. The vibration sensitive receptors located 50 feet from the construction equipment would be exposed to vibration velocities up to 0.027 inches per second PPV. Incorporation of the above mitigation measure, MM NOISE-5, would reduce the maximum vibration impact associated with construction activities to a less than significant level of 0.5 inches per second PPV for potential building damage and 0.035 inches per second PPV for human perception. As such, potentially significant impacts would be reduced to a less than significant level.

Operation

Once construction activities have been completed, there would be no substantial sources of vibration activities from the Project Site. The Project's operations would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which would produce limited levels of vibration. In addition, the primary sources of transient vibration would include passenger vehicle circulation within the proposed parking area, which also produce limited levels of vibration. These sources would generate substantially lower levels of vibration identified above for construction. Therefore, vibration impacts during Project operation would be less than significant.

c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. The existing noise environment in the Project area is dominated by traffic noise from nearby roadways, as well as nearby commercial and residential activities. Long-term operation of the Project would not have a significant effect on the community noise environment in proximity to the Project Site. Noise sources that would have potential noise impacts include: off-site vehicle traffic and mechanical (i.e., heating, ventilation, and air-conditioning) equipment. Motor vehicle travel on local roadways attributable to the Project, as discussed in Response (a.), would have a less than significant impact on community noise levels. Noise levels associated with on-site operations (e.g., mechanical equipment, parking structure, loading activity, and refuse activity) are also considered less than significant as discussed in Response (a.). As such, noise impacts would be less than significant.

d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant With Mitigation Incorporated. The Project would result in a temporary increase in ambient noise near the Project Site during the construction period. Construction noise impacts are discussed in Response (a.). Noise generated by on-site construction activities would have a less than significant impact on surrounding uses with incorporation of the prescribed mitigation measures, and compliance with the applicable LAMC noise regulations (i.e., allowable construction hours).

With respect to temporary operational noise, open space amenities for residents would include two interior courtyards, on the podium level (level 2) that would be connected by passageways. Roof decks are also proposed with plantings and outdoor furniture for the residents.

The largest courtyard on the podium level would be partially open to South Burlington Avenue and would include a pool deck, spa, fire pit and lounge area. The nearest school uses and religious facility, (R2), are located approximately 70 feet from the courtyard 1 and would be partially shielded by the Project building. Under a conservative scenario, there could be up to approximately 80 visitors to the courtyard at one time. Noise from human conversation is

approximately 55 dBA at a reference distance of 3 feet.[138] Assuming 40 visitors talking simultaneously, the continuous noise level would be up to 71 dBA at 3 feet. Based on a noise level source strength of 71 dBA at a reference distance of 3 feet, and accounting for distance attenuation of 6 dBA per doubling of distance and barrier insertion loss by the Project building (minimum 5 dBA insertion loss), the outdoor area noise would be approximately 39 dBA at the school uses and religious facility, R2, which would not exceed the significance threshold of 65 dBA (5 dBA plus the noise levels of 60 dBA (R2) as shown in Table B-21).

Also located on the podium level, the second courtyard on the west side of the Project Site near South Bonnie Brae Street would contain a lawn area and barbeque area. The courtyard would be enclosed by the Project buildings, and would be shielded from off-site noise sensitive receptors to the west. Therefore, due to orientation and shielding, noise associated with outdoor activities at the western courtyard would be less than significant.

The roof decks fronting West Beverly Boulevard on the roof level would have seating areas. The roof decks located at the corner West Beverly and South Bonnie Brae Street would be fully open toward to multi-family residential uses (R4) along South Bonnie Brae Street. The roof deck located the corner of West Beverly Boulevard and South Burlington Avenue, is open toward to the religious facility (R2) to the west along South Burlington Avenue. Under a conservative scenario, there could be up to approximately 10 visitors to each roof deck at one time. Noise from human conversation is approximately 55 dBA at a reference distance of 3 feet. Assuming 5 visitors talking simultaneously, the continuous noise level would be up to 62 dBA at 3 feet. Based on a noise level source strength of 62 dBA at a reference distance of 3 feet, and accounting for distance attenuation of 6 dBA per doubling of distance, the roof deck noise would be approximately 40 dBA at the religious uses, (R2), which would not exceed the significance threshold of 65 dBA (5 dBA plus the noise levels of 60 dBA (R2) as shown in Table B-21).

Noise related to the roof deck at the northwestern portion the Project Site would be approximately 30 dBA at the multi-family residential uses, (R4), which would not exceed the significance threshold of 69 dBA (5 dBA plus the noise levels of 64 dBA (R4) as shown in Table B-21). As such, impacts would be less than significant.

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

No Impact. The Project Site is not located within an airport land use plan area or within two miles of a public airport or public use airport. Therefore, construction or operation of the Project would not expose people to excessive airport related noise levels. No impact would occur in this regard.

[138] American Journal of Audiology Vol.7 21-25 October 1998. doi:10.1044/1059-0889(1998/012)

f. For a project within the vicinity of a private airstrip, 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 vicinity of a private airstrip, or heliport or helistop. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels from such uses. No impact would occur in this regard.

Cumulative Impacts

Noise

The geographic context for the analysis of cumulative noise impacts depends on the impact being analyzed. Noise is by definition a localized phenomenon, and sound reduces significantly in magnitude as the distance from the source increases. As such, only projects expected to occur in the immediate Project area likely would contribute to cumulative noise impacts.

Construction Noise

Noise from construction of the Project and related projects would be localized, thereby potentially affecting areas immediately within 500 feet from either/both construction sites. There are no related projects in the surrounding area within approximately 500 feet of the Project. The nearest related project is the Mixed-Use Project at 1924 West Temple Street, which is approximately 1,500 feet to the north of the Project Site. All other related projects are also greater than 1,500 feet from the Project Site and would not contribute substantially to cumulative construction noise impacts. Furthermore, related projects would be required to comply with City noise standards and implement mitigation measures for identified significant impacts, as required under CEQA, similar to the Project. As such, cumulative impacts associated with construction noise would be less than significant.

Operational Noise

Cumulative noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project and other projects in the Project vicinity. Therefore, cumulative traffic-generated noise impacts have been assessed based on the contribution of the Project to the future cumulative base traffic volumes in the Project vicinity. The noise levels associated with cumulative base traffic volumes with the Project are identified above in Table B-21. Noise level increases in the Project vicinity would reach a maximum of 1.5 dBA CNEL along Lucas Avenue, between Beverly Boulevard and 3rd Street, which would not exceed the Project's 3 dBA significance threshold. Therefore, with respect to roadway noise, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Due to Section 112.02 of the LAMC provisions that limit stationary-source noise from items such as roof-top mechanical equipment, noise levels would be less than significant at the property line for each related project. For this reason, on-site noise produced by any related project would not result in a substantial or noticeable additive increase to Project-related noise levels. As the Project's composite stationary-source impacts would be less than significant, its contribution to

cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Vibration

Due to the rapid attenuation characteristics of ground-borne vibration and distance of the related projects to the Project Site, the Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts would be less than significant.

13. Population and Housing

Would the project:

a. Induce substantial 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 would provide infill replacement development within a currently developed urban setting. It would not add new infrastructure beyond that required to connect the Project to existing utility lines, and adjacent roadways. Therefore, the Project would not open new areas to development; or promote development in an area not otherwise expected to be developed.

The Project would replace the existing mix of commercial uses with new residential and retail uses. This would result in a reduced employment population at the Project Site and an increase in resident population and housing units. The Project would provide 243 residential units (inclusive of 21 units that would be restricted for very low income households), and 3,500 square feet of commercial uses. The changes in Project Site population are calculated in **Table B-22**, *Potential Population Growth*. The estimated household size for converting the Project's number of residences to a Project Site population, 2.82 people per household, is based on the 2020 build-out year household size in the Westlake Community Plan area.[139]

As indicated, in Table B-22 the Project's 243 residential units (less existing units) are estimated to result in an increase of 231 units with a net increase in residential population of approximately 673 residents. Because the Project would replace existing commercial uses, it would reduce the number of total employees by an estimated 15 jobs.

[139] Based on SCAG RTP/SCS data, as presented in Table B-23.

TABLE B-22
POTENTIAL POPULATION GROWTH

Use	Units or Sq. Ft.	Average Household Size[a] or Employment Generation Factor[b]	Total Population or Employees
Residential Development			
Proposed Residential	243	2.82	685
Existing Units	12	[c]	12
Net Residential Increase	**231**		**673**
Employment			
Proposed Retail/Restaurant	3,500	0.00271	9
Existing Commercial	8,900	0.00271	24
Net Employment Increase			-(15)

[a] 2.82 is the estimated 2020 build-out year household size in the Westlake Community Plan area.

[b] The employee generation factors for commercial uses is based on the retail employee generation factor included in the Los Angeles Unified School District, 2014 Developer Fee Justification Study, Table 12, March 2014.

[c] The Project Site currently contains 12 studio residential units. Six of these units are occupied with an existing on site population of 12 persons. Source: CV 1800 Beverly, LLC, March 2017.

SOURCE: ESA PCR, 2017

The estimated increases in housing and population for the City and the Westlake Community Plan areas in the 2020 Project build-out year and in the RTP/SCS 2040 horizon year are shown in **Table B-23**, *Projected Population, Housing and Employment Estimates*. The Project contributions to the expected growth during these two time increments are shown in **Table B-24**, *Project Population, Housing and Employment Impacts.* As indicated in Table B-24, the Project would represent a small percentage (1.0 percent) of the SCAG's projected 2017 - 2020 population growth for the City of Los Angeles and 27.4 percent of the SCAG's projected, short timeframe, 2017 - 2020 population growth for the Westlake Community Plan area. For the 2040 horizon year it would constitute 0.1 percent of the City's growth and 3.1 percent of the Community Plan area's projected increase.

The Project would represent a small percentage (0.5 percent) of the SCAG's projected 2017 - 2020 household growth for the City of Los Angeles and 13.2 percent of the SCAG's projected 2017 - 2020 population growth for the Westlake Community Plan area. For the 2040 horizon year it would constitute 0.1 percent of the City's household growth and 2.1 percent of the Community Plan's projected increase.

TABLE B-23
PROJECTED POPULATION, HOUSING AND EMPLOYMENT ESTIMATES

		Projected Buildout Year - 2020			SCAG 2040 Horizon Year		
	2017 Baseline	Projected	Total Growth	Percentage Increase	Projected	Total Growth	Percentage Increase
Population							
Westlake Community Plan Area	116,294	118,749	2,455	2%	137,751	21,457	18%
City of Los Angeles	3,952,665	4,016,977	64,313	2%	4,609,414	656,750	17%
Housing (dwelling units)							
Westlake Community Plan Area	40,425	42,178	1,753	4%	51,172	10,747	27%
City of Los Angeles	1,397,950	1,441,402	43,452	3%	1,690,343	292,393	21%

SOURCE: Based on SCAG data prepared for the 2016 RTP/SCS. The 2016 RTP/SCS provides population, housing and employment estimates for 2012, 2020, 2035 and 2040 for the use of planning by the jurisdictions in the regions. The City of Los Angeles Demographics Unit aggregates the data for City Community Plan areas. The Estimates for 2017 are based on interpolation of data presented in the RTP/SCS for 2012 and 2020. Compiled by ESA PCR, 2017

TABLE B-24
PROJECT POPULATION AND HOUSING IMPACTS

	Project Increase	SCAG Projected Growth	Project Percentage of Growth
Population			
2017-2020 Buildout			
Westlake Community Plan Area	673	2,455	27.4%
City of Los Angeles	673	64,313	1.0%
2017 - 2040 Projection Horizon			
Westlake Community Plan Area	673	21,457	3.1%
City of Los Angeles	673	656,750	0.1%
Households			
2017-2020 Buildout			
Westlake Community Plan Area	231	1,753	13.2%
City of Los Angeles	231	43,452	0.5%
2017 - 2040 Projection Horizon			
Westlake Community Plan Area	231	10,747	2.1%
City of Los Angeles	231	292,393	0.1%

SOURCE: ESA PCR 2017

The City's CEQA Thresholds Guide recommends that thresholds regarding population and housing growth be developed on a case-by-case basis taking into account the amount of growth, projected/planned levels of growth, the extent to which such growth would occur without

implementation of the project and expected growth in the community plan area.[140] Accordingly, the project would have a significant impact if: "The Project would cause growth (i.e. new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of the project occupancy/buildout, as compared to growth otherwise occurring, and that would result in an adverse physical change in the environment."

As indicated in Table B-24, the Project contributions to growth fall within the range of growth accounted for in the SCAG projections that are used for future planning activities and provision of services. These projections include development that is anticipated over a horizon period that extends to 2040. The projections are revised on four year intervals so as to stay current with current growth trends and changes in land use activity. Changes to planning and zoning designations can be incorporated in timely fashions so long as the growth does not exceed the amount anticipated within the service timelines. Growth at specific sites may vary from that accounted for in the SCAG projections; however the overall growth patterns are sufficient for planning purposes. Further, as indicated in the evaluations for the other topics addressed throughout the MND, the Project would not result in significant impacts on the physical environment. The development considered in those analyses represents development not otherwise anticipated, or induced by this Project's development.

The Project is also consistent with City and regional policies regarding the location of development and preferred development patterns for the region. The SCAG Regional Housing Needs Assessment (RHNA), as addressed in the City's General Plan Housing Element identifies needed housing stock to meet the regional housing needs. The most recent RHNA allocation identifies housing needs for the planning period between January 2014 and October 2021. The City's 2013-2021 Housing Element, is based on the updated 2012 RHNA. Table 1.29 of the Housing Element provides a City needs assessment allocation of 82,002 housing units of which 35,412 units, or 43.2 percent, would be for above moderate income households. The remaining needs are inclusive of 10,213 very low-income units (12.5 percent). The Project would provide 231 net new residential units, inclusive of 21 units that would be restricted for very low income households. Thus, the Project would support the RHNA by contributing to both the overall need for housing as well as contributing to the availability of housing for very low income households.

Further, regional SCAG and City policies, including provisions of the General Plan Housing Element, encourage development in well-served transit areas. As the region's transportation planning agency, SCAG has promoted the concept of integrating transportation planning and land use planning. SCAG's 2016 RTP/SCS incorporates the guidance of State Senate Bill 375 for the reduction of GHGs, which formalizes the idea of integrating planning to meet regional reduction targets for greenhouse gas emission, which can be achieved in part by reducing vehicle miles

[140] These findings take into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors regarding population and housing growth, including the degree to which the project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy/buildout, and that would result in an adverse physical change in the environment; whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and the extent to which growth would occur without implementation of the project.

traveled. The 2016 RTP/SCS focuses new growth around transit through the following policies: "Identifying regional strategic areas for infill and investment; structuring the plan on a three-tiered system of centers development; developing 'Complete Communities'; developing nodes on a corridor; planning for additional housing and jobs near transit; planning for changing demand in types of housing; continuing to protect stable, existing single-family areas; ensuring adequate access to open space and preservation of habitat; and incorporating local input and feedback on future growth."[141]

SCAG encourages transit oriented development (TOD) in areas with high quality transit services. These are areas that are located within one-half mile of a transit stop or corridor. SCAG has also identified High Quality Transit Areas (HQTAs) that meet this criterion on Figure 5.1, page 77, of the RTP/SCS. The 2016 RTP/SCS assumes that 46 percent of new housing and 55 percent of new employment locations developed between 2012 and 2040 will be located within HQTAs, which comprise only three percent of the total land area in the SCAG region. The City has incorporated these criteria in establishing Transit Priority Areas (TPAs), which are inclusive of the Project Site. The City's TPAs are further defined in the City's Zoning Information File, ZI No. 22452. Further, the Westlake Community Plan includes as Policy 2: "That medium density housing be located near commercial corridors where access to public transportation and shopping services is convenient and where a buffer from or a transition between low density housing can be achieved."

The Project Site is served by a network of regional transportation facilities providing connectivity to the larger metropolitan area. The Project is located less than a mile from the Westlake/MacArthur Park Metro Station, which serves the Purple Line (805) and Red Line (802) and links directly to the 7th & Metro Center. The 7th & Metro Center provides access to the majority of the regions rail lines with links to several job centers, including Long Beach, Culver City, Koreatown, the Wilshire Corridor, Hollywood, North Hollywood, Culver City and Santa Monica. The Project Site is also in close proximity to several bus lines including the DASH Pico Union/Echo Park line stop located one block to the east of the Project Site at the intersection of Union Avenue and Beverly Boulevard. Metro Bus lines 14 and 37 run along Beverly Boulevard with stops at Bonnie Brae Street and Union Avenue.

Therefore, the provision of a residential development is consistent with the growth and sustainability policies of SCAG's 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (RTP/SCS), which are to create denser communities connected by public transportation. Because the Project Site is located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of an HQTA and TOD; and because the Project follows the development principles in the Westlake Community Plan Policy 2, the population growth generated by the Project is considered to be consistent with the City's and SCAG's growth policies. Impacts with respect to consistency with population growth pattern policies would be less than significant.

[141] Southern California Association of Governments, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, page 74, April 2016.

b. Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?

c. Displace substantial numbers of people necessitating the construction of replacement housing elsewhere?

Less Than Significant (b-c). The Project Site is developed with existing commercial buildings along with 12 residential apartment units, of which six are currently vacant[142]. The Project would remove all existing dwelling units. Existing tenants would be subject to the provisions of Ordinance 178632; 181744; LAMC Section 151.00 through 151.30 (Rent Stabilization Ordinance); LAMC Section 151.22 through 151.28 (Ellis Act Provisions); and LAMC Section 47.07 (Tenant Relocation Assistance where Apartments are to be Demolished), if warranted by future relocation decisions.

The removal of the 12 dwelling units would be off-set by the provision of the 231 net new housing units. Of these, 21 units would be restricted for very low income households. The provision of the affordable units would contribute to an increase in housing stock and creation of units that can meet the needs of lower income tenants.

The added housing stock would contribute to the City's demand for housing, as defined in the RHNA and General Plan Housing Element. The Project would increase the availability of housing stock and impacts would be less than significant.

Cumulative Impacts

Population and Housing

Of the 168 development projects on the related projects list, 44 are located within the Westlake Community Plan area. Of these 44 related projects, 35 include residential components. The 35 related projects with residential components include a total of 5,382 housing units. If these units were to develop at the same household size as the remainder of the Community Plan area, 2.82 people per household, the increase in population would be 15,177 people. When combined with the Project's 231 net new units and net increase of 673 in population, the total number of housing units is 5,613 units and the total population is 15,850.

The Project's housing and population would combine with the related projects in shaping the land use patterns and character of the Westlake Community Plan area. As indicated in Table B-24, Projected Population, Housing and Employment Estimates above, the projected growth between 2016 and the RTP/SCS 2040 horizon year is 10,747 housing units and 21,457 people. The cumulative 5,613 units and 15,850 population would therefore comprise approximately 52 percent of the housing and 74 percent of the population growth anticipated in the RTP/SCS horizon year projections. Therefore, this development is accounted for and falls within the growth projections for the Community Plan area. The calculation of estimated housing growth and population growth is conservative as many of the related projects are replacement projects,

[142] As of March 2017.

without netting out existing development; some of the related projects may have been completed and accounted for in existing population estimates; and some of the related projects may not be developed at all.

The long-term planning horizon is typically used for evaluating longer-term development in smaller geographic areas. Some related projects may not be built and their implementation can occur over long time periods. Many of the related projects will not be completed until after the 2020 Buildout Year for the proposed Project. The next cycle of the RTP/SCS projections will be published in 2020, the year of Project completion. New projections will be incorporated into future updates of the Westlake Community Plan.

The related projects, as is the case with the proposed Project represent in-fill development located within the SCAG HQTA and City TPA designated areas. Most of the related projects within the Community Plan area located along the eastern side of the Community Plan area, and are adjacent to Downtown. Thus, they provide transitional density to the higher density Downtown center, substantially conforming to the land use pattern, and Regional Center designation identified on the Metro, Long Range Land Use Diagram presented on page 3-9 of the Framework Element.

The Project in concert with the related projects would provide additional housing stock, as defined in the RHNA and Housing Element of the City's General Plan. Therefore, cumulative impacts regarding population and housing would be less than significant.

14. Public Services

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

a. Fire protection?

Less Than Significant Impact. Fire protection and emergency medical services for the Project Site are provided by the City of Los Angeles Fire Department (LAFD). The LAFD's approximately 3,246 uniformed personnel and 353 civilian support staff provide fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service.[143] At any given time, there are approximately 1,018 uniformed firefighters, including 270 firefighter/paramedics, on-duty at 106 fire stations across the LAFD's 471 square-mile jurisdiction.[144] LAFD fire stations within the proximity of the Project Site include Fire Station 11, Fire Station 20, Fire Station 3, and Fire Station 6.[145] **Table B-25**, *LAFD Fire*

[143] Los Angeles Fire Department, Department, Overview, Website, http://lafd.org/about/lafd-overview, accessed April 2017.

[144] These figures represent the number of uniformed firefighters that are available to respond to emergency calls and do not include other on-duty uniformed firefighters that are involved in training or various administrative and support functions (Source: Los Angeles Fire Department, Department Overview, http://lafd.org/about/lafd-overview, accessed April 2017

[145] Los Angeles Fire Department, Fire Stations, Find Your Station, Website http://www.lafd.org/fire-stations/find-your-station, accessed April 2017 and Google Maps, accessed April 2017.

Stations Located in the Vicinity of the Project Site, provides information on the location, the approximate distance/direction from the Project Site and the average response time.

TABLE B-25
LAFD FIRE STATIONS LOCATED IN THE VICINITY OF THE PROJECT SITE

Fire Station[a]	Address[a]	Approximate Distance/Direction from Project Site	Average Response Time[b]
Fire Station 11	1819 West 7th Street	0.78 miles	3.30 (EMS) 3.08 (non EMS)
Fire Station 20	2144 West Sunset Boulevard	0.85 miles	4.24 EMS 4.28 (non-EMS)
Fire Station 3	108 North Fremont Avenue	0.94 miles	4.17 (EMS) 3.37 (non-EMS)
Fire Station 6	326 North Virgil Avenue	1.42 miles	3.57 (EMS) 3.35 (non-EMS)

EMS: Emergency Medical Services

SOURCES:
a: LAFD, Find Your Station. http://www.lafd.org/fire-stations/find-your-station. Accessed April 2017.
b: FIRESTATLA http://www.lafd.org/fsla/stations-map. Accessed April 2017.

Construction activities associated with the Project may temporarily increase the demand for fire protection and emergency medical services, and may cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, covering and coatings, to heat sources including machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings. However, in compliance with the requirements of OSHA, all construction managers and personnel would be trained in fire prevention and emergency response. Further, fire suppression equipment specific to construction would be maintained on the Project Site. As applicable, construction activities would be required to comply with the 2016 California Building Code (CBC), the California Fire Code (CFD), and Article 7: Fire Protection and Prevention (Fire Code) of Chapter V: Public Safety and Protection, of the LAMC.

Construction activities may involve temporary lane closures for right-of-way frontage improvements and utility construction. Construction-related traffic could result in increased travel time due to flagging or stopping of traffic to accommodate trucks entering and exiting the Project Site during construction. As such, construction activities could increase response times for emergency vehicles to local businesses and/or residences within the Project vicinity, due to travel time delays to through traffic. However, the impacts of such construction activity would be less than significant on a temporary and on an intermittent basis. To ensure impacts are minimized to the extent feasible, a Construction Management Plan (PDF TRAF-1) would be prepared for the Project, which is consistent with standard City requirements. The Plan would be prepared to minimize disruptions to through traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. Truck routes for material and equipment deliveries, as well as for soil export and disposal, would require approval by the City of Los Angeles Department of Public

Works prior to construction activities. The Construction Management Plan would be prepared for review and approval by the City of Los Angeles Department of Public Works prior to commencement of any construction activity. These practices, as well as techniques typically employed by emergency vehicles to clear or circumvent traffic, are expected to limit the potential for significant delays in emergency response times during Project construction.

Overall, with compliance to applicable LAFD requirements, including implementation of Project's Construction Traffic Management Plan, and due to the temporary nature of the necessary construction activities, construction impacts on fire protection and emergency medical services would be less than significant.

Operational activities associated with the Project would increase the demand for fire protection and emergency medical services. As discussed under Response No. 13.a, the Project would directly induce population growth by 673 persons. The estimated 673 persons increase in Los Angeles' population would represent a nominal 0.02 percent increase in the City's existing population (3,971,883 persons).[146] Because the Project is located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of an HQTA, the population growth generated by the Project is considered consistent with the City's and SCAG's growth policies.

The Project would also be subject to compliance with fire protection design standards, as necessary, per the CBC, CFD, the LAMC, and the LAFD, to ensure adequate fire protection. Key components of these regulatory requirements that would be implemented as part of the Project pursuant to LAFD review and guidance include the following:

- Building Design: Fire resistant doors and materials, as well as walkways, stairwell and elevator systems (including emergency and fire control elevators) that meet code requirements.
- Fire Safety Features: Installation of automatic sprinkler systems, smoke detectors and appropriate signage and internal exit routes to facilitate a building evacuation if necessary; as well as a fire alarm system, building emergency communication system and smoke control system.
- Emergency Safety Provisions: Implementation of an Emergency Plan in accordance with LAMC Section 57.33.19. The emergency plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident (e.g. floor wardens, evacuation paths); establish a drill procedure to prepare for emergency incidents; establish an on-site emergency assistance center; and establish procedures to be followed during an emergency incident. Provision of on-site emergency equipment and emergency training for personnel to reduce impacts on the increased need for emergency medical services.
- LAFD Access: Access for LAFD apparatus and personnel to the Project Site in accordance with LAFD requirements, inclusive of standards regarding fire lane widths and weight capacities needed to support fire fighting vehicles, markings and on-site vehicle restrictions to ensure safe access. Emergency vehicles and fire access to the Project Site and surrounding

[146] U.S. Census. Population Estimates July 2015. QuickFacts Los Angeles city, Accessed April 2017.

area would be provided along West Beverly Boulevard, South Bonnie Brae Street and South Burlington Avenue.

The City of Los Angeles 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 Site is not located in an area of moderate or very high fire hazard.[147] In addition, the Project Site is surrounded by urban development and is not adjacent to any wildlands. Therefore, no fuel modification for fire fuel management would be required.

Another important component of ensuring fire protection services is the availability of adequate firefighting water flow. Fire flow requirements are closely related to land use. The quantity of water necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazards. The ability of the water service provider to provide water supply to the Project Site is discussed in Section 17, *Utilities and Service Systems*. As discussed therein, adequate water supply would be available to serve the Project Site, including minimum fire flow requirements.

As mentioned above, up to four LAFD fire stations would provide fire protection and emergency medical services to the Project area and are dispatched based on availability and the nearest unit to a service call. The Project-related increase in traffic on surrounding roadways could potentially affect emergency response times in the area. A number of factors would serve to facilitate responses to emergency calls. Emergency response is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in lanes of opposing traffic, use of alternate routes, and multiple station response. The Project vicinity is well served by several nearby fire stations within close proximity to one-another and the Project Site. According to the General Plan Framework Element, the City distance standard for EMS services is one and one half miles. As shown in Table B-25, four LAFD Stations are located near the Project Site within one and half miles, which satisfies the standard. Also, fire stations have access to multiple routes to attend emergency calls. Further, as identified in Section 16, *Transportation and Circulation*, operational traffic impacts to the local roadway network would be less than significant.

There are a number of additional factors that influence emergency response times in addition to traffic, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, signals, and roadway characteristics. The LAFD has taken a number of steps to improve its related systems, processes and practices. Upgrades include installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and

[147] Zimas Website, http://zimas.lacity.org/, accessed April 2017 and the Los Angeles County Fire Hazard Severity Zones in SRA, Adopted by Cal Fire on November 7, 2007, http://frap.fire.ca.gov/webdata/maps/los_angeles/fhszs_map.19.pdf, accessed April 2017

software; development of a new computer aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident; and, use of traffic pre-emption systems. A traffic pre-emption system allows the normal operation of traffic lights to be preempted by an emergency vehicle to improve response times by stopping conflicting traffic in advance, providing the emergency vehicle the right-of-way. Based on the ability of LAFD to respond to emergency situations, the number, proximity, and accessibility of fire stations in the Project vicinity and the multiple steps being taken by the LAFD to improve response times, Project impacts on fire protection, services, and response times are considered less than significant.

With incorporation of applicable regulatory requirements (i.e., building design, fire safety features, emergency safety provisions, LAFD access, construction measures, and plot plan review), along with the fact that LAFD has no known or proposed plans to expand their facilities serving the Project Site,[148] the Project is not expected to result in a substantial increase in demand for additional fire protection services that would exceed the capability of the LAFD to serve the Project such that it would require construction of new fire facilities. Even if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted by LAFD, and was foreseeable, the Project area is highly developed, and the site of a fire station or expansion of a fire station would likely be on an infill lot that would likely be less than an acre in size.

Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact that the Project would be required to mitigate.

Based on the above, the addition of a new fire facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for physical impacts associated with construction of fire facilities are considered less than significant.[149]

[148] Correspondence from LAFD, Hilda Reyes Fire Development Services Unit, Los Angeles Fire Department. April 25, 2017.

[149] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds relating to fire protection and emergency medical services, as a project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service.

b. Police protection?

Less Than Significant Impact. Police protection for the Project Site is provided by the Los Angeles Police Department (LAPD). The LAPD consists of approximately 9,897 sworn officers.[150] The LAPD operates 21 police stations within four bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the Bureaus encompasses several communities. The Project Site is located in the Central Bureau of the LAPD, which includes the Central City, Hollenbeck, Newton, Northeast, and Rampart Community Police Stations and the Central Traffic Division.[151] The Project would be under the jurisdiction of the Rampart Community Police Station, located at 1401 West 6th Street, Los Angeles, located approximately 0.8 to the south. The Rampart Station is staffed by approximately 330 sworn personnel and 30 civilian support staff.[152] The boundaries for the service area that the Rampart Station serves officers, is approximately 5.54 square miles and includes Santa Monica Boulevard and Sunset Boulevard to the north, Interstate 10 (I-10) to the south, Interstate 110 Freeway (I-110) to the east, and Hoover Street and Normandie Avenue to the west.

The Rampart Community Police Station service area is a culturally diverse community that includes approximately 165,000 people. The officer to resident ratio is 1 officer to 500 residents. Additionally, there are special service teams available within the LAPD to service the Rampart service area.

The Rampart Station's emergency response system is directly linked to the LAPD Communications Division's Dispatch Centers. The LAPD Comminutions Division has the responsibility to staff and answer, on a 24-hour basis, the telephones upon which calls for service are received. This includes 911 emergency calls (police, fire, paramedic). The average response time to emergency calls for service in Rampart Area during 2016 was 4.0 minutes. The average response time for non-emergency calls for service in Rampart Area during 2016 was 24 minutes.[153]

Table B-26, *Crime Statistics for the Rampart Area*, summarizes the crime statistics for the Rampart Area for 2016, 2015, and 2014. The total amount of crimes was 4,897 in 2016, 4,993 in 2015, and 4,190 in 2014, with most of the crimes related to burglary from motor vehicles, personal/other thefts, and assaults.

[150] Los Angeles Police Department, COMPSTAT Citywide Profile, 12/04/16-12/31/16 http://assets.lapdonline.org/assets/pdf/123116cityprof.pdf. Accessed April 2017.

[151] The Los Angeles Police Department, Central Bureau, http://www.lapdonline.org/central_bureau/content_basic_view/1910, Accessed April 2017.

[152] LAPD Correspondence, Charlie Beck, Chief of Police and Al Neal, Captain, Community Relationship Division. April 25, 2017.

[153] Ibid.

TABLE B-26
CRIME STATISTICS FOR THE RAMPART AREA

Crime	2016	2015	2014
Homicide	22	11	14
Rape	66	66	53
Robbery	637	663	499
Aggravated Assault	801	856	501
Burglary	416	460	448
Motor Vehicle Theft	640	664	511
Burglary From Motor Vehicle	1,211	1,205	1,103
Personal/Other Theft	1,098	1,068	1,061
Total	4,891	4,993	4,190

SOURCE: LAPD, May 2017

During construction, equipment and building materials could be temporarily stored on-site, which could result in theft, graffiti, and vandalism. However, the Project Site is located in an area with high vehicular activity and visibility from West Beverly Boulevard, South Burlington Avenue, and South Bonnie Brae Street. In addition, PDF PS-1 states the construction site would be fenced along the perimeter to minimize trespassing, vandalism, short-cut attractions and attractive nuisances. Furthermore, PDF AES-1 would ensure that through appropriate postings and daily visual inspections that no unauthorized materials are posted on any temporary construction barriers or temporary pedestrian walkways that are accessible/visible to the public, and that such temporary barriers and walkways are maintained in a visually attractive manner (i.e., free of trash, graffiti, peeling postings and of uniform paint color or graphic treatment) throughout the construction period.

As discussed above, temporary lane closures may be required for right-of-way frontage improvements and utility construction. However, these closures would be temporary in nature and in the event of partial lane closures, both directions of travel on area roadways and access to the Project Site would be maintained. Emergency vehicle drivers 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. Further, as discussed above, a Construction Management Plan (PDF TRAF-1) for the Project would be prepared in order to minimize disruptions to through traffic flow, maintain emergency vehicle access to the Project Site and neighboring land uses, and schedule worker and construction equipment delivery to avoid peak traffic hours. Given the visibility of the Project Site from adjacent roadways and surrounding properties, existing police presence in the City of Los Angeles, maintained emergency access, and construction fencing discussed in PDF PS-1 and PDF AES-1, the Project's construction activities are not expected to increase demand on existing police services to a meaningful extent. Therefore, the Project would have a less than significant temporary impact on police protection during the construction phases.

Operational activities associated with the Project would increase demand for police protection services.

The Project would result in an additional, 673 residents. The estimated 673 persons increase would represent a nominal 0.02 percent increase in the City's existing population of 3,971,883 persons.[154] Because the Project would replace existing commercial uses, it would reduce the number of total employees by an estimated 15 jobs and, thus, result in an indirect population decrease associated with employment. Because the Project is located within a designated City of Los Angeles TPA and within an area meeting SCAG's definition of an HQTA, the population growth generated by the Project is considered consistent with the City's and SCAG's growth policies. The Project would be designed in consideration of the City's "Design Out Crime" initiative to provide a Project design that incorporates strategies from Crime Prevention through Environmental Design (CPTED) (see PDF PS-2). As discussed in Attachment A, *Project Description*, the Project would incorporate security measures for the safety of residents and visitors to the Project Site. During operation of the Project, access to the parking structure would be controlled through gated entries, and the entry areas would be well illuminated. Site security would include controlled keycard access to residential areas, parking areas, secured entry and exit points to all buildings, security lighting within common areas and entryways, and closed circuit TV monitoring (CCTV).

The LAPD apportions each Community Police Station into roughly eight to ten Basic Car areas, with one patrol car permanently assigned to each. Three teams of officers are assigned to patrol each neighborhood on a 24-hour basis (three eight-hour shifts). These officers provide neighborhood patrol to prevent crime and answering radio calls for service. Additional patrol units may be assigned during periods of increased workload.[155] Response times are a function of patrol car location and calls occurring at a particular time. As identified in Section 16, *Transportation and Circulation*, operational traffic impacts would be less than significant. Further, emergency response to a site is routinely facilitated, particularly for high priority calls, through use of sirens to clear a path of travel, driving in the lanes of opposing traffic, use of alternative routes, and multiple station response. Emergency access to the Project Site and surrounding uses would be maintained at all times and emergency vehicles would have priority and the ability to bypass signals and stopped traffic. Thus, Project-related traffic is not anticipated to impair the LAPD from responding to emergencies at the Project Site. Finally, the Project would provide adequate access for emergency vehicles to the Project Site subject to the approval of the LAPD. Prior to the occupancy of the Project, the Applicant would provide the LAPD with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses (see PDF PS-3). Accordingly, impacts associated with emergency response times and emergency access are considered less than significant.

Overall, given the incremental change to the population served by the Rampart Community Police station created by the Project, the Project's planned on-site security measures, and that

[154] U.S. Census. Population Estimates July 2015. QuickFacts Los Angeles City, Accessed April 2017.

[155] LAPD, Official Site of the Los Angeles Police Department, http://www.lapdonline.org/search_results/content_basic_view/6528. Accessed, April 2017.

LAPD has no known or proposed plans to expand their police facilities serving the Project area,[156] the Project is not expected to result in a substantial increase in demand for additional police protection services that would exceed the capability of the LAPD to serve the Project such that it would require construction of new police facilities. Even if a new police station, or the expansion, consolidation, or relocation of a station was determined warranted by LAPD, and was foreseeable, the Project area is highly developed, and the site of a police station or expansion of a police station would likely be on an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the Project would not create the need for additional police protection services as part of an unplanned police station.

Based on the above, the addition of a new police facility, or the expansion, consolidation, or relocation of an existing facility, is not foreseeably needed to maintain service and the potential for physical impacts associated with construction of police facilities are considered less than significant.[157]

Project Design Features

PDF PS-1: A construction fence shall be constructed around the Project Site to minimize trespassing, vandalism, short-cut attractions and attractive nuisances.

PDF PS-2: The Project would incorporate a security program to ensure the safety of residents and site visitors. Access to the parking structure would be controlled through gated entries and the structure would be well illuminated. Site security would include controlled keycard access to residential areas, secured entry and exit points to all buildings, security fencing, and security lighting within common areas and entryways, as well as security patrols. The design would consider guidelines per the "Design out Crime Guidelines: Crime Prevention Through Environmental Design" published by the Los Angeles Police Department's Crime Prevention Section. These measures would be approved by the LAPD prior to issuance of building permits.

PDF PS-3: Prior to the occupancy of the Project, the Applicant shall provide the Rampart Area Commanding Officer with a diagram of each portion of the property, including access routes, and additional information to facilitate potential LAPD responses.

156 http://www.lapropq.org/modules/fileUpload/files/Prop%20Q%20Monthly%20Feb%20Mar%202016%20Report.pdf. Accessed April 20187.

157 This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors relating to police protection, including the population increase resulting from the proposed project, based on the net increase of residential units or square footage of non-residential floor area; the demand for police services anticipated at the time of project buildout compared to the expected level of service available; consider, as applicable, scheduled improvements to LAPD services (facilities, equipment, and officers) and the project's proportional contribution to the demand; and whether the project includes security and/or design features that would reduce the demand for police services.

c. Schools?

Less Than Significant Impact. The Project would be served by the Los Angeles Unified School District (LAUSD). The LAUSD is the largest (in terms of number of students) public school system in California and the second-largest in the U.S. The LAUSD encompasses approximately 710 square miles and serves the City of Los Angeles, all or portions of 31 other cities, as well as several unincorporated areas of Los Angeles County. Approximately 4.8 million persons live within the District's boundaries. The LAUSD provides kindergarten through high school (K–12) education to a total of 664,774 students with a total enrollment of 734,641 students when including adult education, enrolled throughout 1,302 schools and centers, including: 19 primary school centers, 451 elementary schools, 83 middle schools, 96 senior high schools, 54 option schools[158], 44 magnet schools, 24 multi-level schools, 12 special education schools, two home/hospitals, 169 K-12 magnet centers (on regular campuses), 228 charter schools, and 120 other schools and centers.[159]

LAUSD is currently divided into six local districts (Central, East, Northeast, Northwest, South, West), with the Project Site being located in the Local District Central.[160] The Project Site is located within the attendance area boundaries of the Union Avenue Elementary, Sal Caltro Middle School, Miguel Contreras Learning Complex, Ramon C. Cortines School of Visual & Performing Arts, Belmont Senior High, and the Edward R. Roybal Learning Center.[161]

The Project Site is in the attendance area boundaries of Union Avenue Elementary School and Sal Castro Middle School. The Project Site is also within a high school attendance choice/option area (the Belmont Academic Zone) for the Miguel Contreras Learning Complex, Belmont High School, Ramon C. Cortines School of Visual and Performing Arts, Miguel Contreras Learning Complex - Business and Tourism, Miguel Contreras School of Social Justice, Miguel Contreras School of Global Studies, and Roybal Learning Center.[162]

According to the LAUSD, although Union Avenue Elementary School has capacity for one additional student, LAUSD requires a margin of 30 students. Therefore, Union Avenue Elementary School is considered to be currently overcapacity for school year 2016-2017. Union Avenue Elementary School has projected overcapacity of 112 students in five years (2020). This estimate of future seat shortages is based on LAUSD's methodology that estimates the total number of students living the school's attendance boundary and who are eligible to attend the

158 Option schools are alternative pathways to graduation for students whose needs cannot be met in a traditional school setting.

159 LAUSD, Fingertip Facts 2016-2017 LAUSD, Fingertip Factsachieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/32/Fingertip%20Facts2016-17_FINAL.pdf, Accessed April 2017.

160 Los Angeles Unified School District, Local Districts Map, 2015, http://achieve.lausd.net/cms/lib08/CA01000043/Centricity/Domain/34/LocalDistricts_LetterSize.png, Accessed October 2016.

161 LAUSD Correspondence, Rena Perez, Director, Master Planning and Demographics, May 5, 2017

162 The Belmont Academic Zone also includes the Belmont Sh-La Teach Preparatory Academy, which closed in the school year of 2016-2017.

school. None of the other schools serving the Project Site are presently overcapacity or are projected to be overcapacity.

Construction of the Project would require construction employees that would be hired from a mobile regional construction work force that moves from project to project. Typically, construction workers pass through various development projects on an intermittent basis as their particular trades are required. Given the mobility and short durations of work at a particular site, and a large construction labor pool that can be drawn upon in the region, construction employees would not be expected to relocate residences within this region or move from other regions as a result of their work on the Project. Therefore, Project construction would not generate a significant amount of new students needing to attend local schools.

Project operation would incrementally increase demand for school services. The estimated 673 persons increase would represent a nominal 0.02 percent increase in the City's existing population of 3,971,883 persons.[163] Because the Project would replace existing commercial uses, it would reduce the number of total employees by an estimated 15 jobs and, thus, result in an indirect population decrease associated with employment. If new employees currently reside in neighboring communities and have school children, it is expected the children would remain enrolled in their current school. However, if some new employees with school age children choose to move closer to work, or if some new employees with children are hired from the surrounding community or another City, there could be negligible change in student population in the nearby schools.

Using LAUSD student generation rates, the Project is estimated to generate 38 elementary school students, 11 middle school students, and seven high school students for a total of 56 students.[164] This number is conservative in that it assumes that none of the future Project residents with families would already have students attending the affected schools. Furthermore, it should be noted that the Project's large number of studio and one-bedroom units would generate few students and that it is possible that a portion of the Project's school-aged children would likely attend private schools or charter schools, thus reducing attendance at LAUSD schools. Although new students generated by the Project could impact schools serving the Project Site such as Union Avenue Elementary School, as noted earlier, project impacts related to schools would be addressed through payment of required Senate Bill 50 (SB 50) development fees pursuant to Sections 65995 of the California Government Code. In accordance with SB 50, the payment of these fees are deemed to provide full and complete mitigation under CEQA for impacts to school

163 U.S. Census. Population Estimates July 2015. QuickFacts Los Angeles City, Accessed October 2016.

164 Student generation rates for residential uses are taken from the Draft School Facilities Needs Analysis 2012, LAUSD, September 2012. Based on the rate for multi-family residential uses: Elementary = 0.1649; Middle School = 0.045; High School = 0.0303. Student generation rates for retail and restaurant uses are taken from the 2010 Commercial/Industrial Development School Fee Justification Study, LAUSD, September 27, 2010 – the most recent data available for non-residential uses. For each 1,000 square feet of non-residential space – Elementary = 0.0178; Middle School = 0.0089; High School = 0.0111. Total number of students has been rounded up, in order to provide whole student number counts.

facilities. Therefore, with payment of SB 50 school fees, operational impacts to school services and facilities would be less than significant.[165]

d. Parks?

Less Than Significant Impact. The Los Angeles Department of Recreation and Parks (LADRP) is responsible for the establishment, operation, and maintenance of parks and recreational facilities in the City. These facilities include parks, swimming pools, public golf courses, recreation centers, museums, youth camps, tennis courts, sports programs and programs for senior citizens. The LADRP also supervises construction of new facilities and improvements to existing ones. Currently, the LADRP maintains over 16,000 acres of parkland within approximately 444 regional, community and neighborhood parks, dozens of pocket and specialty parks. LADRP maintains and operates hundreds of athletic fields, 422 playgrounds, 321 tennis courts, 184 recreation centers, 72 fitness areas, 62 swimming pools and aquatic centers, 30 senior centers, 26 skate parks, 13 golf courses, 12 museums, nine dog parks, and 187 summer youth camps. [166]

The adequacy of parkland is typically measured in terms of acres of parkland per 1,000 residents.[167] The City has an estimated existing City-wide ratio of 0.76 acres of neighborhood and community parkland per 1,000 residents, which is below the Citywide goals set forth in the Public Recreation Plan (PRP) of one acre each of neighborhood and community parkland per 1,000 persons in the short/intermediate term and two acres each of neighborhood and community parkland per 1,000 persons in the long-term.[168] The Westlake Community Plan area has a ratio of 0.37 acres of neighborhood and community parkland per 1,000 residents.[169]

The Project area is served by several public parks and recreational facilities. The following LADRP facilities are located within a two-mile radius of the Project Site: Hope and Peace Park, located at 843 Bonnie Brae Street (0.57 acres), Unidad Park located at 1644 West Beverly Boulevard (0.29 acres), Madison West Park, 464 N. Madison Street (0.50 acres, Patton Street Pocket Park located at 317-327 Patton Street (0.48 acres), Pico Union Park located at 1827 South Hoover Street, (0.56 acres), Rockwood Community Park located at 1571 Rockwood Street (0.40 acres), Spring Street Park located at 428 South Spring Street (0.7 acres), Echo Park and Lake

[165] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors relating to public schools, including the population increase resulting from the proposed project, based on the increase in residential units or square footage of non-residential floor area; the demand for school services anticipated at the time of project buildout compared to the expected level of service available; consider, as applicable, schedule improvements to LAUSD services (facilities, equipment and personnel) and the project's proportional contribution to the demand; whether (and the degree to which) accommodation of the increased demand would require construction of new facilities, a major reorganization of students or classrooms, major revisions to the school calendar (such as year-round sessions), or other actions which would create a temporary or permanent impact on the school(s); and whether the project includes features that would reduce the demand for school services (e.g., on-site school facilities or direct support to LAUSD).

[166] City of Los Angeles, Los Angeles Department of Recreation and Parks website "Who We Are" http://www.laparks.org/department/who-we-are. Accessed April 2016.

[167] City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, adopted October 9, 1980.

[168] City of Los Angeles, Public Recreation Plan, a portion of the Service Systems Element of the Los Angeles General Plan, adopted October 9, 1980.

[169] LARDP Correspondence, Michael A. Shull, General Manager, May 19, 2017

located at 751 Echo Park Boulevard (26 acres), Grand Hope Park, located at 900 South Hope Street (2.1 acres), and MacArthur Park and Lake located at 2230 West 6th Street (33 acres).[170] Although not maintained by the LADRP, the Vista Hermosa Park located at 100 N. Toluca Street (10.5 acre) is located within a half mile of the Project Site. This natural park was developed and is maintained by the Santa Monica Mountains Conservancy and the Mountains Recreation and Conservation Authority (MRCA).[171]

The LADRP is currently in the process of implementing the 50 Parks Initiative, which consist of small pocket parks typically less than half an acre, often only on tenth of an acre, and have a service radius of one-half mile. Patton Street Park, completed in 2015, was a component of the 50 Parks Initiative, and is located within a-half mile of the Project Site. [172] [173] In addition, the LADRP is in the process of developing a new park near First Street and South Broadway.[174]

The Project's estimated population increase of 673 persons would result in a demand for approximately 0.67 acres of parkland to meet the City's neighborhood and community parkland standards for the short/intermediate term and 1.34 acres to meet the City's neighborhood and community parkland long-term standards.

LAMC Section 12.21-G requires that open space be provided with the development of residential uses. **Table B-27***, Project Open Space Requirements*, illustrates the approximated amount of open space that would be required according to unit types. As shown in Table B-27, pursuant to LAMC 12.22-A,25(f)(6), a 20 percent open space reduction is permitted as part of the Project's Density Bonus on-menu incentive to create additional floor area for affordable housing. As such, the Project must provide a minimum of 20,420 square feet of open space which may include recreational facilities and amenities.

The Project would provide an additional 2,695 square feet of open space beyond the minimum requirements and would provide 23,115 square feet (0.53 acres) of recreation/amenities that would be tailored to meet the needs of the anticipated residential population. Open space and recreation amenities would include two podium courtyards and two roof decks. In addition, the Project would include interior open space including a clubroom and fitness uses. The Project would also provide private balconies. Because of the Project's smaller unit sizes, which may reduce the incidence of larger families and the demand for open space facilities, it is expected that the majority of the Project's recreational demand would take place within the Project Site.

[170] LARDP Correspondence, Michael A. Shull, General Manager, May 19, 2017 and GoogleEarth Pro accessed June 12, 2017.

[171] http://lamountains.com/parks.asp?parkid=672. Accessed June 12, 2017.

[172] 50 Parks Initiative. Secured New Park Sites, http://www.laparks.org/50parks/map. April 2017.

[173] Echo Park's Newest Park Does A Lot with a Little Space, July 28, 2015. The Trust for Public Land. https://www.tpl.org/media-room/echo-park%E2%80%99s-newest-park-does-lot-little-space#sm.001cve1yy14rgcsfv6d18uyvgdmk8. Accessed April 2017.

[174] LARDP Correspondence, Michael A. Shull, General Manager, May 19, 2017

TABLE B-27
PROJECT OPEN SPACE REQUIREMENTS

Proposed Residential Units	Quantity	Factor (sq. ft./unit)[a]	Open Space Requirement (sq. ft.)
Studio	80	100	8,000 sf
One Bedroom	114	100	11,400 sf
Two Bedroom	49	125	6,125 sf
Total:	**243**		**25,525 sf**
Open Space Required After up to 20% Reduction [b]			**20,420 sf**

a Factors based on LAMC Section 12.21.G
b Per LAMC 12.22 A.25 (f)(g)

SOURCE: ESA PCR, 2017.

Residual off-site park use would likely be dispersed to parks serving the Project area that would be easily accessible and which have unique features that would be of interest to different residents. It is, thus, anticipated that impacts at any single park location would be minimum and the Project contribution to park use would not cause substantial degradation of existing facilities or require a new public park.

Section 17.12 and Section 12.33 of the LAMC, which implement the City's parkland dedication ordinance enacted under the Quimby Act, provide a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. The area of land required for park and recreation dedication is based upon the maximum residential density at which the land may or will be developed. With 243 units, the Project would have approximately 146 units per acre. Pursuant to Section 17.12 the maximum dedication is required for projects with more than 100 dwelling units and is equal to 32 percent of the gross subdivision area. Therefore, the dedication required for this Project would be approximately 32 percent of 1.66 acres, or approximately 0.53 acres, unless in-lieu fees were paid.

As mentioned above, Section 17.12-F of the LAMC allows private recreational areas developed within a project site for use by the Project's residents to be credited against the Project's land dedication and/or in lieu fee requirement. As described above, the Project proposes to include 23,115square feet (0.53 acres) of recreational/amenity spaces, which meets the 0.53-acre dedication that may otherwise be required under Section 17.12 of the LAMC.

In addition, pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax), the City imposes a tax $200 per dwelling unit on all construction of new dwelling units and modification of existing dwelling units. These taxes are placed into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. If a developer has already paid Quimby fees, as described under Section 17.12, or has dedicated in lieu parkland or recreational facilities, the dwelling unit tax required may be

reduced accordingly. Any future proposed parks near the Project Site would be subject to environmental review and is unlikely to have new significant and unavoidable impacts.

Although it is anticipated that the Project would comply with Section 17.12 of the LAMC, the finalized Project design would be reviewed by the Department of City Planning to determine whether proposed facilities meet the applicable criteria for consideration or additional park land dedication or fees must be paid. With fulfillment of the required provisions of the LAMC, which require dedication of land or payment of in-lieu fees, if necessary, impacts would be less than significant.[175]

e. Other governmental services?

Less Than Significant Impact. The City of Los Angeles Public Library (LAPL) provides library services to the City of Los Angeles. The LAPL system provides library facilities and services to the Project Site and the City of Los Angeles. The LAPL consists of the Central Library, eight regional branches, and 64 community branches, with a multimedia inventory of over 6.5 million items and 2,600 computer workstations with access to the internet and electronic databases. All branch libraries provide free access to computer workstations that are connected to the LAPL's information network. In addition to providing internet access, these workstations enable the public to search LAPL's electronic resources including the online catalog, over 100 subscription databases, word processing, language learning, literacy, and a large collection of historic documents and photographs. In addition, specially designed websites are provided for children, teens, and Spanish-speaking patrons. The LAPL is a member of the Southern California Library Cooperative (SCLC). SCLC is an association of 38 independent city and special district public libraries in the greater Los Angeles area that shares resources to improve library service to the residents of all participating jurisdictions. Participation in this program enables mutual loan privileges and allows member libraries to receive compensation for such use. [176]

The LAPL service populations are based on the number of people residing in census tracts that are assigned to (i.e., served by) a specific library. The Project Site is served by the Echo Park Branch Library, the Edendale Branch Library, the Central Library, and the Felipe de Neve Branch Library. **Table B-28**, *Libraries Located in the Vicinity of the Project Site*, provides information regarding these libraries, including their distance/direction from the Project Site, size, and population served.

[175] This finding took into consideration the 2006 City of Los Angeles CEQA Thresholds Guide screening factors relating to recreation and parks, including the net population increase resulting from the proposed project; the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available; consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to demand; and whether the project includes features that would reduce the demand for recreation and park services (e.g., onsite recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

[176] Los Angeles Public Libraries, About the Library. http://www.lapl.org/about-lapl/press/central-facts., accessed April 2017.

TABLE B-28
LIBRARY FACILITIES LOCATED IN THE VICINITY OF THE PROJECT SITE

Library	Distance/ Direction from Project Site[a]	Size in Square Feet[b]	Population Served[c]
Echo Park Branch Library 1410 West Temple Street	0.57 miles to the northeast	17,543	52,661
Edendale Branch Library 2011 West Sunset Boulevard	0.95 miles to the north	12,500	39,772
Felipe de Neve Branch Library 2820 West 6th Street	0.98 miles to the west	9,273	85,581
Central Library 630 West 5th Street	1.32 miles southeast	538,000	3,792,621

a Approximate distance/direction from Project Site in miles is a straight line distance, not a drive distance.
b Sunset & Everett Mixed-Use Dev. Project & Everett Small Lot Subdivision EIR, May 2016
c 1020 S. Figueroa Project Draft EIR, September 2016 and The Lake on Mitigated Negative Declaration January 2017.

SOURCE: ESA PCR, 2017

The 2007 LAPL Branch Facilities Plan (Facilities Plan) guides the construction of branch libraries and specifies standards for the size and features of branch facilities based on the population served in each community. The Facilities Plan also outlines the required facilities expansion needs of the libraries within the City. Under the Facilities Plan, the service population for a branch library is determined by the size of the facility as set forth in **Table B-29,** *LAPL Branch Facilities Plan - Library Building Size Standards*. The Facilities Plan has been implemented with two bond measures: the 1989 Bond Program and the 1998 Bond Program.[177]

TABLE B-29
LAPL BRANCH FACILITIES PLAN - LIBRARY BUILDING SIZE STANDARDS

Library Type	Population Served	Size of Facility (sf)
Local Branch	< 45,000	12,500
Local Branch	> 45,000	14,500
Regional Branch	Unspecified	≤ 20,000
Central Library	System-Wide	Unspecified
Level at which new Branch Library recommended	90,000	12,500 – 14,500

SOURCE: Building on Success: Los Angeles Public Library Strategic Plan, 2007-2010, Branch Facilities Plan. http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf

In 1989, City of Los Angeles voters approved Proposition 1, a $53.4 million Branch Library Facilities Bond also known as the 1989 Library Bond Issue. Under Proposition 1, the Facilities Plan proposed to obtain new sites for building, renovating, and expanding libraries that were

[177] Los Angeles Public Library, Strategic Plan, 2007 – 2010, Building on Success; Appendices, VI and VII. http://www.lapl.org/sites/default/files/media/pdf/about/Strategic_Plan.pdf. Accessed April 2017.

unable to serve the community sufficiently and/or were damaged by the Whittier earthquake. LAPL also obtained additional funds from the Community Development Block Grant Award of federal funds from the California State Library Proposition 85, as well as from Friends of the Library groups, for a total branch construction program of $108 million. Under the 1989 Bond Program, 29 libraries were built.[178]

On November 3, 1998, Los Angeles voters approved Proposition DD. Proposition DD, also known as the 1998 Library Facilities Bond, authorized $178.3 million in bonds for funding the construction, renovation, improvement, or expansion of 32 new branch libraries. As a result of effective project management, four additional projects were added to the scope of the overall facilities program. Of the 36 total projects, 18 existing library facilities were replaced with 18 new library facilities on the existing City-owned sites, nine libraries were constructed on newly acquired sites, five new libraries were constructed on acquired sites in communities that previously did not have library services, and with the four additional projects, existing libraries were renovated and expanded. The entire original Facilities Plan has been completed. The Project's construction workers would come from an existing labor pool whose workers move between construction projects on short-term bases without requiring relocation. Workers traveling to work may stop at a library that is outside of their residential neighborhood. Such library stops would be incidental and typical of workers throughout the region. Such stops would increase library use at one location while reducing it at another. Such variations would occur on short-term bases. Therefore, there would be no notable increase in library usage at the libraries serving the Project Site, and no need for the construction of library facilities to accommodate construction population. The nearest library to the Project Site is the Echo Park Branch Library, located 0.57 miles to the northeast from the Project Site. There are no LAPL plans to add libraries in the area. Therefore, construction activities would not adversely affect the operations of nearby libraries.

The Project's would result in a net increase in residential population of approximately 673 residents. The four nearest libraries serving the Project Site are identified in Table B-30. The closest library is the Echo Park Branch Library located 0.57 from Project Site and thus would be expected to be the primary facility used by Project residents. The Project Site also has close proximity to the Edendale Branch Library located 0.95 from the Project Site, the Felipe de Neve Branch Library located 0.98 miles from the Project Site, and the Central Library, located 1.32 miles from the Project Site. As identified in Table B-30, the two closest libraries, the Echo Park Branch Library and Edendale and Branch Library meet the facility size criteria for its service population. While the Felipe de Neve Branch Library is smaller than the facility size criteria, the two closet libraries exceed the service size criteria and the Project Size would also be served by the Central Library, the largest library in the LAPL system that has the most extensive and diverse collection. As such, many of the proposed residents would also utilize the Central Library. The Central Library serves the entire LAPL service area, and as indicated in Table B-30, the LAPL Branch Facilities Plan does not identify population served or facility size criteria for this facility as it serves not just the downtown area but the entire City as a unique facility with resources that go beyond what is provided through local and regional branch libraries. The

[178] Ibid.

existing population served by this library, as well as the population added by the Project, would be substantially below the 90,000 population threshold that would require consideration of the development of a new library. Therefore, impacts on the physical environment would not occur due to construction of such a facility.

The Project would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. Measure L, which gradually increases library funding from its current level of 0.0175 percent of assessed property value to 0.0300 percent to keep libraries open longer and improve library services, also provides LAPL with a mechanism to address the needs of additional residents. The above fees and mechanisms would offset any incremental need for funding of capital improvements to maintain adequate library facilities and service, resulting from the Project. As such, impacts regarding library services would be less than significant.

The Project's residents, employees, and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. However, implementation of the Project would result in a nominal population increase compared to the overall population that utilizes local roadways, and which would be consistent with anticipated projections envisioned for the Project area. Therefore, development of the Project would not significantly increase the use of government services beyond current levels. Construction activities would result in a temporary increased use of the surrounding roads. However, the use of such facilities would not require maintenance beyond normal requirements. Overall, less than significant impacts to governmental services, including roads, would occur.[179]

Cumulative Impacts

Public Services

Fire Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional fire protection and emergency medical services from the LAFD. Although there would be cumulative demand on LAFD services, cumulative impacts on fire protection and medical services would be reduced through regulatory compliance and site specific design and safety requirements, similar to the Project. All related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, fire flow, and fire safety. Further, project-by-project traffic mitigation, multiple fire station response, and system wide upgrades to improve response times, and other requirements imposed by the LAFD are expected to help support adequate response times. Even in consideration of the related projects, if a new fire station, or the expansion, consolidation, or relocation of a station was determined warranted by LAFD, and was foreseeable, the Westlake

[179] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors relating to libraries, including the net population increase resulting from the proposed project; the demand for library services anticipated at the time of project buildout compared to the expected level of service available; consider, as applicable, scheduled improvements to library services (renovation, expansion, addition or relocation) and the project's proportional contribution to the demand; and whether the project includes features that would reduce the demand for library services (e.g., on-site library facilities or direct support to the LAPL).

Community Plan Area is highly developed, and the site of a fire station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a fire station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. Accordingly, the need for additional fire protection services as part of an unplanned fire station at this time is not an environmental impact that the Project is required to mitigate.

Based on the above considerations, the Project would not result in a cumulatively considerable contribution to cumulative impacts associated with the construction of new fire facilities.

Police Protection Services

The related projects would cumulatively generate, in conjunction with the Project, the need for additional police protection services from the LAPD. It is expected that the related projects (particularly those of a larger nature) would be subject to review by the LAPD on a project-by-project basis to ensure that sufficient security measures are implemented to reduce potential impacts to police protection services. Many of the related projects would also be expected to provide on-site security, personnel, and/or design features for their residents and patrons per standard development practices for the given uses. Even in consideration of the related projects, if a new police station, or the expansion, consolidation, or relocation of a station was determined warranted by LAPD, and was foreseeable, the Westlake Los Angeles Community Plan Area is highly developed, and the site of a police station would likely be an infill lot that would likely be less than an acre in size. Development at this scale is unlikely to result in significant unavoidable impacts, and projects involving the construction or expansion of a police station are typically addressed pursuant to CEQA through categorical exemptions or negative declarations. Further, the protection of public safety is the first responsibility to local government and local officials have an obligation to give priority to the provision of adequate public safety services, which are typically financed through the City general funds. According, the need for additional police protection services as part of an unplanned police station at this time is not an environmental impact that the Project is required to mitigate.

Based on the above considerations, the Project would not make a cumulative considerable contribution to cumulative impacts associated with the construction of new police facilities.

Schools

Pursuant to Government Code Section 65995, the payment of developer fees under the provisions of SB 50 addresses the impacts of new development on school facilities serving that development. Accordingly, impacts on public schools from related projects would be mitigated to less than significant with payment of developer fees. Furthermore, as the Project would also pay school impact fees, its contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

Parks

The 167 related projects would result in the potential development of approximately 35,992 residential units and more than 101,497 new residents. To meet PRP goals of one acre each of neighborhood and community parkland per 1,000 persons in the short/intermediate term and two acres each of neighborhood and community parkland per 1,000 persons in the long-term, more than 203 acres of new neighborhood and community parkland in the short-term and 203 additional acres of new parkland may be required in the long term.

As with the Project, new related residential projects are anticipated to provide on-site open space and recreational amenities to meet the needs of projected residents. In addition, LAMC Sections 17.12 and 12.33, which implement the City's parkland dedication ordinance enacted under the Quimby Act, provide a formula for satisfying park and recreational uses through land dedication and/or the payment of in-lieu fees. In addition to the provision of on-site recreational amenities for related residential related projects, the implementation of required parks and recreational fees under the LAMC would allow for land purchase and expansion of existing facilities. As such, related projects are not anticipated to result in substantial physical deterioration or accelerated deterioration of recreational and parks facilities.

As described above, the Project proposes to include would provide 23,115 square feet (0.53acres) of recreation/ amenities spaces, which is the same as the 0.53-acre dedication that may otherwise be required under Section 17.12 of the LAMC. Although it is anticipated that the Project would comply with Section 17.12 of the LAMC, the finalized Project design would be reviewed by the Department of City Planning to determine whether proposed facilities meet the applicable criteria for consideration or additional park land dedication or fees must be paid. With fulfillment of the required provisions of the LAMC, which require dedication of land or payment of in-lieu fees, if necessary, impacts would be less than significant.

Based on the above considerations, the Project would not make a cumulative considerable contribution to cumulative impacts associated with the construction of new police facilities.

Other governmental services

The related projects' residents, employees, and visitors would utilize and, to some extent, impact the maintenance of public facilities, including roads. Construction activities would result in a temporary increased use of the surrounding roads. However, the use of such facilities would be typical of that experienced for the highly urbanized Project vicinity. The related projects would generate revenue for the City's general fund that could be used for the provision of public services, such as library facilities. The related projects would be required to pay applicable development impact fees of the City of Los Angeles. Measure L, also provides LAPL with a mechanism to address the needs of additional residents. The above mechanisms would offset any incremental need for funding of capital improvements to maintain adequate library facilities and service, resulting from related projects. Similarly the Project would generate revenue for the City's general fund that could be used for the provision of public services such as library facilities. Based on the above considerations, the Project would not make a cumulative

considerable contribution to cumulative impacts associated with the construction of new library facilities.

15. Recreation

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

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

Less Than Significant Impact (a-b). As discussed under Response No. 14.d, operational activities associated with the Project would increase demand for park services. However, the Project would provide 23,115 square feet (0.53acres) of recreational amenities that would be tailored to meet the needs of the anticipated residential population. The Project would provide open space features that exceed the City's open space requirements. As such, the demand or use of nearby park facilities would be reduced at times by the Project. Nonetheless, to offset the Project's demand on park facilities and services, the Project applicant would be responsible for meeting the parkland dedication or fee requirements pursuant to the Quimby Act and Section applicable LAMC requirements, as necessary. Therefore, with the proposed open space features and payment of applicable fees, the Project would not substantially deteriorate, or accelerate the deterioration of recreational facilities or resources. Impacts would be less than significant in this regard.[180]

Cumulative Impacts

Recreation

Refer to discussion under Parks, above.

16. Transportation/Circulation

Would the project:

a. Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to

[180] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors relating to recreation and parks, including the net population increase resulting from the proposed project; the demand for recreation and park services anticipated at the time of project buildout compared to the expected level of service available; consider, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to demand; and whether the project includes features that would reduce the demand for recreation and park services (e.g., onsite recreation facilities, land dedication or direct financial support to the Department of Recreation and Parks).

intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

Less Than Significant Impact. The following discussion is based on the analysis provided in the *Traffic Study for the 1800 Beverly Project, September 2017,* (Traffic Study*)* prepared by Gibson Transportation Consulting, Inc. contained in Appendix L of this MND. The Traffic Study as reviewed and approved by the Los Angeles Department of Transportation (LADOT) as discussed in the LADOT approval letter dated September 18, 2017.

The Project proposes a mixed-use development consisting of up to 243 apartment units, including 21 affordable housing units, and approximately 3,500 square feet (sf) of ground floor commercial uses. The existing residential and commercial uses on the Project Site would be removed with the development of the Project. Access to the Project Site would be provided via two full access driveways (accommodating both right-turn and left-turn ingress/egress movements) located on Bonnie Brae Street and Burlington Avenue. The Project would increase the development intensity on the Project Site compared to existing conditions. Thus, the Project would result in an increase in daily and peak-hour traffic within the traffic study area.

Construction activity would add traffic to the local and regional transportation systems through the hauling of excavated materials and debris, the transport of construction equipment, the delivery of construction materials, and travel by construction workers to and from the Project Site.

Based on projections, during the excavation phase of the Project, up to 200 daily haul truck trips (100 inbound, 100 outbound) are forecast to occur during the excavation and grading period, with approximately 26 trips per hour (13 inbound, 13 outbound) uniformly over a typical eight-hour workday. The 26 hourly truck trips would be equivalent to 52 PCE trips (26 inbound, 26 outbound) per hour. In addition, during this period an average of 30 construction workers would work at the Project Site during this phase resulting in a total of 26 vehicle trips to and from the Project Site on a daily basis.

The estimated number of construction workers each day depends on the phase of construction. According to construction projections prepared for the Project, the building subphase of construction would employ the most construction workers, with an average of approximately 100 workers per day for all components of the building (i.e., framing, plumbing, elevators, inspections, finishing). However, since the different building components would not be constructed or installed simultaneously, this cumulative estimate likely overstates the number of workers that would be expected on the peak construction day. Furthermore, on most of the estimated workdays to complete the Project, there would be far fewer workers than on the peak day. Therefore, the estimate of 140 workers per day used for the purposes of this analysis represents a conservative estimate. The 140 workers would result in a total of 123 vehicles that would arrive and depart from the Project Site each day. The estimated number of daily trips associated with the construction workers is approximately 246 (123 inbound and 123 outbound trips). In general, the hours of construction typically require workers to be on-site before the weekday morning commuter peak period and allow them to leave before or after the afternoon

commuter peak period (i.e., arrive at the site prior to 7:00 a.m and depart before 4:00 p.m or after 6:00 p.m). [181]Therefore, most, if not all, construction worker trips would occur outside of the typical weekday commuter peak periods.

As part of the Project, a detailed Construction Management Plan, included as PDF TRAF-1, would be provided. The Construction Management Plan would include street closure information, a detour plan, haul routes, and a staging plan, and would be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan would be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site.

As detailed above, the trips generated to the Project Site during construction activities are anticipated to be less than the trips generated by the Project. Therefore, it is expected that the traffic impacts associated with construction activities would also be less than the traffic impacts associated with the operations of the Project. Thus, construction activities are expected to have a less than significant impact on street and intersection service levels.

Construction activities are expected to be primarily contained within the Project Site boundaries. However, it is expected that construction fences may encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site. Adjacent to the Project Site, the eastbound curb lane on Beverly Boulevard is anticipated to be closed during the construction period resulting in the removal of one morning peak hour travel lane and off-peak hour unmetered parking spaces. The parking lane on Bonnie Brae Street and Burlington Avenue adjacent to the Project Site would also be used for staging during the construction period. Temporary traffic controls would be provided to direct traffic around any closures as required in the Construction Management Plan. The construction activities would not result in a temporary significant impact.

The use of the public right-of-way along Bonnie Brae Street, Burlington Avenue, and Beverly Boulevard would require temporary re-routing of pedestrian and bicycle traffic as the sidewalks fronting the Project Site would be closed during construction activities. The Construction Management Plan would include measures to ensure pedestrian and bicycle safety along the affected sidewalks, bicycle facilities, and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering).

There are no bus stops adjacent to the Project Site and, therefore, no temporary impacts to transit are expected. Parking is allowed on Bonnie Brae Street, Burlington Avenue, and Beverly Boulevard (with morning peak hour restrictions) adjacent to the Project Site. Construction would result in a temporary loss of up to nine on-street parking spaces on both Bonnie Brae Street and Burlington Avenue and up to 15 on-street parking spaces on Beverly Boulevard.

Project construction is not expected to create hazards for roadway travelers, bus riders, or parkers, so long as commonly practiced safety procedures for construction are followed. Such procedures

[181] LADOT approval letter dated September 18, 2017.

and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) have been incorporated into the Construction Management Plan. The construction-related impacts are anticipated to be less than significant, and the implementation of the Construction Management Plan described below would further reduce those impacts.

Project Design Feature

PDF-TRAF-1: The Applicant shall prepare a detailed Construction Management Plan that shall include, but not be limited to, the following elements, as appropriate:

- Advance, bilingual notification of adjacent property owners and occupants of upcoming construction activities, including durations and daily hours of operation.
- Prohibition of construction worker or equipment parking on adjacent streets.
- Temporary pedestrian, bicycle, and vehicular traffic controls during all construction activities adjacent to Bonnie Brae Street, Burlington Avenue, and Beverly Boulevard, to ensure traffic safety on public rights-of-way. These controls shall include, but not be limited to, flag people trained in pedestrian and bicycle safety at the Project Site's driveways.
- Temporary traffic controls during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways (e.g., flag men).
- Scheduling of construction activities to reduce the effect on traffic flow on surrounding arterial streets.
- Potential sequencing of construction activity for the Project to reduce the amount of construction-related traffic on arterial streets.
- Containment of construction activity within the Project Site boundaries.
- Prohibition on construction-related vehicles/equipment parking on surrounding public streets.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be implemented as appropriate.
- Scheduling of construction-related deliveries, haul trips, etc., so as to occur outside the commuter peak hours to the extent feasible.
- Installation of appropriate traffic signs around the Project Site to ensure pedestrian, bicycle, and vehicle safety.
- No staging of hauling trucks on any streets adjacent to the Project, unless specifically approved as a condition of an approved haul route.
- Spacing of trucks so as to discourage a convoy effect.
- Installation of truck crossing signs within 300 feet of the exit of the Project Site in each direction.
- Sufficient dampening of the construction area to control dust caused by grading and hauling and reasonable control at all times of dust caused by wind.
- Securing of loads by trimming and watering or covering to prevent the spilling or blowing of the earth material.

- Cleaning of trucks and loads at the export site to prevent blowing dirt and spilling of loose earth.
- Maintenance of a log documenting the dates of hauling and the number of trips (i.e., trucks) per day available on the job site at all times.
- Identification of a construction manager and provision of a telephone number for any inquiries or complaints from residents regarding construction activities. The telephone number shall be posted at the site readily visible to any interested party during site preparation, grading and construction.
- Ongoing contact with the administrator of nearby schools during construction. The administrative offices shall be contacted when demolition, grading and construction activity begin on the Project Site so that students and their parents will know when such activities are to occur. The developer shall obtain school walk and bus routes to the schools from either the administrators or from the Los Angeles Unified School District's Transportation Branch and guarantee that safe and convenient pedestrian and bus routes to the school be maintained.
- No staging or parking of construction vehicles, including vehicles to transport workers, on any of the streets immediately adjacent to schools.
- Assignment by the Los Angeles Department of Building and Safety of specific haul route hours of operation based upon nearby schools' hours of operation.
- Haul route scheduling sequenced to minimize conflicts with pedestrians, school buses and cars at the arrival and dismissal times of the school day. Haul route trucks shall not be routed past schools during periods when school is in session, especially when students are arriving or departing from the campus.

Once construction is complete, the Project's residents, employees, and visitors would generate daily vehicle and transit trips that could affect the existing capacity of the street system.

A total of 30 intersections, 29 signalized and one unsignalized, were selected for the Project traffic analysis. Level of Service (LOS) is a qualitative measure used to describe traffic flow conditions, which range from excellent, nearly free-flow traffic at LOS A to restricted movements and tremendous delays at LOS F. The definitions of the LOS levels and their related V/C ratio for intersections are shown in **Table B-30**, *Level of Service Definitions*.

The methodology for the signalized intersection analysis calculated the volume-to-capacity (V/C) ratio, which is used to determine the intersection LOS. LADOT guidelines indicate that a Project is considered to have a significant traffic impact on a signalized intersection if the increase in the V/C ratio attributable to the Project exceeds a specific threshold depending on the final intersection LOS. As shown in **Table 31**, *Signalized Intersection Analysis Methodology*, LADOT has developed a sliding scale methodology in which the minimum allowable increase in the V/C ratio attributable to a project decreases as the V/C ratio of the intersection increases.

TABLE B-30
LEVEL OF SERVICE DEFINITIONS

Level of Service	Definition	Signalized V/C Ratio
A	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.	0.000 - 0.600
B	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.	0.601 - 0.700
C	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.	0.701 - 0.800
D	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.	0.801 - 0.900
E	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.	0.901 - 1.000
F	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.	> 1.000

SOURCE: *Transportation Research Circular No. 212, Interim Materials on Highway Capacity* (Transportation Research Board, 1980).

TABLE B-31
SIGNALIZED INTERSECTION ANALYSIS METHODOLOGY

Intersection Conditions with Project Traffic		Significant Impact Threshold for Project-related Increase
LOS	V/C	in V/C Ratio
C	0.701 – 0.800	Equal to or greater than 0.04
D	0.801 – 0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01

SOURCE: City of Los Angeles.

The signalized 29 intersections and respective LOS are summarized in **Table B-32**, *Levels of Service for Existing Conditions: Signalized Intersections*. As the Project met the screening thresholds identified in the First Amendment to the Agreement between LADOT and Caltrans District 7 on Freeway Impact Analysis Procedures (State of California and City of Los Angeles, December 15, 2015), a detailed analysis of Caltrans facilities was also conducted and is included in the Traffic Study.

As shown in Table B-33, 28 of the 29 signalized study intersections currently operate at LOS D or better during both the a.m. and p.m. peak hours. The remaining intersection of Glendale Boulevard and Temple Street operates at LOS D during the a.m. peak hour and LOS E during the p.m. peak hour. Procedures and methodology are described in detail in the Traffic Study.

As detailed in **Table B-33**, *Estimated Project Vehicle Trip Generation*, the Project is anticipated to generate a total of1,482 net new trips on a typical weekday, including 127 morning peak hour trips (34 inbound, 93 outbound) and 135 afternoon peak hour trips (88 inbound, 47 outbound).

Table B-34, *Existing Traffic Conditions With Project: Signalized Intersections (2017)* displays the Project traffic volumes that were added the Existing Conditions shown in Table B-33. As shown in Table B-35, 27 of the 29 signalized study intersections would continue to operate at LOS D or better during all of the analyzed peak hours under Existing with Project Conditions. The remaining two intersections would operate at LOS E or F during at least one of the analyzed peak hours. Project related traffic does not exceed the thresholds of the LADOT significant impact criteria at any of the 29 signalized study intersections. Thus, the Project is not anticipated to trigger a significant traffic impact at any of the 29 signalized study intersections under Existing with Project Conditions, and no mitigation measures are required.

TABLE B-32
LEVEL OF SERVICE FOR EXISTING CONDITIONS: SIGNALIZED INTERSECTIONS

			Existing Conditions	
No.	**Signalized Intersection**	**Peak Hour**	**V/C**	**LOS**
1.	Reno Street &	AM	0.403	A
	Beverly Boulevard	PM	0.369	A
2.	Rampart Boulevard &	AM	0.663	B
	Beverly Boulevard	PM	0.654	B
3.	Rampart Boulevard &	AM	0.587	A
	3rd Street	PM	0.659	B
4.	Alvarado Street &	AM	0.900	D
	Sunset Boulevard	PM	0.858	D
5.	Alvarado Street &	AM	0.628	B
	US 101 NB Ramps	PM	0.522	A
6.	Alvarado Street &	AM	0.490	A
	US 101 SB Ramps	PM	0.663	B
7.	Alvarado Street &	AM	0.848	D
	Temple Street	PM	0.814	D
8.	Alvarado Street &	AM	0.647	B
	Beverly Boulevard	PM	0.655	B
9.	Alvarado Street &	AM	0.649	B
	3rd Street	PM	0.660	B
10.	Alvarado Street &	AM	0.582	A
	6th Street	PM	0.534	A
11.	Alvarado Street &	AM	0.557	A
	Wilshire Boulevard	PM	0.551	A

			Existing Conditions	
No.	**Signalized Intersection**	**Peak Hour**	**V/C**	**LOS**
12.	Bonnie Brae Street &	AM	0.397	A
	Beverly Boulevard	PM	0.506	A
13.	Bonnie Brae Street &	AM	0.529	A
	3rd Street	PM	0.561	A
14.	Burlington Avenue &	AM	0.419	A
	3rd Street	PM	0.350	A
15.	Union Avenue/Belmont Avenue &	AM	0.415	A
	Temple Street	PM	0.408	A
16.	Union Avenue &	AM	0.596	A
	Beverly Boulevard	PM	0.620	B
17.	Glendale Boulevard &	AM	0.511	A
	Bellevue Avenue	PM	0.520	A
18.	Glendale Boulevard &	AM	0.852	D
	Temple Street	PM	0.909	E
19.	Glendale Boulevard/Lucas Avenue &	AM	0.492	A
	Beverly Boulevard/2nd Street	PM	0.491	A
20.	Lucas Avenue &	AM	0.587	A
	3rd Street	PM	0.567	A
21.	Echo Park Avenue/US 101 NB Ramps &	AM	0.519	A
	Bellevue Avenue	PM	0.559	A
22.	Huntley Drive/Boylston Street &	AM	0.593	A
	3rd Street	PM	0.746	C
23.	Beaudry Avenue &	AM	0.571	A
	1st Street	PM	0.628	B
24.	Beaudry Avenue &	AM	0.749	C
	2nd Street	PM	0.776	C
25.	Beaudry Avenue &	AM	0.456	A
	SR 110 SB Off-Ramp	PM	0.314	A
26.	Beaudry Avenue &	AM	0.657	B
	3rd Street	PM	0.464	A
27.	Beaudry Avenue &	AM	0.689	B
	4th Street	PM	0.601	B
28.	Figueroa Street &	AM	0.551	A
	2nd Street	PM	0.657	B
29.	Figueroa Street &	AM	0.681	B
	3rd Street	PM	0.579	A

SOURCE: Gibson Transportation Inc, September 2017.

TABLE B-33
ESTIMATED PROJECT VEHICLE TRIP GENERATION

Description	Size	Daily Traffic	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Proposed Project								
Affordable Housing - Family	21 du	86	4	7	11	4	3	7
Less 10% Transit/Walk-In [a]		(9)	0	(1)	(1)	0	0	0
Subtotal - Affordable Housing - Family		77	4	6	10	4	3	7
Apartment	222 du	1,476	23	90	113	90	48	138
Less 10% Transit/Walk-In [a]		(148)	(2)	(9)	(11)	(9)	(5)	(14)
Subtotal - Apartment		1,328	21	81	102	81	43	124
Restaurant [b]	3.5 ksf	445	21	17	38	20	14	34
Less 10% Transit/Walk-In [a]		(45)	(2)	(2)	(4)	(2)	(1)	(3)
Less 20% Internal Capture [c]		(80)	(4)	(3)	(7)	(4)	(3)	(7)
Less 20% Pass-by [d]		(64)	(3)	(2)	(5)	(3)	(2)	(5)
Subtotal - Coffee Shop / Café		256	12	10	22	11	8	19
Total Proposed Project		**1,661**	**37**	**97**	**134**	**96**	**54**	**150**
Existing Uses to be Removed								
Apartment [e]	7 du	47	1	3	4	3	1	4
Less 10% Transit/Walk-In [a]		(5)	0	0	0	0	0	0
Subtotal - Apartment		42	1	3	4	3	1	4
Commercial	8.9 kfs	381	6	3	9	16	17	33
Less 10% Transit/Walk-In [a]		(38)	(1)	0	(1)	(2)	(2)	(4)
Less 20% Internal Capture [c]		(69)	(1)	(1)	(2)	(3)	(3)	(6)
Less 50% Pass-by [d]		(137)	(2)	(1)	(3)	(6)	(6)	(12)
Subtotal - Commercial		137	2	1	3	5	6	11
Total Existing Uses to be Removed		**179**	**3**	**4**	**7**	**8**	**7**	**15**
Total Net New Project Trips		**1,482**	**34**	**93**	**127**	**88**	**47**	**135**

Notes
ksf: 1,000 square feet

[a] The Project Site is located within 1,500 feet of stops for Metro Local and LADOT DASH bus lines, therefore a reduction was applied to account for transit usage and walking visitor arrivals.

[b] Based on discussions with LADOT, the Project's café/coffee shop uses were analyzed rates with a high-turnover restaurant rate.

[c] Internal capture adjustments account for person trips made between distinct land uses within a mixed-use development without using an off-site road system.

[d] Pass-by adjustments account for Project trips made as an intermediate stop on the way from an origin to a primary trip destination without route diversion.

[e] Of the 12 apartment units on-site, seven units were occupied at the time traffic counts were collected.

SOURCE: Gibson Transportation Consulting, Inc., September 2017.

TABLE B-34
EXISTING WITH PROJECT CONDITIONS: SIGNALIZED INTERSECTIONS (2017)

No.	Signalized Intersection	Peak Hour	Existing Conditions w/o Project		Existing with Project Conditions		Change in V/C	Significant Impact
			V/C	LOS	V/C	LOS		
1.	Reno Street & Beverly Boulevard	AM	0.403	A	0.404	A	0.001	NO
		PM	0.369	A	0.369	A	0.000	NO
2.	Rampart Boulevard & Beverly Boulevard	AM	0.663	B	0.665	B	0.002	NO
		PM	0.654	B	0.658	B	0.004	NO
3.	Rampart Boulevard & 3rd Street	AM	0.587	A	0.588	A	0.001	NO
		PM	0.659	B	0.661	B	0.002	NO
4.	Alvarado Street & Sunset Boulevard	AM	0.900	D	0.901	E	0.001	NO
		PM	0.858	D	0.860	D	0.002	NO
5.	Alvarado Street & US 101 NB Ramps	AM	0.628	B	0.633	B	0.005	NO
		PM	0.522	A	0.525	A	0.003	NO
6.	Alvarado Street & US 101 SB Ramps	AM	0.490	A	0.490	A	0.000	NO
		PM	0.663	B	0.669	B	0.006	NO
7.	Alvarado Street & Temple Street	AM	0.848	D	0.853	D	0.005	NO
		PM	0.814	D	0.817	D	0.003	NO
8.	Alvarado Street & Beverly Boulevard	AM	0.647	B	0.649	B	0.002	NO
		PM	0.655	B	0.657	B	0.002	NO
9.	Alvarado Street & 3rd Street	AM	0.649	B	0.655	B	0.006	NO
		PM	0.660	B	0.667	B	0.007	NO
10.	Alvarado Street & 6th Street	AM	0.582	A	0.583	A	0.001	NO
		PM	0.534	A	0.535	A	0.001	NO
11.	Alvarado Street & Wilshire Boulevard	AM	0.557	A	0.559	A	0.002	NO
		PM	0.551	A	0.552	A	0.001	NO
12.	Bonnie Brae Street & Beverly Boulevard	AM	0.397	A	0.415	A	0.018	NO
		PM	0.506	A	0.524	A	0.018	NO
13.	Bonnie Brae Street & 3rd Street	AM	0.529	A	0.533	A	0.004	NO
		PM	0.561	A	0.576	A	0.015	NO
14.	Burlington Avenue & 3rd Street	AM	0.419	A	0.427	A	0.008	NO
		PM	0.350	A	0.354	A	0.004	NO
15.	Union Avenue/Belmont Avenue & Temple Street	AM	0.415	A	0.428	A	0.013	NO
		PM	0.408	A	0.414	A	0.006	NO
16.	Union Avenue & Beverly Boulevard	AM	0.596	A	0.614	B	0.018	NO
		PM	0.620	B	0.626	B	0.006	NO
17.	Glendale Boulevard & Bellevue Avenue	AM	0.511	A	0.511	A	0.000	NO
		PM	0.520	A	0.520	A	0.000	NO

No.	Signalized Intersection	Peak Hour	Existing Conditions w/o Project		Existing with Project Conditions		Change in V/C	Significant Impact
			V/C	LOS	V/C	LOS		
18.	Glendale Boulevard & Temple Street	AM	0.852	D	0.852	D	0.000	NO
		PM	0.909	E	0.909	E	0.000	NO
19.	Glendale Boulevard/Lucas Avenue & Beverly Boulevard/2nd Street	AM	0.492	A	0.499	A	0.007	NO
		PM	0.491	A	0.491	A	0.000	NO
20.	Lucas Avenue & 3rd Street	AM	0.587	A	0.593	A	0.006	NO
		PM	0.567	A	0.575	A	0.008	NO
21.	Echo Park Avenue/US 101 NB Ramps & Bellevue Avenue	AM	0.519	A	0.520	A	0.001	NO
		PM	0.559	A	0.559	A	0.000	NO
22.	Huntley Drive/Boylston Street & 3rd Street	AM	0.593	A	0.599	A	0.006	NO
		PM	0.746	C	0.761	C	0.015	NO
23.	Beaudry Avenue & 1st Street	AM	0.571	A	0.578	A	0.007	NO
		PM	0.628	B	0.631	B	0.003	NO
24.	Beaudry Avenue & 2nd Street	AM	0.749	C	0.753	C	0.004	NO
		PM	0.776	C	0.781	C	0.005	NO
25.	Beaudry Avenue & SR 110 SB Off-Ramp	AM	0.456	A	0.456	A	0.000	NO
		PM	0.314	A	0.320	A	0.006	NO
26.	Beaudry Avenue & 3rd Street	AM	0.657	B	0.659	B	0.002	NO
		PM	0.464	A	0.464	A	0.000	NO
27.	Beaudry Avenue & 4th Street	AM	0.689	B	0.692	B	0.003	NO
		PM	0.601	B	0.602	B	0.001	NO
28.	Figueroa Street & 2nd Street	AM	0.551	A	0.551	A	0.000	NO
		PM	0.657	B	0.662	B	0.005	NO
29.	Figueroa Street & 3rd Street	AM	0.681	B	0.681	B	0.000	NO
		PM	0.579	A	0.580	A	0.001	NO

SOURCE: Gibson Transportation Consulting, Inc., September 2017.

TABLE B-35
FUTURE (2020) TRAFFIC CONDITIONS WITH PROJECT: SIGNALIZED INTERSECTIONS

No.	Signalized Intersection	Peak Hour	Future w/o Project Conditions		Future with Project Conditions		Change in V/C	Significant Impact
			V/C	LOS	V/C	LOS		
1.	Reno Street & Beverly Boulevard	AM	0.442	A	0.443	A	0.001	NO
		PM	0.416	A	0.417	A	0.001	NO
2.	Rampart Boulevard & Beverly Boulevard	AM	0.817	D	0.819	D	0.002	NO
		PM	0.744	C	0.747	C	0.003	NO
3.	Rampart Boulevard & 3rd Street	AM	0.734	C	0.735	C	0.001	NO
		PM	0.785	C	0.787	C	0.002	NO
4.	Alvarado Street & Sunset Boulevard	AM	0.983	E	0.984	E	0.001	NO
		PM	0.939	E	0.941	E	0.002	NO
5.	Alvarado Street & US 101 NB Ramps	AM	0.760	C	0.764	C	0.004	NO
		PM	0.637	B	0.640	B	0.003	NO
6.	Alvarado Street & US 101 SB Ramps	AM	0.559	A	0.559	A	0.000	NO
		PM	0.761	C	0.767	C	0.006	NO
7.	Alvarado Street & Temple Street	AM	0.973	E	0.979	E	0.006	NO
		PM	0.903	E	0.907	E	0.004	NO
8.	Alvarado Street & Beverly Boulevard	AM	0.709	C	0.711	C	0.002	NO
		PM	0.718	C	0.720	C	0.002	NO
9.	Alvarado Street & 3rd Street	AM	0.723	C	0.729	C	0.006	NO
		PM	0.726	C	0.727	C	0.001	NO
10.	Alvarado Street & 6th Street	AM	0.662	B	0.663	B	0.001	NO
		PM	0.617	B	0.618	B	0.001	NO
11.	Alvarado Street & Wilshire Boulevard	AM	0.705	C	0.707	C	0.002	NO
		PM	0.664	B	0.665	B	0.001	NO
12.	Bonnie Brae Street & Beverly Boulevard	AM	0.435	A	0.447	A	0.012	NO
		PM	0.545	A	0.563	A	0.018	NO
13.	Bonnie Brae Street & 3rd Street	AM	0.612	B	0.615	B	0.003	NO
		PM	0.601	B	0.615	B	0.014	NO
14.	Burlington Avenue & 3rd Street	AM	0.459	A	0.466	A	0.007	NO
		PM	0.391	A	0.395	A	0.004	NO
15.	Union Avenue/Belmont Avenue & Temple Street	AM	0.470	A	0.483	A	0.013	NO
		PM	0.497	A	0.497	A	0.000	NO
16.	Union Avenue & Beverly Boulevard	AM	0.735	C	0.753	C	0.018	NO
		PM	0.760	C	0.765	C	0.005	NO
17.	Glendale Boulevard & Bellevue Avenue	AM	0.550	A	0.551	A	0.001	NO
		PM	0.615	B	0.619	B	0.004	NO

No.	Signalized Intersection	Peak Hour	Future w/o Project Conditions V/C	Future w/o Project Conditions LOS	Future with Project Conditions V/C	Future with Project Conditions LOS	Change in V/C	Significant Impact
18.	Glendale Boulevard & Temple Street	AM	0.881	D	0.881	D	0.000	NO
		PM	0.939	E	0.939	E	0.000	NO
19.	Glendale Boulevard/Lucas Avenue & Beverly Boulevard/2nd Street	AM	0.579	A	0.586	A	0.007	NO
		PM	0.637	B	0.637	B	0.000	NO
20.	Lucas Avenue & 3rd Street	AM	0.689	B	0.693	B	0.004	NO
		PM	0.687	B	0.695	B	0.008	NO
21.	Echo Park Avenue/US 101 NB Ramps & Bellevue Avenue	AM	0.669	B	0.671	B	0.002	NO
		PM	0.704	C	0.707	C	0.003	NO
22.	Huntley Drive/Boylston Street & 3rd Street	AM	0.647	B	0.654	B	0.007	NO
		PM	0.856	D	0.871	D	0.015	NO
23.	Beaudry Avenue & 1st Street	AM	0.613	B	0.619	B	0.006	NO
		PM	0.676	B	0.679	B	0.003	NO
24.	Beaudry Avenue & 2nd Street	AM	0.829	D	0.834	D	0.005	NO
		PM	0.865	D	0.871	D	0.006	NO
25.	Beaudry Avenue & SR 110 SB Off-Ramp	AM	0.508	A	0.508	A	0.000	NO
		PM	0.354	A	0.360	A	0.006	NO
26.	Beaudry Avenue & 3rd Street	AM	0.719	C	0.721	C	0.002	NO
		PM	0.525	A	0.525	A	0.000	NO
27.	Beaudry Avenue & 4th Street	AM	0.737	C	0.741	C	0.004	NO
		PM	0.650	B	0.652	B	0.002	NO
28.	Figueroa Street & 2nd Street	AM	0.635	B	0.645	B	0.010	NO
		PM	0.786	C	0.791	C	0.005	NO
29.	Figueroa Street & 3rd Street	AM	0.710	C	0.710	C	0.000	NO
		PM	0.611	B	0.612	B	0.001	NO

SOURCE: Gibson Transportation Consulting, Inc., September 2017.

Future 2020 traffic volumes were developed to evaluate traffic conditions after completion of other planned related projects and the Project. These future traffic conditions include traffic volumes from related projects (approved or pending projects expected to be built by the year 2020 in the project vicinity) added to existing traffic conditions, plus one percent ambient growth in traffic per year. The total adjustment applied over the three-year period was 3.03%. This growth factor accounts for increases in traffic due to potential projects not yet proposed or projects outside the Study Area. [182]

[182] Traffic volumes for the related projects are included in Table 6 of the Traffic Study.

Future traffic conditions representing the buildout conditions at the completion of the Project is shown in **Table B-35**, *Future (2020) Traffic Conditions with Project: Signalized Intersections,* 26 of the 29 signalized study intersections operate at LOS D or better during all of the analyzed peak hours. The remaining three intersections are projected to operate at LOS E or F during at least one of the analyzed peak hours.

As detailed in Table B-36, when measuring the Future with Project Conditions against Future without Project Conditions, the incremental increases in the V/C ratios resulting from Project traffic do not exceed the thresholds of the LADOT significant impact criteria at any of the 29 signalized study intersections. Thus, the Project is not anticipated to trigger a significant traffic impact at any of the 29 signalized study intersections under Future with Project Conditions, and no mitigation measures are required.

Tables B-36 and **B-37** summarize the a.m. and p.m. peak hour delay and corresponding LOS for the unsignalized intersection of Burlington Avenue & Beverly Boulevard under Existing and Future Conditions. As shown, the intersection of Burlington Avenue & Beverly Boulevard is anticipated to operate at LOS D or better during the both the a.m. and p.m. peak hours under both Existing and Existing with Project Conditions.

As shown in Table B-37, the intersection of Burlington Avenue & Beverly Boulevard is anticipated to operate at LOS D or better during both the a.m. and p.m. peak hours under Future without Project Conditions. With the addition of Project traffic, the unsignalized intersection is anticipated to operate at LOS E during the a.m. peak hour and LOS B during the p.m. peak hour under Future with Project Conditions.

Pursuant to LADOT guidelines, if, based on the estimated delay, the resultant LOS is E or F in the Future with Project Conditions, the intersection should be evaluated for the potential installation of a new traffic signal through a traffic signal warrant analysis. Therefore, the unsignalized intersection of Burlington Avenue & Beverly Boulevard was analyzed according to according to Warrant 1 (eight- hour), Warrant 2 (four- hour), Warrant 3 (peak hour), Warrant 6 (coordinated signal system), and Warrant 7 (crash experience), as defined in *California Manual on Uniform Traffic Control Devices* (Caltrans, 2012).

Based on discussions with LADOT, further observations were conducted at the intersection of Burlington Avenue & Beverly Boulevard to verify that vehicles could complete the northbound right-turn movement from Burlington Avenue (minor street) under 45 seconds in order to apply a reduction to the right-turn volume in the signal warrant analysis. The signal warrant analysis was conducted assuming both a 50% and 100% right-turn reduction. As shown, the unsignalized intersection of Burlington Avenue & Beverly Boulevard would not meet any of the warrant thresholds under Existing or Future Conditions, with and without addition of Project traffic; and thus, installation of a traffic signal is not recommended. As indicated in the LADOT letter dated September 18, 2017, the analysis was reviewed by the LADOT Hollywood- Wilshire District Office and it concurred with the findings of the Traffic Study that a new traffic signal is not warranted.

As such, impacts would be less than significant.

TABLE B-36
EXISTING WITH PROJECT CONDITIONS (YEAR 2017)
UNSIGNALIZED INTERSECTION PEAK HOUR LEVELS OF SERVICE

No.	Intersection	Peak Hour	Existing Delay	Existing LOS	Meets Signal Warrants[a]	Existing with Project Delay	Existing with Project LOS	Meets Signal Warrants
30.	Burlington Avenue & Beverly Boulevard	A.M.	16.1	C	NO	25.7	D	NO
		P.M.	4.5	A		5.9	A	

Delay is measured in seconds per vehicle
LOS = Level of service
Results per Synchro 8 (HCM 2010 methodology).
a) Based on observations, the signal warrant analyses were conducted assuming both a 50% and 100% northbound right-turn volume reduction.

TABLE B-37
FUTURE WITH PROJECT CONDITIONS (YEAR 2020)
UNSIGNALIZED INTERSECTION PEAK HOUR LEVELS OF SERVICE

No.	Intersection	Peak Hour	Future without Project Delay	Future without Project LOS	Meets Signal Warrants[a]	Future with Project Delay	Future with Project LOS	Meets Signal Warrants
30.	Burlington Avenue & Beverly Boulevard	A.M.	30.1	D	NO	44.9	E	NO
		P.M.	7.9	A		11.3	B	

Delay is measured in seconds per vehicle
LOS = Level of service
Results per Synchro 8 (HCM 2010 methodology).
a) Based on observations, the signal warrant analyses were conducted assuming both a 50% and 100% northbound right-turn volume reduction.

b. Conflict with an applicable congestion management program including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. The Congestion Management Program (CMP) a State-mandated program that serves as the monitoring and analytical basis for transportation funding decisions in Los Angeles County made through the Regional Transportation Improvement Program and State Transportation Improvement Program processes. The CMP requires that a Traffic Impact Analysis (TIA) be performed (1) for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the morning or afternoon weekday peak hours and (2) all mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the morning or afternoon weekday peak hours.

Arterial Intersections

The Project would not add more than 50 peak hour trips at either of the arterial monitoring intersections within the Project Study Area. Therefore, the CMP arterial monitoring intersections impacts are considered to be less than significant.

Freeway Mainline Segment Analysis

The CMP identifies the freeway mainline monitoring location of SR 110 south of US 101 located approximately one mile east of the Project Site. The Project is anticipated to add approximately 11 trips during the morning peak hour and 20 trips during the afternoon peak hours to the freeway mainline monitoring location, well under the 150-trip threshold. Therefore, CMP freeway mainline segment impacts are considered to be less than significant.

Therefore, the Project is considered to have a less than significant impact with respect to CMP intersections or freeways.[183]

c. Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The Project Site is not located within the vicinity of a private or public airport or planning boundary of an airport land use plan. Additionally, the Project does not propose any uses that would increase the frequency of air traffic. The Project would be 79 feet tall and would therefore not trigger Federal Aviation Administration (FAA) requirements regarding rooftop lighting.[184] Therefore, the Project would not change air traffic patterns, increase air traffic levels or result in changes that would result in substantial safety risks. As a result, the Project would have no impact.

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

Less Than Significant Impact . Vehicular access to the Project Site would be provided via two full access driveways (accommodating both right-turn and left-turn ingress/egress movements) located on Bonnie Brae Street and Burlington Avenue. The driveways would be designed to LADOT standards under the review of City staff.

Pedestrian access to the residential uses would be provided at the two lobby entrances located along West Beverly Boulevard and South Bonnie Brae Street. Access to the commercial use would be provided via the storefront along South Bonnie Brae Street. The Project would not mix pedestrian and automobile traffic.

[183] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors and significant thresholds relating to intersection capacity, street segment capacity, and freeway capacity.

[184] Federal Aviation Administration (FAA), Obstruction Marking and Lighting, December 2015.

Long-term bicycle storage would be provided in designated areas within the Project Site. Residents and commercial visitors arriving by bicycle would utilize the vehicular driveways on Bonnie Brae Street and Burlington Avenue, as well as the residential lobbies, to access the bicycle parking areas. Based on the discussion above, the Project would not substantially increase hazards for vehicles, pedestrians, and bicyclists accessing the Project Site. Therefore, impacts related to hazards would be less than significant.

e. Result in inadequate emergency access?

Less than Significant Impact.. The Project Site is located in an established urban area that is well served by a roadway network. While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. However, through-access for drivers, including emergency personnel, along all roads would still be provided. In addition, in accordance with City of Los Angeles requirements, the Project would develop a Construction Management Plan (PDF TRAF-1), to ensure that adequate emergency access is maintained during construction. Therefore, construction is not expected to result in inadequate emergency access.

Long-term emergency access would continue to be provided as under existing conditions. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. Project Site access and circulation plans would be subject to review and approval by the LAFD. Thus impacts would be less than significant. [185]

f. Conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Bicycle Plans and Programs

Less than Significant Impact. The City of Los Angeles adopted a 2010 Bicycle Master Plan to encourage alternative modes of transportation throughout the City of Los Angeles. The Master Plan was developed to provide a network system that is safe and efficient to use in coordination with the vehicle and pedestrian traffic on the City street systems. The Master Plan has mapped out the existing, funded and potential future Bicycle Paths, Bicycle Lanes, and Bicycle Routes. The City of Los Angeles Mobility Plan 2035 identifies a Bicycle Enhanced Network. Tier 1 bicycle lanes are bicycle facilities on arterial roadways with physical separation. Tier 2 and Tier 3 bicycle lanes are bicycle facilities on arterial roadways with striped separation. The Mobility Plan 2035 indicates that Tier 2 bicycle lanes are more likely to be built by 2035 than Tier 3 lanes. The plan entails roadways be improved with bike detectors at actuated signals.

Within the Study Area, Rampart Boulevard, Sunset Boulevard, and Glendale Boulevard are designated for Tier 1 bicycle lanes. Beverly Boulevard and Union Avenue between Temple Street

[185] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors and significant thresholds relating to project access.

and Beverly Boulevard are designated for Tier 2 bicycle lanes, and Alvarado Street and Temple Street are designated for Tier 3 bicycle lanes.

Construction activities may encroach on the public right-of-way adjacent to the Project Site on Beverly Boulevard, resulting in the closure of the eastbound curb lane. Although the design and timeline of implementation for the proposed bicycle lanes on Beverly Boulevard is unknown at this time, coordination of construction activities with LADOT would be planned should construction activities coincide. The Construction Management Plan would include measures to ensure bicycle safety along the affected bicycle facilities.

The Project would not add new driveways or alter rights of way along these roadways and, as such, would not interfere with the City's planned bicycle facilities along these roadways. Therefore, the Project would be consistent with the City's Bicycle Master Plan.

The Project's bicycle parking program is discussed in detail in Attachment A, *Project Description,* of this MND, Table 2, Parking Summary. As described therein, the Project would be required under Code Sec. 12.21-A,16 to provide a minimum of 272 bicycle parking spaces. The Project would provide 27 short-term and 245 long-term bicycle parking spaces for a total of 272 spaces would therefore meet the Code requirements. Impacts related to parking would not be significant.

Pedestrian Facilities

Less than Significant Impact With Mitigation. Construction activities are expected to be primarily contained within the Project Site boundaries. However, it is expected that construction fences may encroach into the public right-of-way (e.g., sidewalks and roadways) adjacent to the Project Site. Adjacent to the Project Site, the eastbound curb lane on Beverly Boulevard is anticipated to be closed during the construction period resulting in the removal of one morning peak hour travel lane and off-peak hour unmetered parking spaces. The parking lane on Bonnie Brae Street and Burlington Avenue adjacent to the Project Site would also be used for staging during the construction period. Temporary traffic controls would be provided to direct traffic around any closures as required in the Construction Management Plan.

The use of the public right-of-way along Bonnie Brae Street, Burlington Avenue, and Beverly Boulevard would require temporary re-routing of pedestrian traffic as the sidewalks fronting the Project Site would be closed during construction activities. The Construction Management Plan (PDF-TRAF-1) would include measures to ensure pedestrian safety along the affected sidewalks, bicycle facilities, and temporary walkways (e.g., use of directional signage, maintaining continuous and unobstructed pedestrian paths, and/or providing overhead covering). In addition, MM- TRAF-1 includes measures to ensure that safe and adequate pedestrian protection would be provided during construction of the Project. With incorporation of PDF- TRAF-1 and MM TRAF-1 impacts to pedestrians would be less than significant during construction. During operation of the Project, pedestrian access to the residential uses would be provided at the two lobby entrances located along Beverly Boulevard and Bonnie Brae Street. Access to the commercial use would be provided via the storefront at the corner Bonnie Brae Street and

Beverly Boulevard. The Project would not mix pedestrian and automobile traffic and, therefore, no pedestrian impacts would occur.

Mitigation Measures

MM TRAF-1:

- The Applicant shall plan construction and construction staging as to maintain pedestrian access on adjacent sidewalks throughout all construction phases. This requires the Applicant to maintain adequate and safe pedestrian protection, including physical separation (including utilization of barriers such as K-Rails or scaffolding, etc.), from work space and vehicular traffic and overhead protection, due to sidewalk closure or blockage, at all times.
- Temporary pedestrian facilities shall be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.
- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.
- The Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction staging. The sidewalk shall be reopened as soon as reasonably feasible, taking construction and construction staging into account.

Transit Plans and Programs

Less Than Significant Impact. A purpose of the City's Mobility Plan 2035 is to reduce vehicle trips, by focusing growth in proximity to public transit and expanding mobility through better quality public transit. The 2010 CMP for Los Angeles County describes the statutory requirement for analyzing the regional transit system as a mechanism for reducing congestion, providing minimum performance measures for transit analysis, and reporting on the function and adequacy of the CMP transit network.[186] The Project Site is served by numerous Metro bus lines, local LADOT DASH service, as well as the Metro Red and Purple Lines. The Project would generate approximately 20 net new transit trips during the A.M. peak hour and 21 net new transit trips during the P.M. peak hour.

The Project and surrounding area is served by numerous established transit routes. The Project is also located within 0.75 miles of the Metro Red and Purple Line Westlake/MacArthur Park Station and in close proximity to other local and regional transit lines. The total residual capacity of the analyzed transit lines within the Study Area during the morning and afternoon peak hours is approximately 12,982 and 9,089 trips, respectively. The Project's a.m. and p.m. peak hour person trips by transit are projected at 20 and 21 trips, respectively, or approximately less than 0.2% of the available capacity during a.m. and p.m. peak hours.[187] Overall, the total transit capacity of the numerous transit lines can accommodate the Project's transit trips. Therefore, the

[186] Los Angeles County Metropolitan Transportation Authority, 2010 Congestion Management Program, Chapter 3.
[187] Traffic Study prepared by Gibson Transportation Consulting, Inc. contained in Appendix L of this MND

Project would not exceed regional transit capacity and transit impacts would be less than significant. [188]

Although the Project and other related projects will cumulatively add transit ridership, the Project Site and Study Area are served by a vast amount of transit service. Overall, the total transit capacity of the numerous transit lines can accommodate the Project's transit trips. Therefore, the Project would not exceed regional transit capacity and transit impacts would be less than significant. Furthermore, it is assumed that public transit providers would add additional service when required in order to accommodate cumulative demand in the region. Therefore, cumulative impacts on public transit would be less than significant.

Parking

Less Than Significant Impact. The Project's parking program is discussed in detail in Attachment A, *Project Description,* Table 2, Parking Summary, of this MND. As discussed therein, the Project proposes to provide a total of 292 automobile parking spaces.

Pursuant to AB 744, the Project is required to provide 40 parking spaces for the 80 studio units, 57 parking spaces for the 114 one-bedroom units, and 49 parking spaces for the 49 two-bedroom units, for a total of 146 residential parking spaces. At a ratio of two parking spaces per 1,000 sf, 7 commercial parking spaces would be required for a total of 153 parking spaces. The Project's 292 automobile parking spaces would exceed the 153 automobile parking space requirements (i.e., 10 parking spaces for commercial uses and 282 for residential uses).

Pursuant to SB 743 (CEQA Statute Section 21099(d)(1)), parking impacts of a mixed-use residential project in an infill transit priority area, such as the Project, are not considered significant. However, the Project would provide 292 parking spaces that exceed AB 744 requirements. Therefore, impacts related to parking would be considered less than significant notwithstanding the provisions of SB 743.

Cumulative Impacts

Transportation and Circulation

Cumulative impacts on traffic associated with construction (e.g., an intermittent reduction in street and intersection operating capacity) are typically considered short-term adverse, but not significant. Each related project would be required to comply with City requirements regarding haul routes and would implement mitigation measures and/or include project characteristics, such as traffic controls and safety procedures as part of a Construction Management Plan, to reduce potential traffic impacts during construction.

The future (2020) service level conditions presented in Table B-36, Future (2020) Traffic Conditions with Project, represent a combination of estimated trips from all related projects, as

[188] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors and significant thresholds relating to transit system capacity.

well as incremental annual growth, and are cumulative in nature. As shown in Table B-36, cumulative traffic impacts would be less than significant.

The regional transportation analysis, including public transit, is based on CMP procedures that have been developed to address countywide cumulative growth impacts on regional transportation facilities. The CMP Guidelines contain procedures for monitoring land use development levels and transit system performance by local jurisdictions and Metro, and are used to inform planning of infrastructure improvements to meet future needs, including development of Metro's LRTP. The cumulative increase in transit demand under related projects is addressed and supported by the CMP and the Mobility Plan 2035. As such, related projects would be consistent with adopted policies, plans or programs regarding public transit. Each related project would be reviewed by the City to ensure compliance with the City's requirements relative to the provision of adequate bicycle and vehicle parking for their site populations.

As indicated in the discussion of Project impacts above, the Project would not have a significant impact on public transit and would be consistent with the City's Mobility Element 2035. The Project would result in a less than significant traffic impact during construction and operation and would implement a Construction Management Plan that would incorporate notification and safety procedures and controls. In addition, the Project would provide bicycle and vehicle parking in compliance with City Code requirements. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

17. Tribal Cultural Resources

Would the project:

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

b. 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 (a and b). The analysis of tribal cultural resources is based on project notification and request to consult letters that the City submitted to ten (10) Native American individuals and organizations on the City's AB 52 Notification List on February 22, 2017. The City has received one comment from the Native American community. In a letter dated March 13, 2017, Mr. Andrew Salas of the Gabrieleno Band of Mission Indians – Kizh Nation requested formal consultation with the City pursuant to AB 52. On May 24, 2017, the City contacted Mr. Salas by phone to initiate the consultation effort. During this call, Mr. Salas requested that his tribe be contacted in the event that a potential tribal cultural resource is encountered during construction. No information regarding a known tribal cultural resources within the Project Site has been received by the City. Mr. Salas' letter and the City's AB 52 Project notification and request to consult letters are provided in Appendix M. As a result of the AB 52 consultations for the project, no known tribal cultural resources as defined in PRC Section 21074(a)(1) that could be affected by Project construction have been identified as listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k) as a result of consultation. Given their old age, sediments within the Project Site associated with the Puente Formation (discovered between 1.5 to 31 feet below the surface throughout the Project Site) would not be conducive to retaining tribal cultural resources. Moreover, it is likely that the original construction of the buildings within the Project Site between 1923 and 1952 have displaced buried tribal cultural resources.

However, in response to the consultation request from the Gabrieleno Band of Mission Indians – Kizh Nation that it be contacted in the event potential tribal cultural resources are encountered during construction, Mitigation Measure, MM CULT-1, in Section 5.b was added. This measure requires that a Gabrielino Tribe be contacted and consulted with regarding the treatment and curation of prehistoric archaeological resource in the event they are encountered. Therefore, with MM-CULT -1 impacts on these resources are expected to be less than significant

Cumulative Impacts

Tribal Cultural Resources

Many of the cumulative projects identified would require redevelopment of properties in urban areas that are currently developed and have been previously disturbed, and the potential to encounter and cause a significant impact on tribal cultural resources is diminished. Further, in association with CEQA review, future AB 52 consultations with Native American tribes in order to identify tribal cultural resources would be required for projects that have the potential to cause significant impacts to tribal cultural resources. Therefore, to the extent impacts on tribal cultural resources from cumulative projects may occur, contribution from the Project would not be cumulatively considerable and there would be no cumulative impact.

18. Utilities and Service Systems

The following impact analysis pertaining to utilities and service systems includes information contained in the Sewer Capacity Availability Report (SCAR) processed by the City of Los

Angeles Bureau of Engineering on March 23, 2017, the Service Advisory Request (SAR) from the City of Los Angeles dated February 14, 2017 and the description of existing and proposed topography/drainage and infrastructure for the Project Site prepared by Brandow & Johnston, Inc. These are included in Appendix H of this MND.

Would the project:

a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

and

b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Wastewater

Less Than Significant Impact. As discussed in Section 9, *Hydrology and Water Quality*, under the NPDES permit from the LARWQCB, all existing and future municipal and industrial discharges to surface waters within the City of Los Angeles are subject to applicable local, State and/or Federal regulations. The Project must comply with all provisions of the NPDES program and other applicable waste discharge requirements (WDRs), as enforced by the LARWQCB. Therefore, implementation of the Project would not result in an exceedance of wastewater treatment requirements.

Wastewater generated within Downtown and central Los Angeles is conveyed to and treated at Hyperion Treatment Plant (HTP). HTP serves a total of 600 square miles in the City and within other jurisdictions outside the City boundaries. HTP is the City's largest wastewater treatment facility and provides preliminary, primary, and secondary treatment processes, and also treats flows bypassed from the DTWRP and LAGWRP. HTP has an existing treatment capacity of 450 mgd, and up to 800 mgd in wet weather. It has an average dry weather flow of approximately 362 mgd, leaving approximately 88 mgd of treatment capacity available.[189] [190]

Following the secondary treatment of wastewater, the majority of effluent from HTP is discharged into Santa Monica Bay while the remaining flows are conveyed to the West Basin Water Reclamation Plant for tertiary treatment and reuse as reclaimed water. HTP has two outfalls that presently discharge into the Santa Monica Bay (a one-mile outfall pipeline and five-mile outfall pipeline. Effluent to Santa Monica Bay from HTP has historically had effects on

[189] The HTP is an end-of-the-line plant, subject to diurnal and seasonal flow variation. It was designed to provide full secondary treatment for a maximum-month flow of 450 mgd, which corresponds to an average daily waste flow of 413 mgd, and peak wastewater flow of 850 mgd. (Information regarding peak flow is included in the IRP, Facilities Plan, Volume 1, Wastewater Management, July 2004; page 7-3.) Accessed May 2017.

[190] City of Los Angeles Bureau of Sanitation, Hyperion Water Reclamation Plant. Available at: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=modqzbl8f_4&_afrLoop=33199812189076655. Accessed April 2017.

water quality. However, according to the City of Los Angeles Environmental Monitoring Division (EMD), since HTP's full secondary effluent discharge began in 1999 with a reduction in biosolids to Santa Monica Bay, water quality has improved with an increase in the number of species and the biodiversity in Santa Monica Bay.

HTP effluent is required to meet the LARWQCB requirements for a recreational beneficial use, which impose performance standards on water quality that are more stringent than the standards required under the Clean Water Act permit administered under the system's NPDES permit. Accordingly, HTP effluent to Santa Monica Bay is continually monitored to ensure that it meets or exceeds prescribed standards. The Los Angeles County Department of Health Services also monitors flows into the Santa Monica Bay. Further, the HTP is required to comply with associated WDRs and any updates or new permits issued. WDRs set the levels of pollutants allowable in water discharged from a facility. Compliance with applicable WDRs would ensure that Project implementation would not exceed the applicable wastewater treatment requirements of the LARWQCB with respect to discharges to the sewer system. As such, impacts would be less than significant in this regard.

During Project construction, a negligible amount of wastewater would be generated by construction workers. It is anticipated that portable toilets would be provided by a private company and the waste disposed off-site. Wastewater generation from construction activities is not anticipated to cause a measurable increase in wastewater flows at a point where, and at a time when, a sewer's capacity is already constrained or that would cause a sewer's capacity to become constrained. Additionally, construction is not anticipated to generate wastewater flows that would substantially or incrementally exceed the future scheduled collection of the HTP. Therefore, construction impacts to the local wastewater conveyance and treatment system would be less than significant.

The existing public sanitary sewer main lines near the Project Site are maintained by the City of Los Angeles Department of Public Works, Bureau of Sanitation. An existing main line exists in each street adjacent to the Project Site including: an 8-inch vitrified clay pipe (VCP) running in South Bonnie Brae Street, running south towards Miramar Street; an 8-inch VCP in West Beverly Boulevard running west towards Bonnie Brae Street; and an 8-inch VCP in South Burlington Avenue running south towards Miramar Street.

Construction of the Project would include all necessary connections to adequately link the Project to the existing City sewer system. The necessary improvements would be verified through the permit approval process of obtaining a sewer capacity and connection permit from the City. Construction-related impacts would be temporary and within the scope of impacts evaluated in this MND. However, the impacts of such construction activity would be temporary and on an intermittent basis. Further, a Construction Management Plan (PDF TRAF-1) for the Project would be prepared in order to minimize disruptions to through traffic flow, which would consider any off-site utility improvements, as necessary. See Response No. 14.a above, for further discussion of the Project's Construction Management Plan.

As shown in **Table B-38**, *Estimated Wastewater Generation*, implementation of the Project would generate approximately 31,878 gallons per day (gpd). Netting out the estimated existing wastewater generated on the Project Site, the Project would generate 31,225 gpd beyond existing conditions.

Given the current available capacity of the HTP, 88 mgd of treatment facilities, Project wastewater generation, 0.031 mgd, would account for a less than one percent increase in demand at the HTP and there would be ample capacity to treat this increase. Based on the above SCAR conclusions, and given existing and anticipated future capacity at the wastewater treatment facilities, Project wastewater generation impacts regarding wastewater facilities would be less than significant.

TABLE B-38
ESTIMATED WASTEWATER GENERATION

Land Use	Sewage Generation (GPD)	Quantity	GPD
Existing Uses			
Retail/Misc	25/1,000 sf	8,900 sf	223
Apartment-Bachelor	75/du	6 du	450
		Total Existing	**673**
New Uses (Project)			
Health Club/Spa*	650/1,000 sf	2,100 sf	1,365
Residential: Apartment – Bachelor	75/du	80 du	6,000
Residential: Apartment – 1 BDRM	110/du	114 du	12,540
Residential: Apartment – 2 BDRM	150/du	49 du	7,350
Commercial Use**	50/1,000 sf	2,458 sf	123
Restaurant: Full service indoor seat	30/seat	150 seats	4,500
		Total New	**31,878 gpd**
Existing Uses - Project		**Total Net**	**31,225**

kgsf = gross square feet; gpd = gallons per day; d.u. = dwelling unit.

* As the fitness facilities are for on-site residential uses only, the wastewater generated would be captured by the residential d dwelling unit wastewater generating characteristics.
** The 2,458 sf commercial space is associated with the proposed club house residential amenity. The commercial sewage generation factor was used in the Sewer Capacity Availability Report (SCAR) as this factor most closely represents wastewater generation associated with clubhouse uses.
SOURCE: Sewer Capacity Availability Report (SCAR) processed by the City of Los Angeles Bureau of Engineering on March 31, 2017.

Water

Less Than Significant Impact. The Project consists of a mixed-use development that includes commercial and residential uses. Based on the Service Advisory Request (SAR), LADWP would provide the Project with domestic and fire water supplies, as provided by public water main lines located on Beverly Boulevard, Bonnie Brae Street, and Burlington Avenue

The proposed water service is anticipated to be off, an 8-inch main line in Beverly Boulevard, a 6-inch main line in Bonnie Brae Street and a 12-inch main line in Burlington Avenue. The LADWP's SAR indicates that the 8-inch main line in Beverly Boulevard has a maximum pressure of 101 psi, the 6-inch main line on Bonnie Brae Street has a maximum pressure of 105 psi, and the 12-inch main line on Burlington Avenue has a maximum pressure of 99 psi.

Two existing fire hydrants are located immediately adjacent to the Project Site at the southeastern corner of South Bonnie Brae Street and West Beverly Boulevard and at the southwestern corner of South Burlington Avenue and West Beverly Boulevard.

The proposed sizes and locations for the domestic water and fire water points of connection would be determined by the Plumbing Engineer and Fire Sprinkler engineer, respectively, during design. The locations of the double detector check assembly and fire department connection would be determined based on feedback from the City of Los Angeles Fire Department. LADWP would be coordinated with accordingly based on the final location both domestic and fire water points of connection.

Based on the results provided by the LADWP within the SAR dated February 14, 2017, the three existing water main lines would have capacity for the Project. As there would be adequate capacity available to accommodate the required fire flows and domestic water demand generated by the Project, impacts would be less than significant, and no mitigation measures are required.[191] [192]

c. Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. Dewatering, treatment, and disposal of groundwater would be conducted in accordance with permitted requirements set forth by the Los Angeles Regional Water Quality Control Board (LARWQCB)'s Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit specifies groundwater discharge prohibitions, receiving water limitations, monitoring and reporting program requirements, and general compliance determination criteria for groundwater discharges.

[191] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds relating to wastewater, as a project would normally have a significant wastewater impact if: the project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that could cause a sewer's capacity to become constrained; or the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any on treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

[192] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds* screening factors related to water, including the total estimated water demand for the project; whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and the degree to which scheduled water infrastructure improvements or project design features would reduce of offset service impacts.

As discussed in detail in Section 9, *Hydrology and Water Quality*, the Project would be designed to comply with the City of Los Angeles's Low Impact Development (LID) design standard. To facilitate this, the Project proposes as a BMP, EPIC planters with storage. The entirety of the building's roof drains will be diverted to the "EPIC" planters with storage and the overflow discharge will be discharged to South Bonnie Brae Street via a curb drain or parkway drains. The use of EPIC planters would meet City of Los LID standards. Environmental impacts associated with the development of the Project, including on-site drainage facilities, have been evaluated throughout this MND document. As concluded herein, all potentially significant impacts associated with development of the Project, including on-site stormwater drainage facilities would be less than significant. Therefore, impacts would be less than significant in this regard.[193]

d. Have sufficient water supplies available to serve the project from existing entitlements and resource, or are new or expanded entitlements needed?

Less Than Significant Impact. Sections 10910-10915 of the State Water Code (Senate Bill [SB] 610) requires the preparation of a water supply assessment (WSA) demonstrating sufficient water supplies for a project that is: 1) a shopping center or business establishment that will employ more than 1,000 persons or have more than 500,000 square feet of floor space; 2) a commercial office building that will employ more than 1,000 persons or have more than 250,000 square feet of space, or 3) any mixed-use project that would demand an amount of water equal to or greater than the amount of water needed to serve a 500 dwelling unit subdivision. As the Project does not meet the established thresholds, no WSA is required.

Based on the anticipated amount of net new wastewater generated as a result of the Project (31,225 gpd), the Project would generate a water demand of approximately 37,470 gpd or 41.9 acre feet per year (AFY), without accounting for regulatory water conservation features beyond reductions embedded in the wastewater generation rates used for calculating the demand. [194] With implementation of additional water conservation measures per regulatory requirements, and current practices, the Project's actual water demand would be less than the amount stated above. Compliance with water conservation measures required by State and City green regulations would reduce this estimated projected water demand.

According to the reliability data in the City of Los Angeles Urban Water Management Plan 2015, (UWMP) LADWP has sufficient supply to meet a total water demand of 675,700 AFY by the year 2040. LADWP has programs to reduce the demand to 565,600 AFY by 2040, a difference of 110,100 AFY. To meet the reduced target, LADWP will reduce water consumption through

[193] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds relating to wastewater, as a project would normally have a significant wastewater impact if: the project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that could cause a sewer's capacity to become constrained; or the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any on treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

[194] The water demand would be consistent with the estimated wastewater generation of the Project per Table B-38, Estimated Wastewater Generation. To be conservative, 20 percent was added (to account for outdoor water use).

conservation, increased recycled water use (including both non-potable and indirect potable reuse), and reduced reliance on imported water.[195]

The UWMP is based on SCAG growth projections and takes into account all expected regional growth. As indicated in the discussion in Section 13, Population and Housing, the Project's contributions to growth fall within the range of growth accounted for in the SCAG projections that are used for future planning activities and provision of services. The projections are revised on four year intervals so as to stay current with current growth trends and changes in land use activity. Changes to planning and zoning designations can be incorporated in timely fashions so long as the growth does not exceed the amount anticipated within the service timelines. The UWMP is updated on regular five year cycles and includes programs to meet the supply requirements.

The Project would result in estimated water demand of approximately 41.9 AFY when fully occupied. The increase in water demand generated by the Project would constitute less than 0.01 percent of the City's projected water supply for 2040 (675,700 AFY). The Project would fall within the available and projected water supplies projected in the 2015 UWMP. As there would be sufficient water supplies available to serve the Project, impacts regarding supply would be less than significant, and no mitigation measures are required.[196]

e. 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. As indicated in Response No. 17.b above, implementation of the Project would generate approximately 31,225 gpd of wastewater. Given the current capacity of the HTP, Project wastewater generation would account for a less than one percent increase in demand at the HTP and there would be ample capacity to treat this increase. Therefore, the Project would have a less than significant impact with respect to wastewater treatment capacity.[197]

[195] City of Los Angeles Department of Water & Power Urban Water Management Plan 2015, page ES-20.

[196] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors related to water, including the total estimated water demand for the project; whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan area to be exceeded in the year of the project completion; and the degree to which scheduled water infrastructure improvements or project design features would reduce of offset service impacts.

[197] This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* significance thresholds relating to wastewater, as a project would normally have a significant wastewater impact if: the project would cause a measurable increase in wastewater flows at a point where, and a time when, a sewer's capacity is already constrained or that could cause a sewer's capacity to become constrained; or the project's additional wastewater flows would substantially or incrementally exceed the future scheduled capacity of any on treatment plant by generating flows greater than those anticipated in the Wastewater Facilities Plan or General Plan and its elements.

f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. Solid waste management in the City of Los Angeles involves both public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. The City of Los Angeles Bureau of Sanitation (BOS) is responsible for developing strategies to manage solid waste generation and disposal in the City of Los Angeles. The BOS collects solid waste generated primarily by single-family dwellings, small multi-family dwellings, and public facilities. Private hauling companies collect solid waste generated primarily from large multi-family residential, commercial, and industrial properties. The City of Los Angeles does not own or operate any landfill facilities, and the majority of its solid waste is disposed of at County landfills.

The remaining disposal capacity for the County's Class III landfills is estimated at approximately 114 million tons as of December 2016, the most recent data available.[198] The average daily disposal capacity is 28,549 tons per day and the average daily disposal rate is 15,298 tons per day, leaving a residual daily capacity of 13,251 tons per day. Waste from the City of Los Angeles is disposed at primarily at the Sunshine Canyon and Chiquita landfill sites. Of the 114 million tons of remaining capacity within the County, 72.61 million tons or approximately 63 percent, is located at the Sunshine Canyon landfill, which has a remaining life of 22 years.

In addition to in-County landfills, out-of County disposal facilities may also be available to the City of Los Angeles. Aggressive waste reduction and diversion programs on a Countywide level have helped reduce disposal levels at the County's landfills, and based on the Los Angeles County Integrated Waste Management Plan (ColWMP), the County anticipates that future Class III disposal needs can be adequately met through 2030 through a combination of landfill expansion, waste diversion at the source, out-of-County landfills, and other practices.

The Solid Waste Integrated Resources Plan (SWIRP), most commonly known as the City's Zero Waste Plan, identifies a long term plan through 2030 for the City of Los Angeles's solid waste programs, policies and environmental infrastructure. The SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs, implementation of new policies and programs, and the development of future facilities.[199]

As illustrated in **Table B-39**, *Projected Solid Waste Generated During Operation*, and based on solid waste generation factors from the California Integrated Waste Management Board (CIWMB), the Project could generate approximately 949 lbs/day (0.474 tons/day or 173.01

[198] County of Los Angeles Department of Public Works, County of Los Angeles Countywide Integrated Waste Management Plan: 2015 Annual Report. December 2016. Appendix E-2, Table 1.

[199] Solid Waste Integrated Resources Plan, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp;jsessionid=AgIoE85QVAFQnxqPpAdrn65Tc-m75Je2g-nC1ILEy8UCT1VM7lLo!-395322140!-1871668233?_afrLoop=11115782988512864&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D11115782988512864%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dgm4tpb8fc_4.Accessed May 2017.

tons/year) of solid waste beyond existing conditions. The Project's 0.474 tons/day would comprise approximately 0.003 percent of the residual daily capacity of 13,251 tons per day As such, the solid waste generated by the Project could be accommodated by the County's available regional landfills. In addition, as discussed above, 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 diversion rate by 2025.

TABLE B-39
PROJECTED SOLID WASTE GENERATED DURING OPERATION

Land Uses	Quantity	Factor[a]	Solid Waste Generated (lbs/day)	Solid Waste Generated (tons/day)	Solid Waste Generated (tons/year)
Existing Land Uses					
Commercial	8,900 sf	5 lbs/k.s.f./day	44.5	0.022	8.03
Residential	6 units	4 lbs/unit/day	24	0.012	4.4
		Total	**68.5**	**0.034**	**12.41**
Proposed Land Uses					
Residential	243 units	4 lbs/unit/day	972	0.49	178.9
Retail and Restaurant	3,500 s.f.	5 lbs/k.s.f./day	17.5	0.009	3.3
Ground Level Amenities	5,627 sq.ft.	5 lbs/k.s.f./day	28.1	0.014	5.11
		Total	**1,017.6**	**0.51**	**187.3**
		Net Increase (Existing/Proposed)	**949.14**	**0.48**	**174.8**

d.u. = dwelling unit; s.f. = square feet; k.s.f.= thousand square feet; lbs. = pounds.

a Generation factors provided by the CalRecycle website, refer to Estimated Solid Waste Generation Rates. https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates, Accessed April 2017.

SOURCE: ESA PCR Services Corporation, 2017.

Construction of the Project would result in generation of solid waste such as scrap, lumber, concrete, residual wastes, packing materials, and plastics which could require disposal of construction associated debris at inert debris facilities located within the Count. Construction and Demolition materials would be conveyed pursuant to the City's Waste Hauler Permit Program (Ordinance 181519), effective January 1, 2011. Under this regulation, all private waste haulers collecting solid waste within the City, including C&D waste, are required to obtain AB 939 Compliance Permits and to transport C&D waste to City certified C&D processing facilities. These facilities process received materials for reuse and have recycling rates that vary from 70 percent to 94 percent.

Disposal and recycling of the construction debris would be required to comply with all Federal, State, and local regulations. Therefore, the Project would not cause any significant impacts from conflicting with statutes or regulations related to solid waste.

Based on the above, a less than significant impact regarding solid waste would occur.[200]

g. Comply with Federal, State, and local statutes and regulations related to solid waste?

Less Than Significant Impact. All local governments, including the City of Los Angeles, are required under Assembly Bill 939 (AB 939), the Integrated Waste Management Act of 1989, to develop source reduction, reuse, recycling, and composting programs to reduce tonnage of solid waste going to landfills. Cities must divert at least 50 percent of their solid waste generation into recycling. If the City's target is exceeded, the City would be required to pay fines or penalties from the State for not complying with AB 939. In addition, the City's Zero Waste Plan, identifies a long term plan through 2030 for the City of Los Angeles's solid waste programs, policies and environmental infrastructure. The Zero Waste Plan aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. This targeted diversion rate would be implemented through an enhancement of existing policies and programs such as implementing additional downstream programs (e.g. adding textiles to the blue bin recycling program; adding food scraps to the green bin recycling program; and requiring private solid waste collection service to provide access to multi-family and commercial customers); implementation of mandatory participation programs for residential, government, commercial, industrial, and institutional users; requiring transfer stations and landfills to provide resource recovery centers; and increased diversion requirements at C&D facilities new policies and programs, and the development of future recycling facilities.[201]

The waste generated by the Project would be incorporated into the waste stream of the City, and diversion rates would not be substantially altered. The Project does not include any component that would conflict with State or local laws governing construction or operational solid waste diversion and would comply pursuant to local implementation requirements. Thus, less than significant impacts regarding compliance with AB 939 or the Zero Waste Plan would occur with Project implementation.[202]

---

200 This finding took into consideration the *2006 City of Los Angeles CEQA Thresholds Guide* screening factors related to solid waste, including the amount of project waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; the need for an additional solid waste collection route, or recycling or disposal facility to adequately handle toe project-generated waste; and whether the project conflicts with solid waste policies and objectives in the SRRE or its updates, CiSWMPP, Framework Element or the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE

201 Solid Waste Integrated Resources Plan, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp;jsessionid=AgIoE85QVAFQnxqPpAdrn65Tc-m75Je2g-nC1ILEy8UCT1VM7lLo!-395322140!-1871668233?_afrLoop=11115782988512864&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D11115782988512864%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dgm4tpb8fc_4.Accessed May 2017.

202 Ibid

h. Other Utilities and Service Systems?

Electricity

Less Than Significant Impact. Electricity transmission to the Project Site is provided and maintained by LADWP. Future plans regarding the provision of electrical services are presented in regularly updated Integrated Resource Plans (IRPs). These plans identify future demand for services and provide a framework for how LADWP plans on continuing to meet future consumer demand. The current IRP is based on a 20-year planning horizon. The LADWP is required to meet operational, planning reserve and reliability criteria, and the resource adequacy standards of the Western Electricity Coordinating Council and the North American Electric Reliability Corporation.

LADWP's Power System served approximately 3.8 million people in 2015 and is the nation's largest municipal electric utility. LADWP has a net dependable generation capacity greater than 7,531 megawatts (MW).[203] LADWP is fully resourced to meet peak demand but maintains transmission and wholesale marketing operations to keep production costs low and increase system reliability. The LADWP December 2015 forecast, as presented in the 2016 IRP, indicates a 2019-2020 fiscal year demand for approximately 23,098 gigawatt hours (GWh) per year.[204] LADWP has achieved 21 percent renewable energy sales as of 2015.[205] Since 1990, LADWP has divested of three coal plants and repowered thirteen natural gas and oil fueled in-basin generating units using cleaner and more efficient new combustion technology, resulting in 19 percent lower GHG emissions and over 90 percent lower NO_X emissions.[206]

The estimated electricity demand for the Project would be approximately 1,837 megawatt hours (MWh) per year, based on the proposed development program and engineering estimates that form the basis of the GHG -related impact analysis (refer to Section 7, *Greenhouse Gas Emissions*, of this MND). The estimated electricity demand for the existing site uses would be approximately 154 MWh per year, based on engineering estimates that form the basis of the GHG -related impact analysis. As a result, the Project would have a net electricity demand of 1,683 MWh per year over existing conditions. When compared to the estimated 2019-2020 LADWP demand of 23,098 GWh per year, the Project's net electricity demand would represent approximately 0.007 percent of total demand. This amount is negligible, and is within the anticipated service capabilities of LADWP.

Appendix F of the State *CEQA Guidelines* states that, in order to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered, to the extent relevant and applicable to the project. Appendix F further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant

[203] City of Los Angeles Department of Water and Power, 2015 Power Integrated Resource Plan, pg. 18. December 2016. Available at: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=10lkmbfht0_4&_afrLoop=156149982339774. Accessed May 2017.

[204] Ibid., Appendix A, pg. A-6.

[205] Ibid., pg. ES-1.

[206] Ibid., pg. 7.

and applicable, in the Project Description, Environmental Setting, and Impact Analysis portions of technical sections.

The CEC first adopted the Energy Efficiency Standards for Residential and Nonresidential Buildings (California Code of Regulations, Title 24, Part 6) in 1978 in response to a legislative mandate to reduce energy consumption in the state. Part 11 of the Title 24 Building Standards Code is referred to as the CALGreen Code. The purpose of the CALGreen Code is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) planning and design; (2) energy efficiency; (3) water efficiency and conservation; (4) material conservation and resource efficiency; and (5) environmental air quality. The CALGreen Code establishes mandatory measures for new residential and non-residential buildings, which includes requirements for energy efficiency, water conservation, material conservation, planning and design, and overall environmental quality. The CALGreen Code was most recently updated in 2016 to include new mandatory measures for residential and nonresidential uses. The new measures take effect on January 1, 2017. According to the CEC, the Title 24 (2016) standards use 28 percent less energy for residential and 5 percent less energy for nonresidential lighting, heating, cooling, ventilation, and water heating compared to the previous Title 24 (2013) standards. The Project would comply with or exceed the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance and would install energy and water efficient appliances in the proposed residential dwelling units. In accordance with the CALGreen Code and LAMC Section 99.04.106.4.2, the Project would exceed the minimum EVSE requirements and would include five percent of the parking spaces as electric vehicle ready with metal conduit and electric wire pulled ready for charging station equipment installation. An additional 20 percent of the proposed parking spaces would be roughed-in with metal conduit only for future wiring to support future growth of EVSE. As such, the Project would support improvements in transportation energy efficiency and minimize transportation fuel demand. Furthermore, the Project would replace the existing uses on the Project Site, which include uses that were constructed in 1949 and 1951, as well as in 1923 for the Spanish Colonial Revival bungalow court (refer to Section 5, *Cultural Resources*, of this MND), prior to the existence of the building energy standards. As a result, the Project would replace existing energy and water inefficient (by current standards) buildings with buildings that meet or exceed current energy and water efficiency standards. As a result, consistent with *CEQA Guidelines* Appendix F requirements, the Project would reduce wasteful or inefficient energy consumption with respect to electricity.

Natural Gas

Less Than Significant Impact. Natural gas is provided to the Project Site by the Southern California Gas Company (SoCal Gas). According to the 2016 California Gas Report, the SoCal Gas total gas demand is expected to decline at an annual rate of 0.6 percent from 2016 to 2035.[207] The decline in demand is due to modest economic growth, CPUC-mandated energy efficiency

[207] California Gas and Electric Utilities, 2016 California Gas Report, pg. 64, https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, accessed December 2016.

standards and programs, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure.[208] In 2015, the Southern California Gas Company had natural gas sales of approximately 291 billion cubic feet, equivalent to approximately 306 billion kilo-British thermal units (kBtu).[209]

The estimated natural gas demand for the Project would be approximately 3.08 million kBtu per year, based on the proposed development program and engineering estimates that form the basis of the GHG -related impact analysis (refer to Section 7, *Greenhouse Gas Emissions*, of this MND). The estimated natural gas demand for the existing site uses would be approximately 0.14 million kBtu per year, based on engineering estimates that form the basis of the GHG -related impact analysis. As a result, the Project would have a net natural gas demand of 2.94 million kBtu per year over existing conditions. When compared to the estimated 2015 SoCal Gas sales of 306 billion kBtu per year, the Project's net natural gas demand would represent approximately 0.001 percent of total demand. This amount is negligible, and is within the anticipated service capabilities of SoCal Gas.

As discussed above, the Project would comply with or exceed the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance and would install energy and water efficient appliances in the proposed residential dwelling units. The Project would replace the existing uses on the Project Site, which include uses that were constructed in 1949 and 1951, as well as in 1923 for the Spanish Colonial Revival bungalow court (refer to Section 5, *Cultural Resources*, of this MND), prior to the existence of the building energy standards. As a result, the Project would replace existing energy and water inefficient (by current standards) buildings with buildings that meet or exceed current energy and water efficiency standards and, consistent with *CEQA Guidelines* Appendix F requirements, the Project would reduce wasteful or inefficient energy consumption with respect to natural gas.

Utility providers are required to plan for necessary upgrades and expansions to their systems to ensure that adequate service would be provided. As such, the Project would have a less than significant impact on electricity and natural gas utilities and service systems. No further analysis of this topic is necessary and no mitigation measures are required. Notwithstanding, the analysis of GHG emissions evaluates energy use as it effects air emissions and potential conservation measures that would reduce energy consumption as well as the emission of GHGs. No mitigation measures are required.

Transportation Fuels

Construction and operation of the Project would result in transportation-related energy use primarily as the result of gasoline and diesel consumption. Construction equipment associated with Project would comply with energy-saving measures, such as the CARB anti-idling regulation, which generally limits idling from trucks to five minutes at any location. According to

[208] California Gas and Electric Utilities, 2016 California Gas Report, pg. 64, https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, accessed December 2016.

[209] Sempra Energy, 2015 Annual Report, http://www.sempra.com/pdf/financial-reports/2015_annualreport.pdf, accessed November 2016.

the CARB staff report that was prepared at the time the anti-idling regulation was being proposed for adoption in late 2004/early 2005, the regulation was estimated to reduce non-essential idling and associated emissions of diesel particulate matter and nitrogen oxide (NO_X) emissions by 64 and 78 percent respectively in analysis year 2009.[210] These reductions in emissions are directly attributable to overall reduced idling times and reduced idling fuel combustion as a result of compliance with the regulation, and the Project's compliance would result in energy savings of approximately 64 percent in the absence of the CARB anti-idling measure (assuming a fuel reduction equivalent to the percent reduction of particulate matter or NO_X as estimated by CARB - the lesser value [i.e., 64 percent] is used as a conservative assumption).

The Project represents an urban infill development, since it would be undertaken on a currently developed site, and would be located near existing off-site commercial and retail destinations and in close proximity to existing public transit stops, which would result in reduced vehicle trips and vehicle miles traveled (VMT) compared to a project located at a greenfield site or other less developed location. According to the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, land use characteristics and site design features contribute to trip and VMT reductions.

The following land use characteristics and site design features from the Project would reduce trips and VMT as well as associated transportation-related emissions:

- **Increased 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. This measure corresponds to CAPCOA guidance measure LUT-1.[211] The Project would increase the Project Site density to approximately 146 dwelling units per acre and 6 jobs per acre (refer to Section 13, *Population and Housing*, which provides population and employment data used to estimate the number of dwelling units and jobs per acre).
- **Location Efficiency:** Location efficiency describes the location of a project relative to the type of urban landscape such as an urban area, compact infill, or suburban center. In general, compared to the statewide average, a project could realize VMT reductions up to 65 percent in an urban area, up to 30 percent in a compact infill area, or up to 10 percent in a suburban center for land use/location strategies. This characteristic corresponds to CAPCOA guidance measure LUT-2.[212] The Project Site represents an urban infill location within the Westlake Community Plan Area and is served by numerous existing public transportation options. The location efficiency of the Project Site would result in synergistic benefits that would reduce vehicle trips and VMT compared to the statewide and Air Basin average and would result in corresponding reductions in transportation-related emissions.

[210] California Air Resources Board, Staff Report: Initial Statement of Reasons for Proposed Rulemaking, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling, Appendix F, July 2004, https://www.arb.ca.gov/regact/idling/idling.htm, accessed October 2016.

[211] California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010) 155-158.

[212] California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010) 159-161.

- **Increased Destination Accessibility:** This characteristic corresponds to CAPCOA guidance measure LUT-4. The Project would be located in an area that offers access to multiple other nearby destinations, including restaurants, office, retail, and residential uses. The Project Site is also located near other job centers in the region and close to the commercial center of Downtown Los Angeles. The access to multiple destinations in close proximity to the Project Site would reduce vehicle trips and VMT compared to the statewide and Air Basin average, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.
- **Increased Transit Accessibility:** Locating a project with high density near transit facilities encourages the use of transit by people traveling to or from a project site. This characteristic corresponds to CAPCOA guidance measure LUT-5.[213] The Project would be located less than a mile from the Westlake / MacArthur Park Metro Rail Station. The Project Site is located adjacent to numerous bus lines operated by Metro, LADOT Downtown Area Shuttle (DASH), and Foothill Transit. These bus lines include Metro Bus Routes 14, 200, 10, 16, 17, 20, 603, 720, and Foothill Transit 481. The DASH Pico Union/Echo Park bus stop is located one block to the east of the Project Site and travels along Beverly Boulevard, Alvarado Street, and 3rd Street and provides access to the Westlake / MacArthur Park Metro Rail Station. The transit accessibility would reduce vehicle trips and VMT versus the statewide and Air Basin average, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.
- **Improve Design of Development:** Improved street network characteristics within a neighborhood enhances walkability and connectivity. Characteristics include street accessibility usually measured in terms of number of intersections (e.g., four-way intersections) per square mile. This characteristic corresponds to CAPCOA guidance measure LUT-9.[214] The Project is located in an urban infill location that is highly street-accessible. Therefore, this characteristic applies to the Project and would reduce vehicle trips and VMT versus the statewide and Air Basin average, encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in emissions.

The reductions in VMT associated with these characteristics were accounted for in the emissions modeling analysis. Furthermore, in accordance with the CALGreen Code and LAMC Section 99.04.106.4.2, the Project would exceed the minimum EVSE requirements and would support improvements in transportation energy efficiency and minimize transportation fuel demand. As the Project would be designed in manner that reduced transportation-related fuel consumption, consistent with *CEQA Guidelines* Appendix F requirements, the Project would reduce wasteful or inefficient energy consumption with respect to transportation.

213 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010) 171-175.

214 California Air Pollution Control Officers Association, Quantifying Greenhouse Gas Mitigation Measures, (2010) 182-185.

Cumulative Impacts

Utilities and Service Systems

Water Supply

Development of the Project in conjunction with the related projects would cumulatively increase water demand on the existing water infrastructure system. None of the related projects is sufficiently close to the Project Site so as to contribute with the Project to the adjacent infrastructure demand and capacity for meeting domestic demand and firefighting capacity.

LADWP, as a public water service provider, is required to prepare and periodically update an UWMP to plan and provide for water supplies to serve existing and projected demands. The UWMP prepared by LADWP is based on the growth projects that are provided in the SCAG RTP, which is updated on 4-year cycles to account for changes in growth rates. It accounts for existing development within the City, as well as projected growth anticipated to occur through redevelopment of existing uses and development of new uses. Each of the related projects is required to be consistent with the SCAG RTP projections in order to be accounted for in LADWP's UWMP current and projected available water demand. Should the related projects be accounted for in LADWP's UWMP, no significant cumulative water supply impact is anticipated from cumulative development. Additionally, under the provisions of SB 610, LADWP is required to prepare a comprehensive WSA for every new development "project" (as defined by Section 10912 of the CWC) within its service area. These contribute to ongoing evaluations to ensure facilities are adequate, and require infrastructure system improvements.

The Project impacts to water supplies would fall within the available and projected water supplies projected in the UWMP. Related projects would be required to provide local connections subject to review for service availability, subject to LADWP water system rules and requirements. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable and cumulative impacts regarding water supply would be less than significant.

Wastewater

Implementation of the Project in combination with the related projects and other projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. HTP has an existing treatment capacity of 450 mgd and an average dry weather flow of approximately 362 mgd, leaving approximately 88 mgd of treatment capacity available.[215, 216] The City has adopted an Integrated Resources Plan (IRP) that shows that the HTP will be able to accommodate growth within its service area to the year 2030.

[215] The HTP is an end-of-the-line plant, subject to diurnal and seasonal flow variation. It was designed to provide full secondary treatment for a maximum-month flow of 450 mgd, which corresponds to an average daily waste flow of 413 mgd, and peak wastewater flow of 850 mgd. (Information regarding peak flow is included in the IRP, Facilities Plan, Volume 1, Wastewater Management, July 2004; page 7-3.)

[216] City of Los Angeles Bureau of Sanitation, Hyperion Water Reclamation Plant. Available at: https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=modqzbl8f_4&_afrLoop=33199812189076655. Accessed April 2017.

As with the Project, all related projects in the City of Los Angeles would be subject to the provisions of the Municipal Code requiring provision of on-site infrastructure, improvements to address local capacity issues and payment of fees for future sewerage replacement and/or relief improvements. In addition, the potential need for the related projects to upgrade sewer lines to accommodate their wastewater needs is site-specific and there is minimal, if any direct cumulative relationship between the development of the Project and the related projects. None of the related projects is sufficiently close to the Project Site so as to contribute with the Project to the adjacent infrastructure demand for conveyance capacity.

The SCAR analysis described above for the Project impacts is based on a methodology that takes into account, among other factors, research and tracing of sewer flow levels upstream and downstream of the Project point of connection, and research of the project location area for other recently approved SCARs to evaluate the cumulative impact of all known SCARs on the sewer system. Per the SCAR conclusions, and given existing and anticipated future capacity at the wastewater treatment facilities, Project wastewater generation impacts regarding wastewater facilities would be less than significant and its contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts related to wastewater would be less than significant.

Solid Waste

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The County promotes jurisdictions to maximize waste reduction and recycling, expand existing landfills, and promote alternative technologies to reduce waste. Most notably, the City of Los Angeles as part of its SWIRP aims for the City of Los Angeles to achieve a goal of 90 percent diversion by 2025. The analysis for the Project above is based on landfill capacity and demand per the Countywide Integrated Waste Management Plan. Planning for landfill needs takes into account continuing demand and increases in demand associated with growth. Therefore, the analyses associated with that plan take into account cumulative development.

As indicated for the analysis above, the remaining disposal capacity for the County's Class III landfills as well the inert debris facilities would be sufficient to meet future needs. Related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the City's Green Building Code, as applicable. As such, impacts to the solid waste from related projects would be less than significant. As discussed above, the Project would not generate solid waste that would exceed landfill capacities and the recycling of solid waste related to construction and operation of the Project would be required to comply with all Federal, State, and local regulations including the City's Green Building Code and the SWIRP. Therefore, the Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts related to solid waste would be less than significant.

19. Mandatory Findings of Significance

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact With Mitigation Incorporated The preceding analysis does not reveal any significant unmitigable impacts to the environment. The Project Site is located within a highly urbanized area and is currently developed with existing warehouse, commercial, residential buildings and surface parking.

The Project would not significantly impact any scenic vistas, scenic resources, or the visual character of the area, as discussed in Section 1, and would not result in excessive light or glare. The Project Site is located within an urbanized area and does not support sensitive plant or animal species or habitat. Potentially significant impacts to nesting birds would be reduced to a less than significant level with implementation of the prescribed mitigation measures. Adverse impacts to archaeological and paleontological resources could occur. However, construction-phase procedures would be implemented in the event any important archaeological or paleontological resources are discovered during grading and excavation activities, consistent with the prescribed mitigation measures. Also, as discussed under Response 5.a, impacts regarding historical resources would be less than significant.

This Project Site is not known to have any association with an important example of California's history or prehistory. The environmental analysis provided in Section 3 concludes that impacts related to emissions of criteria pollutants and other air quality impacts will be less than significant with implementation of the prescribed mitigation measure. Sections 8 and 12 conclude that impacts related to hazards and hazardous materials and construction-related noise impacts would be less than significant after implementation of the prescribed mitigation measures, where applicable.

Overall, based on the preceding analysis of potential impacts, no evidence is presented that the Project would degrade the quality of the environment. The City hereby finds that impacts related to degradation of the environment, biological resources, and cultural resources will be less than significant with mitigation incorporated, as necessary.

b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulative considerable" means that 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).

Less Than Significant Impact with Mitigation Incorporated. A description of 167 related projects and four related infrastructure projects in the Project study area is provided in **Table B-40**, *Summary of Related Projects*, below. Related Projects are mapped in **Figure B-2**, *Related Projects Map*, below. The related projects are utilized to analyze cumulative impacts associated with Project implementation discussed above.

Cumulative Impact Conclusion

Based on the analysis above, the City finds that with mitigation measures incorporated into the Project, the contribution of the Project to cumulative impacts would not be cumulatively considerable, and cumulative impacts would be less than significant.

SOURCE: Gibson Transportation Consulting, Inc., 2017

1800 W. Beverly Boulevard

Figure B-2

Related Projects Map

ESA PCR

c. Does the project have environmental effects which cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact with Mitigation Incorporated. For the purpose of this MND, a significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. The analysis contained in this MND concludes that the Project will not result in significant adverse effects after implementation of mitigation measures.

Based on the preceding environmental analysis, the Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts would be reduced to less than significant levels through the implementation of the applicable mitigation measures identified in Sections 1-18 above.

TABLE B-40
SUMMARY OF RELATED PROJECTS

No.	Use	Size		Address
1	Condominiums	160	du	2525 W Wilshire Boulevard
	Retail	7,500	sf	
2	Condominiums	189	du	3033 W Wilshire Boulevard
	Retail	5,500	sf	
3	Condominiums	402	du	1027 W Wilshire Boulevard
	Retail	7,428	sf	
4	Apartments	615	du	437 S Hill Street
	Retail	16,309	sf	
5	Apartments	32	du	3200 W Beverly Boulevard
	Retail	5,870	sf	
6	Apartments	649	du	1102 W 6th Street
	Retail	39,996	sf	
7	Condominiums	225	du	609 W 8th Street
	Hotel	200	rooms	
	Retail	30,000	sf	
	Restaurant	32,000	sf	
8	Condominiums	32	du	820 S Hoover Street
	Retail	4,500	sf	
9	High-Rise Condominiums	132	du	1924 W Temple Street
	Condominiums	73	du	
	Apartments	46	du	
	Retail	19,103	sf	
10	Office	88,224	sf	1130 W Wilshire Boulevard
	Day Care	20	students	
	Restaurant	5,623	sf	

No.	Use	Size		Address
11	High-Rise Condominiums	420	du	848 S Grand Avenue
	Supermarket	38,500	sf	
12	Apartments	157	du	1430 W Beverly Boulevard
13	Condominiums	330	du	250 S Hill Street
	Retail/Restaurant	12,000	sf	
14	Condominiums	65	du	2225 W Sunset Boulevard
	Retail/Restaurant	15,550	sf	
15	Hotel	560	rooms	900 W Wilshire Boulevard
	Residential	100	du	
	Office	1,500,000	sf	
	Retail/Restaurant	275,000	sf	
16	Restaurant	5,979	sf	2139 W Sunset Boulevard
17	Apartments	133	du	3050 W Wilshire Boulevard
	Lecture Hall	450	Seats	
	Administration	43,400	sf	
18	Apartments	52	du	619 S Westlake Avenue
19	School	656	students	3400 W 3rd Street
20	Apartments	122	du	1435 W 3rd Street
	Retail	5,000	sf	
21	Condominiums	816	du	899 S Francisco Street
	Office	988,225	sf	
	Hotel	480	rooms	
	Retail	46,000	sf	
22	Apartments	218	du	1501 W Wilshire Boulevard
	Retail	6,000	sf	
	Other	1,500	- -	
23	Apartments	94	du	1329 W 7th Street
	Retail	2,000	sf	
24	High School	600	students	1552 W Rockwood Street
25	Hotel	160	rooms	1700 W Olympic Boulevard
26	Apartments	430	du	400 S Broadway
	Retail	10,000	sf	
	Bar	5,000	sf	
27	Apartments	331	du	801 S Olive Street
	Restaurant	10,000	sf	
28	Apartments	589	du	820 S Olive Street
	Retail	4,500	sf	
29	School	450	seats	2723 W 8th Street
30	Apartments	206	du	2850 W 7th Street
	Retail	7,500	sf	

No.	Use	Size		Address
31	Condominiums	80	du	2929 W Leeward Avenue
32	Apartments	399	du	2968 W 6th Street
	Restaurant	12,000	sf	
	Health Club	8,000	sf	
33	Office	33,957	sf	1500 W 8th Street
34	Theatre	1,942	seats	940 S Figueroa Street
	Restaurant	10,056	sf	
	Bar	5,119	sf	
35	Apartments	101	du	1335 W 1st Street
	Retail	3,514	sf	
36	Apartments	94	du	459 S Hartford Avenue
37	High-Turnover Restaurant	7,945	sf	1455 N Alvarado Street
38	Apartments	101	du	401 N Boylston Street
39	Apartments	80	du	1218 W Ingraham Street
40	Apartments	58	du	742 S Hartford Avenue
41	Apartments	428	du	340 S Hill Street
	Retail	6,700	sf	
42	Restaurant	9,600	sf	1728 W 7th Street
	Bar	3,500	sf	
43	Condominiums	126	du	1145 W 7th Street
	Apartments	100	du	
	Retail	7,200	sf	
44	Apartments	108	du	1011 S Park View Street
45	Apartments	137	du	609 N Dillion Avenue
	Retail	18,000	sf	
46	Other	99	rooms	2965 W 6th Street
47	Apartments	80	du	422 S Lake Street
48	School	480	students	1929 W Pico Boulevard
49	Apartments	40	du	3330 W Beverly Boulevard
	Day Care	4,237	sf	
50	Apartments	65	du	326 S Reno Street
51	Apartments	71	du	2335 W Temple Street
52	Apartments	144	du	2405 W 8th Street
	Retail	4,406	sf	
53	Apartments	43	du	340 N Patton Street
54	Hotel	89	rooms	1625 W Palo Alto Street
55	Apartments	81	du	2859 W Francis Avenue
56	Hotel	241	rooms	649 S Olive Street
57	Apartments	103	du	605 S Vermont Avenue
	Museum	30,937	sf	

No.	Use	Size		Address
58	Apartments	369	du	1111 W 6th Street
	Retail	18,600	sf	
	Restaurant	2,200	sf	
	Coffee Shop	1,200	sf	
59	School	460	seats	1633 W 11th Street
60	Apartments	212	du	235 N Hoover Street
61	Apartments	425	du	
	Hotel	126	sf	
	Retail	4,874	sf	
62	Apartments	80	du	740 S Hartford Avenue
63	High-Rise Apartments	644	du	2900 W Wilshire Boulevard
	Retail	10,000	sf	
	Fast-Food Restaurant	5,500	sf	
64	Apartments	77	sf	616 S Westmoreland Avenue
	Restaurant	2,360	sf	
	Retail	745	sf	
65	Condominiums	303	du	1235 W 7th Street
	Retail	5,959	sf	
66	Apartments	45	du	2649 W San Marino Avenue
67	Apartments	84	du	1322 W Linwood Avenue
68	Apartments	65	du	966 S Dewey Avenue
69	Apartments	156	du	1340 S Olive Street
	Retail	5,000	sf	
	Restaurant	10,000	sf	
70	Apartments	197	du	1334 S Flower Street
71	Condominiums	629	du	900 S Figueroa Street
	Retail	27,000	sf	
72	Apartments	600	du	327 N Fremont Avenue
	Retail	30,000	sf	
73	Apartments	42	du	2924 W 8th Street
	Assisted Units	43	units	
74	Office	30,300	sf	2005 W Pico Boulevard
	Assembly Hall	4,500	sf	
75	Condominiums	800	du	2000 Stadium Way
	Hospital	56	beds	
	Retail	15,000	sf	
76	School	450	seats	1700 W Pico Boulevard

No.	Use	Size		Address
77	Apartments	412	du	237 S Grand Avenue
	Retail	449,000	sf	
	Office	681,000	sf	
	Other	1,648	units	
78	Apartments	700	du	710 S Grand Avenue
	Retail	27,000	sf	
	Other	5,000	sf	
79	Retail/ Restaurant	27,765	sf	201 S Broadway
80	Medical Office	100,000	sf	765 W College Street
81	Apartments	300	du	700 W Cesar Chavez Avenue
	Retail	8,000	sf	
82	Apartments	204	du	1185 W Sunset Boulevard
	Retail	9,434	sf	
	Coffee Shop	1,900	sf	
	Single Family Homes	6	units	
83	Hotel	300	rooms	1020 S Figueroa Street
	Condominiums	650	du	
	Retail	40,000	sf	
	Restaurant	40,000	sf	
84	Apartments	304	du	2972 W 7th Street
	Retail	9,735	sf	
85	Apartments	545	du	3250 W Wilshire Boulevard
	Retail	5,222	sf	
	Hotel	162	rooms	
86	Apartments	49	du	1013 N Everett Street
87	Apartments	478	du	1930 W Wilshire Boulevard
	Hotel	220	rooms	
	Theater	850	seats	
	Classroom	50	students	
88	Apartments	230	du	130 S Beaudry Avenue
	Retail	9,000	sf	
89	Apartments	218	du	495 S Hartford Avenue
90	Apartments	173	du	2501 W Olympic Boulevard
	Commercial/ Retail	36,180	sf	
91	Apartments	112	du	1316 W Court Street
92	Hotel	200	rooms	631 S Vermont Avenue
	Condominiums	250	du	
	Office	49,227	sf	
	Retail	21,230	sf	

No.	Use	Size		Address
93	Apartments	122	du	668 S Coronado Street
	Retail	1,182	sf	
94	Apartments	436	du	744 S Figueroa Street
	Retail	10,165	sf	
95	Hotel	346	rooms	815 W Olympic Boulevard
	Retail	61,149	sf	
	Office	36,256	sf	
96	Apartments	43	du	1300 W Court Street
97	Hotel	225	rooms	926 W James M Wood Boulevard
98	Apartments	101	du	459 S Hartford Avenue
99	Condominiums	210	du	215 W 9th Street
	Retail	9,000	sf	
100	Apartments	208	du	1133 S Hope Street
	Retail	5,029	sf	
101	Condominiums	172	du	1115 S Hill Street
	Restaurant	6,850	sf	
102	Condominiums	151	du	1050 S Grand Avenue
	Retail	3,472	sf	
	Restaurant	2,200	sf	
103	Condominiums	142	du	902 W Washington Boulevard
104	Apartments	357	du	200 E Washington Boulevard
	Retail	7,750	sf	
	Restaurant	7,750	sf	
105	Condominiums	291	du	2100 S Figueroa Street
	Retail	7,134	sf	
106	Apartments	100	du	1027 S Olive Streets
107	Apartments	419	du	1306 S Hope Street
	Retail	42,400	sf	
108	Apartments	670	du	928 S Broadway
	Condominiums	17	du	
	Retail	58,800	sf	
	Office	34,824	sf	
109	Apartments	640	du	1200 S Grand Avenue
	Retail	45,000	sf	
110	Apartments	160	du	534 S Main Street
	Retail	18,000	sf	
	Restaurant	3,500	sf	
	Fast Food	3,500		
111	Condominiums	303	du	840 S Olive Street
	Restaurant	9,680	sf	

No.	Use	Size		Address
112	Apartments	877	du	1057 S San Pedro Street
	Condominiums	68	du	
	Hotel	210	du	
	Office	294,641	sf	
	Retail	224,862	sf	
	Cinema	744	seats	
113	Apartments	160	du	233 W Washington Boulevard
	Retail	24,000	sf	
114	Apartments	225	du	1001 S Olive Street
	Retail	5,000	sf	
115	Apartments	274	du	1000 S Grand Avenue
	Retail	12,000	sf	
116	Apartments	239	du	920 S Hill Street
	Retail	5,400	sf	
117	Apartments	201	du	955 S Broadway
	Retail	6,000	sf	
118	Condominiums	730	du	1212 W Flower Street
	Retail	10,500	sf	
	Office	70,465	sf	
119	Apartments	263	du	960 S Olive Street
	Retail	14,500	sf	
120	Apartments	452	du	601 S Main Street
	Retail	25,000	sf	
121	Apartments	214	du	1111 S Broadway
	Retail	10,000	sf	
122	Apartments	94	du	1148 S Broadway
	Retail	2,500	sf	
123	Apartments	666	du	1120 S Grand Avenue & 1155 S Olive Street
	Retail	20,690	sf	
124	Apartments	362	du	1230 S Olive Street
	Retail	4,000	sf	
125	Apartments	118	du	1247 S Grand Avenue
	Retail	5,125	sf	
126	Apartments	106	du	1400 S Figueroa Street
	Retail	4,589	sf	
127	Restaurant	7,149	sf	1036 S Grand Avenue
128	Apartments	80	du	1150 W Wilshire Boulevard
	Retail	4,589	sf	
129	Apartments	320	du	1150 W Wilshire Boulevard
	Pharmacy/Drugstore	25,000	sf	

No.	Use	Size		Address
130	Apartments	400	du	732 S Spring Street
	Drugstore	15,000	sf	
131	Apartments	93	du	1255 E Elden Avenue
132	Medical Office	66	emp	649 S Wall Street
	Assisted Living	55	beds	
133	Apartments	300	du	850 S Hill Street
	Retail	3,500	sf	
	Restaurant	3,500	sf	
134	Residential	689	du	700 W 9th Street
	Retail	22,963	sf	
135	Condominiums	161	du	1229 S Grand Street
	Restaurant	3,000	sf	
136	Apartments	232	du	940 S Hill Street
	Retail	14,000	sf	
137	Hotel	176	rooms	633 Spring Street
	Bar	5,290	sf	
	Restaurant	8,430	sf	
138	Senior Apartments	105	du	720 W Washington Boulevard
	Retail	2,650	sf	
139	Condominiums	300	du	225 S Los Angeles Street
	Retail	3,400	sf	
140	Condominiums	247	du	745 S Spring Street
	Retail	10,675	sf	
141	Apartments	471	du	300 S Main Street
	Restaurant	27,780	sf	
	Retail	5,190	sf	
142	Office	712,500	sf	150 N Los Angeles Street
	Retail	35,000	sf	
	Child Care	2,500	sf	
143	Apartments	77	du	118 S Astronaut E S Onizuka Street
144	Condominiums	504	du	1101 S Flower Street
	Hotel	183	rooms	
	Retail	166,000	sf	
145	Condominiums	648	du	1200 S Figueroa Street
	Retail	48,000	sf	
146	Apartments	160	du	719 E 5th Street
	Retail	10,057	sf	
147	Condominiums	126	du	1201 S Grand Avenue
148	Hotel	--	--	Hoxton Hotel
149	Apartments	526	du	888 S Hope Street

No.	Use	Size		Address
150	Apartments	30	du	950 S Broadway
	Retail	7,500	sf	
151	Apartments	391	du	Forest City/South Park (1)
	Retail	15,000	sf	
152	Apartments	341	du	SE Corner of 9th Street and Figueroa Street
153	Apartments	215	du	4th Street & Spring Street
	Retail	60,000	sf	
154	Apartments	240	du	232 E 2nd Street
	Retail	16,000	sf	
155	Hotel	153	rooms	801 S Broadway
	Office	500,000	sf	
	Retail	200,000	sf	
	Restaurant	--	--	
156	Apartments	450	du	SE Corner of Grand Avenue & 1st Street
	Hotel	300	rooms	
	Retail/Restaurant	--	--	
157	Creative Office	45,000	sf	537 S Broadway
158	Hotel	348	rooms	426 S Hill Street
159	Hotel	200	rooms	416 W 8th Street
160	Hotel	755	rooms	900 W Olympic Boulevard
161	Hotel	148	rooms	1106 S Broadway
162	Hotel	1,180	rooms	1248-1258 Figueroa Street
	Commercial	15,045	sf	
163	Office	500,000	sf	755 S Figueroa Street
	Retail	200,000	sf	
164	Apartments	436	du	744 S Figueroa Street
	Retail	10,000	sf	
165	Apartments	452	du	222 E 7th Street
	Commercial	13,655	sf	
166	Condominiums	100	du	333 W 5th Street
	Hotel	200	rooms	
	Commercial	27,500	sf	
167	Conference/Meeting	170,000	sf	1005 W Chick Hearn Court

No.	Use	Size	Address
Future Infrastructure Projects			
1	Metro Regional Connector	Provide continuous service between Metro Blue, Expo, Red, and Purple Lines and connectors to other rail lines with three new transit stations.	
2	MyFigueroa	Convert Figueroa Street, 11th Street, and Martin Luther King Jr. Boulevard to provide complete, multimodal streets that better serve the needs of pedestrians, bicyclists, and transit riders, while still accommodating drivers.	
3	Los Angeles Streetcar	Enhance mobility and transit circulation and support the growth and revitalization of downtown.	
4	7th Street Improvement Project	Streetscape improvements including sidewalk enhancements, better integration of transportation modes, intersection improvements, street lighting, and wayfinding.	

SOURCE: Gibson Transportation Inc., April 2017