
# Washington Boulevard/ Los Angeles Street Mixed-use Project

## Draft Initial Study – Mitigated Negative Declaration



*prepared for*

**City of Los Angeles**
200 Spring Street, Suite 750
Los Angeles, California 90012

*prepared with the assistance of*

**Rincon Consultants, Inc.**
250 1st Street, Suite 301
Los Angeles, California 90012

**November 2018**

Rincon Consultants, Inc.
*Environmental Scientists Planners Engineers*
www.rinconconsultants.com

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# Initial Study

## 1 Project Title

Washington Boulevard/Angeles Street Mixed-Use Project

## 2 Lead Agency Name and Address

City of Los Angeles
200 Spring Street, Room 763
Los Angeles, California 90012

## 3 Contact Person and Phone Number

Oliver Netburn, City Planner
200 Spring Street, Room 763
Los Angeles, California 90012
(213) 978 1382
oliver.netburn@LACity.org

## 4 Project Sponsor's Name and Address

AMCAL Multi-Housing, Inc.
30141 Agoura Road, Suite 100
Agoura Hills, California 91301

## 5 Project Location

The project site encompasses approximately 1.4 acres and is located at 200 – 224 Washington Boulevard and 1910 – 1914 Los Angeles Street in Los Angeles, California 90015. The Assessor's Parcel Numbers (APNs) that correspond with the street addresses are: 5127-029-037, -049, -902, -903, and -904. The site is located at the southeast corner of the intersection of Los Angeles Street and Washington Boulevard, and is bounded by Santee Street, a private alley, to the east. Figure 1 shows the regional setting of the project site. Figure 2 shows the project site location.

## Figure 1 Regional Location

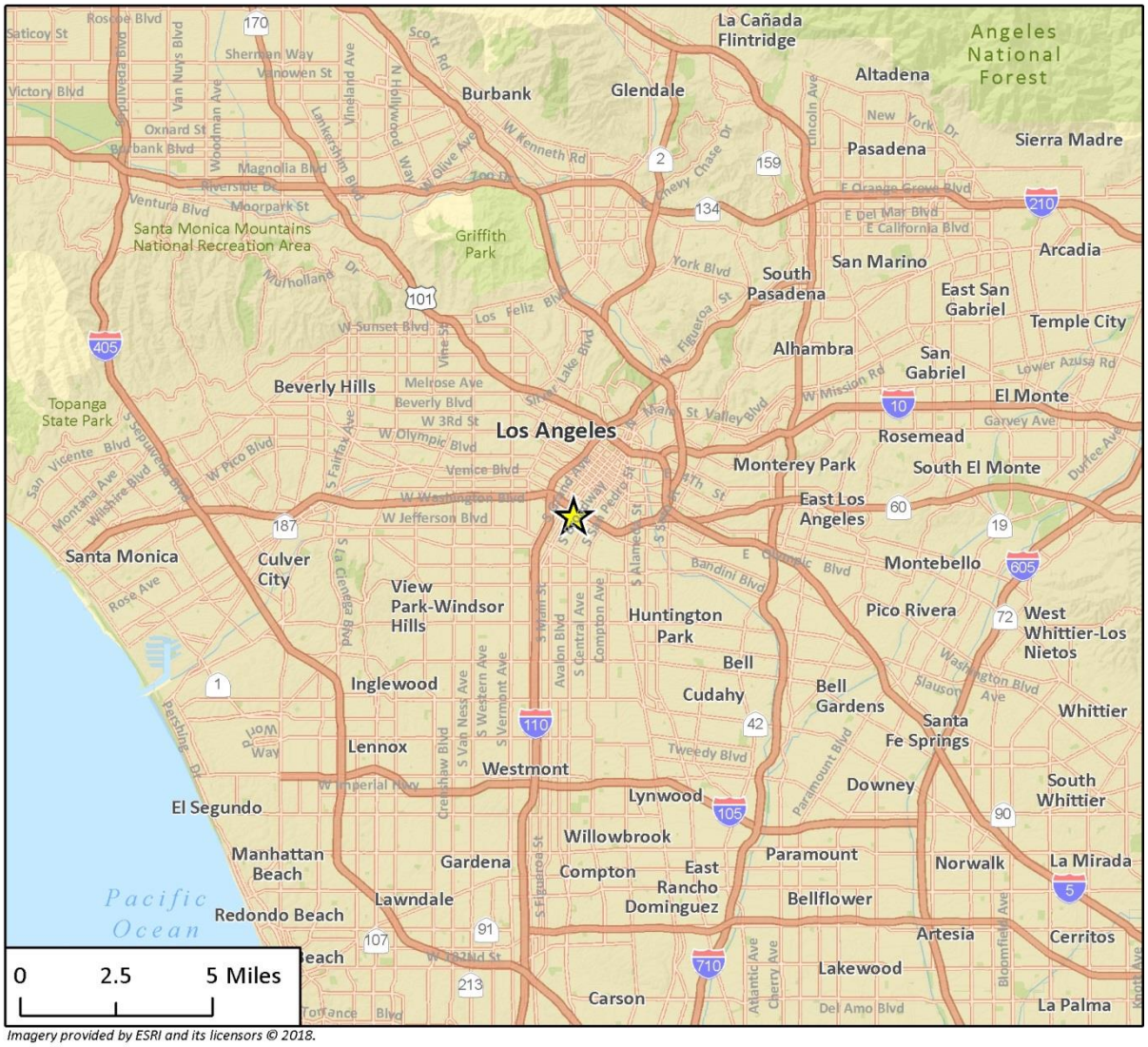


Fig 1 Regional Location

**Figure 2 Project Location**


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# 6 Existing Site Conditions

The project site is generally flat and rectangular in shape. See Figure 3 and Figure 4 for photographs of the project site. Existing development and uses on the project site include the following:

- An operational car repair facility on an approximately 0.2-acre lot at 200 and 206 Washington Boulevard
- A warehouse/industrial building located on an approximately 0.2-acre lot at 210 Washington Boulevard
- A warehouse/industrial building, which was used as a newspaper printing facility, located on an approximately 0.8-acre lot at 214, 216, 220 and 224 Washington Boulevard
- An industrial/warehouse building located on an approximately 0.1-acre lot with the address 1914 Los Angeles Street
- An occupied apartment complex on an approximately 0.1-acre lot at 1910 Los Angeles Street

# 7 Surrounding Land Uses and Setting

The project site is bordered by mixed-uses to the north and west, which are located across the street from the project site along Washington Boulevard and Los Angeles Street, respectively. An apartment complex (the Hirsh Apartments) is located to the east of the project site across Santee Street. The Frida Kahlo High School and the Santee Education Complex are located to the south of the project site. Additionally, the Los Angeles County Metropolitan Transportation Authority (Metro) Blue Line, an at-grade light rail line, is located along Washington Boulevard. The project site is approximately 700 feet south of Interstate 10/Santa Monica Freeway (I-10) and approximately 0.6-mile east of Interstate 110 (I-110). Figure 5 and Figure 6 show the surrounding land uses of the project area.

# 8 General Plan Designation

The project site is designated Community Commercial in the City of Los Angeles' General Plan and the City of Los Angeles' Southeast Los Angeles Community Plan.

# 9 Zoning

The project site is zoned M1-2-O, Limited Industrial Zone.

In addition, the following additional zoning regulations and stipulations apply to the project site:

- Transit Priority Areas (TPA)
- Council District Nine Corridors South of the Santa Monica Freeway Redevelopment Project Area
- Standalone Fast Food Establishments
- Freeway Adjacent Advisory
- State Enterprise Zone
- Metro Rail Project Area

**Figure 3 Site Photographs**

**Photograph 1:** Northwestern view of the project site

**Photograph 2:** Northeastern view of the project site


**Photograph 3:** Existing Automobile Repair Facility

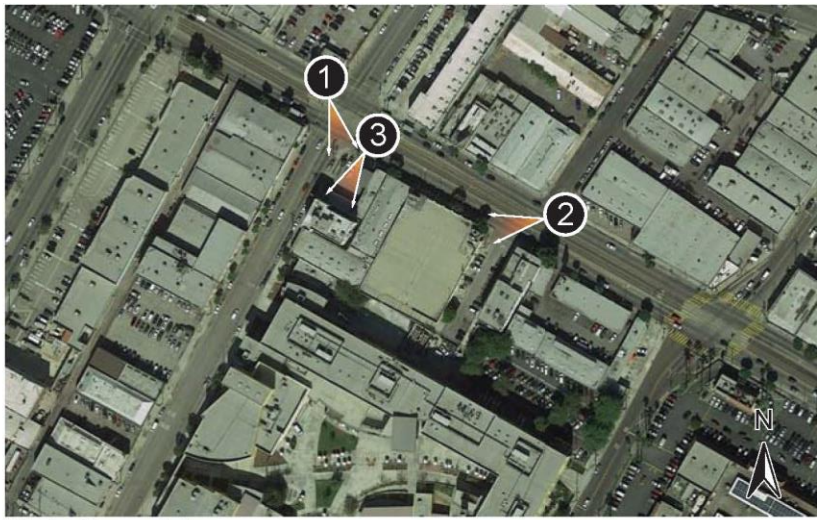



**Photo Viewpoints**

## Figure 4 Site Photographs


**Photograph 4:** Existing vacant warehouse on western side of the project site


**Photograph 5:** View of western side of the project site

**Photograph 6:** View of existing apartment building on western side of the project site

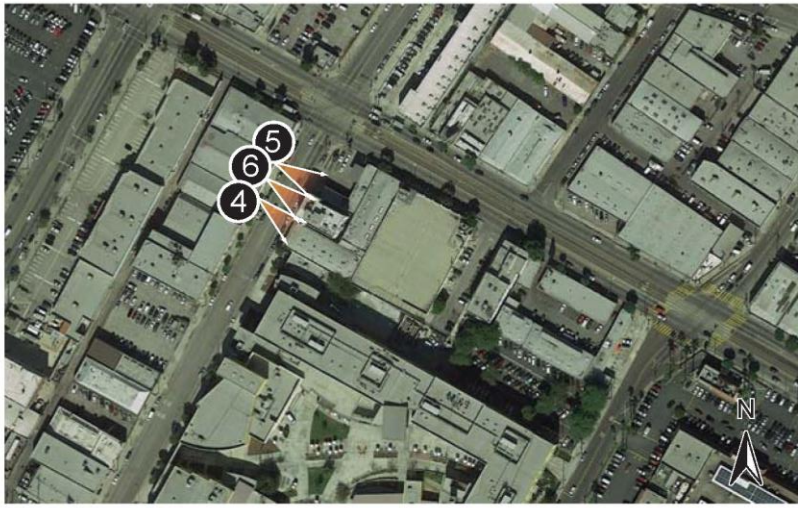
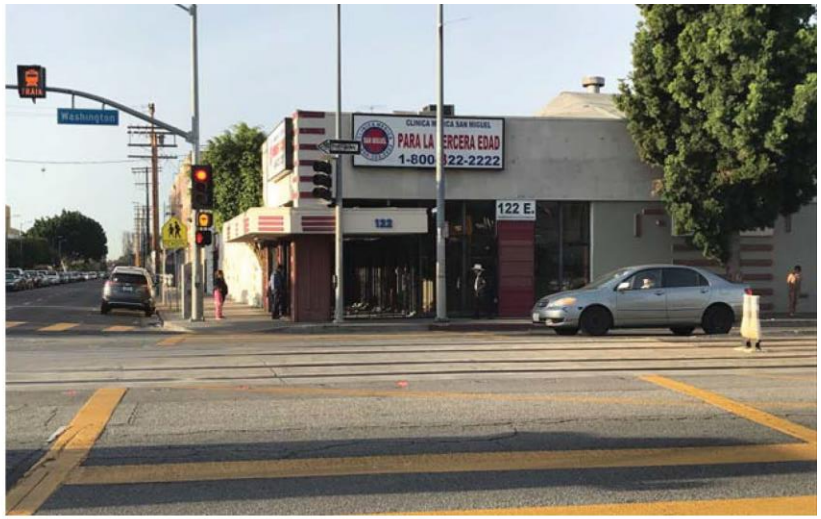



**Photo Viewpoints**

**Figure 5 Surrounding Area Photographs**

**Photograph 7:** Adjacent Frida Kahlo High School and Santee Education Complex, south of the project site




**Photograph 8:** Adjacent commercial use, western side of S. Los Angeles Street, west of the project site


**Photograph 9:** Adjacent apartment building to eastern side of the project site

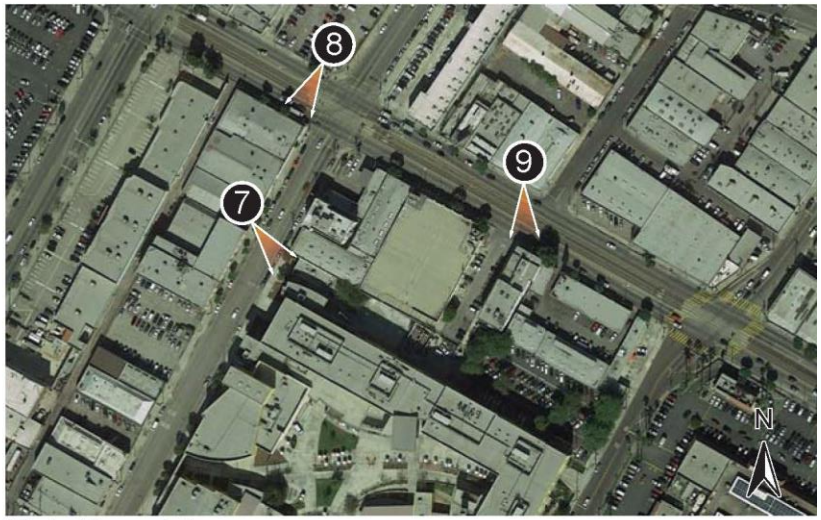
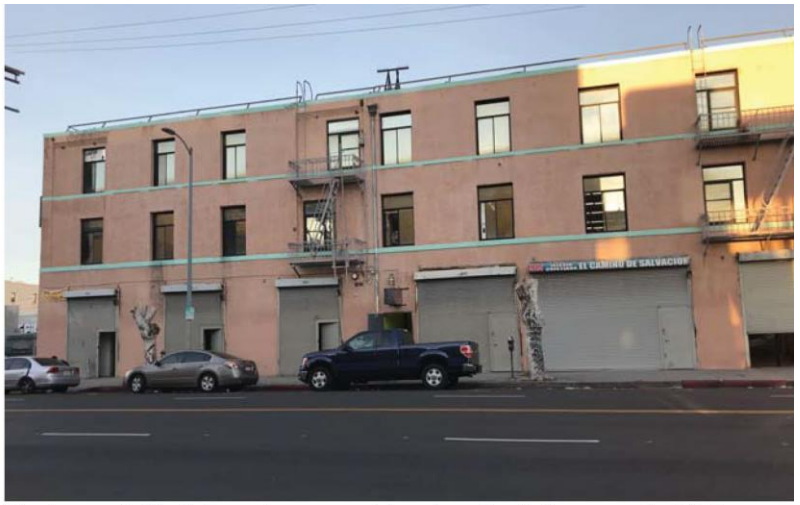



**Photo Viewpoints**

## Figure 6 Surrounding Area Photographs

**Photograph 10:** Adjacent commercial use, north of E. Washington Boulevard, north of the project site



**Photograph 11:** Adjacent commercial and residential use, west of S. Los Angeles Street, west of the project site

**Photograph 12:** Adjacent commercial use, north of E. Washington Boulevard, north of the project site

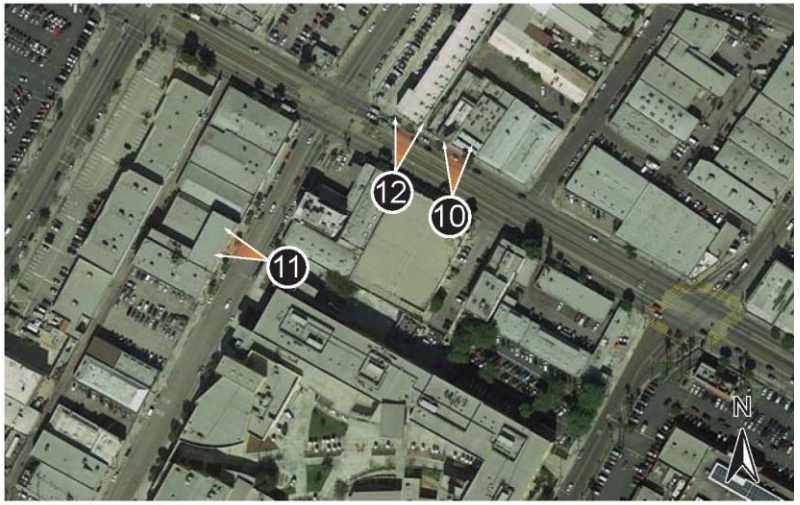



**Photo Viewpoints**

# 10 Project Description

The proposed project would involve demolition of an existing automotive repair facility, three large vacant industrial buildings/warehouses, and an apartment building on the project site for construction of a mixed-use multi-family residential and commercial building. The building would be five stories above ground and a maximum of 66 feet in height. The mixed-use building would include 112 residential units, a courtyard, a gym, business center, community room, office space, and a lobby/leasing area, as well as commercial space (7,300 square feet). The exact mixes of commercial uses are currently undetermined, and may include local retail, cafés or restaurants, or office space. Table 1 provides a summary of the project components. Figure 7 through Figure 10 show the proposed floor plans, Figure 11 and Figure 12 show cross sections of the proposed project, Figure 13 and Figure 14 show elevations of the proposed project, and Figure 15 shows the proposed project rendering.

The 44,560-square foot (sf) building footprint would occupy approximately 71.4 percent of the total lot area (62,382 sf) with a floor-to-area ratio (FAR) of 2.27. The remainder of the total lot area would be occupied by open space and landscaping, as discussed under *Amenities and Open Space*, as well as yards and sidewalks around the perimeter of the project site. The proposed five-story building would have a floor area of 141,796 gross sf, not including parking. The mixed-use building would have a total of 112 residential units, consisting of 36 three-bedroom units, 49 two-bedroom units, and 27 one-bedroom units. Of those units, one would be a market rate manager's unit, 10 would be "extremely low income" units, seven would be "very low income" units, five would be "low income" units, and 89 would be "moderate income" units. The commercial aspect of the project would include approximately 7,300 sf of commercial space. The at-grade parking garage would include a total of 75 vehicle parking spaces, 60 of which would be allocated for residential use and 15 of which would be allocated for commercial use. Additionally, 70 bicycle parking spaces would be provided on-site. Of the 70 provided bicycle parking spaces, 56 bicycle spaces would be long-term residential bicycle parking and six would be short-term residential bicycle parking. There would be eight additional commercial bicycle parking spaces, four long-term commercial bicycle parking spaces, and four short-term commercial bicycle spaces.

## Amenities and Open Space

The proposed project would provide 16,493 sf of open space, consisting of a centralized courtyard, individual balconies, and a community room. The first floor would include a 1,280-sf lobby/mailroom and a 1,685 sf leasing office, and the second floor would include the community room, business center, and gym area. The courtyard would be centrally located, consisting of approximately 9,950 sf, open to the sky above, and surrounded by floors two through five. In addition, the proposed project would include private open space in the form of balconies for each residential unit. The balconies would be 50 sf each for a total of 5,600 sf. The proposed project would also include landscaping and raised planters on the ground floor on all sides of the building as well as community garden plots on the southern side of the building. The project would also include a seating area along the permeable planter on the southern side of the building intended for stormwater infiltration that would provide passive recreation. Additionally, the project would include a courtyard on top of the podium which would include a contemporary landscape design.

## Access and Parking

Primary vehicular access to the project site would be provided via one driveway on the east side of Los Angeles Street along the westerly property frontage, which includes access to the at-grade parking garage. Additionally, a vehicle turnaround area would be provided on Santee Street at the southeast corner of the project site for access to on-street parking and fire/emergency vehicle use. Pedestrian access to the garage would be provided by elevators located within the lobby as well as sets of stairs, located on the western, eastern, and northern sides of the project site. Pedestrians would access the building through a lobby with an entrance along Washington Boulevard.

A total of 60 residential parking spaces and 15 commercial parking spaces are proposed, for a total of 75 parking spaces. Three vehicular parking spaces would have electric vehicle (EV) charging stations, while an additional two spaces would be set aside for future EV charging stations. In accordance with the American Disabilities Act (ADA), three spaces would be handicap accessible spaces.

### Table 1 Project Summary

| | | |
|---|---|---|
| **Address** | 200-224 Washington Boulevard and 1910 – 1914 Los Angeles Street | |
| **Assessor's Parcel Numbers (APNs)** | 5127-029-037, -049, -902, -903, -904 | |
| **Lot Area** | 62,382 sf (1.43 acres) | |
| **Building Footprint** | 44,560 sf | |
| **Floor Area**[1] | Residential Units | 123,036 sf |
| | Commercial | 7,300 sf |
| | Total | 130,336 sf[1] |
| **Floor Area Ratio (FAR)** | 2.27 | |
| **Height** | 66 feet<br>5 floors above grade with 1 level of parking below grade | |
| **Units** | 1-bedroom | 27 units |
| | 2-bedroom | 49 units |
| | 3-bedroom | 36 units |
| | Total | 112 units |
| **Affordable Housing** | Extremely Low Income | 10 units |
| | Very Low Income | 7 units |
| | Low Income | 5 units |
| | Moderate Rate Income | 89 units |
| **Parking Garage** | Residential | 60 parking spaces, 56 LT bicycle spaces, 6 ST bicycle spaces |
| | Commercial | 15 parking spaces, 4 LT bicycle spaces, 4 ST bicycle spaces |
| | Total | 75 parking spaces; 60 LT bicycle spaces, 10 ST bicycle spaces |
| **Open Space** | Grade | 500 sf |
| | Private Open Space (112 balconies x 50 sf) | 5,600 sf |
| | Common Open Space (courtyard) | 9,950 sf |
| | Community Room | 443 sf |
| | Total | 16,493 sf |

Notes: LT = long-term, ST = short-term

[1] Does not include parking areas

sf = square feet

### Construction

Construction would occur over approximately 26 months. The proposed project would require the export of approximately 2,000 cubic yards (CY) of contaminated soil materials and the import of approximately 6,000 CY of clean soil materials. Assuming 15 CY of soil material per truck, proposed grading phase would involve approximately 534 one-way trips by haul truck.

# 11 Required Approvals

The following entitlements are requested for the proposed development:

- **Site Plan Review.** Pursuant to LAMC Section 16.05(C)(1), a site plan review and approval are required prior to issuance of a grading permit, foundation permit, building permit, or use of land permit.
- **Zone Change.** Pursuant to LAMC Section 12.32 F, Planning Commission approval of a zone change from M1-2-O to C2-2D.
- **Height District Change.** Pursuant to LAMC Section 12.32 F, Planning Commission approval of a height district change from M1-2-O to C2-2D.
- **Approval by Community Redevelopment Agency.** The proposed project is under the Council District Nine Corridors South of the Santa Monica Freeway Redevelopment Project Area and requires CEQA clearance as well as permit approval by the Community Redevelopment Agency prior to any request of a permit for construction, remodeling, improvements, alterations, demolition, and/or signs.
- **Obtain Clearance from the Metropolitan Transportation Authority.** Due to the proximity of the Metro Rail, clearance from the Metropolitan Transportation Authority is required prior to the issuance of any building permit.

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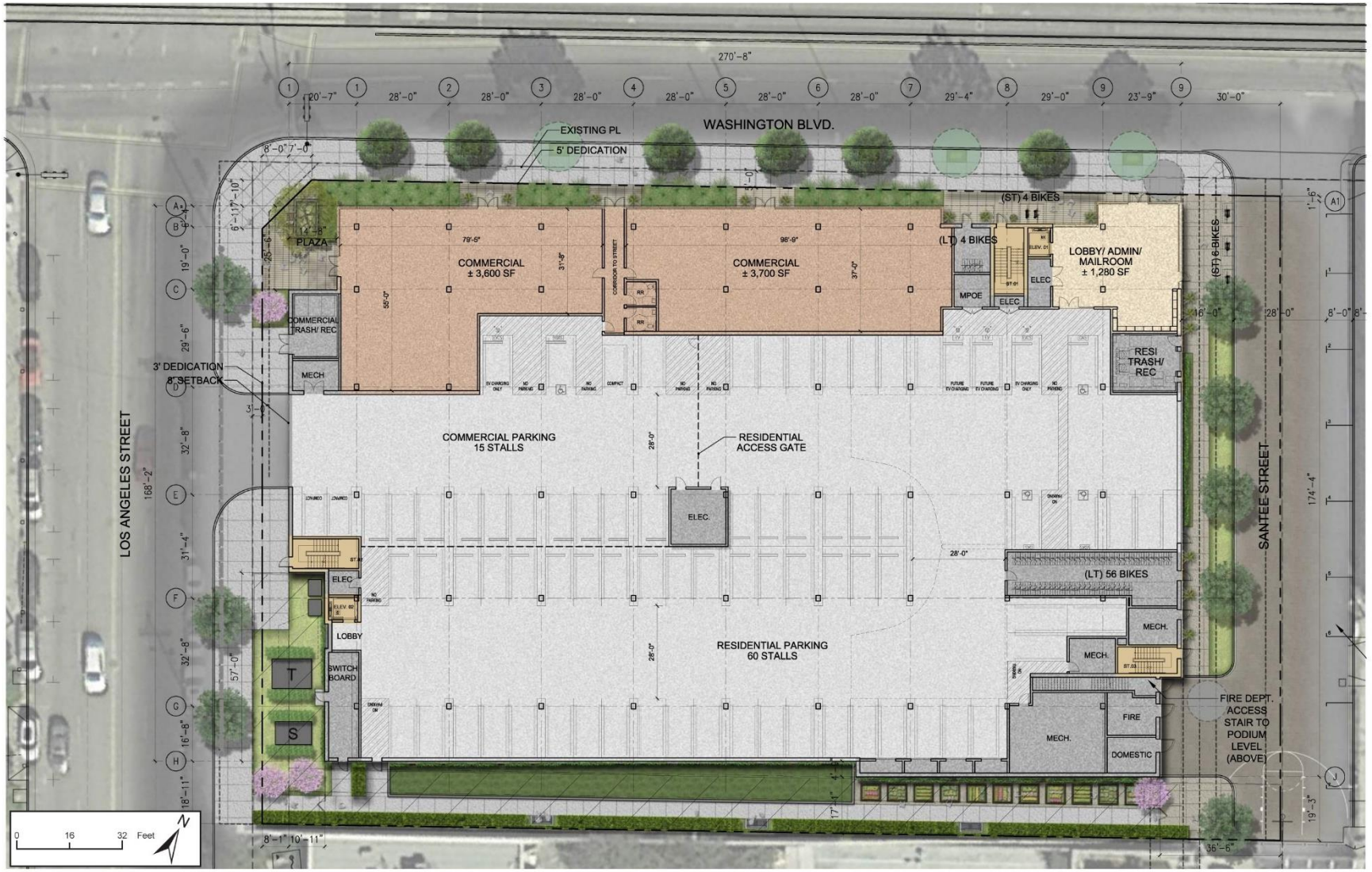
**Figure 7 Proposed Ground Floor Site Plan**




*Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.*

**Figure 8 Proposed Residential Floor Plan – Floor 2**


*Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.*

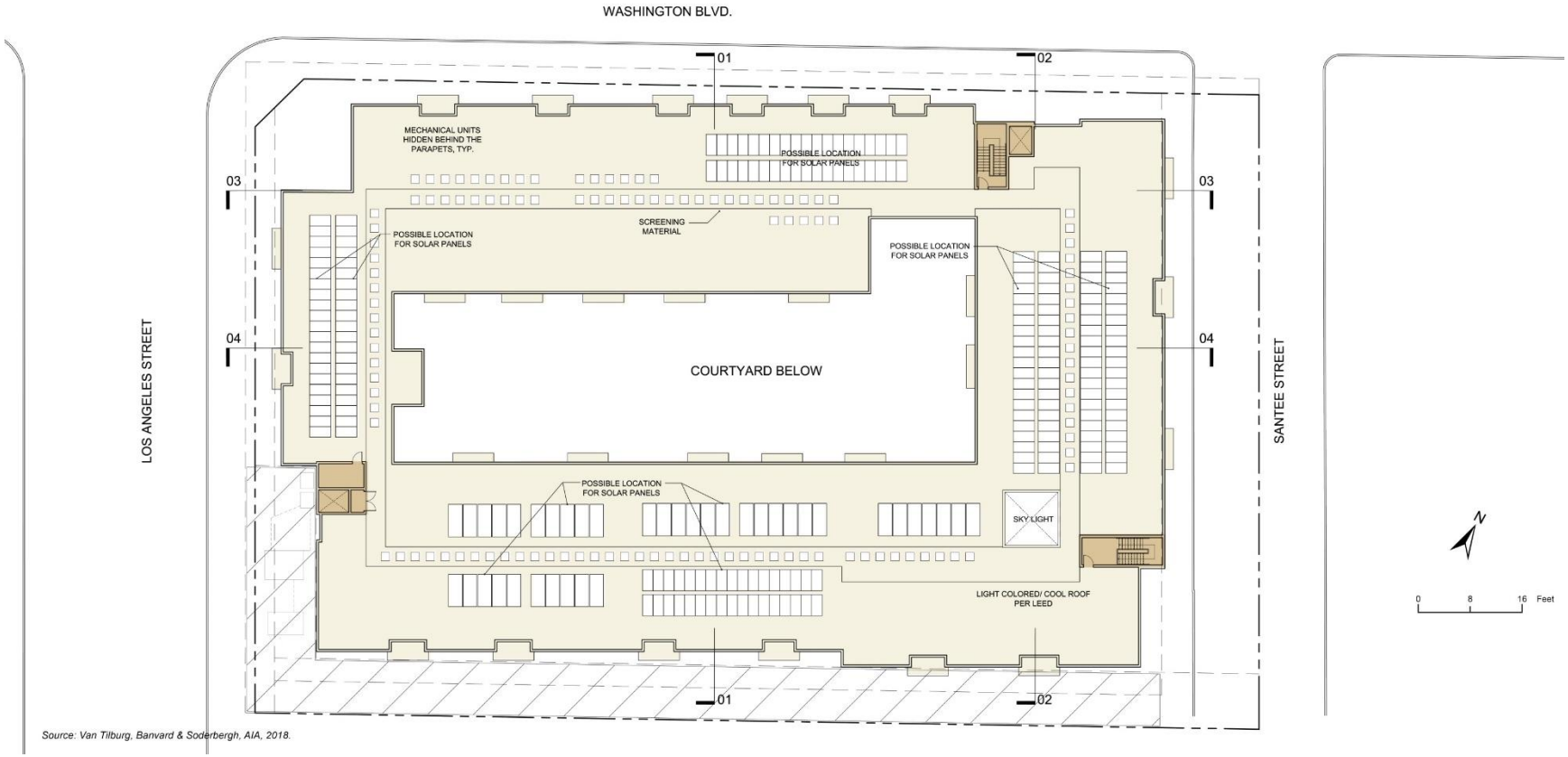
**Figure 9 Proposed Residential Floor Plan – Floors 3 through 5**


*Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.*

**Figure 10 Proposed Residential Floor Plan – Roof Plan**

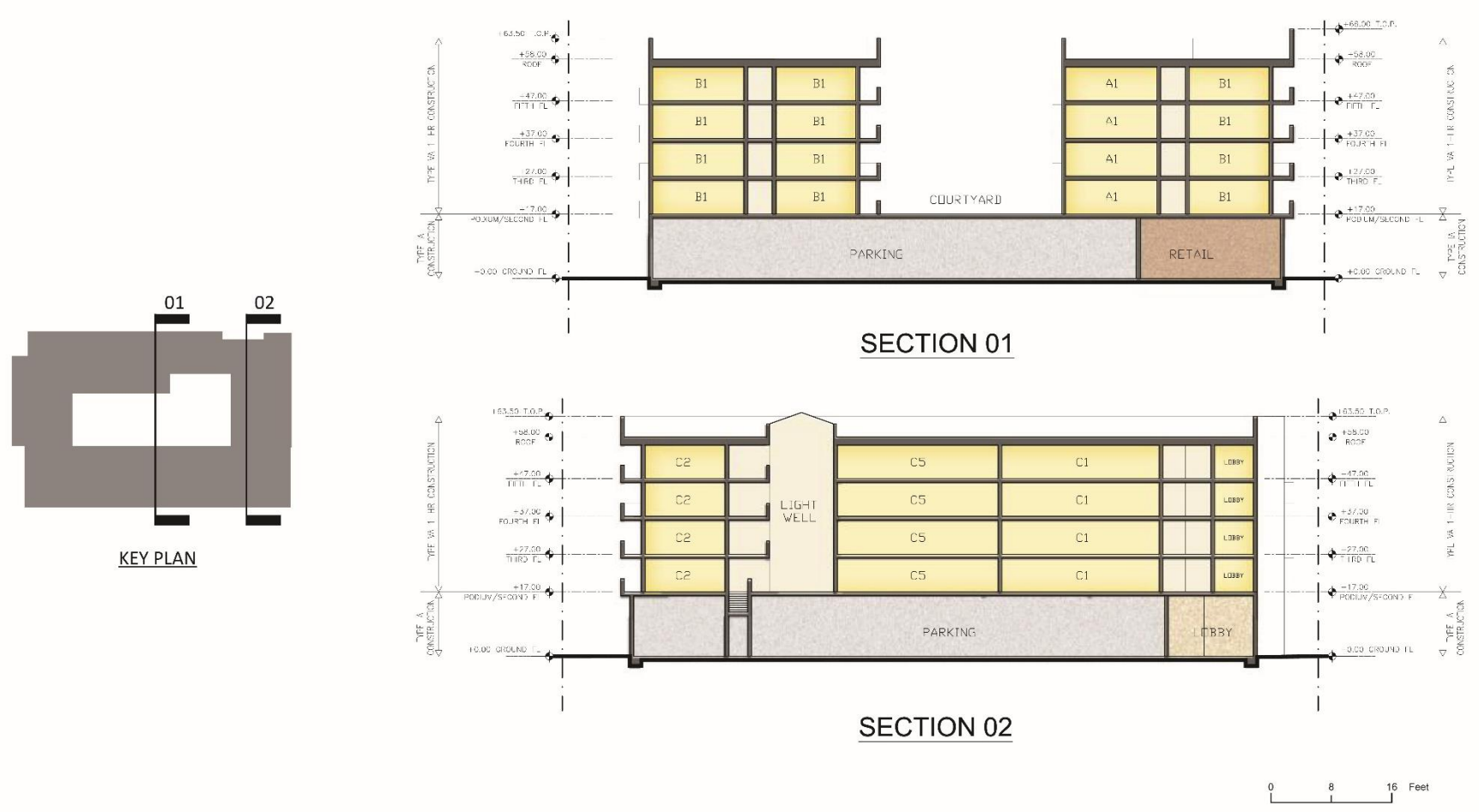

Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.

**Figure 11 Proposed Cross Sections - Vertical**



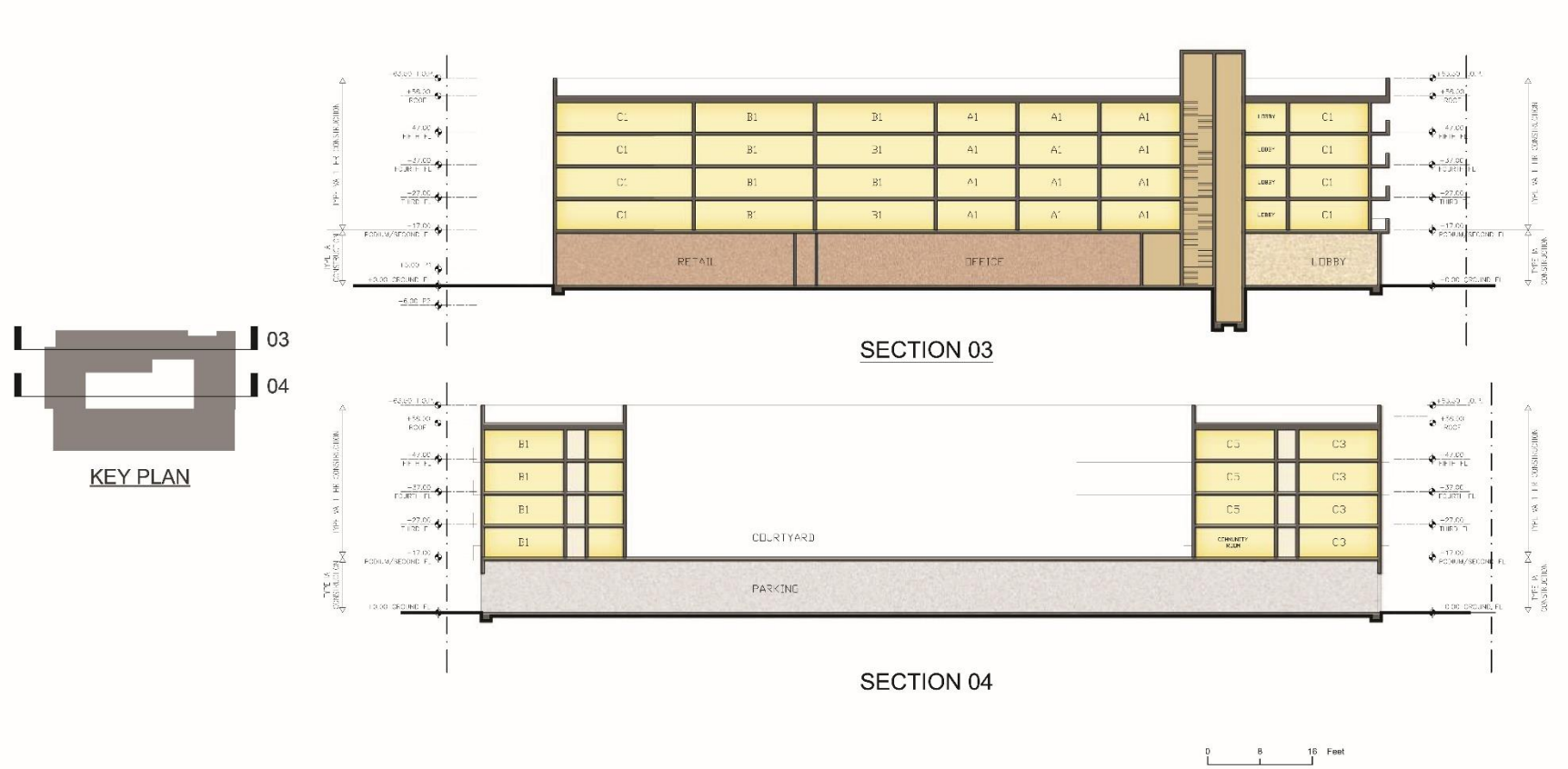

*Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.*

**Figure 12 Proposed Cross Sections – Horizontal**




*Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.*

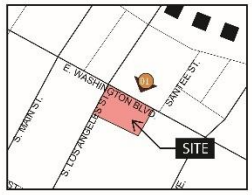
**Figure 13 Proposed North and South Elevations**




*Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.*

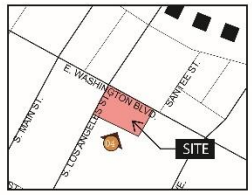
## Figure 14 Proposed East and West Elevations

North Elevation





South Elevation



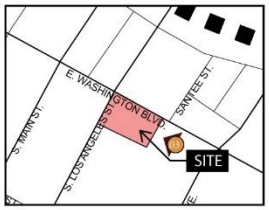


0 8 16 Feet

*Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.*

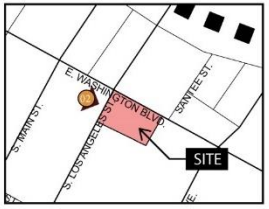
**Figure 15 Rendering**

East Elevation





West Elevation





0 8 16 Feet

*Source: Van Tilburg, Banvard & Soderbergh, AIA, 2018.*

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## Environmental Factors Potentially Affected

This project would potentially affect the environmental factors checked below, involving at least one impact that is "Potentially Significant" or "Potentially Significant Unless Mitigation Incorporated" as indicated by the checklist on the following pages.

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

## Determination

Based on 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 to the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

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

☐ I find that 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 the 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 potential 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 | Date |
| Oliver Netburn | City Planner |
| Printed Name | Title |

# Environmental Checklist Summary

## 1 Aesthetics

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Substantial adverse effect on a scenic vista | ☐ | ☐ | ☐ | ■ |
| b. Substantial damage to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings along a state 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 that would adversely affect daytime or nighttime views in the area | ☐ | ☐ | ■ | ☐ |

## 2 Agriculture and Forest Resources

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on 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 | ☐ | ☐ | ☐ | ■ |

## 3 Air Quality

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Conflict with or obstruct implementation of the applicable air quality 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 project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors) | ☐ | ☐ | ■ | ☐ |
| d. Expose sensitive receptors to substantial pollutant concentrations | ☐ | ☐ | ■ | ☐ |
| e. Create objectionable odors affecting a substantial number of people | ☐ | ☐ | ■ | ☐ |

## 4 Biological Resources

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service | ☐ | ☐ | ■ | ☐ |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or 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 | ☐ | ☐ | ☐ | ■ |

## 4 Biological Resources

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance | ☐ | ☐ | ■ | ☐ |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | ☐ | ☐ | ☐ | ■ |

## 5 Cultural Resources

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 | ☐ | ☐ | ☐ | ■ |
| b. Cause a substantial adverse change in the significance of an archaeological resource as defined in §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

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| 1. 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 | ☐ | ☐ | ■ | ☐ |
| 2. Strong seismic ground shaking | ☐ | ☐ | ■ | ☐ |
| 3. Seismic-related ground failure, including liquefaction | ☐ | ☐ | ■ | ☐ |

## 6 Geology and Soils

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| 4. Landslides | ☐ | ☐ | ☐ | ■ |
| b. Result in substantial soil erosion or the loss of topsoil | ☐ | ☐ | ■ | ☐ |
| c. Be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse | ☐ | ☐ | ■ | ☐ |
| d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property | ☐ | ☐ | ■ | ☐ |
| e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater | ☐ | ☐ | ☐ | ■ |

## 7 Greenhouse Gas Emissions

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment | ☐ | ☐ | ■ | ☐ |
| b. Conflict with any applicable plan, policy, or regulation adopted to reduce the emissions of greenhouse gases | ☐ | ☐ | ■ | ☐ |

## 8 Hazards and Hazardous Materials

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| 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 | ☐ | ☐ | ■ | ☐ |

## 8 Hazards and Hazardous Materials

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school | | | | |
| d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | ☐ | ■ | ☐ | ☐ |
| e. For a project located in 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 near a private airstrip, would it result in a safety hazard for people residing or working in the project 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 | ☐ | ☐ | ☐ | ■ |

## 9 Hydrology and Water Quality

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Violate any water quality standards or waste discharge requirements | ☐ | ☐ | ■ | ☐ |
| b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned 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 that would result in substantial erosion or siltation on- or off-site? | ☐ | ■ | ☐ | ☐ |
| d. Substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or | ☐ | ■ | ☐ | ☐ |

## 9 Hydrology and Water Quality

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite | | | | |
| e. 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 | ☐ | ☐ | ■ | ☐ |
| f. Otherwise substantially degrade water quality | ☐ | ☐ | ■ | ☐ |
| g. Place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map | ☐ | ☐ | ☐ | ■ |
| h. Place structures in a 100-year flood hazard area that would impede or redirect flood flows | ☐ | ☐ | ☐ | ■ |
| i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including that occurring as a result of the failure of a levee or dam | ☐ | ☐ | ■ | ☐ |
| j. Result in inundation by seiche, tsunami, or mudflow | ☐ | ☐ | ☐ | ■ |

## 10 Land Use and Planning

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Physically divide an established community | ☐ | ☐ | ☐ | ■ |
| b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect | ☐ | ☐ | ■ | ☐ |
| c. Conflict with an applicable habitat conservation plan or natural community conservation plan | ☐ | ☐ | ☐ | ■ |

## 11 Mineral Resources

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts: | | | | |
| 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

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project result in any of the following impacts? | | | | |
| 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 | ☐ | ☐ | ■ | ☐ |
| b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels | ☐ | ■ | ☐ | ☐ |
| c. A substantial permanent increase in ambient noise levels above those existing prior to implementation of the project | ☐ | ☐ | ■ | ☐ |
| d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above those existing prior to implementation of the project | ☐ | ■ | ☐ | ☐ |
| e. For a project located in 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 near a private airstrip, would it expose people residing or working in the project area to excessive noise | ☐ | ☐ | ☐ | ■ |

## 13 Population and Housing

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project result in any of the following impacts? | | | | |
| a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure) | ☐ | ☐ | ■ | ☐ |
| b. Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere | ☐ | ☐ | ■ | ☐ |
| c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere | ☐ | ☐ | ■ | ☐ |

## 14 Public Services

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project result in any of the following impacts? | | | | |
| a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | | | | |
| 1. Fire protection | ☐ | ☐ | ■ | ☐ |
| 2. Police protection | ☐ | ■ | ☐ | ☐ |
| 3. Schools | ☐ | ☐ | ■ | ☐ |
| 4. Parks | ☐ | ☐ | ■ | ☐ |
| 5. Other public facilities | ☐ | ☐ | ■ | ☐ |

## 15 Recreation

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project result in any of the following impacts? | | | | |
| 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/Traffic

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project result in any of the following impacts? | | | | |
| a. Conflict with an applicable plan, ordinance or policy establishing a measure 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 due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)? | ☐ | ■ | ☐ | ☐ |
| e. Result in inadequate emergency access? | ☐ | ☐ | ☐ | ■ |
| f. Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities? | ☐ | ☐ | ☐ | ■ |

## 17 Tribal Cultural Resources

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a 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. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | ☐ | ☐ | ■ | ☐ |
| b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Cod Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | ☐ | ☐ | ■ | ☐ |

## 18 Utilities and Service Systems

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project result in any of the following impacts? | | | | |
| 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 storm water 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 resources, 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 | ☐ | ☐ | ■ | ☐ |

## 18 Utilities and Service Systems

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| disposal needs | | | | |
| g. Comply with federal, state, and local statutes and regulations related to solid waste | ☐ | ☐ | ■ | ☐ |

## 19 Mandatory Findings of Significance

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, 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 that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | ☐ | ■ | ☐ | ☐ |
| c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☐ | ■ | ☐ |

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# Environmental Checklist

## 1 Aesthetics

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Substantial adverse effect on a scenic vista | ☐ | ☐ | ☐ | ■ |
| b. Substantial damage to scenic resources, including but not limited to trees, rock outcroppings, and historic buildings along a state 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 that would adversely affect daytime or nighttime views in the area | ☐ | ☐ | ■ | ☐ |

According to the City of Los Angeles Department of City Planning, the project site is located in a Transit Priority Area (TPA), which is defined as an area within a half mile of a major transit stop. Senate Bill 743 (SB 743), adopted in September 2013, limits the extent to which a project's aesthetic impacts are evaluated under CEQA. In particular, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic impacts shall not be considered a significant impact on the environment if the project is a residential, mixed-use residential, or employment project, and the project is located in an infill site within a TPA (City of Los Angeles n.d.). Since the project is a mixed-use project located on an infill site within a TPA based on existing major transit stops, the project's impacts related to aesthetics may not be considered significant. Therefore, aesthetics issues are discussed below for informational purposes only.

*a. Would the project have a substantial adverse effect on a scenic vista?*

**NO IMPACT**

Impacts on a scenic vista may occur if the project introduces incompatible visual elements within a field of view containing a scenic vista or substantially blocks views of a scenic vista. Scenic vistas are generally described in two ways: panoramic views (visual access to a large geographic area, for which the field of view can be wide and extend into the distance) and focal views (visual access to a particular object, scene, or feature of interest). Based on the *L.A. CEQA Thresholds Guide*, the

determination of whether a project results in a significant impact on a scenic vista shall be made considering the following factors (City of Los Angeles 2006):

- 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 ocean);
- Whether a 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 a project affects recognized views available from a length of a public roadway, bike path, or trail, as opposed to a single, fixed vantage point.

The Conservation Element of the City of Los Angeles General Plan (General Plan) describes scenic vistas as the panoramic public view access to natural features, including views of the ocean, striking natural terrain, or unique urban or historic features (City of Los Angeles 2001). None of these elements are visible from or through the project site, which is located in a fully urbanized area of Los Angeles. This site is surrounded by commercial uses, as well as a multi-family residence, parking lots, and two schools, Frida Kahlo High School and the Santee Education Complex. Therefore, the proposed project would not result in adverse impacts to scenic vistas. There would be no impact.

*b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings along a state scenic highway?*

**NO IMPACT**

Based on the *L.A. CEQA Thresholds Guide*, a significant impact would occur if scenic resources would be damaged and/or removed by development of a project. The proposed project is located approximately 700 feet south of I-10 and approximately 0.6-mile east from I-110. Neither freeway is designated as a state scenic highway or eligible for designation as a scenic highway (California Department of Transportation [Caltrans] 2017). Additionally, the City of Los Angeles does not identify any scenic highways in the vicinity of the project site in the Transportation Element of its General Plan (City of Los Angeles 2016a). Because there are no scenic highways in the vicinity of the project site, the proposed project would not substantially damage scenic resources in a scenic highway. There would be no impact.

*c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?*

**LESS THAN SIGNIFICANT IMPACT**

Based on the *L.A. CEQA Thresholds Guide*, a significant impact would occur if the proposed project would result in the removal of one or more features that contribute to the valued aesthetic character or impact of the neighborhood, community, or localized area, or if the proposed project were to introduce incompatible visual elements on the project site or visual elements that would be incompatible with the character of the area surrounding the project site.

The approximate 1.4-acre project site currently has several structures, including a developed lot with an operational car repair facility that covers approximately 0.2-acres, three existing warehouse/industrial buildings located on a combined lot that consists of approximately 1.1 acres, and an occupied apartment complex on an approximate 0.1-acre lot. The car repair facility was constructed with cinder blocks and includes six roll-up doors for the vehicle bays. This portion of the site is currently secured with a metal fence and the outside of the building facing Washington Boulevard has been painted over with graffiti. The existing warehouses (APNs: 5127-029-902, -903,

and -904) represent typical industrial construction techniques that consist of flat buildings with no or minimal windows. The apartment building has neoclassical design elements with an array of windows in the front that have been removed or damaged and are filled in by cinder blocks or plywood panels.

The proposed project would involve demolition of the existing car repair facility, warehouses, and multi-family residence and construction of a five-story, 66-foot tall mixed-use building on the project site. Figure 15 depicts a rendering of the proposed project, which would have a contemporary, utilitarian design. Figure 3 and Figure 4 depict existing conditions at the project site, and Figure 5 shows the development of the surrounding area. The construction of a mixed-use building on the project site would generally improve the existing visual quality of the site. The project's architectural design would be subject to review by the City and applicable design guidelines. In addition, the proposed project would be consistent with zoning requirements, if granted the requested entitlements. The following regulatory compliance measures (RCM) would further ensure that impacts related to the existing visual character or quality of the site and its surroundings would be less than significant.

### *RCM-1 Vandalism*

Compliance with provisions of the Los Angeles Building Code. The project shall comply with all applicable building code requirements, including the following:

- Every building, structure, or portion thereof, shall be maintained in a safe and sanitary condition and good repair. The premises of every building or structure shall be maintained in good repair and free from graffiti, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.
- The exterior of all privately-owned buildings and fences shall be free from graffiti when such graffiti is visible from a public street or alley, pursuant to LAMC Section 91.8104.15.

### *RCM-2 Signage*

The project shall comply with the LAMC Section 91.6205, including on-site signage maximums and multiple temporary sign restrictions, as applicable.

### *RCM-3 Landscape Plan*

All landscaped areas shall be maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect in accordance with LAMC Sections 12.40 through 12.43. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of City Planning during the building permit process.

Compliance with applicable community design guidelines, zoning requirements, and RCMs ensure that there would be a less than significant impact to the visual character.

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

**LESS THAN SIGNIFICANT IMPACT**

Based on the *L.A. CEQA Thresholds Guide*, the determination of whether the proposed project results in a significant nighttime illumination impact must be made considering the following factors:

- 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 affect adjacent light-sensitive areas

The proposed project would replace an existing automotive repair facility, three warehouses, and an apartment building with a five-story mixed-use building. The proposed project would have indoor lighting in residences and indoor amenity areas, as well as exterior lighting for security, private balconies, and outdoor common spaces, such as the second-floor courtyard. The proposed project would also utilize reflective materials, such as glass surfaces, in its doors and windows, which could create glare during daylight hours. In addition, the proposed project would generate new vehicle traffic to and from the project site that would contribute light from vehicle headlamps and glare from vehicle surfaces and windows.

New sources of light and glare created by the project would not adversely affect day or nighttime views in the area. The project site is in a fully urbanized area of Southeast Los Angeles located approximately 700 feet from a major freeway (I-10) and along the Metro Blue Line, which generate relatively high levels of nighttime lighting from passing vehicles. In addition, Washington Boulevard and Los Angeles Avenue are illuminated by streetlights during nighttime hours. The courtyard would be surrounded by residential units on all sides, parking would be provided on the first floor and basement levels and would be entirely enclosed, and residences would be located on the second through fifth floors. Thus, most of the light and glare from the proposed project's use would occur above the surrounding uses, which are one- to three-stories in height. In addition, uses bordering the project site to the east, west, and north are primarily commercial uses that generate comparable or higher levels of nighttime lighting due to operational hours, exterior building light fixtures, and street lights and would not be negatively impacted by residential lighting or vehicle traffic during nighttime hours. To the east, the project site is separated from the adjacent parking lot and residential use by Santee Street, a private alley. The commercial component of the proposed project would be required to comply with California Green Building Standards Code (CALGreen) Section 5.106.8, which sets requirements for outdoor lighting to reduce light pollution, including allowable backlight, up-light and glare ratings on outdoor lights. The residential component of the proposed project would be required to comply with LAMC Section 93.0117(b) of the Electrical Code, which prohibits any stationary exterior light source that causes direct glare to any exterior window or sliding glass door, any elevated habitable porch, deck, or balcony, or any ground surface intended for use, but not limited to recreation, barbeque, or lawn areas of any other residential property. The following RCM would further ensure that impacts would be less than significant to day or nighttime views due to light or glare.

### *RCM-4 Glare*

The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective tinted glass (no mirror-like tints or films) and pre-cast concrete or fabricated wall surfaces to minimize glare and reflected heat.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

The potential for cumulative impacts occurs when the independent impacts of the proposed project are combined with the impacts of related projects in proximity to the project site, thereby resulting in impacts that are greater than the impacts of the project alone. However, the proposed project would be infill development surrounded by existing commercial, residential, institutional, and transit development. Therefore, the proposed project would not create substantial aesthetic impacts related to other development activity in conjunction with that of the project. As discussed above, SB 743 provides that the aesthetic impacts of the project may not be considered significant due to project type and its location in a TPA. Therefore, SB 743, in combination with the requirement for all related projects to undergo City review, would reduce cumulative aesthetic impacts to a less than significant level.

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# 2 Agriculture and Forest Resources

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on 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 | ☐ | ☐ | ☐ | ■ |

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

**NO IMPACT**

A significant impact may occur if the project were to convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use. The project site is developed and currently occupied by a car repair facility, an apartment building, and three warehouses. The California Department of Conservation's (DOC) 2016 map of Los Angeles County Important Farmland shows that the project site is not in an area of prime farmland, unique farmland, or farmland of statewide importance (DOC 2016). Thus, the project has no impact on farmland.

*b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

**NO IMPACT**

A significant impact may occur if the project were to conflict with existing zoning for agricultural use or a Williamson Act contract. The project site is not under any Williamson Act contract (DOC 2014). The project would not involve any development that could result in the conversion of farmland to non-agricultural uses, and for these reasons, the project would have no impact with respect to agricultural zoning or other conversion of farmland to non-agricultural use.

c. *Would the project 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**

A significant impact may occur if the project conflicts with existing zoning or rezoning. Neither the project site nor the surrounding parcels are zoned for forest land or timberland, and there is no timberland production at the project site; therefore, the project would have no impact on such resources.

d. *Would the project result in the loss of forest land or conversion of forest land to non-forest use?*

**NO IMPACT**

A significant impact may occur if the project resulted in the loss or conversion of forest land or timberland. Neither the project site nor the surrounding parcels are zoned for forest land. The project would have no impact on such resources.

e. *Would the project 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**

A significant impact may occur if the project were to involve other changes which could result in conversion of farmland to other non-agricultural uses. As discussed above, the project would not involve any development that could result in the conversion of farmland to non-agricultural uses. The project would have no impact with respect to conversion of farmland to non-agricultural use.

# 3 Air Quality

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Conflict with or obstruct implementation of the applicable air quality 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 project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors) | ☐ | ☐ | ■ | ☐ |
| d. Expose sensitive receptors to substantial pollutant concentrations | ☐ | ☐ | ■ | ☐ |
| e. Create objectionable odors affecting a substantial number of people | ☐ | ☐ | ■ | ☐ |

The project site is in the South Coast Air Basin (the Basin), which is under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As the local air quality management agency, the SCAQMD is required to monitor air pollutant levels to ensure that State and federal air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether or not air quality standards are met or exceeded, the Basin is classified as being in "attainment" or "nonattainment." If the concentration of one or more criteria pollutants in a geographic area is found to exceed the regulated or 'threshold' level, the area may be classified as a nonattainment area. Areas with concentrations of criteria pollutants that are below the applicable levels are considered in attainment**.** The health effects associated with criteria pollutants are described in Table 2.

## Table 2 Health Effects Associated with Criteria Pollutants

| Pollutant | Adverse Effects |
|---|---|
| Ozone | (1) Short-term exposures: pulmonary function decrements and localized lung edema in humans and animals and risk to public health implied by alterations in pulmonary morphology and host defense in animals; (2) long-term exposures: risk to public health implied by altered connective tissue metabolism and altered pulmonary morphology in animals after long-term exposures and pulmonary function decrements in chronically exposed humans; (3) vegetation damage; and (4) property damage. |
| Carbon monoxide (CO) | (1) Aggravation of angina pectoris and other aspects of coronary heart disease; (2) decreased exercise tolerance in persons with peripheral vascular disease and lung disease; (3) impairment of central nervous system functions; and (4) possible increased risk to fetuses. |
| Nitrogen dioxide ($NO_2$) | (1) Potential to aggravate chronic respiratory disease and respiratory symptoms in sensitive groups; (2) risk to public health implied by pulmonary and extra-pulmonary biochemical and cellular changes and pulmonary structural changes; and (3) contribution to atmospheric discoloration. |
| Sulfur dioxide ($SO_2$) | (1) Bronchoconstriction accompanied by symptoms that may include wheezing, shortness of breath, and chest tightness during exercise or physical activity in persons with asthma. |
| Suspended particulate matter ($PM_{10}$) | (1) Excess deaths from short-term and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease (including asthma).[a] |
| Suspended particulate matter ($PM_{2.5}$) | (1) Excess deaths from short- and long-term exposures; (2) excess seasonal declines in pulmonary function, especially in children; (3) asthma exacerbation and possibly induction; (4) adverse birth outcomes, including low birth weight; (5) increased infant mortality; (6) increased respiratory symptoms in children, such as cough and bronchitis; and (7) increased hospitalization for both cardiovascular and respiratory disease, including asthma.[a] |

[a] More detailed discussions on the health effects associated with exposure to suspended particulate matter can be found in the following documents:

[1] Office of Environmental Health Hazard Assessment (OEHHA). May 9, 2002. *Particulate Matter Health Effects and Standard Recommendations*. www.oehha.ca.gov/air/toxic_contaminants/PM10notice.html#may ; and

[2] United States Environmental Protection Agency (USEPA). October 2004.*Air Quality Criteria for Particulate Matter*. https://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=87903

Source: US EPA 2016

According to the California Air Resources Board (CARB), the project site is located in a nonattainment area for both the federal and State standards for ozone and $PM_{2.5}$, and the State standard for $PM_{10}$ (CARB 2017a). Additionally, the project site is located in a federal nonattainment area for lead. This nonattainment status is a result of several factors, the primary ones being the naturally adverse meteorological conditions that limit the dispersion and diffusion of pollutants, the limited capacity of the local airshed to eliminate pollutants from the air, and the number, type, and density of emission sources within the Basin. The regional climate within the South Coast Air Basin (SCAB) is semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the SCAB is primarily influenced by meteorology and a wide range of emissions sources, such as dense population centers, substantial vehicular traffic, and industry. Due to its nonattainment status, the

Basin is required to implement strategies to reduce pollutant levels to recognized acceptable standards. Accordingly, the SCAQMD has adopted an Air Quality Management Plan (AQMP) that provides a strategy for the attainment of State and federal air quality standards.

## Current Air Quality

The SCAQMD operates a network of air quality monitoring stations throughout the SCAB. The purpose of the monitoring stations is to measure ambient concentrations of pollutants and determine whether ambient air quality meets the California and federal standards. The monitoring station located closest to the project is the Los Angeles-North Main Street Station, located at 1630 Main Street, Los Angeles, approximately 3.2 miles northeast of the project site. Table 3 indicates the number of days that each of the standards has been exceeded at the Los Angeles-North Main Street station. However, neither this station, nor any others in the Los Angeles vicinity have sufficient data to determine the CO emissions for the years 2014 to 2016. Therefore, CO emissions are excluded from Table 3. The data collected at the station indicates that the State 8-hour ozone standards have been exceeded each year from 2014 to 2016 and the federal 8-hour ozone standards were exceeded in 2014 and 2016. Additionally, the data indicates that the State worst hour ozone standards were exceeded each year from 2014 to 2016 and the federal $PM_{2.5}$ standard was also exceeded annually between 2014 and 2016. No other State or federal standards were exceeded at this monitoring station.

**Table 3 Ambient Air Quality at the Monitoring Station**

| Pollutant | 2014 | 2015 | 2016 |
|---|---|---|---|
| 8 Hour Ozone (ppm), 8-Hr Maximum | 0.094 | 0.074 | 0.078 |
| Number of days of State exceedances (>0.070) | 6 | 6 | 4 |
| Number of days of Federal exceedances (>0.070) | 2 | 0 | 1 |
| Ozone (ppm), Worst Hour | 0.113 | 0.104 | 0.103 |
| Number of days of State exceedances (>0.09 ppm) | 3 | 2 | 2 |
| Number of days of Federal exceedances (>0.112 ppm) | 0 | 0 | 0 |
| Nitrogen Dioxide (ppb) - Worst Hour | 82.1 | 79.1 | 64.7 |
| Number of days of State exceedances (>0.18 ppm) | 0 | 0 | 0 |
| Number of days of Federal exceedances (0.10 ppm) | 0 | 0 | 0 |
| Particulate Matter 10 microns, $\mu g/m^3$, Worst 24 Hours | 66.0 | 73.0 | 64.0 |
| Number of days above Federal standard (>150 $\mu g/m^3$) | 0 | 0 | 0 |
| Particulate Matter <2.5 microns, $\mu g/m^3$, Worst 24 Hours | 59.9 | 56.4 | 44.3 |
| Number of days above Federal standard (>35 $\mu g/m^3$) | 6 | 7 | 2 |

Los Angeles-North Main Street Station unless otherwise noted.

Carbon Monoxide is not shown because there was insufficient data available to determine the value.

Source: CARB 2017b

The SCAQMD recommends the use of quantitative thresholds to determine the significance of temporary construction-related pollutant emissions and project operations. These thresholds are shown in Table 4.

### Table 4 SCAQMD Air Quality Significance Thresholds

| | Mass Daily Thresholds | |
|---|---|---|
| **Pollutant** | **Operation Thresholds (lbs/day)** | **Construction Thresholds (lbs/day)** |
| $NO_X$ | 55 | 100 |
| ROG[1] | 55 | 75 |
| $PM_{10}$ | 150 | 150 |
| $PM_{2.5}$ | 55 | 55 |
| $SO_X$ | 150 | 150 |
| CO | 550 | 550 |
| Lead | 3 | 3 |

[1] Reactive Organic Gases (ROG) are formed during combustion and evaporation of organic solvents. ROG are also referred to as Volatile Organic Compounds (VOC).

Source: SCAQMD 2015

The SCAQMD has also developed Localized Significance Thresholds (LSTs) in response to concerns regarding the exposure of individuals to criteria pollutants in local communities. LSTs represent the maximum emissions from a project that will not cause or contribute to an air quality exceedance of the most stringent applicable federal or State ambient air quality standard at the nearest sensitive receptor, taking into consideration ambient concentrations in each source receptor area (SRA), project size, and distance to the sensitive receptor. LSTs have been developed for $NO_X$, CO, $PM_{10}$, and $PM_{2.5}$. However, LSTs only apply to emissions within a fixed stationary location, including idling emissions during both project construction and operation. As a result, LSTs are not applied to mobile sources, such as cars on a roadway (SCAQMD 2008).

LSTs have been developed for emissions within areas up to five acres in size, with air pollutant modeling recommended for activity within larger areas. The SCAQMD provides lookup tables for project sites that measure one, two, or five acres. The project site is approximately 1.4 acres and is located in Source Receptor Area 1 (SRA-1). The closest sensitive receptor is Frida Kahlo High School, which is located directly adjacent to the south of the project site. According to the SCAQMD's publication, *Final Localized Significant Thresholds Methodology*, projects with boundaries located closer than 82 feet to the nearest receptor should use the LSTs for receptors located at 82 feet. Based on SCAQMD's *Final LST Methodology*, LSTs for sensitive receptors located at 82 feet from the project boundary on a 1.3-acre site were estimated using linear regression based on one and two-acre LSTs, which are shown in Table 5.

**Table 5 SCAQMD LSTs for Construction**

| Pollutant | Allowable Emissions from a 1.4-acre Site in SRA-1 for a Receptor 25 Meters Away (lbs/day) |
|---|---|
| Gradual Conversion of $NO_X$ to $NO_2$ | 88 |
| CO | 827 |
| $PM_{10}$ | 6 |
| $PM_{2.5}$ | 4 |

Source: SCAQMD 2009

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

**LESS THAN SIGNIFICANT IMPACT**

Based on the *L.A. CEQA Thresholds Guide*, a significant air quality impact may occur if the proposed project is not consistent with the applicable AQMP or would in some way represent a substantial hindrance to employing the polices or obtaining the goals of that plan. According to SCAQMD, to be consistent with the AQMP, a project must conform to the local General Plan and must not result in or contribute to an exceedance of the City's projected population, housing, or employment growth forecast. The 2016 AQMP, adopted in March 2017, is a regional and multi-agency effort (SCAQMD, CARB, Southern California Association of Governments [SCAG], and US EPA). State and federal planning requirements include developing control strategies, attainment demonstrations, reasonable further progress, and maintenance plans. The 2016 AQMP incorporates the latest scientific and technical information and planning assumptions, including the latest applicable growth assumptions, Regional Transportation Plan/Sustainable Communities Strategy, and updated emission inventory methodologies for various source categories.

The 2016 AQMP was developed using SCAG's population forecasts. According to the Department of Finance (DOF), the City of Los Angeles has a current population of 4,041,707 with an average household size of 2.86 persons (DOF 2017). SCAG forecasts that the population of Los Angeles will grow to 4,609,400 by 2040, which is an increase of 567,693, or 12 percent since 2016 (SCAG 2016). Development of the project would involve the demolition of an existing car repair facility, two warehouse spaces, and a multi-family residential building and construction of a new mixed-use building with 112-unit multi-family residential units and approximately 7,300 square feet of commercial space. Based on the average number of residents per household of 2.86 in Los Angeles, the project would add an estimated 320 residents (112 units x 2.86 people/households). Based on applicant-provided information, there are approximately 119 residents inhabiting the existing 31-unit apartment complex on the project site. Therefore, construction of the proposed project would result in a net increase of 201 residents and would bring the total Los Angeles population to 4,041,908 by 2022. The increase of 201 residents associated with the proposed project would represent an increase of less than 0.1 percent. Because this population increase would be within SCAG's projected 2040 growth for the City of Los Angeles, population growth generated by the project would be consistent with the AQMP.

Likewise, based on SCAG estimates, there were approximately 1,325,500 dwelling units in Los Angeles in 2012, with a projected increase of approximately 364,800 units through 2040, for a total of 1,690,300 units. The project would result in a net increase of 81 units (112 proposed units – 31 existing units = 81 units), which would represent an increase of less than 0.1 percent. Because this

housing increase would be within SCAG's projected 2040 growth for the City of Los Angeles, housing growth generated by the project would be consistent with the AQMP.

In 2012 there were approximately 1,696,400 employees in the City of Los Angeles. The employment projection for the City is 2,169,100 in 2040 based on SCAG forecasts, which represents an increase of 472,700 employees. According to *SCAG's Employment Density Study* (2001), the employment density factor for "low-rise office" is 55.28 employees per acre. Therefore, development of the project would generate a total of nine employees (0.17 acres x 55.28 employees/acres). Based on the *SCAG's Employment Density Study*, the existing car repair facility would have approximately six employees (0.25 acres x 25.76 employees/acre). Therefore, the project would result in a net increase of three employees. This would represent an increase of less than 0.1 percent of the projected 2040 increase. Because this employment increase would be within SCAG's projected 2040 employment growth for the City of Los Angeles, employment growth generated by the project would be consistent with the AQMP. Therefore, the project would not generate growth beyond AQMP forecasts and the project would be consistent with the AQMP.

The level of population, employment, and housing growth associated with the proposed project falls within the population growth for Los Angeles anticipated in SCAG's long-term population forecasts. Therefore, the project would not conflict with the population forecasts contained in the 2016 AQMP and this impact would be less than significant.

*b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?*

*c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?*

*d. Would the project expose sensitive receptors to substantial pollutant concentrations?*

**LESS THAN SIGNIFICANT IMPACT**

Based on the *L.A. CEQA Thresholds Guide*, a project may have a significant impact if:

- Project-related emissions would exceed federal, State, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation.
- A project would add a considerable cumulative contribution to federal or State non-attainment pollutant.
- A project would generate pollutant concentrations to a degree that would significantly affect sensitive receptors

Furthermore, the SCAQMD currently recommends that impacts to sensitive receptors be considered significant when emissions generated at a project site causes localized CO or $NO_2$ levels to exceed State ambient air quality standards at sensitive receptors or where a project causes an increase in local $PM_{10}$ levels of 10.4 $\mu g/m^3$ during construction and 2.5 $g/m^3$ during operation of the project. A significant impact may also occur where a project would increase concentrations at sensitive receptors located near congested intersections or exceeding national or State ambient air quality standards.

## Construction Emissions

Demolition and construction activities would generate temporary air pollutant emissions. These impacts are associated with fugitive dust ($PM_{10}$ and $PM_{2.5}$) and exhaust emissions from heavy construction vehicles.

Project-related air pollutant emissions from demolition, grading, paving, building construction, and architectural coating were estimated using the California Emissions Estimator Model (CalEEMod) version 2016.3.2. Construction was based on an applicant-provided construction schedule and is expected to take approximately 23 months, and would include demolition of the existing properties, site preparation, grading and excavation, soil export, building construction, architectural coating, and paving. Construction equipment was based on CalEEMod defaults, which include concrete/industrial saws, rubber-tired dozer, tractors/loaders/backhoes, bore/drill rigs, excavators, graders, trenchers, air compressors, cement and mortar mixers, cranes, forklifts, generator sets, welders, pavers, paving equipment, and rollers.

Project development would comply with all applicable regulatory standards. In particular, project development would comply with 2016 CALGreen Code, in addition to SCAQMD Rules 403, fugitive dust, and 1113, architectural coating, and all other applicable SCAQMD rules. Rules 403 and 1113 were added as "mitigation" in CalEEMod, as discussed below.

The grading phase involves the greatest amount of heavy equipment and the greatest generation of fugitive dust. For the purposes of construction emissions modeling, it was assumed that the project would comply with SCAQMD Rule 403, which identifies measures to reduce fugitive dust and is required to be implemented at all construction sites located in the SCAB. Therefore, the following conditions, which would be required to reduce fugitive dust in compliance with SCAQMD Rule 403, were included in CalEEMod for the site preparation and grading phases of construction.

1. **Minimization of Disturbance.** Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.
2. **Soil Treatment.** Construction contractors should treat all graded and excavated material, exposed soil areas, and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day.
3. **Soil Stabilization.** Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials, shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.
4. **No Grading During High Winds.** Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).
5. **Street Sweeping.** Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

The architectural coating phase involves the greatest release of reactive organic gases (ROG). The emissions modeling for the project also includes the use of low-volatile organic compound (VOC) paint (50 grams per liter (g/L) for non-flat coatings) as required by SCAQMD Rule 1113.

Table 6 summarizes the estimated maximum daily construction emissions. Construction emissions would not exceed SCAQMD thresholds or LSTs. Therefore, impacts associated with construction of the project would be less than significant.

### Table 6 Construction Emissions

| | Maximum Daily Emissions (lbs/day) | | | | |
|---|---|---|---|---|---|
| **Construction Phase** | **ROG** | **$NO_x$** | **CO** | **$PM_{10}$** | **$PM_{2.5}$** |
| Maximum Daily Emissions 2020 | 2.6 | 27.3 | 18.0 | 3.8 | 2.1 |
| Maximum Daily Emissions 2021 | 2.3 | 15.8 | 17.3 | 1.9 | 1.0 |
| Maximum Daily Emissions 2022 | 39.0 | 14.5 | 16.8 | 1.8 | 0.9 |
| SCAQMD Thresholds | 75 | 100 | 550 | 150 | 55 |
| Threshold Exceeded? | No | No | No | No | No |
| Maximum On-site Emissions 2020[1] | 2.1 | 20.9 | 14.8 | 3.4 | 2.1 |
| Maximum On-site Emissions 2021 | 1.8 | 13.6 | 12.9 | 0.7 | 0.7 |
| Maximum On-site Emissions 2022 | 38.9 | 12.5 | 12.7 | 0.6 | 0.6 |
| Local Significance Thresholds (LSTs)[2] | N/A | 88 | 827 | 6 | 4 |
| Threshold Exceeded? | N/A | No | No | No | No |

See Appendix A for CalEEMod model output. Winter emissions were used for a conservative estimate.

[1] LSTs only apply to on-site emissions and do not apply to mobile emissions (the majority of operational emissions). Therefore, only on-site construction emissions are compared to LSTs.

[2] LSTs for a 1.4-acre site in SRA-1 (see Table 3).

## Operational Emissions

Table 7 summarizes estimated emissions associated with operation of the proposed project. The majority of project-related operational emissions would be due to area emissions and vehicle trips to and from the site. The emissions from the proposed project take into consideration operational emissions from the current existing land uses in operation on the project site, which included the apartment complex and auto repair shop. It was assumed that the warehouses are no longer operational. Net emissions from the proposed project are the emissions from the proposed project minus emissions from operation of the existing land uses. As shown in Table 7, emissions would be below SCAQMD thresholds for all pollutants.

**Table 7 Operational Emissions**

| | Estimated Emissions (lbs/day) | | | | | |
|---|---|---|---|---|---|---|
| **Operational Phase** | **ROG** | **$NO_x$** | **CO** | **$SO_x$** | **$PM_{10}$** | **$PM_{2.5}$** |
| **Proposed Project** | | | | | | |
| Area | 3.1 | 0.1 | 9.3 | <0.1 | 0.1 | 0.1 |
| Energy | <0.1 | 0.3 | 0.1 | <0.1 | <0.1 | <0.1 |
| Mobile | 1.3 | 6.4 | 16.1 | 0.1 | 4.9 | 1.3 |
| Total | 4.5 | 6.8 | 25.4 | 0.1 | 4.9 | 1.4 |
| **Existing Land Use** | | | | | | |
| Area | 8.7 | 0.7 | 18.3 | <0.1 | 2.4 | 2.4 |
| Energy | <0.1 | 0.1 | <0.1 | <0.1 | <0.1 | <0.1 |
| Mobile | 0.6 | 2.7 | 8.0 | <0.1 | 1.6 | 0.5 |
| Total | 9.4 | 3.5 | 26.4 | <0.1 | 4.0 | 2.8 |
| **Net Emissions from Proposed Project[1]** | **(4.8)** | **3.0** | **(0.9)** | **<0.1** | **0.9** | **(1.5)** |
| SCAQMD Thresholds | 55 | 55 | 550 | 150 | 150 | 55 |
| Threshold Exceeded? | No | No | No | No | No | No |

See Appendix A for CalEEMod model output. Winter emissions were used for a conservative estimate, except for CO, which was higher in the summer.

[1]Net emissions = Proposed Project – Existing Land Use

Notes: Totals may not add up due to rounding and ( ) denotes negative.

According to the SCAQMD, a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts (SCAQMD 2008). This means that a project would result in a cumulatively considerable net increase if an individual project exceeds the SCAQMD's recommended daily regional thresholds for project-specific impacts, or if a project would conflict with or obstruct implementation of the AQMP. As discussed above, the project would not conflict with the AQMP and would not exceed SCAQMD significance thresholds. Per SCAQMD's cumulative air quality impact methodology, the project's air quality impacts would not be cumulatively considerable. Therefore, the project's short-term and long-term impacts to local and regional air quality would be less than significant.

### *Localized Carbon Monoxide Hotspot Impact*

A carbon monoxide (CO) hotspot is a localized concentration of CO that is above a CO ambient air quality standard. Localized CO hotspots can occur at intersections with heavy peak hour traffic. Specifically, hotspots can be created at intersections where traffic levels are sufficiently high such that the local CO concentration exceeds the federal one-hour standard of 35.0 parts per million (ppm) or the federal and State eight-hour standard of 9.0 ppm (CARB 2016a).

The entire SCAB is in conformance with State and federal CO standards and most air quality monitoring stations no longer report CO levels. No stations within the vicinity of the project site have monitored CO in the last four years. In 2012, the Los Angeles-North Main Street Station detected an 8-hour maximum CO concentration of 1.9 ppm (U.S. EPA 2017), which is substantially below the State and federal standard of 9 ppm. In addition, as shown in Table 6, the project would

generate maximum daily CO emissions of approximately 17.2 pounds during project construction, which is well below the SCAQMD threshold of 550 pounds. Additionally, the project would not exceed the applicable thresholds for CO, as shown in Table 7. Both the SCAQMD and LST thresholds are designed to be protective of public health. Based on the low background level of CO in the project area, ever-improving vehicle emissions standards for new cars in accordance with state and federal regulations, and the project's low level of operational CO emissions, the project would not result in the creation of new hotspots or contribute substantially to existing hotspots. Localized air quality impacts related to CO hot spots would not occur.

### *Toxic Air Contaminants (TACs)*

CARB's *Quality and Land Use Handbook: A Community Health Perspective* (2005) recommends against siting sensitive receptors within 500 feet of a freeway, or near other major sources of toxic air contaminants (TACs), such as rail yards, distribution centers, ports, or refineries. The primary concern with respect to freeway adjacency is the long-term effect of diesel exhaust particulates, a TAC, on sensitive receptors. The primary source of diesel exhaust particulates is heavy-duty trucks on freeways and high-volume arterial roadways. The project site is located approximately 700 feet southwest of I-10, and there are no rail yards, distribution centers, ports, refineries, or other major sources of TACs in the vicinity. Although the project would be a sensitive receptor, the project site is not located near TAC sources that would result in substantial health risks to future residents or employees.

Because the project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or State ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors), or expose sensitive receptors to substantial pollutant concentrations, impacts would be less than significant.

*e. Would the project create objectionable odors affecting a substantial number of people?*

**LESS THAN SIGNIFICANT IMPACT**

A project-related significant adverse effect could occur if construction or operation of the project would result in generation of odors that would be perceptible in adjacent sensitive areas. Substantial objectionable odors are typically associated with such uses as agriculture, wastewater treatment, industrial facilities, or landfills. The project would involve the demolition of an existing automobile care center, two warehouses, and a multifamily residence and construction of a new mixed-use building with 112-unit multi-family residential units and approximately 7,300 square feet of commercial space. Demolition and construction activities could create temporary odors associated with diesel fuel combustion. These odors could be considered to be objectionable; however, due to the short-term and temporary nature of construction activity, odor impacts would not be significant. Further, residential and commercial uses are not identified as a land use typically associated with odor complaints in the SCAQMD CEQA *Air Quality Handbook*. Therefore, the project would not generate objectionable odors affecting a substantial number of people, and this impact would be less than significant.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

According to the SCAQMD, a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. This means that a project would result in a cumulatively considerable net increase if an individual project exceeds the SCAQMD's recommended daily thresholds for project-specific impacts. As discussed above, 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, in conjunction with related project in the region, would occur. Therefore, cumulative impacts related to air quality would be less than significant.

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# 4 Biological Resources

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service | ☐ | ☐ | ■ | ☐ |
| b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or 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 a tree preservation policy or ordinance | ☐ | ☐ | ■ | ☐ |
| f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? | ☐ | ☐ | ☐ | ■ |

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

**LESS THAN SIGNIFICANT IMPACT**

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- The loss of individuals, or the reduction of existing habitat, of a state or federal listed endangered, threatened, rare, protected, candidate, sensitive species, or a Species of Special Concern;
- 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;
- The alternation 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.

The project site is located in a dense urban environment that is fully developed with a wide range of urban uses, structures, and pavement. The project site currently has an existing car repair facility, warehouses, and a residence. The entirety of the site is paved and includes two trees on site and three trees in the City's right-of-way. The tree report for the project site identifies the five trees as (1) Indian laurel fig (*Ficus m. nitida*), (1) carrotwood (*Cupaniopsis anacardioides*), and (3) fern pine (*Podocarpus gracilior*) (Appendix B; Arbor Essence 2018). Because the project site is within an urbanized area and is typical of an urban environment, it does not contain native biological habitats or habitats for special status species. However, the proposed project would remove all five trees, which could provide nesting habitat for a variety of bird species that are afforded protection under the federal Migratory Bird Treaty Act (MBTA – 16 United States Code Sections 703-712). The proposed project has the potential to impact migratory and other bird species if construction activities occur during the nesting season, which is typically February 15 through September 15. Construction-related disturbances could result in nest abandonment or premature fledging of the young. However, compliance with the following RCM and with MBTA and California Fish and Game Code requirements would reduce impacts to nesting birds to a less than significant level by ensuring that any active bird nests on or adjacent to the site are not disturbed by project construction.

## *RCM-5 Habitat Modification – Nesting Native Birds, Non-Hillside, or Urban Areas*

The project would result in the removal of trees and ground disturbances and therefore may result in take of nesting native bird species. Migratory non-game native bird species are protected by international treaty under MBTA of 1918 (50 Code of Federal Regulations [CFR] Section 10.13). 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).

- Proposed project activities (including disturbances to native and non-native vegetation, structures, and substrates) should take place outside of the breeding bird season, which generally runs from March 1 – August 31 (as early as February 1 for raptors) to avoid take

(including disturbances which would cause abandonment of active nests containing eggs and/or young). Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86).

- If project activities cannot feasibly avoid the breeding bird season, beginning thirty days prior to the disturbance of suitable nesting habitat, the applicant shall arrange for weekly bird surveys to detect any protected native birds in the habitat to be removed and any other such habitat within properties adjacent to the project site, as access to adjacent areas allows. The surveys shall be conducted by a qualified biologist with experience in conducting breeding bird surveys. The surveys shall continue on a weekly basis with the last survey being conducted no more than 3 days prior to the initiation of clearance/construction work.
    - If a protected native bird is found, the applicant shall delay all clearance/construction disturbance activities within 300 feet of suitable nesting habitat for the observed protected bird species until August 31.
- Alternatively, the Qualified Biologist could continue the surveys in order to locate any nests. If an active nest is located, clearing and construction within 300 feet of the nest or as determined by a qualified biological monitor, shall be postponed until the nest is vacated and juveniles have fledged and when there is no evidence of a second attempt at nesting. The buffer zone from the nest shall be established in the field with flagging and stakes. Construction personnel shall be instructed on the sensitivity of the area.
- The applicant shall record the results of the recommended protective measures described above to document compliance with applicable State and federal laws received into the case file for the associated discretionary action permitting the project.

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

*c. Would the project 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 located in an urban setting and no habitat of quality to support native riparian plant/wildlife species or other sensitive natural community is present (United States Fish and Wildlife Service [USFWS] 2017). Federally protected wetlands or waters as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) do not occur on-site. As a result, there would be no impact to riparian habitat, other sensitive natural community, or wetland.

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

**NO IMPACT**

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on biological resources if it could result in:

- Interference with wildlife movement/migration corridors that may diminish the chances for long-term survival of a sensitive species.

The project site is within an urbanized area near two major freeways, I-110 and I-10 which are approximately 0.6 mile west and 700 feet north of the project site, respectively. As such, the project site does not facilitate substantial wildlife movement or provide nursery habitat. Therefore, the proposed project would have no impact on the movement of any native resident or migratory fish or wildlife species, or affect a nursery site.

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

**LESS THAN SIGNIFICANT IMPACT**

The City of Los Angeles has a number of local policies and ordinances to protect biological resources. Most target specific habitats or species that do not occur in urban environments. The City's Protected Tree Ordinance (Ordinance no. 177404) protects several southern California native tree species, including Valley Oak, California Live Oak, or any other tree of the oak genus indigenous to California, excluding Scrub Oak, Southern California Black Walnut, Western Sycamore, and California Bay tree species. However, this ordinance does not apply to the project site, which contains an Indian laurel fig tree, Carrotwood tree, and three fern pine trees (Appendix B, Arbor Essence 2018). Nevertheless, all five trees (on and off the project site) are considered significant trees and would be removed as part of the proposed project. Compliance with the following RCM would ensure that the proposed project would not conflict with local policies protecting biological resources. Impacts would be less than significant.

### *RCM-6 Tree Removal – Protected and Non-Protected Trees*

- Prior to the issuance of any permit, a plot plan shall be prepared indicating the location, size, type, and general condition of all existing trees on the site and within the adjacent public right(s)-of-way.
- All significant (8-inch or greater trunk diameter, or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal, if any, shall be replaced at a 2:1 ratio with a minimum 24-inch box tree. Net, new trees, located within the parkway of the adjacent public right(s)-of-way, may be counted toward replacement tree requirements.
- Removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. Contact Urban Forestry Division at: 213-847-3077. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division, the Department of Public Works, and Bureau of Street Services.

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

**NO IMPACT**

A significant impact would occur if the project would be inconsistent with mapping or policies in any conservation plans of the types cited above. The General Plan Conservation Element for the City states several species that are protected, including the Belding's Savannah Sparrow, California condor and other endangered captive species, California Least Tern, California native oaks, and the

El Segundo Blue butterfly. None of the listed species exist on-site. Habitat areas in the City include inland habitats with natural or artificial waters, significant ecological areas, as identified by Los Angeles County and wildlife corridors, including the Rim of the Valley Trail Corridor, ocean habitat, and coastal wetlands. The project site is not located near any waters or significant ecological areas, as identified by the County or any wildlife corridors. Additionally, the project site is not within the area of any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan (Los Angeles County 2013, USFWS n.d.). No impact would occur.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

As discussed, the project site is located in an urban environment that is fully developed with a range of urban uses, structures, and pavement. Because the project site is within an urbanized area and is typical of an urban environment, it does not contain native biological habitats or habitats for special status species. In addition, all related projects would comply with applicable regulations such as the MBTA. Therefore, cumulative impacts would be less than significant.

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# 5 Cultural Resources

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5 | ☐ | ☐ | ☐ | ■ |
| b. Cause a substantial adverse change in the significance of an archaeological resource as defined in §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 | ☐ | ☐ | ■ | ☐ |

*a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?*

**NO IMPACT**

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if a project would adversely impact historic resources that presently exist on the project site or in the vicinity. Pursuant to Section 15064.5 of the *CEQA Guidelines*, a historical resource is presumed significant if it is listed on the California Register of Historic Resources (California Register) or has been determined to be eligible for listing by the State Historical Resources Commission (SHRC). A historical resource may also be considered significant if the lead agency determines, based on substantial evidence, that the resource meets the criteria for inclusion in the California Register. CEQA also contains the following additional guidelines for defining a historical resource:

- California properties formally determined eligible for, or listed in the National Register of Historic Places (Section 5024.1.d.1);
- Those resources included in a local register of historical resources, as defined in Section 5020.1(k) of the Public Resources Code, or identified as significant in a historical resources survey meeting the requirements of Section 5024.1(g) of the Public Resources Code;
- Those resources that a lead agency determines to be historically significant (generally, if it meets criteria for listing on the California Register), provided the determination is supported by substantial evidence; or
- Those resources a local agency believes are historical for more broadly defined reasons than identified in the preceding criteria.

The *L.A. CEQA Thresholds Guide* further states that a project would normally have a significant impact on historical resources if it would result in a substantial adverse change in the significance of an historical resource. A substantial adverse change in significance occurs if the project involves:

- Demolition of a significant resource;
- Relocation that does not maintain the integrity and significance of a significant resource;
- Conversion, rehabilitation, or alteration of a significant resource that does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings; or
- Construction that reduces the integrity or significance of important resources on the site or in the vicinity.

Development of the project would involve demolition of an existing automotive repair facility, three industrial/warehouse properties, and an apartment building on the project site for construction of a mixed-use multi-family residential and commercial building. A site-specific Cultural Resources Assessment Report was prepared by Rincon Consultants, Inc. (Rincon) in 2018 and is included in Appendix G (Treffers et al. 2018). As detailed in the report, four properties within the project site are 45 years of age or older: 210 Washington Boulevard; 214/216/220/224 Washington Boulevard; 1910 Los Angeles Street; and 1914 Los Angeles Street. One property, 200/206 Washington Boulevard, was constructed in 1978 and is therefore exempt from evaluation because it was constructed fewer than 45 years ago.

The City of Los Angeles has an active city-wide survey program to identify and evaluate historic resources for long term planning purposes, known as SurveyLA, which is organized by community planning area. The project site is located in the Southeast Los Angeles Community Planning Area and contains commercially- and industrially-zoned properties, which were surveyed separately as part of SurveyLA. A review of the findings from both surveys indicate that there are no properties within or adjacent to the project site that were identified as eligible for federal, state, or local designation, either individually or as contributors to any historic districts (Treffers et al. 2018; Appendix G). Rincon examined the potential historic significance of each property that is 45 years of age or older in the project site within the framework of the National Register of Historic Places, the California Register of Historical Resources, and SurveyLA. The following is a summary of the findings of the Cultural Resources Assessment Report for each of the four properties (see Appendix G for a more detailed discussion).

- The property located at 210 Washington Boulevard was initially designed and developed as an automobile repair shop and was continually adapted for a variety of light industrial and automobile uses throughout its existence. However, because of several alterations, the building is no longer representative of any particular architectural style, nor is it a good example of a car repair facility or industrial type building. The subject property is one of many industrial properties developed in the Southeast Los Angeles area, which is known for its high concentration of industrial buildings primarily devoted to small-scale manufacturing. The building does not appear to be individually important within this context. While the building is associated with Plastone Co., the building was utilized only as a warehouse space and was not related to the development or production of Plastone Co.’s products. No consequential information was found on other occupants of the building. Therefore, the property at 210 Washington Boulevard is not eligible for federal, State, or local designation as a historical resource (Treffers et al. 2018; Appendix G).

- The property at 214/216/220/224 Washington Boulevard was initially designed and constructed as a printing facility, a use it would support through at least 2000. Although the Spanish-language newspaper *La Opinion* utilized the building as its printing press, their occupancy did not begin until 1990, which is after any of the periods of significance related to Latino history that have been identified by SurveyLA. The property was not home to a company whose products had a significant impact on twentieth century social history, and it does not possess programmatic elements or branding on the façade. While the building is associated with *La Opinion*, the company has operated out of various locations over its 92-year existence, and only occupied the subject property from 1990 to approximately 2014. Additionally, only a few of the company's many departments were operated out of the subject property – those in charge of printing and circulation. The editorial, accounting, classified, and family offices were not located at the subject property. The building is not a representative example of any of the industrial building sub-types that were identified in the SurveyLA Industrial Historic Context. Although the building features some elements of Mid-Century Modernism, it does not appear to be particularly unique or significant within this context as alterations have reduced its integrity of design, materials, feeling, and workmanship. Therefore, the property at 214/216/220/224 Washington Boulevard is not eligible for federal, State, or local designation as a historical resource (Treffers et al. 2018; Appendix G).
- The property at 1910 Los Angeles Street has operated as an apartment house since its construction in 1913. The building is associated with the residential growth of Los Angeles, which occurred during the early twentieth century as the development expanded outward from the City's core. Although it is associated with a larger pattern of events, it is one of numerous apartment houses that were constructed during this period to accommodate a rapidly growing population, and archival research did not reveal that it is unique or noteworthy within this context. Therefore, the property does not appear eligible for associations with significant events. The building's developer, Adolph Jahnke, was a successful restaurateur in early twentieth century Los Angeles and could have potential to be considered an important individual in the City's history. However, the subject building is not associated with the primary business activity for which he was known, which was his well-known restaurant Jahnke's Restaurant. Instead, 1910 Los Angeles appears to have been an investment property and is not representative of those achievements for which he was known; therefore, the building does not appear eligible for any associations with persons significant in the past. The building exhibits many of the character-defining features of the type; it is more than two stories in height and was originally constructed as an apartment house during the period of significance (1910-1980). However, due to the removal of all the original windows, and the infill of many of the window openings with concrete block or plywood, the building cannot be considered an excellent example of the type. Further, the building's architectural style can be considered vernacular with some elements of Classical design, and as a result, it does not appear eligible for any significant architectural associations. Therefore, the property at 1910 Los Angeles Street is not eligible for federal, State, or local designation as a historical resource (Treffers et al. 2018; Appendix G).
- The building at 1914 Los Angeles Street was originally constructed as a garment factory; however, it does not appear to have been initially used in this capacity because shortly after its construction, it was converted for use as a machine shop. The subject property is a simple industrial building constructed in 1941 that no longer possesses its original design, feeling, materials or workmanship due to several alterations. The building was used for several industrial purposes including textile manufacturing and as a printing press; none of these firms

were identified as having a significant impact on 20th century social history. Therefore, the property does not appear eligible for associations with significant events. Research failed to identify any potential associations with labor history, ethnic, or cultural associations. Archival research does not indicate that the property was directly associated with persons significant in our past. Due to alterations that have resulted in a loss of aspects of the building's integrity, the subject property does not appear eligible as a distinctive example of an architectural type specimen, or as a representative property type. Therefore, the property at 1914 Los Angeles Street is not eligible for federal, State, or local designation as a historical resource (Treffers et al. 2018; Appendix G).

There are four previously recorded cultural resources within 0.25 mile of the project site, including the addresses 1601-1613 Los Angeles Street, 2325 Main Street, 155 Washington Boulevard, and 1600 and 1616 Broadway. However, since these properties are not on the project site, the proposed project would have no impact to historic resources.

*b. Would the project cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?*

*c. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

*d. Would the project disturb any human remains, including those interred outside of formal cemeteries?*

**LESS THAN SIGNIFICANT IMPACT**

The project site is generally level, does not contain unique geologic features, and has been previously graded. No prehistoric or historic archaeological resources were identified by the Cultural Resources Assessment Report (Appendix G, Treffers et al. 2018). As such, the likelihood that intact archaeological resources, paleontological resources, or human remains are present is low. Because the site has been developed previously, any surficial paleontological resources that may have been present at one time have likely been disturbed. Therefore, the topmost layers of soil in the project area are not likely to contain substantive fossils.

The proposed project would require excavation below the surficial soil layers for the construction of an underground parking level. This could uncover potentially previously undetected paleontological resources or human remains. Therefore, the possibility for such resources exists and impacts would be potentially significant. Nevertheless, should resources be discovered, compliance with the below RCMs would result in less than significant impacts. The following RCMs would reduce impacts regarding unanticipated cultural resources and human remains to a less than significant level by providing a process for evaluating and, as necessary, avoiding impacts to identified resources.

## *RCM-7 Cultural Resources (Archaeological)*

- If archaeological resources are discovered during excavation, grading, or construction activities, work shall cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the proposed project shall not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the project site. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Sections 21083.2.

- The services of an archaeologist shall then be secured by contacting the South Central Coastal Information Center (657-278-5395) located at California State University Fullerton, or member of the Society of Professional Archaeologist or a Society of Professional Archaeologist-qualified archaeologist, who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact.
- The archaeologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource.
- The applicant shall comply with the recommendations of the evaluating archaeologist, as contained in the survey, study, or report. Recommendations shall be consistent with California Public Resources Code Section 21083.2.
- Project development activities may resume once copies of the archaeological survey, study, or report are submitted to: South Central Coastal Information Center Department of Anthropology, McCarthy 477, CSU Fullerton, 800 State College Boulevard, Fullerton, CA 92834.
- Prior to the issuance of any building permit, the applicant shall submit a letter to the case file indicating what, if any, archaeological reports have been submitted, or a statement indicating that no material was discovered.
- A covenant and agreement binding the applicant to this condition shall be recorded prior to issuance of a grading permit.

### *RCM-8 Cultural Resources (Paleontological)*

- If any paleontological materials are encountered during the course of project development, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all further development activities shall halt. The services of a paleontologist shall then be secured by contacting the Center for Public Paleontology – University of Southern California, University of California, Los Angeles, California State University Los Angeles, California State University Long Beach, or the Los Angeles County Natural History Museum – who shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The paleontologist's survey, study, or report shall contain a recommendation(s), if necessary, for the preservation, conservation, or relocation of the resource, consistent with California Public Resources Code 21083.2.
- The applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study, or report.

### *RCM-9 Cultural Resources (Human Remains)*

- If human remains are encountered unexpectedly during construction, demolition, and/or grading activities, 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 California Public Resources Code Section 5097.98. In addition, in the event that human remains are discovered during excavation activities the following procedure shall be observed:
    - Stop immediately and contact the County Coroner: 1104 Mission Road, Los Angeles, CA 90033. 323-343-0512 (8 a.m. to 5 p.m. Monday through Friday) or 323-343-0714 (after hours, Saturday, Sunday, and Holidays).

- The coroner has two working days to examine human remains after being notified by the responsible person. If the remains are Native American, the Coroner has 24 hours to notify the Native American Heritage Council (NAHC).
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the descendent does not make recommendations within 48 hours, the owner shall reinter (rebury) the remains in an area of the property secure from further disturbance; or,
- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

There would be no project-level impacts to known cultural resources, and potential impacts to unanticipated cultural resources would be less than significant with implementation of RCM-7, RCM-8, and RCM-9. Other projects would also undergo any necessary historic evaluation and comply with relevant regulatory requirements and project recommendations regarding cultural resources. Therefore, cumulative impacts would be less than significant.

# 6 Geology and Soils

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Expose people or structures to potentially substantial adverse effects, including the risk of loss, injury, or death involving: | | | | |
| 5. 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 | ☐ | ☐ | ■ | ☐ |
| 6. Strong seismic ground shaking | ☐ | ☐ | ■ | ☐ |
| 7. Seismic-related ground failure, including liquefaction | ☐ | ☐ | ■ | ☐ |
| 8. Landslides | ☐ | ☐ | ☐ | ■ |
| b. Result in substantial soil erosion or the loss of topsoil | ☐ | ☐ | ■ | ☐ |
| c. Be located on a geologic unit or soil that is made unstable as a result of the project, and potentially result in on or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse | ☐ | ■ | ☐ | ☐ |
| d. Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property | ☐ | ☐ | ■ | ☐ |
| e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater | ☐ | ☐ | ☐ | ■ |

The following analysis is based on a Geotechnical Investigation performed by Geocon West, Inc. (Geocon) on January 25, 2018, which is included as Appendix C. The project site is located in the northern portion of the Los Angeles Basin, a coastal plan bounded by the Santa Monica Mountains on the north, the Elysian Hills and Repetto Hills on the northeast, the Puente Hills and Whittier Fault on the east, the Palos Verdes Peninsula and Pacific Ocean on the west and south, and the Santa Ana

Mountains and San Joaquin Hills on the southeast. Soils on-site consist primarily of artificial fill and Holocene age alluvial deposits consisting primarily of sand, silt, gravel and cobbles (Geocon 2018).

*a.1. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?*

*a.2. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking?*

**LESS THAN SIGNIFICANT IMPACT**

Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of these specific issues, a significant impact may occur if:

- A project site is located within a state-designated Alquist-Priolo Zone or other designated fault zone, and appropriate building practices are not employed; or
- A proposed project represents an increased risk to public safety or destruction of property by exposing people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the southern California region.

In addition, based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would have a significant geologic hazard impact if it would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a significant impact may occur if the project is located in an area identified as having a high risk of liquefaction.

According to the City of Los Angeles *General Plan Safety Element*, there have been approximately 60 damaging seismic events in the Los Angeles region since 1800 (City of Los Angeles 1996). The nearest active fault to the project site is the Newport-Inglewood Fault Zone located approximately 4.8 miles southwest of the project site. The project site does not lie in an Alquist-Priolo earthquake fault zone, and the Geotechnical Investigation concluded that the potential for surface rupture due to faulting occurring beneath the site is low because no active or potentially active faults with the potential for surface rupture are known to pass directly beneath the site (Geocon 2018, Appendix C). Nonetheless, any strong seismic event at a nearby fault could produce considerable levels of ground shaking throughout the City and it is possible that the site is underlain by an undetected blind thrust fault, and several blind thrust faults that underlie the Los Angeles Basin are capable for generating future earthquakes that could produce moderate to significant ground shaking at the site (Geocon 2018, Appendix C). However, the proposed project would be constructed in accordance with California Building Code (CBC) standards for earthquake safety, as well as Los Angeles Building Code requirements (LAMC Chapter 9, Article 1). In addition, the project would be required to comply with the following RCM. Impacts would be less than significant.

## *RCM-10 Seismicity*

- Prior to the issuance of grading or building permits, the applicant shall submit a geotechnical report, prepared by a registered civil engineer or certified engineering geologist, to the Department of Building and Safety, for review and approval. The project shall comply with the

Uniform Building Code Chapter 18, *Soils and Foundations*. The geotechnical report shall assess potential consequences of any liquefaction and soil strength loss, estimation of settlement, lateral movement or reduction in foundation soil-bearing capacity, and discuss mitigation measures that may include building design consideration. Building design considerations shall include, but are not limited to: ground stabilization, selection of appropriate foundation type and depths, selection of appropriate structural systems to accommodate anticipated displacements, or any combination of these measures.

- The project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the proposed project and as it may be subsequently amended or modified.
- The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.

Compliance with local and state building codes and RCM-10 would reduce potential risks due to seismic events to a less than significant level.

*a.3. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving seismic-related ground failure, including liquefaction?*

**LESS THAN SIGNIFICANT IMPACT**

The Geotechnical Investigation concluded that the project site is not located in an area designated as having a potential for liquefaction and that the historic high groundwater level is approximately 80 feet below ground surface. Accordingly, the potential for liquefaction is low, and impacts would be less than significant.

*a.4. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving landslides?*

**NO IMPACT**

The topography at the site is relatively level. The Geotechnical Investigation determined that the project site is not within a hillside area or an area having potential for seismic slope instability. There are no known landslides near the site, and the site is not in the path of any known or potential landslides (Geocon 2018, Appendix C). Therefore, the potential for slope stability hazards to adversely affect the proposed development is low, and there would be no impact.

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

**LESS THAN SIGNIFICANT IMPACT**

There is potential for soil erosion to occur at the site during site preparation and grading activities associated with the project, which would involve soil disturbance and excavation for the construction of the foundation. As discussed in Section 3, *Air Quality*, dust control measures would be implemented during construction as required by the SCAQMD Rule 403 to minimize fugitive dust emissions. Measures to minimize fugitive dust emissions may include watering exposed surfaces and covering soil stockpiles. These measures are also effective for reducing soil erosion. Grading activities would also be required to adhere to Section 61.02, *Abatement of Erosion or Flood Hazard*, of the LAMC, which specifies that erosion control measures must be adopted if grading activities will not be completed prior to commencement of the rainy season (October 1 through April 15). Furthermore, as discussed in Section 9, *Hydrology and Water Quality*, the proposed project would

be required to comply with RCM-12 and RCM-13, which require the installation of appropriate erosion control and drainage devices during demolition, grading, and construction activities, and the acquisition of coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit. A Stormwater Pollution Prevention Plan would be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit and would ensure that the potential for soil erosion and sedimentation is minimized. The proposed project would also be required to comply with RCM-14, which requires the submission of a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan that would address erosion impacts during project operation. Compliance with SCAQMD and LAMC regulations along with these RCMs would result in less than significant impacts related to erosion and loss of topsoil.

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

**LESS THAN SIGNIFICANT IMPACT**

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant geologic hazard impact if:

- It would cause or accelerate geologic hazards that would result in substantial damage to structures or infrastructure, or expose people to substantial risk of injury. For the purpose of this specific issue, a project-related significant adverse effect may occur if the project is located in a hillside area with soil conditions that would suggest a high potential for sliding;
- A project is built in an unstable area without proper site preparation or design features that provide adequate foundations for proposed buildings, thus posing a hazard to life and property; or
- The project is built on expansive soils without proper site preparation or design features that provide adequate foundations for project buildings, thus, posing a hazard to life and property.

As stated above, the project site is in a generally level area that has not been identified as at risk for liquefaction, landslides, lateral spreading, or collapse. However, the project site is located approximately 0.2 mile southwest of the LA Downtown Oil Field, as identified in the City's Safety Element, Exhibit E, "Oil Field and Drilling Areas" (Los Angeles 1996), and oil extraction can contribute to subsidence. The Los Angeles Citywide General Plan Framework EIR indicates there is potential risk of subsidence at the oil fields and all areas which lie above or in the immediate vicinity of the major oil fields are areas of potential concern for methane, including the project site (City of Los Angeles 1995). However, the Geotechnical Investigation states that the project site is not located within an area of known ground subsidence and little to no potential for ground subsidence due to withdrawal of fluids or gases at the site (Geocon 2018). Additionally, the Geotechnical Investigation provides several recommendations relating to foundation support. These recommendations are required per RCM-10. Additional relevant recommendations are provided in the Geotechnical Investigation (Geocon 2018, Appendix C). Adherence to RCM-10 would reduce project-related impacts to a less than significant level.

d. *Would the project be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial risks to life or property?*

**LESS THAN SIGNIFICANT IMPACT**

The proposed project would replace existing development in an urbanized, generally flat landscape. The project site is underlain by artificial fill and Holocene age alluvial deposits consisting primarily of sand, silt, gravel, and cobbles. These soils have a very low expansive potential and are classified as non-expansive in accordance with the 2016 CBC (Geocon 2018). Because the project would not be located on expansive soil and would be required to comply with CBC standards, impacts would be less than significant.

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

**NO IMPACT**

The project would not use septic tanks or other alternative waste water disposal systems. No impact would occur.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

Due to their site-specific nature, geology and soils impacts are typically assessed on a project-by-project basis and a related project would address site-specific geologic hazards through the implementation of site-specific geotechnical recommendations and/or mitigation measures. In addition, all related projects would be subject to all applicable local, state, and federal regulations and standards for seismic safety. Thus, cumulative impacts related to geology and soils would be less than significant.

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# 7 Greenhouse Gas Emissions

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment | ☐ | ☐ | ■ | ☐ |
| b. Conflict with any applicable plan, policy, or regulation adopted to reduce the emissions of greenhouse gases | ☐ | ☐ | ■ | ☐ |

The accumulation of GHGs in the atmosphere naturally regulates Earth's temperature. However, emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations. Carbon dioxide ($CO_2$) and methane ($CH_4$) are the GHGs that are emitted in the greatest quantities from human activities. Emissions of $CO_2$ are largely by-products of fossil fuel combustion, whereas $CH_4$ results from off-gassing associated with agricultural practices and landfills.

Scientific modeling predicts that continued GHG emissions at or above current rates would induce more extreme climate changes during the 21$^{st}$ century than were observed during the 20$^{th}$ century. Some of the potential impacts in California of global warming may include loss of snow pack, sea level rise, more extreme heat days per year, more high ozone days, more large forest fires, and more drought years (California Environmental Protection Agency 2010). While these potential impacts identify the possible effects of climate change at a global and potentially statewide level, in general, scientific modeling tools are currently unable to predict what impacts would occur locally.

In response to an increase in man-made GHG concentrations over the past 150 years, California has implemented AB 32, the "California Global Warming Solutions Act of 2006." AB 32 requires achievement by 2020 of a statewide GHG emissions limit equivalent to 1990 emissions (essentially a 25 percent reduction below 2005 emission levels) and the adoption of rules and regulations to achieve the maximum technologically feasible and cost-effective GHG emissions reductions. On September 8, 2016, the governor signed Senate Bill (SB) 32, which requires the State Air Resources Board to ensure that statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. Based upon CARB's *California Greenhouse Gas Inventory – 2017 Edition*, California produced about 440 metric tons (MT) of carbon dioxide equivalent ($CO_2e$) in 2015.

The City of Los Angeles adopted its climate action plan, *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming* (Green LA), in May 2007. Green LA set the goal of reducing the City's GHG emissions to 35 percent below 1990 levels by 2030. The action plan outlines several actions in the fields of energy, water, waste, and transportation. These actions include improved transportation centered around mobility for people rather than cars, increasing recycling to 70 percent diversion, meeting all additional water use through reclaimed water, and increasing renewable energy to 35 percent by 2020. The action plan also outlines goals to help residents

become "energy misers" by distributing CFL's and increasing rebates for energy efficient appliances and retrofits. The proposed project would be subject to applicable requirements of Green LA; however, this plan is not qualified GHG reduction plan.

Additionally, in April 2015, the City released its first Sustainable City Plan (Sustainable City pLAn), which established a set of goals related to fourteen sectors[1] to help transform Los Angeles by 2035. The Sustainable City pLAn is defined as a roadmap for Los Angeles that is environmentally healthy, economically prosperous, and equitable in opportunity for all. Specifically, the Sustainable City pLAn provides a vision for the City's future; pathway to short-term results that lay foundation for long-term outcomes; framework to build out policies; platform for collaboration; set of tools to manage the City; dashboard of sustainability metrics to transparently measure progress; and a pathway for engaging residents.

The adopted CEQA Guidelines provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts. The 2008 SCAQMD threshold considers emissions of over 10,000 MT of $CO_2e$ per year to be significant. However, the SCAQMD's threshold applies only to stationary sources and is expressly intended to apply only when the SCAQMD is the CEQA lead agency.

In the latest guidance provided by the SCAQMD's GHG CEQA Significance Threshold Working Group in September 2010, SCAQMD considered a tiered approach to determine the significance of residential and commercial projects. The draft tiered approach is outlined in the meeting minutes, dated September 29, 2010.

- **Tier 1**. If the project is exempt from further environmental analysis under existing statutory or categorical exemptions, there is a presumption of less than significant impacts with respect to climate change. If not, then the Tier 2 threshold should be considered.
- **Tier 2**. Consists of determining whether or not the project is consistent with a GHG reduction plan that may be part of a local general plan, for example. The concept embodied in this tier is equivalent to the existing concept of consistency in CEQA Guidelines section 15064(h)(3), 15125(d) or 15152(a). Under this Tier, if the proposed project is consistent with the qualifying local GHG reduction plan, it is not significant for GHG emissions. If there is not an adopted plan, then a Tier 3 approach would be appropriate.
- **Tier 3**. Establishes a screening significance threshold level to determine significance. The Working Group has provided a recommendation of 3,000 MT of $CO_2e$ per year for commercial/residential projects.
- **Tier 4**. Establishes a service population threshold to determine significance. The Working Group has provided a recommendation of 4.8 MT of $CO_2e$ per year for land use projects.

Because the City of Los Angeles does not have a qualified GHG reduction plan, the proposed project is evaluated based on SCAQMD's recommended Tier 3 significance threshold of 3,000 MT of $CO_2e$ per year. The Tier 3 screening level threshold is intended to assess commercial/residential projects and is the most appropriate threshold for the proposed project.

This analysis is based on the methodologies recommended by the California Air Pollution Control Officers Association [CAPCOA] (January 2008) *CEQA and Climate Change* white paper. The analysis

[1] The sectors included in the Sustainable City pLAn are: local water; local solar power; energy-efficient buildings; carbon and climate leadership; waste and landfills; housing and development; mobility and transit; prosperity and green jobs; preparedness and resiliency; air quality; environmental justice; urban ecosystem; livable neighborhoods; and lead by example.

focuses on $CO_2$, $N_2O$, and $CH_4$ as these are the GHG emissions that on-site development would generate in the largest quantities.

*a. Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?*

**LESS THAN SIGNIFICANT IMPACT**

Construction activities, energy use, daily operational activities, and mobile sources (traffic) due to the proposed project would generate GHG emissions. California Emissions Estimator Model (CalEEMod) version 2016.3.2 was used to calculate emissions resulting from project construction and long-term operation. Emissions exceeding the 3,000 MT of $CO_2e$ threshold would be considered significant.

## Demolition and Construction Emissions

Although construction activity is addressed in this analysis, CAPCOA does not discuss whether any of the suggested threshold approaches adequately address impacts from temporary construction activity. As stated in the *CEQA and Climate Change* white paper, "more study is needed to make this assessment or to develop separate thresholds for construction activity" (CAPCOA 2008). Nevertheless, the SCAQMD has recommended amortizing construction-related emissions over a 30-year period in conjunction with the proposed project's operational emissions.

Construction activity would occur over a period of approximately two years. Based on the applicant provided construction schedule and equipment list, construction of the project would generate an estimated 731 MT of $CO_2e$, as shown in Table 8. Amortized over a 30-year period (the assumed life of the project), construction of the proposed project would generate approximately 24 MT of $CO_2e$ per year.

**Table 8 Estimated Construction GHG Emissions**

| Year | Project Emissions (MT of $CO_2e$) |
|---|---|
| 2020 | 219.5 |
| 2021 | 425.8 |
| 2022 | 85.9 |
| Total | 731.1 |
| Total Amortized over 30 Years | 24.4 |

See Appendix A for CalEEMod model output.

## Operational Indirect and Stationary Direct Emissions

Operational emissions include area sources (consumer products, landscape maintenance equipment, and painting), energy use (electricity and natural gas), solid waste, electricity to deliver water, and transportation emissions. Operational emissions were also estimated using CalEEMod version 2016.3.2. CalEEMod does not calculate $N_2O$ emissions related to mobile sources. $N_2O$ emissions were estimated based on the proposed project's VMT using calculation methods provided by the California Climate Action Registry General Reporting Protocol (January 2009). Operational GHG emissions for the proposed project and the existing land use are shown in Table 9. Net

emissions from the proposed project are the total emissions from the proposed project minus total emissions from operation of the existing land uses on the project site, which the project would replace.

### Table 9 Combined Annual Emissions of Greenhouse Gases

| Emission Source | Annual Emissions (MT of $CO_2e$) |
|---|---|
| **Proposed Project** | |
| Construction | 24.4 |
| **Operational** | |
| Area | 1.9 |
| Energy | 478.9 |
| Solid Waste | 29.3 |
| Water | 107.6 |
| **Mobile** | |
| $CO_2$ and $CH_4$ | 687.3 |
| $N_2O$ | 34.7 |
| **Total for Proposed Project** | **1,364.0** |
| **Existing Land Use** | |
| **Operational** | |
| Area | 10.5 |
| Energy | 100.5 |
| Solid Waste | 11.6 |
| Water | 28.0 |
| **Mobile** | |
| $CO_2$ and $CH_4$ | 312.8 |
| $N_2O$ | 14.1 |
| **Total for Existing Land Use** | **477.5** |
| Net Emissions from Proposed Project[1] | 886.4 |
| SCAQMD Thresholds | 3,000 |
| Threshold Exceeded? | No |

See Appendix A for CalEEMod model output.

[1] Net emissions = Proposed Project – Existing Land Use

As shown in Table 9, the net increase in GHG emissions as a result of the project would be approximately 886 MT of $CO_2e$, which does not exceed the 3,000 MT threshold. Therefore, impacts would be less than significant.

*b. Would the project conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

## Climate Action Plan Consistency

The City of Los Angeles released its climate action plan, Green LA, in May 2007. The goal of Green LA is to reduce the City's GHG emissions to 35 percent below 1990 levels by 2030, encouraging municipal facilities and operations to reduce emissions in the community. Table 10 shows the project's consistency with applicable Green LA measures.

### Table 10 Consistency with Applicable Green LA Actions

| Measure | Project Consistency |
|---|---|
| **Energy** | |
| Green the Power from the Largest Municipal Utility in the United States | **Not Applicable**<br>This strategy is directed towards government agencies, not private developers. |
| Make Los Angeles a Worldwide Leader in Green Buildings | **Not Applicable**<br>While this action is directed towards government agencies and not private developers, the project would comply with Los Angeles Department of Building and Safety 2017 Green Building Code. Additionally, the project would be LEED Gold certified and would include features such as high-efficacy lighting, low-flow fixtures and fittings, and ENERGYSTAR rated appliances throughout the project. Additionally, the roof of the project would include high albedo materials on 75 percent of the roof. |
| Transform Los Angeles Into the Model of an Energy Efficient City | **Not Applicable**<br>This strategy is directed towards government agencies, not private developers. Nonetheless, the project would be LEED Gold certified and would include the following energy efficient features: high-efficacy lighting, low-flow fixtures and fittings, and ENERGYSTAR rated appliances throughout the project. Additionally, the roof of the project would include high albedo materials on 75 percent of the roof. |
| Help Angelenos Be "Energy Misers" | **Not Applicable**<br>This strategy is directed towards government agencies, not private developers. Nonetheless, the project would be LEED Gold certified and would include the following energy efficient features: high-efficacy lighting, low-flow fixtures and fittings, and ENERGYSTAR rated appliances throughout the project. |
| **Water** | |
| Decrease Per Capita Water Use | **Consistent**<br>According to the 2009 Sustainability Plan by the Los Angeles Department of Water and Power (LADWP), LADWP is in partnership with the Bureau of Sanitation (BOS) to expand the use of recycled water and develop a Recycled Water Master Plan that would expand the recycled water pipeline system and use recycled water for groundwater replenishment. The project would be required to participate in applicable City water conservation programs.<br>In accordance with the 2016 California Green Building Standards Code, the project would include a schedule of plumbing fixtures and fixture fittings that would reduce the overall use of potable water within the building by at least 20 percent. The reduction would be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The project would also be LEED Gold certified and would include the following water efficient features: low-flow faucets, showers, and toilets and water efficient clothes washers and dishwashers. |

| Measure | Project Consistency |
|---|---|
| **Transportation and Mobility** | |
| Lower the Environmental Impact and Carbon Intensity of Transportation | **Not Applicable**<br>This strategy is directed towards government agencies, not private developers. Nonetheless, the project would be located along the Metro Blue Line. The closest transit stop is located approximately 400 feet to the northwest of the project site at the intersection of Washington Boulevard and S. Main Street |
| Focus on Mobility for People, Not Cars | **Not Applicable**<br>This strategy is directed towards government agencies, not private developers. Nonetheless, the project would be located along the Metro Blue Line, 400 feet from the nearest station. Additionally, there are six stations within 0.25 miles of the project site. The project would also include 122 long-term and 19 short-term bicycle parking spaces. |
| Create a More Livable City | **Not Applicable**<br>This strategy is directed towards government agencies, not private developers. Nonetheless, the project would be infill, located along the Metro Blue Line, 400 feet from the nearest station. Additionally, there are six stations within 0.25 miles of the project site. The project would also include 122 long-term and 19 short-term bicycle parking spaces which would encourage future residents and patrons to actively commute to and from the project site. |
| **Waste** | |
| Shift from Waste Disposal to Resource Recovery | **Consistent**<br>The City of Los Angeles has achieved a landfill diversion rate of 76.4 percent. The project would be subject to the requirements of the statewide mandatory commercial recycling program, which establishes a statewide goal of diverting at least 75 percent of solid waste from landfills by 2020. Compliance with existing City and State programs would achieve consistency with this measure. |
| **Port of Los Angeles** | |
| Green the Port | **Not Applicable**<br>This strategy is directed towards government agencies, and specifically ports, and not private developers. |
| **Airport** | |
| Green the Airports | **Not Applicable**<br>This strategy is directed towards government agencies, and specifically airport, not private developers. |
| **Open Space and Greening** | |
| Unpave Paradise/Create New Paradises | **Not Applicable**<br>This strategy is directed towards government agencies, not private developers. Nonetheless, the project would include a 9,950 sf central courtyard that would be visible from above for residents. |
| **Green Economy** | |
| Create Demand and Catalyze Growth of the Green Economic Sector | **Not Applicable**<br>This strategy is directed towards government agencies, not private developers. Nonetheless, the project is an infill, mixed-use project and the retail/commercial space would be available for future environmentally focused companies that could create demand and catalyze the growth of the green economic sector. |

| Measure | Project Consistency |
|---|---|
| **Adaptation** | |
| Climate Proof Los Angeles | **Not Applicable**<br>This strategy is directed towards government agencies, not private developers. Nonetheless, the project would be infill, located along the Metro Blue Line, 400 feet from the nearest station. Additionally, the project would be developed to be LEED Gold certified and would include the following energy efficient features: high-efficacy lighting, low-flow fixtures and fittings, and ENERGYSTAR rated appliances throughout the project, which would assist the City with its overall goal of climate-proofing Los Angeles. |

## Senate Bill 375 (SB 375)

SB 375, signed in August 2008, enhances the State's ability to reach AB 32 goals by directing CARB to develop regional GHG emission reduction targets to be achieved from vehicles for 2020 and 2035. In addition, SB 375 directs each of the State's 18 major Metropolitan Planning Organizations (MPO) to prepare a "sustainable communities strategy" (SCS) that contains a growth strategy to meet these emission targets for inclusion in the Regional Transportation Plan (RTP). In April 2016, SCAG adopted the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy*. SCAG's RTP/SCS includes a commitment to reduce emissions from transportation sources by promoting compact and infill development to comply with SB 375.

A goal of the RTP/SCS is to "encourage land use and growth patterns that facilitate transit and active transportation." The proposed project would be infill development and would be located along the Metro Blue Line and within walking distance to surrounding commercial services and recreational activities. Moreover, the proposed project would promote bicycling and would include 60 long-term and 10 short-term bicycle parking spaces. Access to facilities in close proximity would reduce the number and length of project-generated vehicle trips. Therefore, the proposed project would be consistent with this goal.

## Assembly Bill 32 and Senate Bill 32

Senate Bill 32 (SB 32) extends the Statewide Assembly Bill 32 (AB 32) reduction goal, requiring the State to further reduce GHGs to 40 percent below 1990 levels by 2030. On December 14, 2017, the CARB adopted the 2017 Scoping Plan, which provides a framework for achieving the 2030 target. The 2017 Scoping Plan relies on the continuation and expansion of existing policies and regulations, such as the Cap-and-Trade Program, as well as implementation of recently adopted policies, such as SB 350 and SB 1383. The 2017 Scoping Plan also puts an increased emphasis on innovation, adoption of existing technology, and strategic investment to support its strategies. As with the 2013 Scoping Plan Update, the 2017 Scoping Plan does not provide project-level thresholds for land use development. Instead, it recommends that local governments adopt policies and locally-appropriate quantitative thresholds consistent with a Statewide per capita goal of six MT of $CO_2e$ by 2030 and two MT $CO_2e$ by 2050 (CARB 2017 ). As stated in the 2017 Scoping Plan, these goals may be appropriate for plan-level analyses (city, county, subregional, or regional level), but not for specific individual projects because they include all emissions sectors in the State.

As a result, State reduction strategies cannot be applied to the project to achieve long-term reductions. Achieving these long-term GHG reduction policies will require State and federal plans and policies for achieving post-2020 reduction goals. Placing the entire burden of meeting long-term reduction targets on local government or individual new development projects would be

disproportionate and likely ineffective. Given the recent legislative attention and judicial action regarding post-2020 goals and the scientific evidence that additional GHG reductions are needed through the year 2050, the Association of Environmental Professionals' (AEP) Climate Change Committee published a white paper in 2015 recommending that CEQA analyses for most land use development projects may continue to rely on current adopted thresholds for the immediate future (AEP, *Beyond 2020: The Challenges of Greenhouse Gas Reduction Planning by Local Governments in California*, 2015).

As discussed above, Green LA has an adopted GHG emissions reduction target of 35 percent below 1990 levels by 2030. As shown in Table 10, the project would be consistent with Green LA and as shown in Table 9, the project would generate a net increase of approximately 1,293 MT of $CO_2e$, which does not exceed the applicable threshold of 3,000 MT of $CO_2e$ per year. Therefore, impacts are less than significant.

**LESS THAN SIGNIFICANT IMPACT**

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

Based on the above methodology for determining project-related GHG impacts, the analysis of GHG emissions is cumulative in nature. Because the project would not result in significant GHG emissions, the project would not result in significant cumulative impacts.

# 8 Hazards and Hazardous Materials

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| 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 0.25 mile of an existing or proposed school | ☐ | ☐ | ■ | ☐ |
| d. Be located on a site that is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment? | ☐ | ■ | ☐ | ☐ |
| e. For a project located in 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 near a private airstrip, would it result in a safety hazard for people residing or working in the project area | ☐ | ☐ | ☐ | ■ |
| g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan | ☐ | ☐ | ■ | ☐ |

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| 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 | ☐ | ☐ | ☐ | ■ |

According to the *L.A. CEQA Thresholds Guide*, the determination of significance with respect to hazards and hazardous materials shall be made on a case-by-case basis considering the following factors:

- The regulatory framework for the health hazard;
- 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 project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance;
- 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 to exposure to the health hazard.

The following discussion regarding potential impacts related to hazards and hazardous materials is partially based on the Phase I and Phase II Environmental Site Assessments (ESA) for the project site prepared by Rincon in 2016 and 2018 (see Appendix D).

*a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

**LESS THAN SIGNIFICANT IMPACT**

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact related to hazards and hazardous materials if:

- The project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation); or
- The project involved the creation of any health hazard or potential health hazard.

The project site is currently occupied by three existing warehouses and an automotive repair facility which may use, dispose of, or transport hazardous materials. The proposed project would involve demolition of these uses and construction of residential and commercial uses on-site that would not involve regular handling or storage of large quantities of hazardous materials.

Potentially hazardous materials, such as fuels, lubricants, and solvents, would be used during construction. However, the transport, use, and storage of hazardous materials during construction of the project would be conducted in accordance with all applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the

California Hazardous Material Management Act, and the California Code of Regulations, Title 22.Therefore, the proposed project would not create a significant hazard to the public or environment through the routine handling of hazardous materials, and impacts would be less than significant.

*b. Would the project 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?*

**POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED**

The following two Phase I and two Phase II ESA reports were prepared by Rincon for the subject properties and are included in Appendix D:

- Phase I ESA for addresses 200 Washington Boulevard and 1910 Los Angeles Street (March 2016)
- Phase I ESA for addresses 200-224 Washington Boulevard and 1910-1918 Los Angeles Street and 1901 Santee Street (January 2018)
- Phase II ESA for addresses 200 Washington Boulevard and 1910 Los Angeles Street (June 2016)
- Phase II ESA for addresses 200-224 Washington Boulevard, 1910-1918 Los Angeles Street, and 1901 Santee Street (March 2018)

The findings and recommendations of these reports are discussed below.

## Phase I ESA – 200 Washington Boulevard and 1910 Los Angeles Street

The Phase I ESA for addresses 200 Washington Boulevard and 1910 Los Angeles Street revealed signs of use, storage, or disposal of hazardous materials or petroleum products on the project site. A vapor encroachment screening was completed, which detected VOC-impacted soil vapor at concentrations exceeding screening levels approximately 60 feet south of the project site at the former Santee Dairy property. Based on the distance from the project site, there is the potential that VOC-impacted soil vapor may be present beneath the subject property. Therefore, the project site has Recognized Environmental Conditions (REC), including:

- Former use of the subject property (200 Washington Boulevard) as a gasoline service station
- Possible presence of old underground storage tanks (UST) beneath the subject property
- Petroleum spills and heavy staining at the on-site automotive repair shop
- Location of the subject property within a City of Los Angeles Methane Buffer Zone
- Former presence of adjacent and nearby historical auto stations and nearby historical cleaners
- The presence of VOC-impacted soil gas at the former Santee Dairy property

The Phase I ESA recommended soil sampling and a soil vapor survey to evaluate the potential impact associated with the on-site automotive repair facility, the former on-site gasoline service station, the adjacent and nearby historical automotive stations, nearby historical cleaners and the presence of VOC-impacted soil gas at the former Santee Dairy property. Additionally, the soil vapor survey was recommended to evaluate for the potential presence of methane in the subsurface. Lastly, the Phase I ESA recommended evaluating for the potential presence of old UST with a geophysical survey, which may identify anomalous features in the subsurface (Rincon 2016a).

## Phase II ESA – 200 Washington Boulevard and 1910 Los Angeles Street

The recommendations of the Phase I ESA were completed with the Phase II ESA for addresses 200 Washington Boulevard and 1910 Los Angeles Street (Rincon 2016). The Phase II ESA was limited to sampling 200 Washington Boulevard, due to access constraints at the property because 1910 Los Angeles Street is occupied by an apartment building (Rincon 2016b).

Subsurface Surveys, Inc. conducted a geophysical survey on June 6, 2016. The purpose of the geophysical survey was to locate and identify the existence of any UST, backfilled excavations, piping, conduit, and other buried features that may exist on the project site. A combination of electromagnetic induction (EM), magnetometry, and ground penetrating radar (GPR) were used during the survey. Although there were numerous high EM signatures throughout the open and accessible portions of the property, the majority of the highs were linear in fashion and relatively shallow. The best candidate anomaly for the existence of an UST was located within the marked boundaries of the EM anomaly in the northern corner of the station. Although there is not convincing evidence for a UST, Subsurface Surveys recommended "that ground truthing and/or further investigation be performed by Rincon to definitively determine the source of the "EM High"" (Rincon 2016b).

Additional to the geophysical survey, a soil vapor survey was completed sampling a total of seven soil borings, installation of 16 soil vapor probes, and 31 soil samples throughout the project site. With the exceptions of trichloroethylene (TCE) and tetrachloroethylene (PCE), no other VOCs were detected in soil vapor samples collected from the project site. However, TCE concentrations were below the California Human Health Screening Levels (CHHSL) for residential and commercial soil vapor. The PCE concentrations were equal to or above the established residential and commercial CHHSL. The sample concentrations were then applied to the Department of Toxic Substances Control Vapor Intrusion Screening Model (Johnson and Ettinger [J&E]) model for Soil Gas. Based on the results of the J&E model, human health risk calculations indicate that on-site soil vapor for PCE is above the carcinogenic risk management range of $1\times10^{-6}$ for samples collected from both shallow and deep probes. The PCE levels in the soil vapor may be attributed to the nearby former Santee Dairy (Rincon 2016b).

Methane was not detected in any of the six soil vapor probes installed on the property; therefore, no additional assessment related to methane was recommended.

In addition to the soil vapor testing, soil samples were analyzed for total petroleum hydrocarbons in the gasoline (TPH-g), diesel (TPH-d), and oil (TPH-o) ranges, VOCs, metals, and polychlorinated biphenyls (PCB). TPH-d was detected in three of the 14 soil matrix samples, TPH-o was detected in two samples, and TPH-g was not detected in soil samples analyzed. Due to the distance from anticipated current groundwater levels of 100 feet below grade,[2] the concentrations of TPH-d and TPH-o were under the screening levels established by the Regional Water Quality Control Board (RWQCB). Therefore, no additional assessment related to TPH-g, TPH-d, and TPH-o was recommended (Rincon 2016b).

VOCs and PCBs were not detected in any of the 31 soil matrix samples analyzed. Therefore, no further evaluation of VOCs or PCBs in on-site soil is recommended. With the exception of arsenic, the results for metals were below their respective Regional Screening Levels (RSL) for residential soil

[2] The historic high groundwater level is the maximum level that has been measured in the past, which was used for the liquefaction analysis to represent "worst-case" scenario. Anticipated groundwater level is what the ESA predicted the groundwater level currently is. These two numbers are different because they are describing two different timeframes of groundwater levels, which vary over time.

and within accepted background concentrations of trace and major elements in California soil. Although arsenic was detected at concentrations exceeding the established residential RSL, the concentrations detected were within the accepted background concentrations for the element in California soil. Therefore, no additional assessment of metals was recommended.

Because the on-site soil vapor for PCE is above the carcinogenic risk management range, the proposed project would have potentially significant impacts related to the release of hazardous materials into the environment. The Phase II ESA recommends soil vapor mitigation measures, such as installation of a vapor barrier and over-excavation, to address the elevated levels of PCE in the soil vapor on-site. The Phase II ESA also recommends development and implementation of a Soil Management Plan for the project site to address unforeseen soil impacts that may be encountered during excavation and grading activities. Accordingly, implementation of Mitigation Measures HAZ-1 and HAZ-2, which include recommendations from the Phase II ESA, are required to reduce hazardous materials impacts to less than significant levels.

## Phase I ESA – 200-224 Washington Boulevard, 1910-1918 Los Angeles Street, and 1901 Santee Street

Rincon performed a reconnaissance of the subject property on November 16, 2017. Small quantities of various hazardous substances and petroleum products were observed at the automotive repair facility. In addition, a used-oil above-ground storage tank (AST) and eleven 55-gallon drums were observed. Two of the drums were used for trash, one was labeled coolant, one was labeled antifreeze, one was labeled automatic transmission fluid, one was marked used oil filters, one was unlabeled, and four contained spoils from a geotechnical survey. Heavy staining was observed throughout the automotive repair facility (Rincon 2018a).

Environmental Data Resources, Inc. (EDR) was contracted to provide a database search of public lists of sites that generate, store, treat, or dispose of hazardous materials or sites for which a release or incident has occurred. The EDR search was conducted for the subject property and included data from surrounding sites within a specified radius of the property. The results indicated that hazardous materials and/or petroleum products have been stored at the subject property, and that underground storage tanks may have been present.

Multiple adjacent and nearby properties were listed in databases searched by EDR. Although nearby properties were not listed in databases indicating unauthorized releases have occurred, they do indicate the potential for undocumented releases to have impacted the subject property.

Historical sources reviewed as part of the Phase I ESA include aerial photographs, topographic maps, city directories, Sanborn maps, and building permits. These records indicate that the subject property was developed with residential structures as far back as 1894. A gasoline station, manufacturing and/or automotive repair have occurred since at a least 1922. The gasoline station was present from 1922 to 1962. Printing facilities were present from at least 1950 through 2008 (Rincon 2018a).

Additionally, asbestos and lead-based paint surveys were conducted on February 18 and 19, 2016 for the on-site apartment building (1910 Los Angeles Street) and the automotive repair shop (200 Washington Boulevard) by Ambient Environmental, Inc. under the direction of Rincon. Additional asbestos and lead-based paint surveys were conducted on November 16, 2017 for the on-site warehouse (addresses 1901 Santee Street, 210 Washington Boulevard, and 1918 Los Angeles Street). The following summarizes the surveys (Rincon 2018a):

## *Asbestos*

- **200 – 206 Washington Boulevard.** Asbestos was not detected in any of the building materials sampled during the survey
- **1910 Los Angeles Street.** One asbestos containing material was identified
  - 85 percent Chrysotile asbestos content was found in pipe insulation material located throughout the old water system piping in the current apartment building
  - Asbestos was not detected in any other building materials sampled during the survey
- **210 – 224 Washington Boulevard, 1918. Los Angeles Street, and 1901 S. Santee Street.** Asbestos containing materials were identified at 210 – 224 Washington Boulevard
  - 20 percent Chrysotile asbestos content was found in transite panel material located throughout the exterior window panels in the warehouse building
  - 5 percent Chrysotile asbestos content was found in roof mastic located throughout the roof of the warehouse building
  - 5 percent Chrysotile asbestos content was found in 9x9 black vinyl floor tile and 2 percent Chrysotile asbestos content was found in the black mastic associated with the 9x9 black vinyl floor tile located throughout the brick building office space of the warehouse building
  - Trace Chrysotile asbestos content was found in the black mastic associated with the 12x12 black vinyl floor tile located throughout the brick building office space of the warehouse building. Asbestos was not detected in the 12X12 black vinyl floor tiles
  - Asbestos was not detected in any other building materials sampled during the survey
  - Identified asbestos containing materials will require abatement or special handing during demolition

## *Lead-Based Paint*

- **200 – 206 Washington Boulevard.** Lead was not detected in any of the building components sampled during the survey
- **1910 Los Angeles Street.** Lead was detected in building components of 24 of the residential units, hallways, and the exterior of the apartment building. Components containing more than 0.06 milligrams per cubic centimeter ($mg/cm^2$) of lead included surfaces of the kitchens, restrooms, living rooms, closets, hallways, exterior walls, fire ladder and window frames. In accordance with Title 8 California Code of Regulations (CCR) Section 1532.1, the California Division of Occupational Safety and Health (Cal/OSHA) requires that all workers be properly protected when working with painted building components containing lead concentrations above 0.06 $mg/cm^2$
- **210 – 224 Washington Boulevard, 1918 Los Angeles Street and 1901 Santee Street.** Lead was not detected in any of the building components sampled during the survey

Ambient Environmental concluded that the asbestos-containing materials and lead-based paints identified during the survey are in good condition.

Based on the findings of the Phase I ESA for 200-224 Washington Boulevard, 1910-1918 Los Angeles Street, and 1901 Santee Street, there are RECs in connection with the project site including:

- Petroleum spills and heavy staining at the on-site automotive repair shop and the presence of PCE and TCE in soil vapor at concentrations exceeding CHHSL, and lead exceeding the RSL for residential soil
- Former presence of a gasoline service station at 200 – 206 Washington Boulevard
- Former presence of an automotive repair facility at the subject property (210 Washington Boulevard)
- Former presence of manufacturing and printing facilities at the subject property with two USTs potentially remaining in the subsurface
- Location of the subject property within a City of Los Angeles Methane Buffer Zone

A potential REC includes the former presence of adjacent and nearby historical gasoline service stations, automotive repair facilities, manufacturing operations, and dry-cleaning facilities (Rincon 2018a).

The following is a summary of the recommendations provided in the Phase I ESA (Rincon 2018a):

- To evaluate the potential subject property impact associated with the former automotive repair facility at 210 Washington Boulevard (not previously assessed in 2016), as well as the manufacturing and printing facilities, recommended collection of soil and soil vapor samples at 210 – 224 Washington Boulevard, 1918 Los Angeles Street, and 1901 Santee Street. Soil and soil vapor samples should be evaluated for VOCs, and select soil samples should be evaluated for TPH-g, TPH-d, TPH-o, and Title 22 metals.
- To evaluate for the presence of USTs remaining in the subsurface, we recommend conducting a geophysical survey along the sidewalk adjacent to 210 Washington Boulevard. If USTs are encountered, they should be removed in accordance with all applicable local, state, and federal regulations during site redevelopment activities.
- To evaluate the potential impact to the subject property associated with off-site properties of concern, it is recommended to collect soil vapor samples at the perimeter of 210 – 224 Washington Boulevard, 1918 Los Angeles Street, and 1901 Santee Street.
- Due to the location of the subject property within a Methane Buffer Zone, additional methane testing may be required by the City of Los Angeles for the parcels not previously assessed. Methane mitigation measures in accordance with the City of Los Angeles Methane Ordinance may be required for the site based on its location within a Methane Buffer Zone.
- Although not considered an REC, asbestos-containing materials were identified in pipe insulation material at 1910 Los Angeles Street, and in transite panel material, roof mastic, and floor tile and mastic, at 210 – 224 Washington Boulevard. Lead based paint was identified at 1910 Los Angeles Street. Current federal and State regulations require that all workers be properly trained when handling or working with materials containing asbestos and lead. Asbestos-containing materials and surfaces coated with lead-based paint should be removed under the guidance of a State Certified Consultant prior to demolition, replacement, or removal activities.

## Phase II ESA – 210-224 Washington Boulevard, 1918 Los Angeles Street and 1901 Santee Street

To address the recommendations of the Phase I ESA completed by Rincon for 210-224 Washington Boulevard, 1918 Los Angeles Street, and 1901 Santee Street (dated January 19, 2018), Rincon completed a Phase II ESA for the same properties.

To evaluate the subject property for potential impact from the RECs and potential REC listed above (Phase I ESA), Rincon conducted a geophysical survey along the sidewalk adjacent to 210 Washington Boulevard in an attempt to locate the suspected USTs, as well advanced 14 soil borings for the collection of additional soil matrix and/or soil vapor samples.

Pacific Coast Locators, Inc. mobilized to the subject property on February 9, 2018 to conduct a geophysical survey utilizing a magnetometer and GPR. Based on the results of the geophysical survey the existence of the USTs could not be confirmed.

On February 21 through 23, 2018, Rincon and H&P Mobile Geochemistry (H&P) mobilized to the subject property to advance a total of 14 soil borings to depths ranging from 15 to 20 feet below ground surface (bgs). A total of 33 soil vapor probes were installed. Discrete soil matrix samples were collected in each of the 14 borings at 1, 5, and 10 feet bgs.

A total of 30 soil matrix samples were analyzed for total petroleum hydrocarbons, full carbon chain, and for VOCs. A total of 28 soil samples were analyzed for Title 22 Metals. A total of 28 soil vapor samples and three replicate (duplicate) samples were analyzed by an on-site mobile laboratory for VOCs. Additionally, a methane assessment was conducted on five of the borings in general conformance with the Los Angeles Department of Building and Safety (LADBS) protocol Site Testing Standards for Methane. A total of 15 probes were analyzed for methane.

With the exception of TCE and PCE, no VOCs were detected above laboratory reporting limits in soil vapor samples collected from the subject property. TCE concentrations were below the CHHSL for TCE for residential and industrial/commercial scenarios. Concentrations of PCE were equal to or above the established residential and industrial/commercial CHHSL.

The J&E Model was run on the soil vapor samples exhibiting the highest concentration of TCE and the soil vapor samples exhibiting the shallowest and highest concentration of PCE. Based on the results of the J&E model, human health risk calculations indicated that on-site soil vapor for PCE is above the carcinogenic risk management range of $1\times10^{-6}$ for samples collected from both shallow and deep (SV-8 at 20 feet) probes. However, the on-site soil vapor results for TCE are below the incremental lifetime cancer risk value of $1\times10^{-6}$.

Methane was not detected in any of the five soil vapor probes sampled at the subject property, and pressure was not detected in the probes; therefore, no additional assessment related to methane is recommended. According to LADBS Ordinance No. 175790, the site falls under Design Level 1, thus, methane mitigation will not be required.

TPH was detected, but below the RWQCB's screening level. Additionally, the VOCs acetone, PCE, and benzene were detected in one or more of the 30 soil matrix samples analyzed, but concentrations were below their respective RSLs or screening levels.

Metals were detected in all 28 soil matrix samples analyzed. Apart from arsenic and thallium, all other metals were below either their respective Department of Toxic Substances Control (DTSC) screening level or RSL for residential soil and within accepted background concentrations of trace and major elements in California soil. Although arsenic and thallium were detected at concentrations exceeding either their respective residential SL or RSL, all concentrations detected were within their respective accepted background range for metals in California soils.

Because the on-site soil vapor for PCE is above the carcinogenic risk management range, the proposed project would have potentially significant impacts related to the release of hazardous materials into the environment. Similar to the Phase II ESA for addresses 200 Washington Boulevard and 1910 Los Angeles Street, the Phase II ESA for addresses 210-224 Washington Boulevard, 1918

Los Angeles Street, and 1901 Santee Street recommends soil vapor mitigation measures, such as installation of a vapor barrier and/or a passive soil vapor mitigation system, to address the elevated levels of PCE in the soil vapor on-site. The Phase II ESA also recommends development and implementation of a Soil Management Plan for the project site to address unforeseen soil impacts that may be encountered during excavation and grading activities. Accordingly, implementation of Mitigation Measures HAZ-1 and HAZ-2, which include recommendations from the Phase II ESA, are required to reduce hazardous materials impacts on this portion of the project site to less than significant levels.

## Asbestos and Lead-based Paint

The project would not release hazardous materials into the environment as a result of the proposed operational land use. Although not considered an REC, asbestos-containing materials were identified during the Phase I ESA for addresses 200-224 Washington Boulevard, 1910-1918 Los Angeles Street, and 1901 Santee Street. It was found in pipe insulation material at 1910 Los Angeles Street, and in transite panel material, roof mastic, and floor tile and mastic at 210 – 224 Washington Boulevard. Also, lead-based paint was identified at 1910 Los Angeles Street. Current federal and State regulations require that all workers be properly trained when handling or working with materials containing asbestos and lead. Asbestos-containing materials and surfaces coated with lead-based paint should be removed under the guidance of a State Certified Consultant prior to demolition, replacement, or removal activities. As such, RCM-11 further ensures that there would be no impact associated asbestos and lead. Adherence to these requirements and the following RCM would reduce impacts related to asbestos and lead paint to a less than significant level.

### *RCM-11 Existing Toxic/Hazardous Construction Materials*

- **Asbestos.** All asbestos on the project site, including materials identified during the Phase I ESA (Rincon 2018a) in pipe insulation material at 1910 Los Angeles Street and in transite panel material, roof mastic, and floor tile and mastic at 210 – 224 Washington Boulevard, shall be abated in compliance with the SCAQMD Rule 1403 as well as all other applicable State and federal rules and regulations.
- **Lead Paint.** All lead-based paint on the project site, including the lead-based paint identified at 1910 Los Angeles Street shall be handled and disposed of using standard handling and disposal practices pursuant to Occupational Safety and Health Administration regulations.

## Mitigation Measures

### *HAZ-1 Soil Vapor Barrier*

Engineering controls shall be installed beneath the proposed structure and within the parking garage to prevent soil vapor intrusion into the structure. Common effective engineering control measures that could meet these objectives include soil vapor barriers placed beneath the proposed structure and exhaust ventilation systems in the parking garage that are engineered to ventilate PCE in addition to vehicle exhaust. Prior to issuance of building permits, the applicant shall submit for City of Los Angeles review, the design of engineering controls and sufficient information about construction and operation parameters as determined necessary by the County of Los Angeles Department of Environmental Health, Regional Water Quality Control Board, or the State of California Environmental Protection Agency Department of Toxic Substances Control to ensure that

the future occupants would not be impacted by current or future contaminated soil vapor intrusion resulting from elevated levels of PCE in on-site soils.

### *HAZ-2 Soil Management Plan*

Before the issuance of a grading permit, the impacted soil on-site shall be mitigated before redevelopment in accordance with a Soil Management Plan (SMP) that shall be prepared for the entire project area. The laboratory data for the impacted soil shall be used to profile the soil for transport, treatment, and recycling at a licensed treatment facility. The SMP shall also include health and safety information for workers and the public and shall inform the various contractors and workers of the presence of soil impacted with petroleum hydrocarbons and the appropriate measures to safely deal with the soil. This plan shall be submitted to the City of Los Angeles Department of Building and Safety for review and approval prior to the commencement of excavation and grading activities.

## Significance After Mitigation

With adherence to the Phase I ESA and Phase II ESA Report recommendations, summarized as Mitigation Measures HAZ-1 and HAZ-2, there would be no significant hazard to the public or the environment and potential impacts would be less than significant.

*c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school?*

**POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED**

Based upon criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact to hazards and hazardous materials if:

- A project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to, oil, pesticides, chemicals, or radiation); or
- A project involved the creation of any health hazard or potential health hazard

The project site is located adjacent to southern boundary of Frida Kahlo High School and is approximately 400 feet north of the Santee Education Complex. Based on the results of the soil vapor sampling, the Phase I ESA recommend the installation of a vapor barrier (Rincon 2018a), as summarized in Mitigation Measure HAZ-1.

Additionally, although potentially hazardous materials, such as oil or fuel used by heavy-duty construction equipment, may be utilized during construction the project applicant would be required to comply with local, State, and federal policies for handling such materials and equipment properly. As discussed in Section 3, *Air Quality*, emissions generated by construction of the proposed project would be below SCAQMD LSTs and, therefore, would not significantly impact the local community, including any schools in the project vicinity. Adherence to Mitigation Measure HAZ-1, and given that construction activities would be temporary and below SCAQMD threshold levels, impacts associated with potential hazardous emissions during construction would be less than significant.

*d. Would the project be located on a site included on a list of hazardous material 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?*

**POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED**

The following databases compiled pursuant to Government Code Section 65962.5 were reviewed by EDR (October 30, 2017) and Rincon (January 19, 2018) for known hazardous materials contamination at the project site. Summarized results are available in the Phase I ESA (Appendix D):

- USEPA
  - Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)/Superfund Enterprise Management System (SEMS)/Envirofacts database search
- State Water Resources Control Board (SWRCB)
  - Geotracker search for leaking underground storage tanks (LUST) and other Cleanup Sites
- Department of Toxic Substances Control (DTSC)
  - Envirostor search for hazardous facilities or known contamination sites
  - Cortese list of Hazardous Waste and Substances Sites
  - Cleanup Site and Hazardous Waste Facilities Database

The project site is located on or directly adjacent to known hazardous or contaminated sites. The EDR search resulted in several historical uses on the project site as well as three adjacent and nearby properties that have reported unauthorized releases of hazardous substances or are businesses that are permitted to use hazardous materials or generate hazardous wastes, for which an unauthorized release has not been reported to a regulatory agency (Rincon 2018a). Rincon completed a follow-up to the database search conducted by EDR. Table 11 provides a summary of the findings:

**Table 11 Hazardous Materials Sites Database Results**

| Property | Database Searched | Results |
|---|---|---|
| 200 - 206 Washington Blvd. | **EDR:** HAZNET, FINDS and EDR Historical Auto Stations<br>**Rincon:** LADPW website, LAFD | ▪ Previously occupied by a gasoline service station<br>▪ Property has disposed of hazardous wastes<br>▪ Acetylene, antifreeze, oxygen, waste oil, argon, motor oil, and solvent have been stored on the subject property in connection with the automotive repair facility<br>▪ One violation on record pertaining to a lack of Hazardous Materials Business Plan in 2013 (subsequently filed)<br>▪ Facility reported in violation in 2016 due to lack of reporting<br>▪ Three 550-gallon and one 150-gallon USTs were removed from the northern portion of the property in 1962 |
| 210 Washington Blvd. | **EDR:** RCRA-SQG, FINDS, and HAZNET<br>**Rincon:** LADPH (no response as of Phase I report), LAFD | ▪ Listed as La Opinión Daily Newspaper, small quantity generator with no violations (RCRA-SQG)<br>▪ The facility disposes of hydrocarbon solvents, photochemicals/photoprocessing waste, liquids with halogenated organic compounds greater than or equal to 1,000 mg/L, off-specification, aged, or surplus organics (HAZNET)<br>▪ Materials that have been present at the site: blanket roller wash, dry developer, dry fixer and replenisher, oil, |

| Property | Database Searched | Results |
|---|---|---|
| | | petroleum-based litho ink, plate finisher, press fountain, roller solvent, solvent based litho ink, soybean based litho ink, waste blanket wash, waste oil, and waste solvent. Printing ceased in September 2007, and shut down in December 2008<br>▪ Property listed as an automobile repair facility in 1937. Possible USTs may remain in the subsurface, however, due to the age, it is unlikely that governmental agencies would maintain records (EDR Historical Auto)<br>▪ Property has approximately two tons of oil/water separation sludge removed in 1994 and disposed of at an accepting facility (HAZNET) |
| 212 Washington Blvd. | **Rincon:** LAFD | ▪ Listed as Plastone, Inc., for installation of two 3,000-gallon USTs in 1953. One Underground Storage Tank (UST) containing oil and one containing solvent were installed approximately 1 foot south of the curb along Washington Boulevard. Sketches provided with the permit indicate that the solvent was alcohol. No records pertaining to the removal of the USTs were provided. |
| 214 – 224 Washington Blvd. and 1901 Santee St. | **EDR:** RCRA-SQG, FINDS, ECHO, HAZNET, and EMI<br>**Rincon:** FIND, LAFD | ▪ 1901 Santee Street<br>▫ Listed as La Opinión Daily Newspaper as a FINDS, ECHO, HAZNET, and EMI site.<br>- The FINDs listing indicates that the facility was an ECHO site. According to the ECHO database, the facility was a newspaper facility with minor air emissions and no violations.<br>- The HAZNET database indicates that the facility generated photochemicals and photoprocessing waste from 1993 through 1999.<br>- According to the EMI database, permitted emissions of organic hydrocarbon gases and reactive organic gases occurred from 1990 through 2007.<br>- Rincon further reviewed the SCAQMD FIND website. According to permits listed on the FIND database, the facility was permitted to operate a lithographic air-dry printing press from 1989 through 2000. The printing activities included the use of VOCs.<br>▫ Listed as Bank Printing Company, Inc. as a small quantity generator with no violations (RCRA-SQG)<br>Rincon further reviewed the LAFD online hazardous materials listing, however, the facility was not listed under the 1901 Santee Street address. |
| 201 Washington Blvd. (adjacent property to the north across Washington Blvd.) | **EDR:** EDR Historical Auto Stations | ▪ Listed as A.R. Sidlo, an automobile repairing facility in 1937. Possible USTs in the subsurface, but due to the age, unlikely that records would exist (EDR Historical Auto listing)<br>▪ Listed as C.W. Covington, an automobile repairing facility in 1942. Possible USTs in the subsurface, but due to age, unlikely that records would exist (EDR Historical Auto listing). |
| 235 Washington Blvd. (adjacent property to the northeast across Washington Blvd.) | **EDR:** EDR Historical Auto Stations | ▪ Listed as The Flivver Shop, an automobile repairing facility in 1924. Possible USTs in the subsurface, but due to the age, unlikely that records would exist. (EDR Historical Auto listing). |

| Property | Database Searched | Results |
|---|---|---|
| 301 E Washington Blvd. | **EDR:** EDR Historical Auto Stations, HIST UST, SWEEPS UST, and CA FID UST<br>**Rincon:** LADPW, LAFD | ▪ Listed as Savings Oil Co/ LA, RNG Texaco, with potential presence of USTs remaining in the subsurface and potential presence of unidentified, undocumented releases originating from the facility (EDR Historical Auto Stations, HIST UST, SWEEPS UST, and CA FID UST databases).<br>▪ Rincon reviewed the LADPW website for information pertaining to the removal of USTs at the facility. No records were on file with the LADPW.<br>▪ In addition, Rincon reviewed the LAFD listings of USTs and hazardous materials facilities. Historical UST records are on file for the facility, however, they have not been provided by LAFD as of the date of the Phase I ESA Report. |

Notes: HAZNET = California Environmental Protection Agency Facility and Manifest Data , FINDS = United States Environmental Protection Agency (USEPA) Facility Index System/Facility Registry System, FIND = South Coast Air Quality Management District Facility Information Detail, EDR = Environmental Data Resources, Inc., LADPW = Los Angeles County Department of Public Works, LAFD = City of Los Angeles Fire Department , UST = underground storage tank, RCRA-SQG = Resource Conservation and Recovery Act – Small Quantity Generator , ECHO = USEPA Enforcement & Compliance History Information, EMI = California Air Resources Board (CARB) Emissions Inventory Data, HIST UST = State Water Resources Control Board (SWRCB) Hazardous Substance Storage Container Database, SWEEPS UST = Statewide Environmental Evaluation and Planning System Underground Storage Tank, CA FID UST = California Environmental Protection Agency Facility Inventory Database, ESA = Environmental Site Assessment

Source: Rincon 2018a

None of the listings for the sites adjacent to the project site are indicative of a hazardous materials release. However, the EDR Historical Auto Stations listings are indicative of the potential presence of USTs remaining in the subsurface, and the potential presence of unidentified, undocumented releases originating from these adjacent sites. As such, the Phase II ESA recommendations relating to development are included as Mitigation Measure HAZ-2, provided above, to reduce the impact to less than significant.

## Significance After Mitigation

With adherence to the Phase I ESA and Phase II ESA Reports recommendations, summarized as Mitigation Measure HAZ-2 above, there would be no significant hazard to the public or the environment related to on-site hazardous materials, and potential 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 result in a safety hazard for people residing or working in the project area?*

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

**NO IMPACT**

The project site is located approximately 13.5 miles southwest of El Monte Airport, 9.75 miles north of the Compton/Woodley Airport, and approximately 9.0 miles northeast of the Los Angeles International Airport, which are the nearest public airports to the project. The site is not located within an airport land use plan or near a private airstrip (Los Angeles County 2014). Therefore, implementation of the project would have no impact on the safety and usage of existing airfields in the project site vicinity.

*g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

**LESS THAN SIGNIFICANT IMPACT**

According to the City's General Plan Safety Element, a designated disaster route in the City functions as primary thoroughfare for movement of emergency response traffic and access to critical facilities. Exhibit H of the Safety Element shows the City's designated disaster routes, which also provide a plan for interjurisdictional road reconstruction and rebuilding following a major disaster. Immediate debris clearance for short-term emergency operations would be emphasized along these routes (Los Angeles 1996). Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact would normally occur if:

- A project involved possible interference with an emergency response plan or emergency evacuation plan

Based on Exhibit H of the Safety Element, the project site is along a designated disaster route (Washington Boulevard). However, no roads would be permanently closed as a result of the construction or operation of the project. The project would not involve the development of structures that could potentially impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The design of any new access points would be reviewed and approved by the LAFD to ensure that emergency access meets City standards. Therefore, there would be a less than significant impact.

*h. Would the project 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?*

**NO IMPACT**

The City of Los Angeles is an urbanized community and there are no wild lands in the project vicinity. In addition, the proposed project is not located in a wildfire hazard area as identified in the City of Los Angeles General Plan Safety Element, Exhibit D, *Selected Wildfire Hazard Areas in the City of Los Angeles*. The project site is not located in a fire buffer zone, a mountain fire district, or an area of known shallow methane accumulation (City of Los Angeles 1996). The Angeles National Forest is located approximately 15 miles northeast of the project site. Construction of the proposed project would involve demolishing and replacing existing residential units and industrial buildings/warehouses, and an automobile repair facility with the proposed five story mixed-use building, consistent with the existing land use and General Plan Designation. There would be no risk of exposing people or structures to a significant risk of loss, injury or death involving wildland fires; therefore, there would be no impact.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

Due to the site-specific nature, impacts related to hazards and hazardous materials are typically assessed on a project-by-project basis. As with the project, related projects would address site-specific hazards through the implementation of site-specific recommendations and/or mitigation measures. In addition, all related development located within the vicinity of the project site would be subject to local, regional, state, and federal regulations pertaining to hazards and hazardous materials. Therefore, development of the project and related projects would not result in cumulatively significant impacts. Impacts would be less than significant.

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# 9 Hydrology and Water Quality

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Violate any water quality standards or waste discharge requirements | ☐ | ☐ | ■ | ☐ |
| b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering or the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned 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 that would result in substantial erosion or siltation on- or off-site? | ☐ | ■ | ☐ | ☐ |
| d. Substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite | ☐ | ■ | ☐ | ☐ |
| e. 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 | ☐ | ☐ | ■ | ☐ |
| f. Otherwise substantially degrade water quality | ☐ | ☐ | ■ | ☐ |
| g. Place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map | ☐ | ☐ | ☐ | ■ |

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| h. Place structures in a 100-year flood hazard area that would impede or redirect flood flows | ☐ | ☐ | ☐ | ■ |
| i. Expose people or structures to a significant risk of loss, injury, or death involving flooding, including that occurring as a result of the failure of a levee or dam | ☐ | ☐ | ■ | ☐ |
| j. Result in inundation by seiche, tsunami, or mudflow | ☐ | ☐ | ☐ | ■ |

*a. Would the project violate any water quality standards or waste discharge requirements?*

*e. Would the project 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?*

*f. Would the project otherwise substantially degrade water quality?*

**LESS THAN SIGNIFICANT IMPACT**

Temporary site preparation, grading, and paving activities associated with project construction may result in soil erosion that could degrade water quality. However, proposed demolition and construction activities would be required to comply with LAMC Section 91.106.4.1.14, which requires grading or building permit applicants to incorporate best management practices (BMP) necessary to control stormwater pollution from sediments, erosion, and construction materials leaving the construction site into the plan documents. These BMPs must be in accordance with provisions in the *Development Best Management Practices Handbook - Part A Construction Activities* issued by the Department of Public Works.

The proposed project would reduce impervious surface on the site from 100 percent to approximately 95 percent (59,263 square feet) by adding planters to treat stormwater around the perimeter of the northern, western, and southern boundaries of the site. This treatment would need to comply with LAMC Chapter 6, *Public Works and Property*, Article 4.4, *Stormwater and Urban Runoff Pollution Control*, which includes regulations to prohibit discharge of pollutants into storm drains and receiving waters, as well as stormwater pollution control measures for development planning and construction activities (Section 64.72). Section 64.72 includes Low Impact Development (LID) requirements that would apply to the construction and operation of the proposed project, such as preparation of a LID plan to achieve full capture and treatment of stormwater runoff on-site for a design storm event or 24-hour runoff event, and minimization of impacts to natural drainage systems. Compliance with these requirements and the following RCMs would reduce potential impacts to stormwater drainage systems and water quality to a less than significant level.

### *RCM-12 Stormwater Pollution: Demolition, Grading, and Construction Activities*

- Leaks, drips, and spills shall be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains.
- All vehicle/equipment maintenance, repair, and washing shall be conducted away from storm drains. All major repairs shall be conducted off-site. Drip pans or drop clothes shall be used to catch drips and spills.
- Pavement shall not be hosed down at material spills. Dry cleanup methods shall be used whenever possible. Dumpsters shall be covered and maintained. Uncovered dumpsters shall be placed under a roof or be covered with tarps or plastic sheeting.
- Standard Urban Stormwater Mitigation Plan – Hillside Residential and all 10-or-more unit Subdivisions and Multi-Family Dwellings.
- Environmental impacts may result from erosion carrying sediments and/or the release of toxins into the stormwater drainage channels. However, the potential impacts will be mitigated to a less than significant level by incorporating stormwater pollution control measures. Ordinance No. 172,176 and Ordinance No. 173,494 specify Stormwater and Urban Runoff Pollution Control which requires the application of BMPs. Chapter IX, Division 70 of the LAMC addresses grading, excavations, and fills. Applicants must meet the requirements of the Standard Urban Stormwater Mitigation Plan approved by Los Angeles Regional Water Quality Control Board.
- Project applicants are required to implement stormwater BMPs to treat and infiltrate the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period. The design of structural BMPs shall be in accordance with the *Development Best Management Practices Handbook Part B Planning Activities*. A signed certificate from a California licensed civil engineer or licensed architect that the proposed BMPs meet this numerical threshold standard is required.
- Post development peak stormwater runoff discharge rates shall not exceed the estimated pre-development rate for developments where the increase peak stormwater discharge rate will result in increased potential for downstream erosion.
- Concentrate or cluster development on portions of a site while leaving the remaining land in a natural undisturbed condition.
- Maximize trees and other vegetation at each site by planting additional vegetation, clustering tree areas, and promoting the use of native and/or drought tolerant plants.
- Promote natural vegetation by using parking lot islands and other landscaped areas.
- Any connection to the sanitary sewer must have authorization from the Bureau of Sanitation.
- Incorporate appropriate erosion control and drainage devices, such as interceptor terraces, berms, vee-channels, and inlet and outlet structures, as specified by Section 91.7013 of the Building Code. Protect outlets of culverts, conduits or channels from erosion by discharge velocities by installing a rock outlet protection. Rock outlet protection is a physical devise composed of rock, grouted riprap, or concrete rubble placed at the outlet of a pipe. Install sediment traps below the pipe-outlet. Inspect, repair, and maintain the outlet protection after each significant rain.
- All storm drain inlets and catch basins within the project area must be stenciled with prohibitive language (such as NO DUMPING – DRAINS TO OCEAN) and/or graphical icons to discourage illegal dumping.

- Signs and prohibitive language and/or graphical icons, which prohibit illegal dumping, must be posted at public access points along channels and creeks within the project area.
- Legibility of stencils and signs must be maintained.
- Materials with the potential to contaminate stormwater must be: (1) placed in an enclosure such as, but not limited to, a cabinet, shed, or similar structure that prevents contact with runoff spillage to the stormwater conveyance system; or (2) protected by secondary containment structures such as berms, dikes, or curbs.
- The storage area must be paved and sufficiently impervious to contain leaks and spills.
- The storage area must have a roof or awning to minimize collection of stormwater within the secondary containment area.
- The owner(s) of the property will prepare and execute a covenant and agreement (Planning Department General form CP-6770) satisfactory to the Planning Department binding the owners to post construction maintenance on the structural BMPs in accordance with the Standard Urban Stormwater Mitigation Plan and or per manufacturer's instructions.

### *RCM-13 National Pollutant Discharge Elimination System General Permit*

Prior to issuance of a grading permit, the Applicant shall obtain coverage under the SWRCB National Pollutant Discharge Elimination System General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (Order No. 2009-0009-DWQ, National Pollutant Discharge Elimination System No. CAS000002) (Construction General Permit) for the proposed project. The Applicant shall provide the Waste Discharge Identification Number to the City of Los Angeles to demonstrate proof of coverage under the Construction General Permit. A Stormwater Pollution Prevention Plan shall be prepared and implemented for the proposed project in compliance with the requirements of the Construction General Permit. The Stormwater Pollution Prevention Plan shall identify construction BMPs to be implemented to ensure that the potential for soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities.

### *RCM-14 Low Impact Development Plan*

Prior to issuance of grading permits, the applicant shall submit a Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan to the City of Los Angeles Bureau of Sanitation Watershed Protection Division for review and approval. The Low Impact Development Plan and/or Standard Urban Stormwater Mitigation Plan shall be prepared consistent with the requirements of the Development Best Management Practices Handbook.

### *RCM-15 Development Best Management Practices*

BMPs shall be designed to retain or treat the runoff from a storm event producing 0.75 inch of rainfall in a 24-hour period, in accordance with the Development Best Management Practices Handbook Part B Planning Activities. A signed certificate from a licensed civil engineer or licensed architect confirming that the proposed Best Management Practices meet this numerical threshold standard shall be provided.

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

**LESS THAN SIGNIFICANT IMPACT**

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater levels 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 respond to emergencies and drought;
  - Reduce yields of adjacent wells or well fields (public or private); or
  - Adversely change the rate or direction of flow of groundwater; or
- Result in demonstrable and sustained reduction in groundwater recharge capacity

The Los Angeles Department of Water and Power (LADWP) supplies the City of Los Angeles residents with potable and recycled water. Due to limited local water resources, LADWP depends heavily on imported water purchased from the Metropolitan Water District. However, local groundwater supplies are an important piece of LADWP's water portfolio, providing between 12 and 23 percent of the total water supply (LADWP 2016). Because the Southern California region is water-limited, groundwater resources are tightly managed to prevent over-extraction and depletion of groundwater supplies. Los Angeles is entitled to extract approximately 109,809 acre-feet per year (AFY) from the San Fernando, Sylmar, Eagle Rock, Central, and West Coast Basins, of which, approximately 87,000 AFY, are from the San Fernando Basin. Ground water quality issues have prevented LADWP from extracting its entitled amounts. LADWP is investing in efforts to increase groundwater supplies through treatment, cleanup, and enhanced groundwater recharge systems.

The Geotechnical Investigation states that the historic highest groundwater level in the area is approximately 80 feet beneath the ground surface, and borings of the site did not encounter groundwater at a depth of 50.5 feet on the project site (Geocon 2018). However, it is also noted that it is not uncommon for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate project site vicinity. The Geotechnical Investigation states that proper surface drainage of irrigation and precipitation will be critical for future performance of the project. The recommended drainage measures are detailed below, under subsection (c) and (d). The proposed subgrade parking area would extend about six feet below grade and would not encounter groundwater.

Due to the highly-regulated nature of groundwater resources in Southern California, the proposed project would not result in a substantial depletion of groundwater supplies. In addition, the project site is in an urban environment that is entirely paved and provides little groundwater recharge. The proposed project would also increase infiltration potential on the project site by increasing the amount of pervious surfaces on-site by approximately five percent. The impacts would be less than significant.

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

*d. Would the project substantially alter the existing drainage pattern of the site or area, including the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or offsite?*

**POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED**

The proposed project would not alter the course of any stream or other major natural drainage as there are none in the project vicinity. In addition, the project site is entirely covered with impervious surfaces, and the proposed project would reduce the amount of impervious surface to the site by five percent. Additionally, adherence to City stormwater and urban runoff control programs would reduce the quantity of runoff and level of pollutants leaving the site. In particular, as discussed above, the proposed project would need to comply with LAMC Article 4.4, *Stormwater and Urban Runoff Pollution Control* as well as the LID requirements under Section 64.72 that would apply to the construction and operation of the proposed project, such as preparation of a LID plan to achieve full capture and treatment of stormwater runoff on-site for a design storm event or 24-hour runoff event, and minimization of impacts to natural drainage systems. Compliance with these requirements would reduce potential impacts.

In addition to compliance with City requirements, there are several drainage-related recommendations in the Geotechnical Investigation (Geocon 2018), which are summarized as Mitigation Measure HWQ-1, below.

## Mitigation Measures

### *HWQ-1 Site Drainage*

Per recommendations in the Geotechnical Investigation (Geocon 2018), the following site drainage development recommendations are required:

- Proper surface drainage is critical to the future performance of the project. Uncontrolled infiltration of irrigation excess and storm runoff into the soils can adversely affect the performance of the planned improvements. Saturation of a soil can cause it to lose internal shear strength and increase its compressibility, resulting in a change in the original designed engineering properties. Proper drainage should be maintained at all times.
- All site drainage should be collected and controlled in non-erosive drainage devices. Drainage should not be allowed to pond anywhere on the site, and especially not against any foundation or retaining wall. The site should be graded and maintained such that surface drainage is directed away from structures in accordance with 2016 CBC 1804.4 or other applicable standards. In addition, drainage should not be allowed to flow uncontrolled over any descending slope. Discharge from downspouts, roof drains and scuppers are not recommended onto unprotected soils within five feet of the building perimeter. Planters which are located adjacent to foundations should be sealed to prevent moisture intrusion into the soils providing foundation support. Landscape irrigation is not recommended within 5 feet of the building perimeter footings except when enclosed in protected planters.
- Positive site drainage should be provided away from structures, pavement, and the tops of slopes to swales or other controlled drainage structures. The building pad and pavement areas should be fine graded such that water is not allowed to pond.

- Landscaping planters immediately adjacent to paved areas are not recommended due to the potential for surface or irrigation water to infiltrate the pavement's subgrade and base course. Either a subdrain, which collects excess irrigation water and transmits it to drainage structures, or an impervious above-grade planter boxes should be used. In addition, where landscaping is planned adjacent to the pavement, it is recommended that consideration be given to providing a cutoff wall along the edge of the pavement that extends at least 12 inches below the base material.

Incorporation of Mitigation Measure HWQ-1 and City requirements would reduce impacts related to alterations to the existing drainage pattern to a less than significant level and would not result in substantial erosion, siltation, or flooding on- or off-site.

*g. Would the project place housing in a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary, Flood Insurance Rate Map, or other flood hazard delineation map?*

*h. Would the project place in a 100-year flood hazard area structures that would impede or redirect flood flows?*

A significant impact may occur if:

- The project places housing in a 100-year flood zone; or
- The project is located within a 100-year flood zone, which would impede or redirect flood flows

**NO IMPACT**

The project site is located in Zone X of the FEMA Flood Insurance Rate Map (FIRM) (Map # 06037C1620F, dated September 26, 2008) (FEMA 2008). Zone X is characterized as an area determined to be outside the 0.2 percent annual chance floodplain. In addition, Exhibit F of the City's Safety Element, *100-Year & 500-Year Flood Plains* indicates that the project site is not within a 100- or 500-year flood plain area (City of Los Angeles 1996). Therefore, the proposed project would not have the potential to impede flood flows or place housing or structures in a 100-year flood hazard area and there would be no impact.

*i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding including that occurs as a result of the failure of a levee or dam?*

**LESS THAN SIGNIFICANT IMPACT**

A significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

As discussed above, the project site is not located within a 100-year flood hazard area, and Exhibit G of the City's Safety Element, *Inundation & Tsunami Hazard Areas* indicates that the project site is not located in a flood control basin, potential inundation area, or area potentially impacted by a tsunami (Los Angeles 1996). However, the project site is located approximately 7.2 miles southeast of the Mulholland Dam. The dam is continually monitored by various governmental agencies to prevent dam failure and to ensure that the dam is capable of withstanding the maximum potential earthquake for the site. In accordance with these regulations, Mulholland Dam is regularly inspected and meets safety regulations. Should dam failure occur despite safeguards, LADWP has emergency response plans in place to address dam failure and potential impacts. As Mulholland Dam is

regularly inspected and subject to regulatory oversight, emergency response plans are in place in case of dam failure, and the dam is located over seven miles from the project site, potential impacts from inundation due to dam failure would be less than significant.

*j. Would the project result in inundation by seiche, tsunami, or mudflow?*

**NO IMPACT**

A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically-induced tidal phenomena (i.e., seiche and tsunami), or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

As indicated in Exhibit G of the City of Los Angeles General Plan Safety Element, the project site is approximately 27 miles east of the Pacific Ocean and lies outside of a tsunami hazard area. In addition, the project site does not lie near a large body of water that could experience a seiche. In addition, the project site is not located near a hillside area and would not be vulnerable to mudflow. Therefore, the proposed project would have no impact due to inundation by seiche, tsunami, or mudflow.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

As discussed above, the project would not result in any significant hydrological impacts including those related to water quality, drainage systems, and flooding. The proposed project would not substantially increase stormwater runoff and other related projects would also be required to comply with the LAMC for urban runoff and LID requirements. In addition, related projects would be subject to National Pollution Discharge Elimination System permit requirements, development of Stormwater Pollution Prevention Plans, compliance with Standard Urban Stormwater Mitigation Plan requirements, during operation, and compliance with other local requirements as applicable. Therefore, cumulative impacts related to hydrology and water quality would be less than significant.

# 10 Land Use and Planning

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project have any of the following impacts? | | | | |
| a. Physically divide an established community | ☐ | ☐ | ☐ | ■ |
| b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect | ☐ | ☐ | ■ | ☐ |
| c. Conflict with an applicable habitat conservation plan or natural community conservation plan | ☐ | ☐ | ☐ | ■ |

*a. Would the project physically divide an established community?*

**NO IMPACT**

A significant impact may occur if the project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- The extent of the area that would be impacted, the nature and degree of impacts, and the types 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.

The project site is located in a highly urbanized area and is currently occupied by existing car repair facility, warehouses, and multi-family residence. The project site is bounded by commercial and residential uses to the west and east, commercial uses to the north, and institutional uses to the south. The proposed project would replace the existing car repair facility, warehouses, and multi-family residence on the project site with a five-story mixed-use building. The proposed residential and commercial uses would be compatible with surrounding mixed-uses and would not involve construction of any new infrastructure (such as a new road) that would divide the project site or surrounding area. No roads or other public access would be permanently impeded by the project. Therefore, the proposed project would not have any impacts related to physically dividing an established community.

*b. Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?*

**LESS THAN SIGNIFICANT IMPACT**

The project site is currently designated General or Highway Oriented Commercial and Limited Industrial land uses in the City of Los Angeles' General Plan, and Community Commercial and Limited Industrial in the City of Los Angeles' Southeast Los Angeles Community Plan. The project site is zoned M1-2-O (Limited Industrial). Per Section 12.22.A.25 of LAMC, the applicant is requesting the following density bonus incentives:

- Vesting Zone Change and Height District change to all parcels to the zone C2-D2
- Allowance of 2.44 FAR in lieu of 1.5 FAR (as limited by the Community Plan Footnote number one designating the site as Height District No. 1), and
- A parking ratio of 0.5 spaces per dwelling unit for the project site

As provided in the footnotes of the land use map for the Southeast Los Angeles Community Plan, each land use has corresponding permitted zones. The Community Commercial land use has the following corresponding permitted zones: limited commercial zone (CR), commercial zones (C2 and C4), and residential/accessory services zone (RAS3) (City of Los Angeles 2013). The proposed Zone Change to C2 would be consistent with these zones.

As previously mentioned, the project is located in the Southeast Los Angeles Community Plan area. The following policies and programs applicable to the proposed project are summarized below (City of Los Angeles 2016b), each followed by a consistency discussion.

- **Policy 1-2.1:** Locate higher residential densities near commercial centers, light mass transit stations, and major bus routes where public service facilities, utilities, and topography will accommodate this development.

  The proposed project includes redevelopment of an existing parcel with a mid-rise mixed-use building. As discussed in Section 14, *Public Services*, and Section 18, *Utilities and Service Systems*, the proposed project would be accommodated by existing public service facilities and utilities; therefore, the project would be consistent with this policy.

- **Policy 2-1.1:** New commercial uses shall be located in existing, established commercial areas or existing shopping centers.

  The proposed project includes redevelopment of an existing parcel with a mid-rise mixed-use building that would include approximately 7,300 sf of commercial space. The project site is located in an existing, established commercial corridor; therefore, the project would be consistent with this policy.

- **Policy 2-3.1:** Encourage the development of offices in Community and Neighborhood Centers.
  - **Program:** The Plan identifies and establishes Neighborhood Centers and the Community Commercial Centers on the Plan Map and encourages a mix of uses in these centers to attract new office development. It designates Plan categories and corresponding C1.5 and [Q]C4 Zones which promotes this type of development. The Plan also includes design standards for commercial areas as established in the Urban Design Chapter.

The project site is located in a Community Commercial Center, and the project would include approximately 7,300 sf of commercial space within this area; therefore, the project would be consistent with this policy and program.

- **Policy 2-4.10:** Promote mixed use projects in proximity to transit stations, along transit corridors, and in appropriate commercial areas.

  The proposed project includes a mixed-use building that would be located in proximity to the Metro Blue Line San Pedro Street Station, located on Washington Street, approximately three blocks east of the project site. Therefore, the project would be consistent with this policy.

- **Policy 10-1.1:** To the extent feasible and consistent with the Mobility Plan 2035's policies promoting multi-modal transportation (e.g., walking, bicycling, driving, and taking public transit) and safety, maintain a LOS for streets not to exceed LOS "D" for Avenues, Collector streets and Local streets; not to exceed LOS "E" for Boulevards, and not to exceed LOS "E" in the Community's major business districts.

  As discussed in Section 16, *Transportation and Traffic*, none of the five study intersections currently exceed the applicable LOS standards described in this policy, and the proposed project would not cause significant impacts to peak hour LOS at any of the five study intersections. Therefore, the project would be consistent with this policy.

- **Policy 11-2.3:** Maximize opportunities for affordable housing and pedestrian access adjacent to rail stations.

  The proposed project includes 112 residential units, all of which are designated for affordable housing with the exception of the manager's unit. The project site is located approximately three blocks west of the Metro Blue Line San Pedro Station; therefore, the proposed project would involve affordable housing with pedestrian access to a nearby rail station. Accordingly, the project would be consistent with this policy.

- **Policy 16-1.1:** Consolidate parking, where appropriate, to eliminate the number of ingress and egress points onto arterials.

  The proposed project would include a parking garage with one ingress and egress point onto Los Angeles Street. Therefore, the project would consolidate parking and would minimize the number of ingress and egress points onto arterials, and would be consistent with this policy.

Table 12 summarizes the proposed project's consistency with land use and zoning requirements, given requested entitlements.

## Table 12 Consistency with Land Use and Zoning Ordinance Requirements

| Topic | Requirements | Proposed Project |
|---|---|---|
| **Lot Area**<br>*(LAMC Section 12.11.C.4)* | Width: 50 feet minimum<br>Area: 5,000 SF (0.11 acres) minimum | Width: 311 feet, 10 inches<br>Area: 62,382 SF (1.43 acres)<br>**Consistent** |
| **Density/Total No. of Allowed Units**<br>*(LAMC Section 12.11.C.4)* | DU Area: 400 SF each minimum x 62,382 SF[1] = 155 DU | 112 DU<br>DU Area: 1.38 acres (60,126 SF)<br>**Consistent with Approval** |
| **Floor Area Ratio (FAR)**<br>*(LAMC Section 12.22.A.25[f][4])* | 1.5:1<br>Density Bonus incentive request[2]: 2.44:1 | Project FAR = 2.27<br>**Consistent with Approval** |
| **Height**<br>*(LAMC Section 12.21.1)* | Maximum: N/A per LAMC 12.21 | T.O.R= 58' 0"<br>T.O.P.= 66' 0"<br>**Consistent with Approval** |
| **Side/Rear Yard Setbacks**[3]<br>*(LAMC Section 12.11.C.2 and 12.11.C.3)* | **Side Yard Setback.** 8 feet width (above ground floor)<br>**Rear Yard Setback.** 17 feet width<br>**Front Setback** :0 feet wide | **Side Yard Setback:** 8 feet<br>**Rear Yard Setback:** 17 feet 1 inch<br>**Front Setback:** 1 foot 6 inches<br>**Consistent** |
| **Parking**[7]<br>(*LAMC Section 12.21.A.4, 12.22.A.25[d], AB 2501 Requirements)* | **Residential**<br>Low or Very Low-Income Project: 0.5 per bedroom<br>Residential DU: 0.5 per DU x 111= 56 spaces<br>Managers DU: 2 per DU x 1 = 2 parking spaces<br>**Retail** 7,300 SF x 1 space per 500 SF= 15 spaces<br>**Total Required = 58 residential parking spaces, 15 commercial parking spaces** | ▪ 60 residential parking spaces<br>▪ 15 commercial parking spaces<br>**Consistent** |
| **Bicycle Parking**<br>*(LAMC Section 12.21.A.16)* | **Residential**<br>▪ LT bicycle parking 1 per 2 DU = 56 LT<br>▪ ST bicycle parking 1 per 20 DU = 6 ST<br>**Commercial**<br>Retail Stores, General<br>▪ LT bicycle parking 1 per 2,000 SF (minimum 2) = 4 LT<br>▪ ST bicycle parking 1 per 2,000 SF (minimum 2) = 4 ST<br>**Total required = 60 LT, 10 ST bicycle parking** | **Residential**<br>▪ 56 LT bicycle parking<br>▪ 6 ST bicycle parking<br>**Commercial**<br>▪ 4 LT bicycle parking<br>▪ 4 ST bicycle parking<br>**Consistent** |
| **Open Space**<br>*(LAMC Section 12.21.G.2 and 12.21.G.2[b][2])* | 100 SF per DU with less than three habitable rooms x 27 = 2,700 SF<br>125 SF per DU with three habitable rooms x 49 = 6,125 SF<br>175 SF per DU with more than three habitable rooms x 36 = 6,300 SF<br>Total Required = 15,125 SF | Grade = **500 s**f<br>Private Open Space (112 balconies x 50 sf) **= 5,600 sf**[8]<br>Common Open Space (courtyard) = **9,950 sf**<br>Community Room = **443 sf**<br>**Total = 16,493 sf**<br>**Consistent** |

Notes: SF = square feet, LAMC = City of Los Angeles Municipal Code, DU = Dwelling Unit, No. = Number, LT = Long-term, ST = short-term

[1] Site Area = 62,382 SF

[2] The project site is requesting a density bonus, and subject to LAMC Section 12.22.A.25(f)(4) requirements.

[3] None required for C2 zoning unless used for residential purposes. Then the R4 Zone requirements are applicable (LAMC Section 12.14(C)(2).

[7] Parking reduction per City of Los Angeles Parking Ordinance (15 percent due to Transit Priority Area).

[8] The balconies would be 50 sf each for a total of 5,600 sf, however, due to LAMC Section 12.21.G.2(b)(2)(i), the private balconies account for 5,600 sf of required usable open space

As indicated in Table 12, with approval of requested entitlements, the proposed project would be consistent with applicable land use plans and policies. Impacts would be less than significant.

*c. Would the project conflict with an applicable habitat conservation plan or natural community conservation plan?*

**NO IMPACT**

The project site is located in an urbanized area of the City of Los Angeles. As previously discussed in Section 4, *Biological Resources*, the project site does not support and habitats or natural communities and is not subject to any habitat conservation plan or natural community conservation plan (Los Angeles County 2013, USFWS n.d.). Therefore, the proposed project would not conflict with any such plan and there would be no impact.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

Impacts related to land use and planning are typically assessed on a project-by-project basis. As with the project, related projects would address site-specific land use compatibility through the implementation of site-specific incentives and/or mitigation measures. In addition, all related development located within the vicinity of the project site would be subject to local regulations pertaining to land use and planning. Therefore, development of the project and related projects would not result in cumulatively significant impacts. Impacts would be less than significant.

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# 11 Mineral Resources

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

*a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?*

*b. Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?*

**NO IMPACT**

A significant impact may occur if the project site is located in an area used or available for extraction of a regionally-important or locally-important mineral resource, or if the project development would convert an existing or future regionally-important or locally-important mineral extraction use to another use, or if the project development would affect access to a site used or potentially available for regionally-important or locally-important mineral resource extraction (City of Los Angeles 2006). According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors:

- Whether, or the degree to which, the project might result in the permanent loss of, or loss of access to, a mineral resource that is located in a State Mining and Geology Board Mineral Resource Zone MRZ-2 zone 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

The project site is not currently or was historically used for extraction of mineral resources as shown in the General Plan Conservation Element *Exhibit A, Mineral Resources* (City of Los Angeles 2001). According to the Phase I ESA Report, there are no oil wells located on or within 0.25-mile of the project site (Rincon 2018).

The project site is located in an urbanized setting that is already fully developed for residential, commercial, and industrial uses with no mineral resource extraction activities occurring on-site or in adjacent areas. The project site has not historically been used for extraction of mineral resources.

CGS Information Warehouse was searched for mineral land classification of the project site (DOC 2016). According to the CGS mineral land classification maps, the project site is not within an MRZ-2

zone or other known or potential mineral resource area (DOC 2015). Because there are no known mineral resources or mineral resource extraction on or in the vicinity of the project site and the proposed project does not involve the use or mining of mineral resources, the project would have no impact on the availability or recovery of mineral resources.

## Cumulative Impacts

**NO IMPACT**

Since the project site or surrounding vicinity are not within an MRZ-2 zone or designated as potential mineral resources areas for mineral extraction, there would be no cumulative impacts resulting from the proposed project.

# 12 Noise

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project result in any of the following impacts? | | | | |
| 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 | ☐ | ☐ | ■ | ☐ |
| b. Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels | ☐ | ■ | ☐ | ☐ |
| c. A substantial permanent increase in ambient noise levels above those existing prior to implementation of the project | ☐ | ☐ | ■ | ☐ |
| d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above those existing prior to implementation of the project | ☐ | ■ | ☐ | ☐ |
| e. For a project located in 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 near a private airstrip, would it expose people residing or working in the project area to excessive noise | ☐ | ☐ | ☐ | ■ |

## General Noise Background

Noise level (or volume) is generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels to be consistent with that of human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dBA level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dBA, and a sound that is 10 dBA less than the ambient sound level has no effect on

ambient noise. Because of the nature of the human ear, a sound must be about 10 dBA greater than the ambient noise level to be judged as twice as loud. In general, a 3 dBA change in the ambient noise level is noticeable, while 1-2 dBA changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while areas adjacent to arterial streets are typically in the 50 to 60+ dBA range. Normal conversational levels are usually in the 60 to 65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

Noise from point sources, such from individual pieces of machinery, typically attenuates (or drop off) at a rate of 6 dBA per doubling of distance from the noise source. Noise levels from lightly traveled roads typically attenuate at a rate of about 4.5 dBA per doubling of distance. Noise levels from heavily traveled roads typically attenuate at about 3 dBA per doubling of distance. Noise levels may also be reduced by intervening structures. Generally, a single row of buildings between the receptor and the noise source reduces noise levels by about 5 dBA, while a solid wall or berm reduces noise levels by 5 to 10 dBA (Federal Transit Administration [FTA] 2006). The way buildings in California are constructed generally provides a reduction of exterior-to-interior noise levels of approximately 20 to 25 dBA with closed windows (FTA 2006).

In addition to the instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (Leq). The Leq is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, Leq is summed over a one-hour period. Lmax is the highest RMS (root mean squared) sound pressure level within the measurement period, and Lmin is the lowest RMS sound pressure level within the measurement period.

The time period in which noise occurs is also important since nighttime noise tends to disturb people more than daytime noise. Community noise is usually measured using Day-Night Average Level (Ldn), which is the 24-hour average noise level with a 10-dBA penalty for noise occurring during nighttime (10:00 PM to 7:00 AM) hours, or Community Noise Equivalent Level (CNEL), which is the 24-hour average noise level with a 5 dBA penalty for noise occurring from 7:00 PM to 10:00 PM and a 10 dBA penalty for noise occurring from 10:00 PM to 7:00 PM. Noise levels described by Ldn and CNEL typically do not differ by more than 1 dBA. In practice, CNEL and Ldn are often used interchangeably.

## General Vibration Background

Vibration refers to groundborne noise and perceptible motion. Vibration is a unique form of noise because its energy is carried through buildings, structures, and the ground, whereas noise is simply carried through the air. Thus, vibration is generally felt rather than heard. Some vibration effects can be caused by noise (e.g., the rattling of windows from passing trucks). This phenomenon is caused by the coupling of the acoustic energy at frequencies that are close to the resonant frequency of the material being vibrated. Typically, groundborne vibration generated by manmade activities attenuates rapidly as distance from the source of the vibration increases. The ground motion caused by vibration is measured as particle velocity in inches per second and is referenced as vibration decibels (VdB) in the U.S.

The background vibration velocity level in residential areas is usually around 50 VdB. The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for

many people. The range of interest is from approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings. Most perceptible indoor vibration is caused by sources in buildings such as operation of mechanical equipment, movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration are construction equipment, steel wheeled trains, and traffic on rough roads.

## Project Site Noise Conditions

The primary source of noise in the vicinity of the project site is motor vehicle traffic, particularly from Washington Boulevard north of the site and Los Angeles Street west of the site. Secondary sources of noise include railway operations from the Metro Blue Line along Washington Boulevard and freeway traffic from the I-10 approximately 700 feet north of the site. While typical activities such as conversations and vehicle parking may occur nearby, traffic is the main contributor to existing ambient noise levels as it is characterized by a high number of individual events that often create sustained noise levels. Ambient noise levels are generally highest during the daytime and rush hour unless congestion slows traffic speeds substantially.

To determine existing ambient noise levels on the project site and in the surrounding vicinity, three 15-minute noise measurements were taken near the project site during AM peak traffic hours between 7:00 AM and 9:00 AM on January 29, 2018, using an ANSI Type II integrating sound level meter. The first noise measurement was located along Washington Boulevard, north of the project site. The second noise measurement was located along Los Angeles Street, west of Frida Kahlo High School, approximately 140 feet south of the project site. The third noise measurement was located along Maple Avenue, approximately 400 feet east of the project site. Figure 16 shows the on-site noise measurement locations and Table 13 identifies the measured ambient noise levels.

**Table 13 On-site Noise Measurement Results**

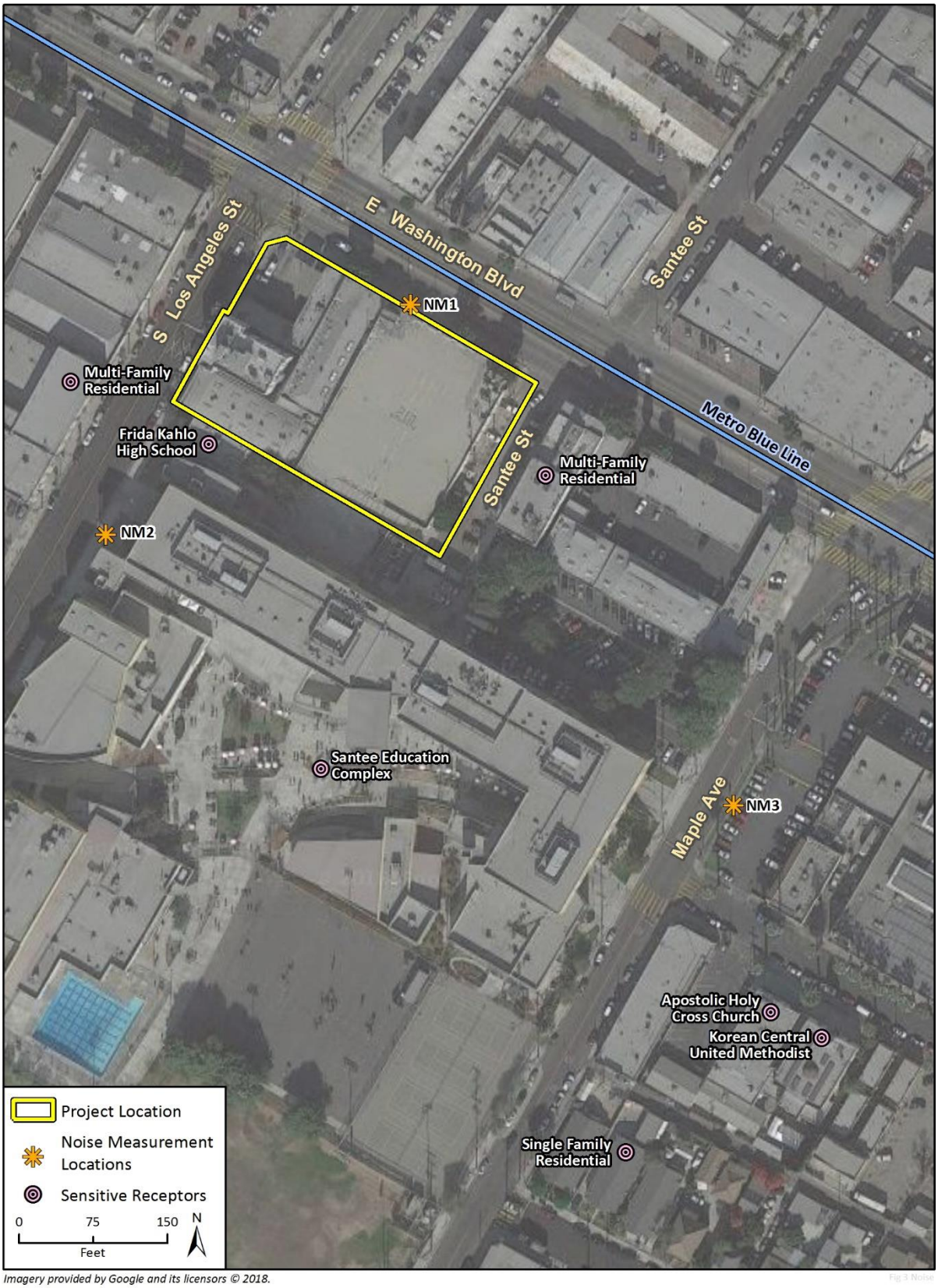
| # | Measurement Location | Primary Noise Source | Traffic Counts | Sample Time (Weekday Peak Hour) | Leq [15][1] (dBA) |
|---|---|---|---|---|---|
| 1 | Washington Boulevard (adjacent to northern project boundary) | Traffic on Washington Boulevard | Passenger Cars: 478<br>Medium Duty Trucks: 7<br>Heavy Duty Trucks: 6 | 7:13 AM – 7:28 AM | 73.0 |
| 2 | Los Angeles Street (approximately 140 feet south of the southern project boundary) | Traffic on Los Angeles Street | Passenger Cars: 128<br>Medium Duty Trucks: 4<br>Heavy Duty Trucks: 0 | 7:32 AM – 7:47 AM | 62.7 |
| 3 | Maple Avenue (approximately 400 feet east of the eastern project boundary) | Traffic on Maple Avenue | Passenger Cars: 162<br>Medium Duty Trucks: 3<br>Heavy Duty Trucks: 0 | 8:04 AM – 8:19 AM | 63.6 |

Refer to Appendix E for noise monitoring data sheets.

[1] The equivalent noise level (Leq) is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). For these measurements the Leq was over a 15-minute period (Leq[15]).

Source: Field visit on January 29, 2018, using ANSI Type II Integrating sound level meter.

## Figure 16 Noise Measurement Locations

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## Regulatory Setting

The goals, policies, and actions contained in the Los Angeles General Plan Noise Element focus on establishing and applying criteria for acceptable noise levels for difference land uses in order to minimize the negative impacts of noise, especially at sensitive receptors. In support of these goals and actions, the *L.A. CEQA Thresholds Guide* contains a land use and noise compatibility matrix (shown in Table 13), which determines the normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable noise levels for various land uses. Noise-sensitive on-site uses associated with the proposed project would include multi-family residences; however, the project would also include a commercial space. According to the City's noise standards shown in Table 13, ambient noise up to 65 dBA CNEL or less is normally acceptable for multi-family residences and ambient noise up to 70 is normally acceptable for commercial uses. In addition, consistent with State noise insulation standards (California Building Code Title 24), the City's Noise Element requires that intrusive noise not exceed 45 dBA in any habitable room (Los Angeles 1999).

### Table 14 Land Use and Noise Compatibility Matrix (CNEL, dBA)

| Land Use | Normally Acceptable[1] | Conditionally Acceptable[2] | Normally Unacceptable[3] | Clearly Unacceptable[4] |
|---|---|---|---|---|
| Single-Family, Duplex, Mobile Homes | 50 – 60 | 55 – 70 | 70 – 75 | 70+ |
| Multi-Family | 50 – 65 | 60 – 70 | 70 – 75 | 70+ |
| School, Library, Church, Hospital, Nursing Home | 50 – 70 | 60 – 70 | 70 – 80 | 80+ |
| Transient Lodging, Motel, Hotel | 50 – 65 | 60 – 70 | 70 – 80 | 80+ |
| Auditorium, Concert Hall, Amphitheater | – | 50 – 70 | – | 65+ |
| Sports Arena, Outdoor Spectator Sports | – | 50 – 75 | – | 70+ |
| Playground, Neighborhood Park | 50 – 70 | – | 65 – 75 | 72+ |
| Golf Course, Riding Stable, Water Recreation, Cemetery | 50 – 75 | – | 70 – 80 | 80+ |
| Office Building, Business, Commercial, Professional | 50 – 70 | 67 – 77 | 75+ | – |
| Agriculture, Industrial, Manufacturing, Utilities | 50 – 75 | 70 – 80 | 75+ | – |

[1] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements.

[2] Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

[3] Normally Unacceptable: New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design.

[4] Clearly Unacceptable: New construction or development should generally not be undertaken.

Note: Noise levels are provided in CNEL, dBA.

Source: Los Angeles 1998

A significant impact may also occur if the project were to result in a substantial temporary or periodic increase in ambient noise levels above existing ambient noise levels without the project. According to the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact from noise levels from construction if:

- Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA (Community Noise Equivalent Level [CNEL]) or more at a noise sensitive use;
- Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA (CNEL) or more at a noise sensitive use; or
- Construction activities would exceed the ambient noise level by 5 dBA (CNEL) at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday

The *L.A. CEQA Thresholds Guide* also includes thresholds for off-site operational noise. According to the *L.A. CEQA Threshold Guide*, off-site project noise (i.e., roadway noise) would result in a significant impact if the project would cause the ambient noise level measured at the property line of affected uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" category as identified in Table 13, or any 5 dBA CNEL or greater noise increase.

A significant impact may also occur where a project would not comply with the City's construction and operational noise regulations in LAMC Chapter 11, *Noise Regulation* (Ordinance No. 144,331). Section 41.40 of the LAMC also restricts construction activity to the hours below:

- Monday through Friday between 7:00 AM to 9:00 PM
- Saturdays and National Holidays between 8:00 AM to 6:00 PM
- Sundays, no construction except for residents

Section 112.01 and 112.02 of the LAMC regulates the operational noise of radios, television sets, air conditioning, refrigeration, heating, pumping, and filtering equipment associated with any residence or other structure. According to LAMC Section 112.02, operation of such equipment is prohibited from exceeding the ambient noise of any other occupied property by more than 5 dBA.

Consistent with the City's Noise Element, Section 91.1207.14.2 of the LAMC requires that interior noise levels not exceed 45 dBA CNEL in any habitable room.

The LAMC does not include quantitative thresholds for construction or operational groundborne vibration impacts.

## Sensitive Receptors

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. According to the City's Noise Element, the following land uses are considered noise-sensitive: single-family and multi-unit dwellings; long-term care facilities (including convalescent and retirement facilities); dormitories; motels; hotels; transient lodgings and other residential uses; houses of worship; hospitals; libraries; schools; auditoriums; concert halls; outdoor theaters; nature and wildlife preserves, and parks (Los Angeles 1999).The nearest sensitive receptors to the project site consist of Frida Kahlo High School located adjacent to the southern boundary, the Hirsh Apartments located approximately 50 feet east of the eastern boundary, the Studio Apartments located approximately 80 feet west of the western boundary, Santee Education Complex located approximately 400 feet south of the southern boundary. See Figure 16 for location

of existing noise-sensitive receptors. In addition, the proposed project would include residential units, which would also be new noise-sensitive receptors on the project site.

*a. Would the project result in 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?*

*c. Would the project result in a substantial permanent increase in ambient noise levels above levels existing without the project?*

**LESS THAN SIGNIFICANT IMPACT**

The proposed project would introduce a five-story mixed-use building with multi-family residences and ground floor commercial uses on the project site. Existing sensitive uses near the project site may be subject to both operational noise associated with the new residential and commercial use and off-site traffic noise associated with vehicle trips generated by the proposed project. Because construction would result in a temporary increase in ambient noise levels, construction noise impacts are discussed under item (d) of this section.

## On-site Stationary Noise

The ground floor commercial uses associated with the proposed project would be located along Washington Boulevard and would not present new sources of noise when compared to the existing commercial uses in the area. In addition, on-site parking would be located in an enclosed garage, which would serve as a noise barrier to reduce noise from parking activities (i.e., vehicle circulation, car alarms, engine start-ups, door slams) at exterior surrounding uses. Furthermore, the proposed on-site courtyard would be enclosed by floors two through five of the building, which would serve as noise barriers to prevent substantial recreational noise from reaching offsite noise-sensitive receptors. Operational noise from the proposed commercial uses, parking structure, and courtyard would be less than significant. Potential new on-site noise sources associated with operation of the proposed project would include noise from heating ventilation air conditioning (HVAC) equipment, and recreational noise from residential balconies at building facades facing off-site noise sensitive receptors east, south, and west of the project site.

Operational noise from HVAC equipment is a common noise source associated with new development. However, the design of the equipment would comply with LAMC Section 112.02, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of any other occupied property by more than 5 dBA. Compliance with this section of the LAMC would ensure that operation of on-site HVAC equipment would not result in a significant noise impact.

Operational noise associated with private residential balconies would include tenant conversations, music, television, or other sound-generating equipment. However, noise from conversation would be an intermittent and temporary noise source, which would typically be limited to the daytime hours outside noise-sensitive hours of sleep. In addition, Section 112.01 of the LAMC prohibits operational noise of radios and television sets associated with any structure from exceeding the ambient noise of any other occupied property by more than 5 dBA. Therefore, operational noise generated from use of the residential balconies associated with the proposed project would be less than significant.

## Off-site Traffic Noise

The dominant source of noise in the project vicinity is traffic along area roadways, particularly from Washington Boulevard north of the site and Los Angeles Street west of the site. The project would generate new vehicle trips and increase traffic volumes on area roadways. Traffic noise levels associated with existing and future traffic along area roadways were estimated using the United States Department of Housing and Urban Development (HUD) Day/Night Noise Level (DNL) Calculator (HUD 2018). Traffic noise model data is provided in Appendix E. The HUD DNL Calculator was used to estimate noise levels generated by traffic on area roadways under existing, existing plus project, cumulative, and cumulative plus project conditions.

The analysis of anticipated noise levels from traffic generated by the project utilizes data from the Traffic Impact Study (TIS) prepared for the proposed project by Linscott, Law & Greenspan (LLG) in July 2018. The TIS is provided in Appendix F. According to the TIS, the project would generate an estimated net increase of 370 daily vehicle trips, including 45 trips (18 inbound/27 outbound) during the AM peak hour and 31 trips (16 inbound/15 outbound) during the PM peak hour. The TIS also provides traffic volumes for the AM and PM peak hour for several roadways in the project site vicinity. This analysis evaluates noise-sensitive receptors along the following four roadway segments due to their proximity to the project site and because these segments would experience the greatest increase in traffic volumes because of new traffic generated by the project:

- Washington Boulevard between Los Angeles Street and Maple Avenue
- Los Angeles Street south of Washington Boulevard
- Washington Boulevard between Main Street and Los Angeles Street
- Los Angeles Street north of Washington Boulevard

The results of the HUD CNL calculations for existing traffic were compared to measured noise levels to ensure the accuracy of the model in the project vicinity. As shown in Table 15, model calculations indicate an existing noise level of 70.2 dBA CNEL along Washington Boulevard and 65.7 dBA CNEL along Los Angeles Street. The California Department of Transportation (Caltrans) indicates that modeled noise is generally reflective of measured vehicle noise if modeled noise is within 3 dBA of the peak-hour measurement (Caltrans 2013). Since modeled results are within 3 dBA of measured noise levels (see Table 15), the HUD DNL Calculator appropriately reflects existing traffic noise.

### Table 15 Comparison of Measured and Modeled Traffic Noise Levels

| Measurement Number | Measurement Location | Existing Noise Level (dBA, Leq) | | Difference in Noise Level (dBA, Leq) [2] – [1] |
|---|---|---|---|---|
| | | Measured Ambient Noise [1] | Modeled Traffic Noise [2] | |
| 1 | Washington Boulevard (adjacent to northern project boundary) | 73.0 | 70.2 | -2.8 |
| 2 | Los Angeles Street (approximately 140 feet south of the southern project boundary) | 62.7 | 65.7 | +3.0 |

Source: Rincon Consultants, field measurements on January 28, 2018 field using ANSI Type II Integrating sound level meter.

See Appendix E for noise measurement data and model results.

As discussed under *Regulatory Setting* of this section, off-site roadway noise would result in a significant impact if the project would cause the ambient noise level measured at the property line of affected uses to increase by 3 dBA CNEL to or within the "normally unacceptable" or "clearly unacceptable" category as identified in Table 13, or any 5 dBA CNEL or greater noise increase. This analysis compares the project's off-site roadway noise increases to a 3 dBA threshold for a more conservative analysis.

As shown in Table 16, project traffic would not generate a significant increase in traffic noise when compared to existing noise levels on segments of Washington Boulevard and Los Angeles Street, adjacent to the project site. Therefore, the project's contribution to existing traffic noise levels in the project vicinity would be less than significant.

**Table 16 Comparison of Existing and Existing Plus Project Traffic Noise**

| | Noise Level (dBA, CNEL) | | | | |
|---|---|---|---|---|---|
| **Roadway Segment** | **Existing [1]** | **Existing Plus Project [2]** | **Change in Noise Level [2] – [1]** | **Significance Threshold (dBA, CNEL)** | **Significant** |
| Washington Boulevard between Los Angeles Street and Maple Avenue | 70.2 | 70.2 | 0 | 3 | No |
| Los Angeles Street south of Washington Boulevard | 65.7 | 65.9 | +0.2 | 3 | No |
| Washington Boulevard between Main Street and Los Angeles Street | 70.5 | 70.5 | 0 | 3 | No |
| Los Angeles Street north of Washington Boulevard | 68.3 | 68.5 | +0.2 | 3 | No |

See Appendix E for noise measurement data and model results.

Source: HUD 2018

## Residential Noise

Although CEQA does not require analysis of potential impacts of the environment on the proposed project, the following impact analysis of the ambient noise environment on future residents at the project is provided for informational purposes to disclose existing noise conditions in the project site vicinity.

The following analysis evaluates potential noise impacts from traffic noise at the proposed residential units. As mentioned under *Project Site Noise Conditions*, the primary source of noise in the vicinity of the project site is motor vehicle traffic, particularly from Washington Boulevard north of the site and Los Angeles Street west of the site. Secondary sources of noise include railway operations from the Metro Blue Line along Washington Boulevard and freeway traffic from the I-10 approximately 700 feet north of the site. The proposed project would include a mixed-use multi-family residential and commercial building. The proposed residential units and their balconies would be new noise-sensitive receptors on the project site, which would be subject to ambient traffic noise. The proposed project would also include a noise-sensitive courtyard area; however, as shown in Figure 16, the courtyard would be located in the center of the building surrounded by four stories

of residential use. Therefore, the surrounding building would act as a noise barrier to reduce traffic noise from surrounding roadways at the center of the building.

As shown in Table 13, noise measured along Washington Boulevard was 73.0 dBA Leq and noise measured along Los Angeles Street was 62.7 dBA Leq. Because the project site is located in an urban area, the daily CNEL value would be roughly 2-4 dBA higher than the peak hourly Leq at the proposed development. Therefore, noise levels at the multi-family residences and balconies would range between 65 dBA CNEL and 77 dBA CNEL.

According to the City's noise standards shown in Table 14, ambient noise levels in exceedance of 70 dBA CNEL is clearly unacceptable for multi-family uses. Assuming that the project site would be exposed to ambient traffic noise levels up to 77 dBA CNEL, the residential balconies would be exposed to noise within the "clearly unacceptable" noise range. Although traffic noise levels at proposed balconies would be a potential annoyance for project tenants, noise from passing vehicles would be intermittent and tenants would have the option of retiring indoors.

Additionally, per the City's Noise Element and Section 91.1207.14.2 of the LAMC, interior noise must not exceed 45 dBA CNEL in any habitable room (Los Angeles 1999). The manner in which buildings in California are constructed typically provides a reduction of exterior-to-interior noise levels of up to 25 dBA with closed windows. Assuming that operation of air conditioning units would limit the time windows remain open and based on a maximum exterior noise level of 77 dBA CNEL, interior noise in the residential units would be approximately 52 dBA CNEL, which is above the interior noise standard of 45 dBA CNEL. Implementation of the following recommendation measure would reduce exterior-to-interior noise levels within residential units to an acceptable noise level in compliance of the City's 45 dBA CNEL standard.

### *RCM-16 Interior Sound Insulation*

Installation of exterior building materials with sufficient Sound Transmission Class (STC) ratings to reduce interior noise levels in habitable rooms of all residential units with direct exposure to Washington Boulevard and Los Angeles Street to below 45 dBA DNL. All exterior wall assemblies (including windows and wall components) that face Washington Boulevard and Los Angeles Street should meet an STC 40 rating to ensure the adequate attenuation of noise at a range of frequencies. All residential units should be provided with forced-air mechanical ventilation with non-operable windows. Although STC 40-rated materials would not perform equally at all frequencies of ambient noise, they would reduce overall exterior noise of up to 77 dBA DNL by about 40 dBA. The resulting interior noise level of about 37 dBA DNL would meet City's interior standard of 45 dBA DNL.

*b. Would the project result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?*

**POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED**

Construction of the proposed project could potentially increase ground-borne vibration on the project site. Vibration refers to ground-borne noise and perceptible motion. Ground-borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors, where the motion may be discernible, but without the effects associated with the shaking of a building, there is less adverse reaction. Operation of the proposed residential units and commercial space would not generate significant vibration since heavy industrial machinery would not be used on site. Therefore, this analysis considers temporary vibration impacts only from project construction. According to the FTA *Transit Nosie and Vibration Impact Assessment*, the background vibration

velocity level in residential areas is usually around 50 VdB or lower (FTA 2006). The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. The range of interest is approximately 50 VdB, which is the typical background vibration velocity level, to 100 VdB, which is the general threshold where minor cosmetic damage can occur in fragile buildings (FTA 2006). The general human response to different levels of ground-borne vibration velocity levels is described in Table 17.

**Table 17 Human Response to Different Levels of Ground-borne Vibration**

| Vibration Velocity Level | Human Reaction |
|---|---|
| 65 VdB | Approximate threshold of perception for many people. |
| 75 VdB | Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable. |
| 85 VdB | Vibration acceptable only if there are an infrequent number of events per day. |

Source: FTA 2006

Demolition and project construction would both create varying degrees of temporary ground-borne vibration and noise, depending on the equipment and methods employed. Operation of construction equipment causes vibrations that spread through the ground and diminish in strength with distance. The project site is predominately surrounded by commercial, residential, and institutional uses. Commercial uses are not typically considered noise-sensitive; however, residential and institutional uses are. As discussed under *Sensitive Receptors* of this section, the nearest sensitive receptors to the project site are:

- Frida Kahlo High School located adjacent to the southern boundary
- The Hirsh Apartments, located approximately 50 feet east of the eastern boundary
- Studio Apartments, located approximately 80 feet west of the western boundary
- Santee Education Complex, located approximately 400 feet south of the southern boundary
- Korean Central United Methodist Church, located approximately 575 feet southeast
- Apostolic Holy Cross Church, located approximately 575 feet southeast
- Single-Family Residences, located approximately 600 feet southeast

Construction activity would be temporary, and the use of heavy equipment would be primarily limited to the excavation, site preparation, and exterior construction phases. As construction of the outer shell of the building progresses, the building itself would contain much of the construction activity, and the likelihood of utilizing bulldozers and jackhammers decreases. Trucks would be required to bring construction materials to the site, which may periodically generate vibrations that would be felt by nearby receptors. However, the vibration levels generated by trucks would not persist for long periods. Table 18 shows estimated maximum vibration source levels for typical construction equipment.

**Table 18 Vibration Source Levels for Construction Equipment**

| | Approximate VdB | | |
|---|---|---|---|
| **Equipment** | **25 feet** | **50 feet** | **80 feet** |
| Vibratory Roller | 94 | 85 | 79 |
| Small Bulldozer | 58 | 48 | 42 |
| Large Bulldozer | 87 | 78 | 72 |
| Loaded Trucks | 86 | 77 | 70 |
| Jackhammer | 79 | 70 | 64 |
| Caisson Drilling | 87 | 78 | 72 |

Notes: Vibration levels assume a noise attenuation rate of 6 dBA per doubling of distance
Source: FTA 2006

The nearest sensitive receptor, Frida Kahlo High School, could experience vibration levels up to 94 VdB, which would exceed the threshold of 85 VdB for infrequent vibration events. However, ground-borne vibration from temporary construction activity would not reach levels that could cause damage to fragile buildings (100 VdB). In addition, construction would only occur during daytime hours in compliance with Section 41.40 of the LAMC, which would generally avoid sleep disruption. Pile driving is not included in this analysis because project construction would not require pile driving but drilling, which is included in Table 18. Although vibration would occur only temporarily during project construction, construction-related vibration would exceed the threshold of 85 VdB at Frida Kahlo High School. To reduce potential construction vibration-related impacts, the following mitigation measure is required to reduce construction-related vibration to the extent feasible:

## Mitigation Measure

### *N-1 Construction Vibration Reduction*

The project developer shall use non-vibratory smooth wheel rollers or pneumatic tired rollers instead of vibratory rollers in order to reduce groundborne vibration impacts on Frida Kahlo High School. The project developer shall not use large bulldozers, loaded trucks, or caisson drilling equipment within 35 feet of Frida Kahlo High School, to the extent practicable given design requirements.

## Significance After Mitigation

Implementation of the above mitigation measure would reduce construction-related vibration levels at Frida Kahlo High School to the extent feasible. Therefore, impacts would be less than significant.

*d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?*

**POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED**

## Construction Noise

Based upon the criteria established in the *L.A. CEQA Thresholds Guide,* a project would have a significant impact if noise from construction-related activities lasting more than 10 days in a three-month period would exceed existing ambient noise levels by more than 5 dBA at a noise-sensitive use. The project would result in temporary noise level increases during site preparation, excavation, paving, and building. The grading phase of project construction tends to create the highest construction noise levels because of the operation of heavy equipment. Noise impacts associated with construction activity are a function of the noise generated by construction equipment, the location and sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Table 19 shows typical peak noise levels associated with various types of heavy construction equipment expected during each construction phase. Noise levels are based on the FHWA *Highway Construction Noise Handbook* (2006).

Peak noise levels associated with the use of individual pieces of heavy equipment can range from about 73 to 90 dBA at 50 feet from the source, depending upon the types of equipment in operation at any given time and phase of construction (FHWA 2006).

The nearest identified sensitive receptors are the Frida Kahlo High School located adjacent to the southern boundary of the project site, the Hirsh Apartments located approximately 50 feet east of the eastern boundary, studio apartments located approximately 80 feet west of the western boundary, the Santee Education Complex located approximately 400 feet south of the southern boundary The Korean United Methodist Church and Apostolic Holy Church located approximately 575 feet southeast of the project site and single-family residences located approximately 600 feet southeast of the project site. These sensitive land uses may experience a temporary increase in noise during construction activities. Table 20 shows the maximum expected noise levels at sensitive receptors nearest the project site during different phases of construction.

## Table 19 Typical Noise Levels Generated by Construction Equipment during Different Phases of Construction

| Equipment | Type | Typical Lmax (dBA) 50 feet from the Source |
|---|---|---|
| **Demolition** | | |
| Concrete/Industrial Saws | Mobile | 90 |
| Rubber Tired Dozers | Mobile | 85 |
| Tractors/Loaders/Backhoes | Mobile | 80 |
| **Site Preparation** | | |
| Grader | Mobile | 85 |
| Trencher (Slurry Trenching Machine) | Mobile | 82 |
| Rubber Tired Dozers | Mobile | 85 |
| Tractors/Loaders/Backhoes | Mobile | 80 |
| **Grading** | | |
| Bore/Drill Rigs | Mobile | 85 |
| Excavators | Mobile | 85 |
| Graders | Mobile | 85 |
| Tractors/Loaders/Backhoes | Mobile | 80 |
| Rubber Tired Dozers | Mobile | 85 |
| **Building Construction** | | |
| Cranes | Mobile | 85 |
| Air Compressors | Stationary | 80 |
| Cement and Mortar Mixers | Stationary | 85 |
| Generator Sets | Stationary | 82 |
| Forklifts[1] | Mobile | 89 |
| Welders | Stationary | 73 |
| Trenchers (Slurry Trenching Machine) | Mobile | 82 |
| Tractors/Loaders/Backhoes | Mobile | 80 |
| **Paving** | | |
| Cement and Mortar Mixers | Stationary | 85 |
| Pavers | Mobile | 85 |
| Paving Equipment (Pavement Scarifier) | Stationary | 85 |
| Rollers | Mobile | 85 |
| Tractors/Loaders/Backhoes | Mobile | 80 |
| **Architectural Coating** | | |
| Air Compressor | Stationary | 80 |

[1]Forklift noise is sourced from the University of Washington School of Public Health and Community Medicine, Department of Environmental and Occupational Health Sciences *Construction Industry Noise Exposures: Operating Engineers*

Source: FHWA 2006

**Table 20 Construction Noise Levels during Different Phases of Construction**

| | Maximum Hourly Noise Levels During Different Phases of Construction (dBA) | | | | | |
|---|---|---|---|---|---|---|
| **Phase** | **25 feet** | **50 feet** | **80 feet** | **400 feet** | **575 feet** | **600 feet** |
| Demolition | 95.6 | 89.6 | 85.5 | 71.5 | 68.4 | 68.0 |
| Site Preparation | 91.0 | 85.0 | 80.9 | 66.9 | 63.8 | 63.4 |
| Grading | 91.0 | 85.0 | 80.9 | 66.9 | 63.8 | 63.4 |
| Building Construction | 95.0 | 89.0 | 84.9 | 70.9 | 67.8 | 67.4 |
| Paving | 95.5 | 89.5 | 85.4 | 71.4 | 68.3 | 67.9 |
| Architectural Coating | 83.7 | 77.7 | 73.6 | 59.6 | 56.5 | 56.1 |

See Appendix E for calculations. Based on standard attenuation rate of 6 dBA per doubling of distance.

As shown in Table 20, operation of equipment during the different phases of construction could generate maximum noise levels from approximately 95.6 dBA Leq at the Frida Kahlo High School to 68.0 dBA at the single-family residences located approximately 600 feet away. This represents an approximate 32.9 dBA increase over the approximate existing ambient level of 62.7 dBA Leq measured at Noise Measurement location 2 (near Frida Kahlo High School), and an approximate 4.4 dBA increase over the approximate exiting ambient level of 63.6 measured at Noise Measurement location 3.

LAMC Section 41.40 restricts construction to between the hours of 7:00 AM and 9:00 PM on weekdays, to between 8:00 AM and 6:00 PM on Saturdays and national holidays, and prohibits construction on Sundays. This includes construction or repair work of any kind, any excavating for any building or structure that includes the use of any power-driven drill or riveting machine excavator, job-site delivering of construction materials, and any other equipment that makes loud noises that disturb persons occupying sleeping quarters in any dwelling, hotel, apartment, or other place of residence.

Although construction noise would occur only temporarily during project construction, construction noise would exceed existing ambient noise levels by more than 5 dBA. To reduce potential construction noise-related impacts, the following mitigation measures are required to reduce construction noise levels to the extent feasible:

## Mitigation Measures

### *N-2 Construction Staggering, Mufflers, and Noise Barriers*

The project developer shall schedule construction activities to avoid operating several pieces of equipment simultaneously, to the extent feasible, and use power construction equipment with state-of-the-art noise shielding and muffling devices. Construction activities shall also require the use of temporary sound attenuating barriers along the project site boundary. Temporary sound attenuating barriers must be high enough and long enough to break the line-of-sight between the sound source and the receiver and must be continuous with no gaps or holes between panels or the ground. Temporary sound barriers can include noise curtains, sound blankets, or solid temporary barriers. No temporary sound barriers would be required along the northern site boundary.

### *N-3 Construction Equipment*

Wherever feasible, the project developer shall incorporate on-site electrical sources or solar generators to power equipment rather than diesel generators and replace other noisy equipment with quieter equipment (e.g., a vibratory pile driver instead of a conventional pile driver and rubber-tired equipment rather than track equipment).

### *N-4 Haul Truck Routes*

Wherever feasible, the project developer shall avoid residential areas when planning haul truck routes.

### *N-5 Construction Equipment*

Wherever feasible, the project developer shall incorporate on-site electrical sources or solar generators to power equipment rather than diesel generators.

### *N-6 Maintenance*

Maintain all sound-reducing devices and restrictions throughout the construction period.

Installation of a temporary noise barrier between construction activities and adjacent sensitive receptors typically provides up to 10 dBA attenuation (FHWA 2006). Additionally, installation of sound shielding and muffling devices on construction equipment can generally provide approximately 5 dBA attenuation. Therefore, implementation of these measures would reduce construction by up to 15 dBA Leq to approximately 80.6 dBA Leq at the Frida Kahlo High School. With implementation of the mitigation measures, peak temporary construction-related noise levels could be 19.0 dBA Leq above existing ambient noise level of 61.6 dBA Leq.

## Significance After Mitigation

This analysis conservatively assumes that multiple pieces of construction equipment would be operating concurrently at all times during each phase of construction. Staggered operation of equipment would potentially further reduce construction related noise. Implementation of the above mitigation measures would reduce construction-related exterior noise to the extent feasible. Therefore, impacts would be less than significant.

*e. For a project located in 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?*

**NO IMPACT**

The project site is not located within an airport land use plan or area subject to excessive noise levels generated by airport operations. The project site is located approximately 13.5 miles southwest of El Monte Airport, 9.75 miles north of the Compton/Woodley Airport, and approximately 9.0 miles northeast of the Los Angeles International Airport, which are the nearest public airports to the project. The site is not located within an airport land use plan or near a private airstrip (Los Angeles County 2014). Therefore, the project would not be subject to excessive noise levels associated with airport or private air strip operations. No impact would occur.

## Cumulative Impacts

**POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED**

Cumulative construction noise and vibration impacts would consist of the combined noise impacts from the construction and of the proposed project and other planned projects in the vicinity of the project site, which would potentially generate noise levels in substantial excess of existing ambient noise levels. According to the TIS, two projects are proposed in the project site vicinity. The Reef Project, located at 1900 Broadway approximately 0.1 mile (approximately 2 city blocks) west of the project site, is a proposed mixed-use complex with 1,450 dwelling units, a 210-room hotel, 143,100 square feet of retail space, 180,000 square feet of office space, 17,600 square feet of gallery space, and an 8,000-square foot gym. The 233 Washington Boulevard project, located approximately 0.3 mile (approximately 6 blocks) west of the project site, is a proposed mixed-use project with 160 dwelling units and 24,000 square feet of retail space.

Construction activity would comply with LAMC Section 41.40 and would be restricted to the hours between 7:00 AM and 9:00 PM on weekdays, and 8:00 AM and 6:00 PM on Saturdays and national holidays. No construction would occur on Sundays. In addition, the proposed project would include implementation of Mitigation Measures N-2 through N-6 to reduce construction noise levels to the extent feasible. However, should construction of The Reef Project, the 233 Washington Boulevard project, and the proposed project overlap, short-term cumulative construction-related noise and vibration impacts could occur. Therefore, in the event that construction of these three projects occurs simultaneously, implementation of Mitigation Measure N-7 would be required to reduce impacts to less than significant levels.

Cumulative operational noise impacts would consist of combined operational noise of the project in conjunction with planned projects in the vicinity of the project site, which would result in potential increases in traffic noise. Future development in the project site vicinity may generate additional traffic volumes and increase traffic noise levels in the project area. To analyze project-generated traffic noise under cumulative conditions, cumulative plus project traffic volumes were compared baseline cumulative traffic volumes and existing volumes reported in the TIA. Results are shown in Table 21 below. As shown in the “Cumulative Change in Noise Level [3]-[1]” column, cumulative development would not result in a substantial increase in traffic noise when compared to existing noise levels. In addition, the project’s contribution to the cumulative future roadway noise level increase would not exceed 3 dBA CNEL, as shown in the “Project-Specific Change [3]-[2]” column. Therefore, the project would not contribute to substantial cumulative future traffic noise.

**Table 21 Comparison of Future and Future Plus Project Traffic Noise**

| Roadway Segment | Noise Level (dBA, CNEL) | | | | | Significance Threshold (dBA CNEL) | Significant |
|---|---|---|---|---|---|---|---|
| | Existing [1] | Cumulative [2] | Cumulative Plus Project [3] | Cumulative Change in Noise Level [3] – [1] | Project-Specific Change [3] – [2] | | |
| Washington Boulevard between Los Angeles Street and Maple Avenue | 70.2 | 70.6 | 70.6 | +0.4 | 0 | 3 | No |
| Los Angeles Street south of Washington Boulevard | 65.7 | 65.8 | 66.0 | +0.3 | +0.2 | 3 | No |
| Washington Boulevard between Main Street and Los Angeles Street | 70.5 | 70.8 | 70.9 | +0.4 | +0.1 | 3 | No |
| Los Angeles Street north of Washington Boulevard | 68.3 | 68.5 | 68.5 | +0.3 | 0 | 3 | No |

Source: HUD 2018

See Appendix E for noise measurement data and model results.

## Mitigation Measures

### *N-7 Construction Traffic Coordination*

The project developer shall coordinate with the developers for The Reef Project (1900 Broadway) and the 233 Washington Boulevard project during all phases of construction regarding the following:

- All temporary roadway closures shall be coordinated to limit overlap of roadway closures.
- All major deliveries for all three projects shall be coordinated to limit the occurrence of simultaneous deliveries. The project applicants shall ensure that deliveries of items such as concrete and other high-volume items shall not be done simultaneously.
- The applicants shall coordinate regarding the loading and unloading of delivery vehicles. Any offsite staging areas for delivery vehicles shall be consolidated and shared.
- Applicants or their representatives shall meet on a regular basis during construction to address any outstanding issues related to construction traffic, deliveries, and worker parking.

## Significance After Mitigation

Cumulative impacts related to construction activity associated with the proposed project and other planned and pending development would be less than significant with implementation of Mitigation Measure N-7.

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# 13 Population and Housing

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project result in any of the following impacts? | | | | |
| a. Induce substantial population growth in an area, either directly (e.g., by proposing new homes and businesses) or indirectly (e.g., through extension of roads or other infrastructure) | ☐ | ☐ | ■ | ☐ |
| b. Displace substantial amounts of existing housing, necessitating the construction of replacement housing elsewhere | ☐ | ☐ | ■ | ☐ |
| c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere | ☐ | ☐ | ■ | ☐ |

*a. Would the project 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**

As mentioned in Section 2, *Air Quality*, the City of Los Angeles has a current population of 4,041,707 with an average household size of 2.86 persons, according to the California DOF (DOF 2017). SCAG forecasts that the population of Los Angeles will grow to 4,609,400 by 2040, which is an increase of 567,693, or 12 percent since 2016 (SCAG 2016).

The proposed project would involve the demolition of 31 existing residential units, the automotive repair facility, and warehouse buildings and the construction of a new five- story multi-family residential building consisting of 112 units. Based on the average household size in the City of Los Angeles of 2.86, the proposed project would accommodate approximately 320 persons (DOF 2017). According to applicant-provided information, approximately 119 people currently reside in the 31-unit apartment building on-site; therefore, the proposed project would increase population on-site by approximately 201 net new residents. As such, the proposed project would increase the City population to 4,041,908, which is within the SCAG population forecast for 2040. The project site is in a developed urban area and would not require the expansion of infrastructure or roads that might also facilitate population growth. Impacts would be less than significant.

*b. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?*

*c. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?*

**LESS THAN SIGNIFICANT IMPACT**

The proposed project involves demolition of an existing 31-unit apartment building. Approximately 119 people currently reside on the project site. Although the project would displace these residences, the project would generate a net increase in housing by 81 residential units. Therefore, the project would not displace a substantial number of people or existing housing necessitating the construction of replacement housing elsewhere and impacts would be less than significant.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

According to SCAG, the population of Los Angeles will grow to 4,609,400 by 2040, which is an increase of 567,693 from the current population (DOF 2017). The sum of residents generated by the project in conjunction with related projects would be anticipated to be within the City's forecast. Like the proposed project, related projects in the City would be serviced with existing infrastructure, including roads, water, sewer, electricity, and natural gas, that is already in place to support urban development. Therefore, cumulative impacts associated with population and housing would be less than significant.

# 14 Public Services

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project result in any of the following impacts? | | | | |
| a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: | | | | |
| 1. Fire protection | ☐ | ☐ | ■ | ☐ |
| 2. Police protection | ☐ | ■ | ☐ | ☐ |
| 3. Schools | ☐ | ☐ | ■ | ☐ |
| 4. Parks | ☐ | ☐ | ■ | ☐ |
| 5. Other public facilities | ☐ | ☐ | ■ | ☐ |

*a.1. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection?*

**LESS THAN SIGNIFICANT IMPACT**

Based on the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact related to fire protection if it requires the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. The LAFD provides fire protection and emergency medical services for the City of Los Angeles. Fire Station #10, located at 1335 S. Olive Street, is the nearest station to the project site at approximately 0.5 mile north from the site (LAFD 2018a). According to LAFD FireStatLA, response times for Fire Station #10 for 2017 varied from 4 minutes and 31 seconds for structural fires to 6 minutes and 28 seconds for emergency medical service calls (LAFD 2018b). The proposed project would provide housing for 320 persons and would incrementally increase the service population for Fire Station #10 and any responding station in the service area by approximately 201 net new persons (see Section 13, *Population and Housing*). In addition, the project site contains an existing multi-family building that would be demolished as part of the proposed project.

The Fire Department would review the proposed site plan, floor plans, and building plans prior to construction to ensure that required fire protection safety features, including building sprinklers and emergency access, comply with Fire Department requirements. The project site is within the Fire Department's existing service area. Implementation of the following RCM would ensure that the proposed project would not necessitate the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain acceptable fire protection service; therefore, impacts would be less than significant.

### *RCM-17 Fire Safety*

The following recommendations of the Fire Department relative to fire safety shall be incorporated into the building plans, which include the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features:

- Fire lanes, where required, shall be a minimum of 20 feet in width.
- All structures must be within 300 feet of an approved fire hydrant.
- Entrances to any dwelling unit or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

*a.2. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection?*

**POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED**

A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station. Based on the *L.A. CEQA Thresholds Guide* the determination of whether the project results in a significant impact on police protection must be made considering the following factors:

- 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.

The police station closest to the project site is the Central Community Police Station, located at 251 E. 6th Street, approximately 1.3 miles northeast from the site (LAPD 2018a). The Central Community Police Station is staffed by approximately 400 sworn and civilian members of the LAPD (LAPD 2018b). The proposed project would consist of 112 residential units and generate approximately 201 net new persons, as discussed in Section 13, *Population and Housing*. However, the project would incrementally increase population within LAPD's Central Community service area by approximately 0.8 percent in the area compared to the existing population of approximately 40,000 people (LAPD 2018b). In addition, the project site contains a multi-family building that would be

demolished as part of the proposed project. As such, the proposed project would incrementally increase the service population for the Central Community Police Station or any responding station in the service area.

The project would also include exterior lighting, a locked lobby, gated parking, and video cameras for security purposes, which would promote safety and aid in deterring criminal activities. The project site is in the existing service area of the police station. Implementation of the following RCM would reduce the project's impacts to police protection services during construction. Nevertheless, the project would accommodate 201 net new residents in the service area of the Central Community Police Station, which may have a minor impact on response times and service ratios. Therefore, implementation of Mitigation Measure PS-1 would be required to reduce impacts to police protection services to less than significant levels.

### *RCM-18 Police – Demolition/Construction Sites*

Temporary construction fencing shall be placed along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to keep unpermitted persons from entering the construction area.

## Mitigation Measure

### *PS-1 Design Out Crime Guidelines*

The plans shall incorporate the design guidelines relative to security, semi-public and private spaces, which may include but not be limited to access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the project site, if needed. Please refer to "Design Out Crime Guidelines: Crime Prevention Through Environmental Design," published by the Los Angeles Police Department. The project developer shall also provide the Commanding Officer of the Central Community Police Station with a diagram of each portion of the property. The diagram shall include access routes and additional information that may facilitate police response.

## Significance After Mitigation

Implementation of the above mitigation measure would reduce impacts to police protection services to less than significant levels by ensuring that the project incorporates design features that reduce the incidence of crime and provides LAPD with information to help facilitate police response.

*a.3. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools?*

**LESS THAN SIGNIFICANT IMPACT**

The proposed project is in the Los Angeles Unified School District (LAUSD), which in the 2017-2018 year has an estimated 588,696 norm day enrollment for grades K through 12 (LAUSD 2017a). Norm day enrollment is the count of actively enrolled students as of the fifth Friday of the school year (LAUSD 2017b). The proposed project would involve the construction of 112 residential units and

would increase City population by an estimated 201 net new residents, as discussed in Section 13, *Population and Housing*. The proposed project would be served by the San Pedro Street Elementary School, John Adams Middle School, and four high schools (Dr. Maya Angelou Community Senior High, Nava College Preparatory Academy, Thomas Jefferson Senior High, and the Santee Education Complex). The *L.A. CEQA Thresholds Guide* provides student generation factors for the Los Angeles Unified School District, summarized in Table 22 below. Because the unit types of the existing 31-unit apartment building on the project site are unknown, this analysis conservatively assumes that all students generated by the proposed project would be net new students in the LAUSD.

**Table 22 Los Angeles Unified School District Generation Factors**

| Type of Housing | Generation Factors | | | Proposed Project Units | Total Students Generated |
|---|---|---|---|---|---|
| | Elementary (K-5) | Junior High (6-8) | Senior High (9-12) | | |
| 1 bedroom | 0.00 | 0.00 | 0.00 | 27 | 0 |
| 2 bedrooms | 0.22 | 0.10 | 0.14 | 49 | 23 |
| 3+ bedrooms | 0.52 | 0.20 | 0.27 | 36 | 36 |
| Total | – | – | – | 112 | 59 |

Source: City of Los Angeles 2006

Using the rates for rented multi-family housing, the proposed project would generate 59 additional students at LAUSD schools (City of Los Angeles 2006). Students generated by the proposed project would represent less than a 0.1 percent increase in the students served by LAUSD.

Additionally, in accordance with State law, the applicant would be required to pay school impact fees. Pursuant to Section 65995 (3)(h) of the California Government Code (Senate Bill 50, chaptered August 27, 1998), the payment of statutory fees "...is deemed to be full and complete mitigation of the impacts of any legislative or adjudicative act, or both, involving, but not limited to, the planning, use, or development of real property, or any change in governmental organization or reorganization." Implementation of the following RCM would include payment of the development fees and would mitigate any potential impacts to a less than significant level.

### *RCM-19 Schools*

The applicant shall pay school fees to the Los Angeles Unified School District to offset the impact of additional student enrollment at schools serving the project area.

*a.4. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks?*

**LESS THAN SIGNIFICANT IMPACT**

Refer to Section 15, *Recreation*, for discussion of the proposed project's impacts to recreational facilities and parks. Impacts to recreational facilities would be less than significant.

*a.5. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities?*

Development of the proposed project would result in incremental impacts to the City's public services and facilities such as storm drain usage, solid waste disposal, water usage, and wastewater disposal. Impacts to these issue areas are discussed in Section 9, *Hydrology and Water Quality*, and Section 18, *Utilities and Service Systems*.

Public libraries within a two-mile radius of the project site include Central Library, Felipe de Neve Branch Library, and Little Tokyo Branch Library (Los Angeles Public Library n.d.). The Los Angeles Public Library moves 40,000 items between libraries to meet patrons' needs (Los Angeles Public Library 2015). The proposed project would generate approximately 320 residents as discussed in Section 3, *Air Quality* and Section 13, *Population and Housing*. Additionally, because the project would include demolition of an existing apartment complex with 31 units, the net population increase would result in approximately 201 new residents. Therefore, increased demand would be nominal and the City of Los Angeles public libraries would continue to accommodate the needs of the City and others in Los Angeles County. Increased demand on existing libraries and public services would be negligible and impacts would be less than significant.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

The project is not anticipated to contribute to a significant cumulative demand for fire services, police protection, schools, parks, recreational facilities, and libraries. This is in large part due to the consistency of the project with population projections. LAFD and LAPD would continue to monitor population growth and land development throughout the City and identify additional resources that may need to be met through the City budget. All related projects would be reviewed by the LAFD and LAPD to ensure adequate fire flow capabilities, adequate emergency access, and sufficient security measures. All related projects would also comply with LAFD requirements and LAMC requirements related to fire safety, access, and fire flow. The project and related residential project would pay school fees that would fully mitigate potential school impacts. Moreover, the project and related projects would provide open space, such as the centralized courtyard and individual balconies for each unit, and recreational amenities, such as the gym/community room. Likewise, the project would comply with the parks and open space requirements established by the LAMC to offset potential recreation impacts. Therefore, cumulative impacts would be less than significant.

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# 15 Recreation

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

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

*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?*

Based on the *L.A. CEQA Thresholds Guide*, the determination of significance is made on a case-by-case basis, considering 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, and whether the project includes features that would reduce the demand for recreation and park services. Based on these factors, a significant impact may occur if a project:

- Results in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks
- Increases 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
- Includes recreational facilities or require the construction or expansion of recreational facilities which might have a physical effect on the environment

**LESS THAN SIGNIFICANT IMPACT**

According to the City of Los Angeles Department of Recreation and Parks (RAP) Facility Map Locator, the project site is within one mile of the Trinity Recreation Center, St. James Park, Central Park Recreation Center, and Central Pool (RAP 2018a). As identified by the City of Los Angeles RAP, the City's parks system consists of approximately 16,000 acres of parklands offering extensive recreational, social, and cultural programs at 444 park sites in every Los Angeles neighborhood (RAP

2018b). As mentioned in Section 2, *Air Quality*, and Section 13, *Population and Housing*, has a current population of the City of Los Angeles is estimated at 4,040,707 people (DOF 2017). Consequently, there are about 4 acres of parkland for every 1,000 residents, and the City currently meets the standard ratio for parkland per the Quimby Act (i.e., 3 to 5 acres per 1,000 residents; California Department of Parks and Recreation 2002) and the City's Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan metric of 3 park acres per 1,000 residents (City of Los Angeles 2015a).

The addition of 201 net new persons would incrementally reduce the parkland ratio of 4.0 acres of parkland for every 1,000 residents. The project applicant would be required to pay applicable Quimby Act fees required for the project's proposed 112 units. Thus, while there would be an incremental increase in use of the existing parks, the existing parkland ratio would stay nearly the same and no significant impacts would occur to existing parks. In addition, the project would include a gym/community room (approximately 1,775 sf) and a centralized courtyard for resident use (approximately 9,950 sf). Therefore, impacts would be less than significant.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

As discussed above, the project would provide recreational amenities and comply with the parks and open space requirements established by the LAMC to offset potential recreation impacts, including applicable Quimby Act fees. Therefore, cumulative impacts would be less than significant.

# 16 Transportation/Traffic

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project result in any of the following impacts? | | | | |
| a. Conflict with an applicable plan, ordinance or policy establishing a measure 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 due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)? | ☐ | ■ | ☐ | ☐ |
| e. Result in inadequate emergency access? | ☐ | ☐ | ☐ | ■ |
| f. Conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities? | ☐ | ☐ | ☐ | ■ |

*a. Would the project conflict with an applicable plan, ordinance or policy establishing a measure 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?*

**LESS THAN SIGNIFICANT IMPACT**

## Construction Traffic

Construction of the proposed project would result in a temporary increase in traffic on area roadways from construction worker vehicle trips as well as haul truck trips and equipment and material delivery trips. As discussed in Section 2, *Project Description*, the proposed project would require approximately 534 one-way haul truck trips to export approximately 2,000 CY of contaminated soil material and to import approximately 6,000 CY of clean soil material. In addition, CalEEMod estimates that demolition of the existing structures would require approximately 220 one-way haul truck trips to remove demolished materials. Assuming a 20-day demolition phase and a 44-day grading phase, based on applicant provided information, construction of the proposed project would result in approximately 11 one-way haul truck trips during each day of demolition and 12 one-way haul truck trips during each day of grading. Assuming an eight-hour work day, approximately one to two haul truck trips to the project site would occur each hour during the demolition phase, and approximately one to two haul truck trip would occur each hour during the grading phase. As discussed in Section 18, *Utilities and Service Systems*, all demolition waste generated by the proposed project would be required to be taken to a certified C&D waste processor, the closest of which is Downtown Diversion/USA Waste of California, located approximately 2.3 miles east of the project site at 2424 Olympic Boulevard. Haul trucks would utilize one haul truck route during project construction. Haul trucks proceed eastbound along Washington Boulevard for one block, turn left onto San Pedro Street, proceed north for one block, and turn left onto the westbound ramp to I-10.

Construction of the proposed project would generate up to 49 one-way construction worker trips per day and approximately 10 one-way vendor trips per day to the project site. Therefore, peak construction worker and vendor trips, which would occur during the building construction phase, would total 59 daily trips. As shown in Table 23, the existing uses on-site currently generate approximately 198 daily vehicle trips. During construction, these trips would not occur. Therefore, construction worker and vendor trips would not increase vehicle trips to the project site above those of existing uses and would have a less than significant impact to local roadways.

## Operational Traffic

Linscott, Law & Greenspan, Engineers (LLGE) prepared a Traffic Impact Study (TIS) for the project in July 2018 (LLGE 2018 see Appendix F). On August 15, 2018, the Los Angeles Department of Transportation (LADOT) confirmed that the TIS adequately evaluated the project's traffic impacts on the surrounding community (Los Angeles Department of Transportation 2018). Project trip generation rates are shown in Table 23. These trips include affordable housing, manager housing, and "retail." The retail trips include a transit reduction factor of 10 percent, walkability adjustment factor of 10 percent, and pass-by reduction in trips of 50 percent based on the site's proximity to the Metro rail and bus transit opportunities, walkability, and on-site access to commercial access. Based on the trip rates, the project would generate a net total of 370 daily trips, including 45 AM peak hour trips and 31 PM peak hour trips.

Four key study intersections were selected for evaluation in consultation with the LADOT. The intersections listed below provide both local and regional access to the project area and define the extent of the boundaries for the traffic impact investigation:

1) Main Street/Washington Boulevard
2) Los Angeles Street/18th Street
3) Los Angeles Street/Washington Boulevard
4) Maple Avenue/Washington Boulevard

Morning (7:00 a.m. to 10:00 a.m.) and afternoon (3:00 p.m. to 6:00 p.m.) peak period turning movement counts were collected at the four study intersections in January 2018 and are provided in Attachment B of the TIS (Appendix F). The study intersections were analyzed under the following scenarios:

- Existing (Year 2018) Conditions
- Existing with Project (Year 2018) Conditions
- Future without Project (Year 2020) Conditions
- Future with Project (Year 2020) Conditions

Consistent with Traffic Study Policies and Procedures (LADOT 2013), intersection capacity was analyzed using the "Critical Movement Analysis (CMA) – Planning" (Transportation Research Circular No. 212, Interim Materials on Highway Capacity, Transportation Research Board, 1980) methodology. The CMA methodology, calculates volume-to-capacity (V/C) ratio and determines intersection level of service (LOS), which is a letter grade ranging from LOS A (free-flow conditions) to LOS F (congested conditions, over capacity).

The significance of the potential impacts of project generated traffic at the signalized study intersections was determined using LADOT's 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, as shown in Table 24.

## Table 23 Estimated Project Trip Generation[1]

| ITE Land Use | Size | Peak Hour[2] AM | Peak Hour[2] PM | Total Daily Trips |
|---|---|---|---|---|
| **Proposed Project** | | | | |
| Affordable Housing [3] | 111 DU | 56 | 38 | 453 |
| Managers Apartment [4] | 1 DU | 0 | 0 | 5 |
| Retail [5] | 7,300 GLSF | 7 | 28 | 276 |
| Less Transit Adjustment (10%) [6] | | 0 | (3) | (28) |
| Less Walk Adjustment (10%) [6] | | 0 | (3) | (28) |
| Less 50% Pass-by [7] | | (4) | (12) | (110) |
| **Total Project Trips** | | **59** | **48** | **568** |
| **Existing Land Use** | | | | |
| Apartment | 31 DU | 11 | 14 | 169 |
| Less Transit Adjustment (10%) [6] | | 1 | 2 | 17 |
| Less Walk Adjustment (10%) [6] | | | 2 | 17 |
| Auto Repair Shop [8] | 2,322 GLSF | 5 | 7 | 70 |
| Less 10% Pass-by [7] | | 0 | 0 | 7 |
| **Total Existing Trips** | | **14** | **17** | **198** |
| Net Total Project Trips (Proposed – Existing) | | 45 | 31 | 370 |

[1] Source: Transportation Impact Study Guidelines, City of Los Angeles Department of Transportation (LADOT), December 2016 and ITE "Trip Generation Manual", 10th Edition, 2017

[2] Trips are one-way traffic movements, entering or leaving.

[3] LADOT trip generation average rates for affordable housing type Family Housing:

- Daily Trip Rate: 4.08 trips/dwelling unit; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.50 trips/dwelling unit; 40% inbound/60% outbound
- PM Peak Hour Trip Rate: 0.34 trips/dwelling unit; 55% inbound/45% outbound

[4] ITE Land Use Code 221 (Apartment) trip generation average rates:

- Daily Trip Rate: 5.44 trips/dwelling unit; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.36 trips/dwelling unit; 26% inbound/74% outbound
- PM Peak Hour Trip Rate: 0.44 trips/dwelling unit; 61% inbound/39% outbound

[5] ITE Land Use Code 820 (Shopping Center) trip generation average rates:

- Daily Trip Rate: 37.75 trips/1,000 SF of floor area; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.94 trips/1,000 SF of floor area; 62% inbound/38% outbound
- PM Peak Hour Trip Rate: 3.81 trips/1,000 SF of floor area; 48% inbound/52% outbound

[6] Transit and walk trip adjustments are based on the site's proximity to Metro rail and bus transit opportunities.

[7] Source: LADOT policy on pass-by trip adjustments. Pass-by trips are made as intermediate stops on the way from an origin to a primary trip destination without a route diversion. Pass-by trips are attracted from the traffic passing the site on an adjacent street or roadway that offers direct access to the site.

[8] ITE Land Use Code 942 (Automobile Care Center) trip generation average rates:

- ITE Daily trip rate not provided. Average Daily volume calculated based on the assumption that the higher peak hour traffic volumes typically represent 10% of the daily trip ends.
- AM Peak Hour Trip Rate: 2.25 trips/1,000 SF of floor area; 66% inbound/34% outbound
- PM Peak Hour Trip Rate: 3.11 trips/1,000 SF of floor area; 48% inbound/52% outbound

### Table 24 Significant Impact Threshold for Project-Related Traffic

| Intersection Conditions with Project Traffic | | Significant Impact Threshold for Project-Related Increase in V/C Ratio |
|---|---|---|
| **LOS** | **V/C** | |
| 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 | > 0.901 | Equal to or greater than 0.01 |

Source: LLGE, Traffic Impact Study, 2018(Appendix H)

Table 25 compares Existing Conditions (Year 2018) and Future Conditions (Year 2020) with project traffic to conditions without project traffic. The trip data utilized in the table is based on the proposed project's trip generation using the number of residents rather than the number of units in order to analyze project impacts under conservative assumptions.

### Table 25 Peak Hour Intersection Capacity Analysis Summary

| | | | Without Project Conditions | | With Project Conditions | | | |
|---|---|---|---|---|---|---|---|---|
| **No.** | **Intersection** | **Peak Hour** | **V/C** | **LOS** | **V/C** | **LOS** | **Change in V/C** | **Impact** |
| **Existing Conditions (Year 2018)** | | | | | | | | |
| 1 | Main Street/ Washington Boulevard | AM | 0.606 | B | 0.611 | B | 0.005 | NO |
| | | PM | 0.765 | C | 0.767 | C | 0.002 | NO |
| 2 | Los Angeles Street/ 18th Street | AM | 0.507 | A | 0.509 | A | 0.002 | NO |
| | | PM | 0.673 | B | 0.673 | B | 0.000 | NO |
| 3 | Los Angeles Street/ Washington Boulevard | AM | 0.586 | A | 0.595 | A | 0.009 | NO |
| | | PM | 0.657 | B | 0.666 | B | 0.009 | NO |
| 4 | Maple Avenue/ Washington Boulevard | AM | 0.524 | A | 0.528 | A | 0.004 | NO |
| | | PM | 0.648 | B | 0.649 | B | 0.001 | NO |
| **Future Conditions (Year 2020)** | | | | | | | | |
| 1 | Main Street/ Washington Boulevard | AM | 0.739 | C | 0.744 | C | 0.005 | NO |
| | | PM | 0.949 | E | 0.951 | E | 0.002 | NO |
| 2 | Los Angeles Street/ 18th Street | AM | 0.525 | A | 0.526 | A | 0.001 | NO |
| | | PM | 0.697 | B | 0.697 | B | 0.000 | NO |
| 3 | Los Angeles Street/ Washington Boulevard | AM | 0.620 | B | 0.629 | B | 0.009 | NO |
| | | PM | 0.713 | C | 0.721 | C | 0.008 | NO |
| 4 | Maple Avenue/ Washington Boulevard | AM | 0.558 | A | 0.562 | A | 0.004 | NO |
| | | PM | 0.699 | B | 0.701 | C | 0.002 | NO |

LOS = Level of Service, V/C = Volume-to-Capacity Ratio

Bold ICU/LOS and HCM/LOS values indicate adverse service levels based on the LOS standards mentioned in this report

Source: GTC, Traffic Impact Study, 2018 (Appendix H)

All four study intersections would operate at LOS C or better under both Existing Conditions and Existing with Project Conditions. Based on LADOT significant impact criteria, the incremental increase in the V/C ratios with the addition of project traffic would not be significant at any of the study intersections under Existing with Project Conditions.

The Future without Project Conditions (Year 2020) scenario was developed by applying an ambient growth factor of 1 percent per year compounded annually to the existing traffic volumes. The total adjustment applied over the three-year period was 3.03 percent. The Future with Project Conditions (Year 2020) scenario was developed by adding project traffic to the Future without Project scenario traffic volumes. As shown in Table 25, all four intersections are anticipated to operate at LOS C or better during morning and evening peak hours, with and without project traffic. The project's incremental increase to V/C ratios would not exceed LADOT significance thresholds at any of the four study intersections under Future with Project Conditions. Therefore, impacts would be less than significant.

Furthermore, the proposed project would provide only two parking spaces above the minimum 73 parking spaces required by the City of Los Angeles for a mixed-use, affordable housing development located in a transit priority area. Therefore, the proposed project would discourage residents' automobile use by providing limited vehicular parking, which would further ensure that the project would be consistent with the City's traffic reduction goals and that project-generated traffic would be less than significant.

*b. Would the project 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 Los Angeles County Congestion Management Program (CMP) requires an analysis of all arterial segments and arterial monitoring intersections on the CMP roadway network where the project adds 50 or more peak hour trips. Additionally, the CMP requires evaluation of all mainline freeway monitoring locations where the project adds 150 or more peak hour trips. The project would generate at most 370 daily trips, 45 trips during the AM peak hour, and 31 trips during the PM peak hour. The project adds less than 50 peak hour trips; therefore, a CMP analysis is not required. Furthermore, the results of the Los Angeles CMP traffic assessment indicate that the proposed project would not adversely affect any CMP arterial monitoring intersections or freeway monitoring locations (LLGE 2018). Impacts would be less than significant.

*c. Would the project 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**

No airport or airstrip is located immediately adjacent to the project site. As discussed in Section 8, *Hazards and Hazardous Materials,* the project site is located approximately 13.5 miles southwest of El Monte Airport, 9.75 miles north of the Compton/Woodley Airport, and approximately 9.0 miles northeast of the Los Angeles International Airport, which are the nearest public airports to the project. The site is not located within an airport land use plan or near a private airstrip (Los Angeles County 2014). As such, the proposed project would not affect air traffic patterns and no impact would occur.

*d. Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?*

**POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED**

A significant impact may occur if the proposed project:

- Includes new roadway design or introduces a new land use or features ito an area with specific transportation requirements and characteristics that have not been previously experienced in that area; or
- Includes site access or other features designed in such a way as to create hazardous conditions.

The project would not involve new roadways, nor does it include a design features that would significantly alter existing roadways or site access or increase hazards. The construction of a multi-family residential building would not result in vehicles or equipment, such as farm equipment or tractors, that would be incompatible with the existing land uses surrounding the area. However, construction may require temporary closure of sidewalks along Washington Boulevard and Los Angeles Street, which may increase traffic hazards due to pedestrians attempting to cross major roadways between intersections or walking on the side of the roadways to avoid construction. Therefore, temporary construction-related impacts related to traffic hazards would be potentially significant, and implementation of Mitigation Measure TRA-1 would be required to reduce impacts to a less than significant level.

## Mitigation Measure

### *TRA-1 Pedestrian Access during Construction*

- 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 should 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. Sidewalk shall be reopened as soon as reasonably feasible, taking construction and construction staging into account.

## Significance After Mitigation

Implementation of Mitigation Measure TRA-1 would reduce impacts related to traffic hazards during construction to less than significant by providing for safe and adequate detour routes.

*e. Would the project result in inadequate emergency access?*

A significant impact may occur if the proposed project:

- Would not provide emergency access meeting the requirements of the LAFD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site or adjacent uses.

**NO IMPACT**

The proposed project would not result in inadequate emergency access because it would be subject to LAFD review. Review would include acceptance of site plans and project structures prior to occupancy to ensure that required fire protection safety features, such as adequate driveway access to buildings and adequate emergency access, are implemented. Therefore, no impact would occur.

*f. Would the project conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, or otherwise substantially decrease the performance or safety of such facilities?*

**NO IMPACT**

A significant impact may occur if the project would conflict with adopted polices or involve modification of existing alternative transportation facilities located on- or off-site. Sidewalks are provided along all key roadways and pedestrian crosswalks with walk lights are provided at signalized intersections in the project vicinity. The proposed project would maintain the current sidewalks and would promote biking through the inclusion of 70 biking spaces. Furthermore, the project site is located in proximity to the Metro Blue Line San Pedro Street Station, located on Washington Street, approximately 3 blocks east of the project site. As such, the project would not conflict with adopted policies, plans, or programs regarding public transit, bikeways, or pedestrian facilities, and would not otherwise substantially reduce the performance or safety of such facilities. Therefore, there would be no impact related to public transportation and alternative transportation plans, policies, or programs.

## Cumulative Impacts

**POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED**

According to the TIS, two projects are proposed in the project site vicinity. The Reef Project, located at 1900 Broadway approximately 0.1-mile (approximately 2 city blocks) west of the project site, is a proposed mixed use complex with 1,450 dwelling units, a 210-room hotel, 143,100 square feet of retail space, 180,000 square feet of office space, 17,600 square feet of gallery space, and an 8,000-square foot gym. The 233 Washington Boulevard project, located approximately 0.3-mile (approximately 6 blocks) west of the project site, is a proposed mixed use project with 160 dwelling units and 24,000 square feet of retail space. Should construction of The Reef Project, the 233 Washington Boulevard project, and the proposed project overlap, short-term cumulative construction-related traffic impacts could occur. Potential impacts could include:

- **Simultaneous arrival and departure of haul trucks.** The increased volume of haul truck traffic and number of trucks entering/exiting roadways surrounding the two project sites could result in congestion on those roadways.
- **Simultaneous arrival and departure of delivery trucks.** Equipment and supply delivery vehicles could impact adjacent roadways by creating additional congestion. Temporary queuing of these delivery vehicles on Washington Boulevard and Washington Boulevard may also occur if large numbers of vehicles arrive or depart at once.

- **Simultaneous construction worker parking.** Construction workers for both projects could potentially park in areas adjacent to the site.

In the event that construction of these three projects occurs simultaneously, construction associated with the proposed project would have a cumulatively considerable contribution to short-term cumulative traffic impacts. Implementation of Mitigation Measure TRA-2 would be required to reduce impacts to less than significant levels.

As discussed above, the project's incremental increase to V/C ratios would not exceed LADOT significance thresholds at any of the five study intersections under Future with Project Conditions (Year 2020). Therefore, long-term cumulative impacts would be less than significant.

## Mitigation Measures

### *TRA-2 Construction Traffic Coordination*

The project developer shall coordinate with the developers for The Reef Project (1900 Broadway) and the 233 Washington Boulevard project during all phases of construction regarding the following:

- All temporary roadway closures shall be coordinated to limit overlap of roadway closures.
- All major deliveries for all three projects shall be coordinated to limit the occurrence of simultaneous deliveries. The project applicants shall ensure that deliveries of items such as concrete and other high-volume items shall not be done simultaneously.
- The applicants shall coordinate regarding the loading and unloading of delivery vehicles. Any offsite staging areas for delivery vehicles shall be consolidated and shared.
- Applicants or their representatives shall meet on a regular basis during construction to address any outstanding issues related to construction traffic, deliveries, and worker parking.

## Significance After Mitigation

Cumulative impacts related to construction activity associated with the proposed project and other planned and pending development would be less than significant with implementation of Mitigation Measure TRA-2.

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# 17 Tribal Cultural Resources

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in a 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. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or | ☐ | ☐ | ■ | ■ |
| b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Cod Section 2024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. | ☐ | ☐ | ■ | ☐ |

*a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?*

*b. Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074 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 2024.1?*

As of July 1, 2015, California Assembly Bill 52 of 2014 (AB 52) was enacted and expands CEQA by defining a new resource category, "tribal cultural resources." Assembly Bill 52 establishes that "A project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3). PRC Section 21074 (a)(1)(A) and (B) defines tribal cultural resources as "sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe" and meets either of the following criteria:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

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

**LESS THAN SIGNIFICANT IMPACT**

AB 52 also establishes a formal consultation process for California tribes regarding those resources. The consultation process must be completed before a CEQA document can be certified. AB 52 requires that lead agencies "begin consultation with a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project." Native American tribes to be included in the process are those that have requested notice of projects proposed within the jurisdiction of the lead agency.

The Los Angeles Department of City Planning contacted a total of 10 tribal representatives via a written letter on April 3, 2018. This letter communication resulted in several requests from tribal representatives. A representative from the Gabrieleno Band of Mission Indians – Kizh Nation requested that a Tribal Monitor be on site during all ground disturbance activities. A representative of the Gabrieleno/Tongva San Gabriel Band of Mission Indians requested tribal involvement in the project's initial ground disturbing activities, as well as involvement in archaeological monitoring if such monitoring occurs. A representative from the Gabrielino Tongva Indians of California Tribal Council requested notification if any human remains, archaeological, or cultural resources are encountered during the project's ground disturbing activities, and requested project related updates and a copy of the cultural study results.

The site is generally flat and occupied with a car repair facility, warehouses, and a multi-family residence. The site has been previously graded and does not contain any known tribal cultural resources. In addition, according to the Native American Heritage Commission (NAHC), a record search of the *Sacred Lands File* for the area of potential effect (APE) did not generate results for the proposed project (see Appendix G). However, the proposed project would require excavation below the surficial soil layers for the construction of an underground parking level. This could potentially uncover previously unknown tribal cultural resources. The following RCM would reduce potential impacts to a less than significant level by providing a monitor and avoiding potential impacts to any tribal cultural resources that may be uncovered during grading. As such, impacts would be less than significant.

### *RCM-20 Unanticipated Discovery of Tribal Cultural Resources*

In the event that archaeological resources of Native American origin are identified during project construction, all work in the area of the find shall cease and a qualified archaeologist will consult with the City to begin Native American consultation procedures. Construction activities can continue in areas 50 feet away from the find and not associated with the tribal cultural resource location. As part of this process, the City may determine that archaeological monitoring may be required. In addition to the archaeologist, a Native American monitor may also be required to participate in the recovery and disposition of the remains.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

There are no project-level impacts anticipated regarding known tribal cultural resources, and potential impacts to unanticipated tribal cultural resources would be less than significant with implementation of RCM-20. Other projects would also undergo any necessary evaluation for potential impacts to tribal cultural resources and comply with relevant regulatory requirements and project recommendations regarding tribal cultural resources. Therefore, cumulative impacts would be less than significant.

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# 18 Utilities and Service Systems

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| Would the project result in any of the following impacts? | | | | |
| 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 storm water 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 resources, 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 | ☐ | ☐ | ■ | ☐ |

*a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?*

*b. Would the project 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?*

*e. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

**LESS THAN SIGNIFICANT IMPACT**

The Los Angeles Bureau of Sanitation (LASAN) operates and maintains the City's wastewater infrastructure. The City's wastewater collection system serves over four million residential and business customers within a 600 square mile service area that includes Los Angeles and 29 contracting cities and agencies. Over 6,700 miles of public sewers connect to the City's four wastewater treatment and water reclamation plants, which have a combined capacity to treat an average of 580 million gallons per day (mgd) of wastewater (LASAN 2018a). The Hyperion Treatment Plant (HTP) serves the project site and is located in Playa del Rey. According to LASAN, the HTP is designed to treat up to 450 mgd and currently treats an average of 275 mgd, with a remaining capacity of 175 mgd (LASAN 2018b).

The proposed mixed-use residential building would include 112 one-, two-, and three-bedroom apartments as well as 7,300 sf of commercial space. The average daily generation sewer rates for each land use, shown in Table 26, were obtained from the Sewer Capacity Availability Request approved by the Los Angeles Bureau of Sanitation on April 3, 2018 (Los Angeles Bureau of Sanitation, Appendix H).

### Table 26 Average Daily Sewer Generation Rates

| Land Use | Quantity | Sewer Generation Rate (gallons/unit) | Total Sewage Generation (gallons/day) |
|---|---|---|---|
| 1-Bedroom | 27 units | 110 | 2,970 |
| 2-Bedroom | 49 units | 150 | 7,350 |
| 3-Bedroom | 36 units | 190 | 6,840 |
| Retail | 7,300 sf | 25 | 183 |
| Total Proposed Project | | | 17,343 |

sf = square foot

Source: Los Angeles Bureau of Sanitation 2018 (Appendix H)

The proposed project would produce an estimated 17,343 gallons of wastewater per day, which is about 0.01 percent of the remaining capacity at the HTP. This estimate is conservative since it does not account for wastewater generated by the existing uses on-site. In addition, this amount falls below the maximum allowable capacity of 17,915 gallons per day approved by the Los Angeles Bureau of Sanitation for the proposed project (Los Angeles Bureau of Sanitation 2018, Appendix H). As such, the proposed project would not generate wastewater such that the HTP or the sewer system would become constrained. Therefore, impacts to wastewater facilities would be less than significant.

*c. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?*

**LESS THAN SIGNIFICANT IMPACT**

The proposed project would include permeable landscape and raised planters at the ground level on all sides of the building. As discussed in Section 9, *Hydrology and Water Quality*, the proposed project would decrease runoff from the site by reducing impervious surfaces by five percent, and would comply with current regulations pertaining to retention/detention of site runoff into storm drains and receiving waters, as well LID requirements which would apply to the construction and operation of the proposed project to further reduce stormwater runoff. Compliance with these requirements would reduce potential impacts to local stormwater drainage facilities to a less than significant level.

*d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?*

**LESS THAN SIGNIFICANT IMPACT**A significant impact may occur if a project would increase water consumption to such a degree that new water sources would need to be identified. LADWP supplies water within the City limits. LADWP water sources between 2010 and 2014 included: the Los Angeles Aqueducts (LAA) (average of 29 percent), local groundwater (average of 12 percent), the Metropolitan Water District (average of 57 percent), and recycled water (2 percent) (Urban Water Management Plan [UWMP] 2015). Assuming that water use is 120 percent of wastewater generation (as calculated in Table 26, above) the proposed project would increase water demand by approximately 20,812 gallons per day or 23.31 acre-feet per year (AFY). Table 27 shows the service area reliability assessment for a potential multiple dry year period 2020 through 2040, such as what was experienced from the years 2010 through 2015 according to the City's 2015 UWMP.

**Table 27 Multiple Dry Years Water Supply and Demand**

| | 2020 | 2025 | 2030 | 2035 | 2040 |
|---|---|---|---|---|---|
| Total Demand (AFY) | 642,400 | 676,900 | 685,500 | 694,900 | 709,500 |
| **Supply (AFY)** | | | | | |
| Existing/Planned | 323,470 | 369,470 | 380,470 | 396,670 | 398,970 |
| MWD Water Purchases | 318,930 | 307,430 | 305,030 | 298,230 | 310,530 |
| Total Supply | 642,400 | 676,900 | 685,500 | 694,900 | 709,500 |

Source: LADWP, 2015 Urban Water Management Plan (UWMP), Exhibit 11G

On April 7, 2017, Governor Brown issued Executive Order B-40-17, which lifted the drought emergency in all California counties except Fresno, Kings, Tulare, and Tuolumne; rescinded drought-related Executive Orders B-26-14, B-28-14, B-29-15, and B-36-15; and reinforced Executive Order B-37-16, entitled Making Water Conservation a California Way of Life. Executive Order B-40-17 also directed the State Water Resources Control Board (SWRCB) to continue developing permanent restrictions on wasteful water-using practices and to adopt urban water use efficiency standards (State of California 2017). Until SWRCB restrictions are implemented, emergency prohibitions against wasteful water-using practices remain in place until their expiration as provided by the Water Code. As of April 2018, the SWRCB was still in the process of developing a set of permanent

restrictions on water use (SWRCB 2018). Finally, Mayor Eric Garcetti issued Executive Directive No. 5, Emergency Drought Response – Creating a Water Wise City (ED5), which specified timeframes and water use reduction targets to increase water conservation. According to Los Angeles' Sustainable City pLAn, citywide targets include a 20 percent gallon per capita per day (gpcd) reduction by 2017, a 22.5 percent reduction by 2025, and a 25 percent reduction by 2035. Other long-term outcomes involve LADWP reducing their purchases of imported water by 50 percent by 2025, and sourcing 50 percent of water locally by 2035, including 150,000 AFY of stormwater capture (Los Angeles 2015b).

LADWP anticipates that through various measures, such as conservation and rebalancing the proportions of existing and future water supply sources, adequate water supplies will be available even in the multi-dry year scenario. Total demand in Table 27 was calculated based on LADWP's service area population, which is expected to increase from 3,987,622 in 2015 to 4,441,545 in 2040 (LADWP 2015). As discussed above, in Section 13, *Population and Housing*, the proposed project would result in a net increase of 201 residents and would not exceed the SCAG projected growth rates. Therefore, the population and water demand increases associated with the proposed project has been accounted for in the UWMP. Despite the current drought conditions, the 23.7 AFY of water demand associated with the proposed project could be accommodated by existing and planned supplies as the demand forecast in the UWMP accounts for future development and population growth. In addition, the proposed project would be required to comply with all existing and future restrictions on water use that the City implements. As such, water supply impacts would be less than significant.

*f. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?*

*g. Would the project comply with federal, state, and local statutes and regulations related to solid waste?*

**LESS THAN SIGNIFICANT IMPACT**

The management of solid waste in the City of Los Angeles involves public and private refuse collection services as well as public and private operation of solid waste transfer, resource recovery, and disposal facilities. LASAN provides collection services primarily to single-family residences, while multi-family residences, such as apartment complexes (e.g. the proposed project), contract with a private company to collect and transport their materials for disposal or recycling.

The City of Los Angeles has enacted numerous waste reduction and recycling programs in order to comply with AB 939, which required every city in California to divert at least 50 percent of its annual waste by the year 2000, and be consistent with AB 341, which sets a 75 percent recycling goal for California by 2020. As tracked by the City's Zero Waste Progress Report, the City achieved a landfill diversion rate of 76 percent as of 2012 (Los Angeles 2006, Los Angeles 2013). The City of Los Angeles also prepared a Solid Waste Management Policy Plan (CiSWMPP), which contains long-term goals, objectives, and policies for solid waste management for the City. It specifies that the City's Zero Waste goal is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to achieve an overall diversion rate of 90 percent or more by 2025 (LASAN 2013).

With regard to the proposed project, the handling of all debris and waste generated during construction would be subject to the State's requirements under AB 939 for salvaging, recycling, and reuse of materials from construction activity on the project site. The proposed project has two components (construction and operation) that would result in the generation of solid waste. For

purposes of this analysis, the estimated operational waste is used to determine the net increase in solid waste from the proposed project. Construction of the proposed project would also involve site preparation activities that would generate waste materials; however, construction would be temporary. In addition, the proposed project would be required to comply with the City's Construction and Demolition (C&D) Waste Recycling Ordinance. All construction and demolition waste generated by the proposed project would be required to be taken to a certified C&D waste processor. Many certified waste processors are located in the City of Los Angeles. The processor closest to the project site is Downtown Diversion/USA Waste of California, located approximately 2.3 miles east of the project site at 2424 Olympic Boulevard, which has a recycling rate of 76.8 percent as of January 1, 2018 (LASAN 2018c).

LASAN manages solid waste collection in the City. Table 28 summarizes the permitted daily throughput, estimated average waste quantities disposed, remaining capacity, and closure date for landfills and waste facilities in the vicinity of the project site. Landfills and facilities that may serve the project site have an average remaining capacity of over 10,000 tons per day.

**Table 28 Solid Waste Disposal Facilities**

| Facility | Permitted Daily Throughput (tons/day) | Average Daily Waste Quantities Disposed (tons/day) | Estimated Remained Daily Capacity (tons/day)[1] | Estimated Remaining Permitted Capacity (million tons) | Estimated Closure Date |
|---|---|---|---|---|---|
| Calabasas Landfill | 3,500 | 951 | 2,549 | 5.95 | 2026 |
| Sunshine Canyon Landfill | 12,100 | 7,496 | 4,604 | 62.11 | 2037 |
| Chiquita Canyon Landfill | 6,000 | 4,544 | 1,456 | –[2] | 2019 |
| Commerce Refuse-To-Energy Facility | 1,000 | 299 | 701 | N/A | N/A |
| Southeast Resource Recovery Facility | 2,240 | 1,345 | 895 | N/A | N/A |
| **Total** | **24,840** | **14,635** | **10,205** | **68.1** | **–** |

N/A = not applicable

[1] Estimated remaining daily capacity was calculated by subtracting the average daily waste quantities disposed from the permitted daily throughput.

[2] "The current Conditional Use Permit 89-081(5) (CUP) expired in June 2016 when the landfill reached its fill capacity limits. However, Department of Regional Planning issued a "Clean Hands Waiver" on March 17, 2016, allowing the landfill to continue its operation while processing the new CUP application. The waiver will terminate on July 31, 2017 or earlier if revoked by the Director of Regional Planning." (Los Angeles County Department of Public Works 2017)

Source: Los Angeles County Department of Public Works 2017

As shown in Table 29, the estimated solid waste generation rate for a residential use is 12.23 pounds per household per day, according to Section M.3., Solid Waste, in the *L.A. CEQA Thresholds Guide*. Thus, the proposed mixed-use building would generate a net increase of 1,417 pounds per day, or approximately 0.7 tons per day. This estimate is conservative since it does not factor in any recycling or waste diversion programs, or subtract solid waste generated by the existing uses on-site. The proposed project's solid waste would be handled by private waste collection services. The

0.4 tons generated by the project would not exceed the existing daily capacity of any of the landfills listed in Table 28.

### Table 29 Estimated Solid Waste Generation

| Land Use Type | Number of Proposed Units/Employees | Solid Waste Generate Rate (pounds per day) | Total Solid Waste Generation (pounds per day) |
|---|---|---|---|
| Proposed Apartment Complex | 112 units | 12.23 | 1,333 |
| Proposed Commercial Component | 8 employees | 10.53 | 84 |
| Total Project Solid Waste Generation | | | 1,417 |

Sources: Source: *L.A. CEQA Thresholds Guide*, 2006, Section M.3

The proposed project would comply with federal, State, and local statutes and regulations related to solid waste, such as AB 939, the Solid Waste Management Policy Plan, and the City's recycling program and impacts would be less than significant.

## Cumulative Impacts

**LESS THAN SIGNIFICANT IMPACT**

As discussed above, the proposed project would not cause significant impacts related to water demand, wastewater treatment, and solid waste facilities and landfill capacities. Impacts related to public utilities and services are typically assessed on a project-by-project basis, due to the site-specific demands and generation rates. As with the project, related projects would address site-specific utility impacts through environmental review and implementation of site-specific recommendations and/or mitigation measures, if necessary. In addition, all related development located within the vicinity of the project site would be subject to applicable local and regional regulations pertaining to utilities that service the area. Therefore, the cumulative impact would be less than significant.

# 19 Mandatory Findings of Significance

| | Potentially Significant Impact | Potentially Significant Unless Mitigation Incorporated | Less than Significant Impact | No Impact |
|---|---|---|---|---|
| a. Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, 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 that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)? | ☐ | ■ | ☐ | ☐ |
| c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? | ☐ | ☐ | ■ | ☐ |

*a. Does the project have the potential to substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, 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**

A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues, as discussed in the preceding sections. As discussed in Section 4, *Biological Resources*, the entirety of the site is paved and includes two trees on site and three trees in the City's right-of-way. Because all five of the trees will be removed, the proposed project does have the potential to impact migratory and other bird species if construction activities occur during the nesting season. As such, implementation of RCM-5 is required to reduce impacts to nesting birds to a less than significant level. However, the project is within an urbanized area and is typical of an urban environment. The project site does not contain habitat of quality to support native riparian plant/wildlife species or other sensitive natural communities which would not have the potential to

substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

In addition, the proposed project would require excavation below the surficial soil layers for the construction of an underground parking level. This could uncover previously undisturbed paleontological resources, human remains, or tribal cultural resources. As noted under Section 5, *Cultural Resources*, and Section 17, *Tribal Cultural Resources*, implementation of the proposed project would have a less than significant impact on known cultural resources with implementation of RCM-7, -8, -9, and -20, which would require adherence to existing local, state and federal regulations related to the discovery of any unanticipated cultural or tribal cultural resources and human remains during construction activity. With implementation of RCM-7, -8, -9, and -20 impacts to California history or pre-history would be reduced to a less than significant level.

*b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

**POTENTIALLY SIGNIFICANT UNLESS MITIGATION INCORPORATED**

A significant impact may occur if the proposed project, in conjunction with other related projects in the vicinity of the project site, would result in impacts that may be less than significant when viewed separately, but would be significant when viewed together. According to the TIS prepared by LLGE, 121 approved and/or under construction projects are located within 1.5 miles of the project site (Appendix F).

As described in the discussion of environmental checklist Sections 1 through 18, the project would have no impact, a less than significant impact, or a less than significant impact with mitigation incorporated, with respect to all environmental issues. The project's contribution to cumulative regional and global impacts with respect to such issues as air quality, climate change, and noise would not be substantial due to the project size, location, and design. Some of the other resource areas (agricultural and mineral) were determined to have no impact in comparison to existing conditions; therefore, the project would not contribute to cumulative impacts related to these issues. The nearest proposed projects are The Reef Project, located at 1900 Broadway approximately 0.1 mile west of the project site and the 233 Washington Boulevard project located approximately 0.3 mile west of the project site. The Reef Project is a proposed mixed-use complex with 1,450 dwelling units, a 210-room hotel, 143,100 square feet of retail space, 180,000 square feet of office space, 17,600 square feet of gallery space, and an 8,000-square foot gym. The 233 Washington Boulevard project is a proposed mixed-use project with 160 dwelling units and 24,000 square feet of retail space. Due to the distance of these projects from the project site, cumulative air quality and noise impacts from construction activities would be less than significant. As discussed in Section 16, *Transportation*, the TIS provides an analysis for potential cumulative traffic impacts (Future Conditions Year 2020), which were found to be less than significant. However, should construction of The Reef Project, the 233 Washington Boulevard project, and the proposed project overlap, short-term cumulative construction-related traffic impacts could occur. In the event that construction of these three projects occurs simultaneously, construction associated with the proposed project would have a cumulatively considerable contribution to short-term cumulative traffic impacts. Implementation of Mitigation Measure TRA-2 (see Section 16, *Transportation*) would be required to reduce cumulative construction traffic impacts to less than significant levels.

*c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

**LESS THAN SIGNIFICANT IMPACT**

A significant impact may occur if the proposed project has the potential to result in significant impacts, as discussed in the preceding sections. In general, impacts to human beings are associated with such issues as air quality, hazards and hazardous materials, and noise impacts. As detailed in Section 3, *Air Quality*, Section 8, *Hazards and Hazardous Materials*, and Section 16, *Transportation/Traffic*, the proposed project would not result, either directly or indirectly, in significant hazards related to air quality, hazardous materials, or traffic congestion. As discussed in Section 12, *Noise,* short-term construction and long-term operational use would not create significant impacts on neighboring properties. In addition, noise impacts on the proposed project would be reduced to less than significant levels through implementation of the mitigation measures identified in Section 12. Compliance with applicable rules and regulations, RCMs, and mitigation measures would reduce potential impacts on human beings to a less than significant level.

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# References

## Bibliography


Arbor Essence. 2018. *Washington/L A Mixed Use.* Glendale, CA. January 3, 2018.

California Air Pollution Control Officers Association (CAPCOA). *CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act*. January 2008. http://www.capcoa.org/wp-content/uploads/2012/03/CAPCOA-White-Paper.pdf (accessed January 2018)

California Air Resources Board (CARB). October 18, 2017a. *Area Designations Maps/State and National*. http://www.arb.ca.gov/desig/adm/adm.htm (accessed January 2018)

_____. 2017b. *Top 4 Summary: Select Pollutant, Years, & Area.* https://www.arb.ca.gov/adam/topfour/topfour1.php (accessed January 2018)

_____. April 2005. *Quality and Land Use Handbook: A Community Health Perspective.* https://www.arb.ca.gov/ch/handbook.pdf (accessed January 2018)

California Department of Conservation (DOC). 2015. CGS Information Warehouse: Mineral Land Classification. http://maps.conservation.ca.gov/cgs/informationwarehouse/ (accessed January 2018)

_____. 2016. *Los Angeles County Important Farmland 2016*. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2016/los16.pdf (accessed January 2018).

_____. 2014. *State of California Williamson Act Contract Land*. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/2014%20Statewide%20Map/WA_2014_11x17.pdf. (accessed January 2018).

California Department of Finance (DOF). 2017. *E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2017 with 2010 Census Benchmark*. http://www.dof.ca.gov/Forecasting/Demographics/Estimates/E-5/ (access January 2018)

California Department of Transportation (Caltrans). 2017. *List of eligible and officially designated State Scenic Highways.* [Spreadsheet]. Last modified: March 27, 2017. http://www.dot.ca.gov/design/lap/livability/scenic-highways/2017-03DesigandEligible.xlsx (accessed January 2018).

California Geological Survey (CGS). 2014. *Earthquake Zones of Required Investigation, Hollywood Quadrangle*. [Map]. Tabular digital data and vector digital data. 1:24,000. California Department of Conservation. Sacramento, CA. November 6, 2014. http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/HOLLYWOOD_EZRIM.pdf (accessed January 2018).

Federal Emergency Management Agency (FEMA). 2008. Flood Insurance Rate Map (FIRM) #06037C1620F. September 26, 2008.

Federal Highway Administration (FHWA). 2006. "Construction Noise Handbook." U.S. Department of Transportation. Last modified: August 2006. https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/ (accessed January 2018).

_____. 2017. "Highway Traffic Noise Analysis and Abatement Policy and Guidance." U.S. Department of Transportation. Last modified: August 24, 2017. https://www.fhwa.dot.gov/environMent/noise/regulations_and_guidance/polguide/polguide05.cfm (accessed January 2018).

Geocon West, Inc. (Geocon). 2018. *Geotechnical Investigation: Proposed Mixed-Use Development 200-224 East Washington Boulevard and 1910-1914 South Los Angeles Street, Los Angeles, California.* Burbank, CA. January 25, 2018.

Los Angeles Bureau of Sanitation (LASAN). 2013. City of Los Angeles Solid Waste Integrated Resources Plan – A Zero Waste Master Plan. https://www.lacitysan.org/san/sandocview?docname=cnt012522

_____. 2018a. *Clean Water*. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw?_adf.ctrl-state=g8rtik474_566&_afrLoop=12924000914586953&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D12924000914586953%26_afrWindowMode%3D0%26_adf.ctrl-state%3D11gdr3vhtl_187 (accessed January 2018)

_____. 2018b. *Hyperion Water Reclamation Plant*. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=g8rtik474_1329&_afrLoop=12923882111664877&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D12923882111664877%26_afrWindowMode%3D0%26_adf.ctrl-state%3D11gdr3vhtl_126 (accessed January 2018)

_____. 2018c. Construction & Demolition Recycling. Citywide Construction and Demolition (C and D) Waste Recycling Ordinance. https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-r/s-lsh-wwd-s-r-cdr?_adf.ctrl-state=18spguip9s_4&_afrLoop=12922031027119043&_afrWindowMode=0&_afrWindowId=null#!%40%40%3F_afrWindowId%3Dnull%26_afrLoop%3D12922031027119043%26_afrWindowMode%3D0%26_adf.ctrl-state%3D11gdr3vhtl_4

Los Angeles Bureau of Sanitation. 2018. Sewer Capacity Availability Request (62-4118-0318). April 3, 2018.

Los Angeles, City of. 1995. *Los Angeles Citywide General Plan Framework Draft Environmental Impact Report.* Los Angeles, CA. January 19, 1995.

____. 1996. *Safety Element of the Los Angeles City General Plan*. Los Angeles, CA. November 26, 1996. https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf

_____. 1999. *Noise Element of the Los Angeles City General Plan*. Los Angeles, CA. February 3, 1999. https://planning.lacity.org/cwd/gnlpln/noiseElt.pdf

____. 2001. *Conservation Element of the City of Los Angeles General Plan.* Los Angeles, CA. September 26, 2001. https://planning.lacity.org/cwd/gnlpln/consvelt.pdf

____. 2006. *L.A. CEQA Thresholds Guide: Your Resource for Preparing CEQA Analyses in Los Angeles.* Los Angeles, CA. http://www.environmentla.org/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf

_____. 2007. *Green LA: An Action Plan to Lead the Nation in Fighting Global Warming*. May 2007. http://environmentla.org/pdf/GreenLA_CAP_2007.pdf (accessed January 2018)

____. 2013. *General Plan Land Use Map (as of August 22, 2013), Southeast Los Angeles Community Plan, A Part of the General Plan of the City of Los Angeles.* [map]. Tabular digital data and vector digital data. 1:31,200. City of Los Angeles Planning Department. Los Angeles, CA. https://planning.lacity.org/complan/central/PDF/selplanmap.pdf (accessed January 2018).

____. 2015a. *Plan for a Healthy Los Angeles: A Health and Wellness Element of the General Plan.* Los Angeles, CA. March 2015. http://planning.lacity.org/cwd/gnlpln/PlanforHealthyLA.pdf

_____. 2015b. *pLAn: Transforming Los Angeles*. April 8, 2015. http://plan.lamayor.org/wp-content/uploads/2017/03/the-plan.pdf (accessed January 2018).

____. 2016a. *Mobility Plan 2035, An Element of the General Plan.* Los Angeles, CA. September 7, 2016. https://planning.lacity.org/documents/policy/mobilityplnmemo.pdf

____. 2016b. *Southeast Los Angeles Community Plan*. Los Angeles, CA. September 7, 2016. https://planning.lacity.org/complan/pdf/selcptxt.pdf

____. 2018. "Official City of Los Angeles Municipal Code." Last modified: December 31, 2017. http://library.amlegal.com/nxt/gateway.dll/California/lamc/municipalcode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc (accessed January 2018).

____. n.d. *City of Los Angeles, Department of City Planning, Zoning Information File ZI No. 2452, Transit Priority Areas (TPAs)/Exemptions to Aesthetics and Parking within TPAs Pursuant to CEQA.* Los Angeles, CA. http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf

Los Angeles, City of, Department of Parks and Recreation (RAP). 2018a. *Department of Recreation and Parks. Facility Map Locator.* (accessed January 2018). http://www.laparks.org/maplocator?cat_id=All&geo[radius]=1&geo[latitude]=34.024032&geo[longitude]=-118.277746&address=515%20W%2031st%20St,%20Los%20Angeles,%20CA%2090007,%20USA

Los Angeles County. 2013. *GIS-NET3 Public: Planning & Zoning Information for unincorporated LA County.* [map]. Last modified: 2013. Los Angeles County Department of Regional Planning. http://rpgis.isd.lacounty.gov/GIS-NET3_Public/Viewer.html (accessed January 2018).

_____. 2015. *Countywide Integrated Waste Management Plan: 2014 Annual Report.* https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=4710&hp=yes&type=PDF

Los Angeles County, Department of Public Works. 2017. *County of Los Angeles Countywide Integrated Waste Management Plan: 2016 Annual Report*. September 2017. https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF (accessed January 2018)

Los Angeles Department of Transportation (LADOT). 2018. Inter-departmental correspondence from Wes Pringle, Transportation Engineer, Department of Transportation to Luciralia Ibarra, City Planner, Department of City Planning regarding the Transportation Impact Assessment for the Proposed Washington Boulevard Mixed-Use Project Located at 200-224 East Washington and 1910-914 South Los Angeles (ENV-2018-1095-EAF). August 15, 2018.

Los Angeles Department of Water and Power (LADWP). 2016. *Urban Water Management Plan 2015*. Los Angeles, CA. April 27, 2016. https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=QOELLADWP005416&RevisionSelectionMethod=LatestReleased

Los Angeles Fire Department (LAFD). 2018a. "Find your station." http://www.lafd.org/fire-stations/station-results?st=361&address=200%20E%20Washington%20Blvd%2C%20Los%20Angeles (accessed February 2018).

Los Angeles Police Department (LAPD). 2018a. "Central Community Police Station." Los Angeles Police Foundation and LAPD. Last modified: 2018. http://www.lapdonline.org/central_community_police_station (accessed February 2018).

____. 2018b. "About Central Area." Los Angeles Police Foundation and LAPD. Last modified: 2018. http://www.lapdonline.org/central_community_police_station/content_basic_view/1681 (accessed March 2018).

Los Angeles Public Library. 2015. *Los Angeles Public Library Strategic Plan 2015-2020.* Los Angeles, CA. June 2015. https://www.lapl.org/sites/default/files/media/pdf/about/LAPL_Strategic_Plan_2015-2020.pdf

____. n.d. "Los Angeles Public Library Locations & Hours." City of Los Angeles. https://www.lapl.org/branches?distance%5Bpostal_code%5D=90015&distance%5Bsearch_distance%5D=2&distance%5Bsearch_units%5D=mile&field_branch_resources_services_tid=All (accessed March 2018).

Los Angeles Unified School District (LAUSD). 2017a. *L.A. Unified Fingertip Facts, 2017-2018 Destination Graduation.* Los Angeles, CA. October 2017. https://achieve.lausd.net/cms/lib/CA01000043/Centricity/Domain/32/NewlyUpdatedFingertip%20Facts2017-18_English.pdf

____. 2017b. *Los Angeles Unified School District Reference Guide: Norm Day and Classification Reports – Instructions and Schedules of Electronic Capture.*REF-1819.15. Los Angeles, CA. August 14, 2017. https://achieve.lausd.net/cms/lib/CA01000043/Centricity/domain/123/memorandum%20and%20reference%20guide/REF-1819.15_NORM_DAY_AND_CLASS.pdf

Office of Environmental Health Hazard Assessment (OEHHA). 2001. *2001 Particulate Matter Health Effects and Standard Recommendations*. December 10, 2001. www.oehha.ca.gov/air/toxic_contaminants/PM10notice.html#may (accessed January 2018).

Rincon Consultants, Inc. (Rincon). 2016a. *Phase I Environmental Site Assessment: 200 E. Washington Boulevard and 1910 S. Los Angeles Street, Los Angeles, California.* Ventura, CA. March 1, 2016.

____. 2016b. *Phase II Environmental Site Assessment: 200 East Washington Boulevard and 1910 South Los Angeles Street, Los Angeles, California*. Ventura, CA. June 30, 2016.

____. 2018a. *Phase I Environmental Site Assessment: 200-224 East Washington Boulevard, 1910 South Los Angeles Street, and 1901 Santee Street, Los Angeles, California.* Ventura, CA. January 19, 2018.

____. 2018b. *Phase II Environmental Site Assessment: 200-224 E. Washington Boulevard, 1910-1918 S. Los Angeles Street & 1901 Santee Street, Los Angeles, California.* Los Angeles, CA. March 5, 2018.

South Coast Air Quality Management District (SCAQMD). March 2015.*SCAQMD Air Quality Significance Thresholds*. http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf(accessed February 2018)

_____. February 2016. *Final 2016 Air Quality Management Plan*. http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15

_____. 2009. *Table C-1. 2006 – 2008 Thresholds for Construction and Operation with Gradual Conversion of $NO_X$ to $NO_2$*. June 2009. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/appendix-c-mass-rate-lst-look-up-tables.pdf?sfvrsn=2 (accessed January 2018).

_____. 2008. *Final Localized Significance Threshold Methodology*. June 2003. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf (accessed January 2018).

_____. *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plan*s. December 5, 2008. http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2

Southern California Associate of Governments (SCAG). 2015. *SCAQMD Air Quality Significance Threshold*. March 2015. http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf (accessed January 2018)

_____. 2001. *Employment Density Study Summary Report*. October 31, 2001. https://www.mwcog.org/uploads/committee-documents/YV5WXFhW20110503134223.pdf (accessed January 2018)

_____. 2016. *2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) Appendix: Current Demographics & Growth Forecast*. http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf (accessed January 2018)

State of California. 2017. Executive Order B-40-17. https://www.gov.ca.gov/wp-content/uploads/2017/09/4.7.17_Exec_Order_B-40-17.pdf (accessed September 2018).

State Water Resources Control Board (SWRCB). 2018. "Regulation on Waste and Unreasonable Water Uses." Last modified: February 2018. https://www.waterboards.ca.gov/water_issues/programs/conservation_portal/regs/wasteful_water_uses.html (accessed September 2018).

Treffers, Steven, Susan Zamudio-Gurrola, and Shannon Carmack. 2018. *Washington/Los Angeles Mixed Use Project: Historical Resources Assessment Report*. Rincon Consultants Project No. 17-05301.

United States Department of Transportation (US DOT). 2006. *Transit Noise and Vibration Impact Assessment*. FTA-VA-90-1003-06. May 2006. https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/FTA_Noise_and_Vibration_Manual.pdf

_____. 2016. *Criteria Air Pollutants*. https://www.epa.gov/criteria-air-pollutants (accessed January 2018).

_____. October 2004. *Air Quality Criteria for Particulate Matter.* https://cfpub.epa.gov/ncea/risk/recordisplay.cfm?deid=87903 (accessed January 2018).

United States Fish and Wildlife Service (USFWS). 2017. "Wetlands Mapper." Last modified: October 1, 2017. https://www.fws.gov/wetlands/data/mapper.html (accessed January 2018).

____. n.d. "Environmental Conservation Online System." http://ecos.fws.gov/ecp0/conservationPlan/region/summary?region=8&type=HCP. (accessed January 2018).

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