CITY OF LOS ANGELES

DEPARTMENT OF CITY PLANNING

City Hall • 200 N. Spring Street, Room 750 • Los Angeles, CA 90012

INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

Environmental Case No.: ENV-2016-2580-MND
Related Case Nos.: CPC-2016-2579-VZC-BL-MCUP-ZAD-SPR
VTT-74191
Project Title: 3700 Wilshire Project

Council District No. 1

THIS DOCUMENT COMPRISES THE INITIAL STUDY/PROPOSED MITIGATED NEGATIVE DECLARATION ANALYSIS AS REQUIRED UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

Project Addresses: 3700 Wilshire Boulevard, Los Angeles, CA 90010
Project Description: The Project Site is located on the south side of Wilshire Boulevard, between Oxford Avenue to the west and Serrano Avenue to the east, in the City of Los Angeles, 90010. The total area that composes the Project site is approximately 137,902 gross square feet (or 3.166 acres). The Site is within ZI-2410 Metro Westside Subway Extension Project, ZI-1117 MTA Project, ZI-2452 Transit Priority Area in the City of Los Angeles, ZI-2374 Los Angeles State Enterprise Zone, ZI-1940 Wilshire Center / Koreatown Redevelopment Project and Adaptive Reuse Incentive Area. The Project Site is currently developed with an 11-story, approximately 295,942 square foot office building located on the rear half of the Project Site with a 46,153 square foot lawn and plaza area fronting the office building located on the front half of the Project Site. The office building and parking would remain as part of the proposed Project and the land occupied by the lawn and plaza is proposed to be developed with a mixed-use residential and commercial building. The lawn and plaza area (hardscape) are approximately 65,000 square feet (1.5 acres).

The Project proposes development of a mixed-use 36-story, 531,470 square foot tower building containing 506 residential units (381 1-bedroom units, 119 2-bedroom units, and 6 penthouse 3-bedroom units) and 62,035 square feet of commercial space (40,322 square feet retail, 6,204 square feet quality restaurant, 12,407 square feet high-turnover sit-down restaurant, and 3,102 square feet fast-food restaurant). The proposed building would be oriented on the north portion of the Project Site. The Project will require approval of the following discretionary actions:

1. Vesting Zone Change per Section 12.32.Q from C4-2, CR-2, and P-2 to [Q]C4-2;
2. Building line removal per Section 12.32.R to remove a 5-foot building line on Wilshire Boulevard;
3. Master Conditional Use Permit per Section 12.24.W.1 to permit the on-site sale of alcoholic beverages within four establishments;
4. Zoning Administrator's Determination per Section 12.24.X.20 to permit shared parking between the residential, commercial, and office uses;
5. Site Plan Review per Section 16.05.C.1(b) for the construction of 506 residential dwelling units and 62,035 sf. of non-residential floor area;
6. Vesting Tentative Tract Map per Section 17.15 to create one ground floor lot and 5 airspace lots; and
7. Any additional actions as may be deemed necessary or desirable, including but not limited to, grading, excavation, haul route, and building permits.

APPLICANT: Wilshire Park Place, LLC and Wilshire Park Place North, LLC

PREPARED FOR: Los Angeles Department of City Planning

PREPARED BY: CAJA Environmental Services, LLC

SIGNATURE (OFFICIAL)	DATE
Nicholas Hendricks	1/9/2017

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CITY OF LOS ANGELES

CALIFORNINA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY AND CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in 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 potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature	**Date**
	11/29/2016
Printed Name	
Heather Bleemers	

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

BACKGROUND

PROPONENT NAME *Wilshire Park Place, LLC and Wilshire Park Place North, LLC*	**PHONE NUMBER** *213-201-1009*
PROPONENT ADDRESS *3470 Wilshire Boulevard, Suite 700, Los Angeles, California 90010*	
AGENCY REQUIRING CHECKLIST *City of Los Angeles Department of City Planning*	**DATE SUBMITTED** *November 2016*
PROPOSAL NAME (If Applicable) *3700 Wilshire Project*	

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

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
1.	**AESTHETICS.** Would the project:				
a.	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b.	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, within 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 which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐
2.	**AGRICULTURE AND FORESTRY RESOURCES.** In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project, and the Forest Legacy Assessment project; and forest carbon measurement mythology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a.	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b.	Conflict the 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	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	(g))?				
d.	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e.	Involve other changes in the existing environment, which due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒
3.	**AIR QUALITY.** Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
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.** Would the project:				
a.	Have a substantial adverse effect, either directly or through habitat modifications on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the local or regional plans, policies, regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	Service?				
c.	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	☐	☒	☐	☐
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:** Would the project:				
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 pursuant to §15064.5?	☐	☐	☒	☐
c.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐
d.	Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐
6.	**GEOLOGY AND SOILS.** Would the project:				
a.	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i.	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii.	Strong seismic ground shaking?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
iii.	Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv.	Landslides?	☐	☐	☐	☒
b.	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c.	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potential result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d.	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☒	☐
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.** Would the project:				
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b.	Conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐
8.	**HAZARDS AND HAZARDOUS MATERIALS.** Would the project:				
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to	☐	☐	☐	☒

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?				
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for the people residing or working in the area?	☐	☐	☐	☒
g.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h.	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☐	☐	☒
9.	**HYDROLOGY AND WATER QUALITY.** Would the proposal result in:				
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 of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned land uses for which permits have been granted)?	☐	☐	☒	☐
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off site?	☐	☐	☒	☐
e.	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	systems or provide substantial additional sources of polluted runoff?				
f.	Otherwise substantially degrade water quality?	☐	☐	☒	☐
g.	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h.	Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i.	Expose people or structures to a significant risk of loss, inquiry or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j.	Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒
10.	**LAND USE AND PLANNING**. Would the project:				
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, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c.	Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒
11.	**MINERAL RESOURCES**. Would the project:				
a.	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b.	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒
12.	**NOISE.** Would the project result in:				
a.	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	☐	☒	☐	☐

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
	other agencies?				
b.	Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c.	Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d.	Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☒	☐	☐
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f.	For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
13.	**POPULATION AND HOUSING**. Would the project:				
a.	Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b.	Displace substantial numbers of existing housing necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c.	Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
14.	**PUBLIC SERVICES.**				
a.	Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i.	Fire protection?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii.	Police protection?	☐	☒	☐	☐
iii.	Schools?	☐	☐	☒	☐
iv.	Parks?	☐	☐	☒	☐
v.	Other public facilities?	☐	☐	☒	☐
15.	**RECREATION.**				
a.	Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b.	Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐
16.	**TRANSPORTATION/TRAFFIC**. Would the project:				
a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?	☐	☐	☒	☐
b.	Conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d.	Substantially increase hazards to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
e.	Result in inadequate emergency access?	☐	☐	☒	☐

		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycles, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?	☐	☐	☒	☐
17.	**UTILITIES AND SERVICE SYSTEMS.** Would the project:				
a.	Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b.	Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c.	Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d.	Have sufficient water supplies available to serve the project from existing entitlements and 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?	☐	☐	☒	☐
18.	**MANDATORY FINDINGS OF SIGNIFICANCE.**				
a.	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b.	Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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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2. PROJECT DESCRIPTION

The section is based in part on the following item, included as Appendix A of this IS/MND:

A Plans, Callison RTKL, June 8, 2016.

Introduction

Project Title:	3700 Wilshire Project
Case Numbers:	ENV-2016-2580-MND CPC-2016-2579-VZC-BL-MCUP-ZAD-SPR Vesting Tentative Tract No. 74191
Project Location:	3700 Wilshire Boulevard, Los Angeles, CA 90010
Lead Agency:	City of Los Angeles, Department of City Planning 200 N. Spring Street, Room 763, Los Angeles, California 90012
City Staff Contact:	Heather Bleemers, City Planner (213) 978-0092 and heather.bleemers@lacity.org
Project Applicant:	Wilshire Park Place, LLC Wilshire Park Place North, LLC 3470 Wilshire Boulevard, Suite 700, Los Angeles, California 90010

The subject of this Initial Study/Mitigated Negative Declaration (IS/MND) under the California Environmental Quality Act (CEQA) is the proposed 3700 Wilshire Project (the Project), which consists of a new residential and commercial development.

CEQA Statutes and Guidelines

According to CEQA Statute § 21064.5:

MITIGATED NEGATIVE DECLARATION

"Mitigated negative declaration" means a negative declaration prepared for a project when the initial study has identified potentially significant effects on the environment, but (1) revisions in the project plans or proposals made by, or agreed to by, the applicant before the proposed negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur, and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

According to CEQA Guidelines Article 6, Negative Declaration Process:

15070. DECISION TO PREPARE A NEGATIVE OR MITIGATED NEGATIVE DECLARATION

A public agency shall prepare or have prepared a proposed negative declaration or mitigated negative declaration for a project subject to CEQA when:

(a) The initial study shows that there is no substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment, or

(b) The initial study identifies potentially significant effects, but:

(1) Revisions in the project plans or proposals made by, or agreed to by the applicant before a proposed mitigated negative declaration and initial study are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur, and

(2) There is no substantial evidence, in light of the whole record before the agency, that the project as revised may have a significant effect on the environment.

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A Negative Declaration circulated for public review shall include:

(a) A brief description of the project, including a commonly used name for the project, if any;

(b) The location of the project, preferably shown on a map, and the name of the project proponent;

(c) A proposed finding that the project will not have a significant effect on the environment;

(d) An attached copy of the Initial Study documenting reasons to support the finding; and

(e) Mitigation measures, if any, included in the project to avoid potentially significant effects.

Project Location

The Project Site is located on the south side of Wilshire Boulevard, between Oxford Avenue to the west and Serrano Avenue to the east, in the City of Los Angeles, 90010. See Figure 1, Regional Map, for the location within the City. See Figure 2, Aerial Map, for the Project Site and surrounding areas.

Regional Setting

The Site is approximately 3 miles west of the Downtown Los Angeles and approximately 11 miles east of the Pacific Ocean. The Site is located within the Wilshire Community Plan (WCP). The majority of the WCP consists of gently sloping plains and includes about 8,954 acres (about 14 square miles), which is approximately 3 percent of the total land in the City of Los Angeles. The WCP is often referred to as the Mid-City section of Los Angeles. The eastern edge of the approximately 2.5-mile wide by 6-mile long

plan area is about 6 miles west of Downtown Los Angeles, while the western edge abuts the City of Beverly Hills. The plan area is bounded by Melrose Avenue and Rosewood Avenue to the north; 18th Street, Venice Boulevard and Pico Boulevard to the south; Hoover Street to the east; and the Cities of West Hollywood and Beverly Hills to the west. The WCP area is surrounded by the City of Los Angeles community plan areas of Hollywood to the north; South Central Los Angeles and West Adams Leimert-Baldwin Hills to the south; Silverlake-Echo Park and Westlake to the east; and West Los Angeles to the west. The plan area is generally southwest of the Hollywood Freeway (U.S. 101), which is oriented northwest-southeast across the northeast corner of the Plan Area at Vermont and Rosewood Avenues. The Hollywood Freeway is the only freeway within the Wilshire plan area. The Harbor Freeway (I-110) is located one mile to the east; the Santa Monica Freeway (I-10) is located one mile to the south; and the San Diego Freeway (I-405) is approximately five miles to the west of the community boundaries.

The Metro Red Line subway also serves the WCP, running along portions of Wilshire Boulevard and Vermont Avenue. The WCP Area has a pattern of low to medium density residential uses interspersed with areas of higher density residential uses. Long narrow corridors of commercial activity can be found along major boulevards including Wilshire, Pico, La Cienega, Western and Vermont. The plan area east of Western Avenue contains large concentrations of higher-density residential neighborhoods surrounding the regional commercial area known as Wilshire Center. The street pattern in the Wilshire area is primarily a grid. Most of the street network is oriented on primary compass points with few exceptions. Notably, south of Wilshire Boulevard and west of Wilton Place, the street grid shifts uniformly towards a northeast/southwest alignment, while east/west streets shift somewhat to a northwest/southeast orientation. Wilshire Boulevard between Hoover Street and Western Avenue includes a substantial number of mid-rise buildings, generally with minimal setbacks or setbacks that increase the sidewalk width along the boulevard and some with ground floor shops and services. This highly urbanized section of the boulevard experiences considerable pedestrian activity and is supported by Metro Red Line subway service. The Wilshire Center Regional Commercial Center is approximately 100 acres in size. It includes a dense collection of high-rise office buildings, large hotels, regional shopping complexes, churches, entertainment centers, and both high-rise and low-rise apartment buildings.[1]

Regional and Local Access

The US-101 Freeway provides regional access approximately 2.0 miles north of the Site and the I-10 Freeway approximately 1.65 miles south of the Site. Wilshire and Western Avenue provide local access.

Public Transit

LA County Metro Line 20 and Foothill Transit (FT) Line 481 stop at Wilshire and Serrano. Metro Line 207 and LADOT DASH Wilshire Center stop at Western and 7th. Metro Purple Line subway has a station stop at Wilshire and Western, approximately 300 feet from the Site.

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[1] *Wilshire Community Plan: http://cityplanning.lacity.org/complan/pdf/wilcptxt.pdf*

Site Characteristics

The Project Site's assessor parcel number (APN), zoning, and land use designation are listed on Table 2-1, Project Site. The total area that composes the Project site is approximately 137,902 gross square feet[2] (or 3.166 acres). The Site is within ZI-2410 Metro Westside Subway Extension Project, ZI-1117 MTA Project, ZI-2452 Transit Priority Area in the City of Los Angeles, ZI-2374 Los Angeles State Enterprise Zone, ZI-1940 Wilshire Center/Koreatown Redevelopment Project and Adaptive Reuse Incentive Area.

Table 2-1

Project Site

Address	APN	Zone	General Plan Land Use	Size (sf)
3700, 3732 Wilshire 672, 674, 658 Oxford 673, 651, 655 Serrano	5093-006-019	C4-2 CR-2 P-2	Regional Center Commercial	108,181.0
3720, 3710, 3728 Wilshire	5093-006-021	P-2		29,721.6
Source: Zone Information & Map Access System (ZIMAS): http://zimas.lacity.org, June 2016.				

Existing Uses

The Project Site is currently developed with an 11-story, approximately 295,942 square-foot office building located on the rear half of the Project Site with a 46,153 square-foot lawn and plaza area fronting the office building located on the front half of the Project Site. The ground floor of the office building is occupied by a café restaurant and bank and the upper floors are occupied by offices uses. Three parking levels are located underneath the office building and portion of the lawn and plaza area. The office building and parking would remain as part of the proposed Project and the land occupied by the lawn and plaza is proposed to be developed with a mixed-use residential and commercial building, as described below. The lawn and plaza area (hardscape) are approximately 65,000 square feet (1.5 acres).[3]

Project Site Zoning and Land Uses

The WCP designates the Project Site as Regional Center Commercial. Approximately 73,187 square feet of land in the northern portion of the Project Site is zoned P-2 and contains the lawn and portion of the plaza. To the south on the Project Site is approximately 57,046 square feet of land zoned C4-2 and contains the remaining portion of the plaza and commercial office building. To the south of the office

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[2] *Callison RTKL, Inc., June 2016.*

[3] *Google maps measurement.*

building on the Project Site is approximately 7,669 square feet of land zoned CR-2. The Project would require a Zone Change for the portions of the Project Site that are zoned P-2 and CR-2 to C4-2.

Surrounding Uses

North: across Wilshire are twin 9-story office buildings separated by a plaza. The area is zoned C4-2.

South: directly south of the existing office building is the Pio Pico Library building and surface parking lot. The area is zoned CR-2.

West: across Oxford is a two-story building with ground floor restaurant and 3-story parking structure. The area along Wilshire is zoned C4-2 and the area along Oxford is zoned R1-1.

East: across Serrano is a 5-story commercial building with ground floor coffee shop and restaurant uses and a 2-story parking structure with a golf driving range on the upper level. The golf driving range fencing extends to roughly 6-stories in height. The corner of the building at Wilshire and Serrano contains a rooftop electronic sign. The area along Wilshire is zoned C4-2 and along Serrano is zoned R3P-2.

Proposed Project

The Project proposes development of a mixed-use 36-story, 531,470 square-foot tower building containing 506 residential units (381 1-bedroom units, 119 2-bedroom units, and 6 penthouse 3-bedroom units) and 62,035 square feet of commercial space (40,322 square feet of retail, 6,204 square feet of quality restaurant, 12,407 square feet of high-turnover sit-down restaurant, and 3,102 square feet of fast-food restaurant).[4] The proposed building would be oriented on the north portion of the Project Site.

Building Program

The commercial space would occupy the entire ground floor of the new building and a portion of the second floor oriented on the western portion of the Project Site with above grade parking located on the eastern portion of the second level. Proposed open space would connect the new building to the existing office building to create a unified design and operation. The remaining levels of the towers would be oriented on the eastern portion above the Project Site. Additional above grade parking levels would be located on the 3rd through 4th mezzanine levels. The 5th level would include a pool deck and resident amenity areas along with 12 residential units. The 6th through 33th levels would contain residential units and additional residential units along with a sky lounge and amenity deck would be located on the 34th level. The 35th level would include five penthouse residential units. Three levels of subterranean parking are proposed underneath the proposed new building that would align and connect with the existing three levels of parking for the office building. The B-1 Mezzanine is a subterranean space, located between level 1 and the B-1 parking level. Its proposed use is bicycle parking. There are 2 bicycle mezzanines: one

[4] *Page 1, Traffic Study Memorandum of Understanding, June 2016.*

for retail parking and a second one for residential bike parking. Both mezzanines are accessible via elevators, egress stairs, and a bicycle ramp/stair allowing users to walk their bicycle to the sidewalk facing ground level bike lobbies. A plot plan is shown in Figure 3. Building plans for each level, elevations, and a viewpoint rendering from the street are shown in Appendix A to this MND.

Floor Area

The Project Site is zoned with Height District 2, which permits a floor area ratio (FAR) of six times the lot area. The proposed Floor Area is 827,412 square feet for a 6:1 FAR. This floor area on the Project Site would be comprised of 295,942 square feet for the existing office building and 531,470 square feet of new floor area with 62,035 square feet of commercial floor area and 469,435 square feet of residential floor area.[5]

Height

Height District 2 regulates permitted FAR but does not prescribe a height limit. The proposed height would be approximately 400 feet to the top of the building parapet and rooftop mechanical covers.

Amenities

The proposed Project would include a 1,350 square foot fitness center for the residential uses, 9,090 square feet of indoor amenity spaces and 19,825 square feet of outdoor amenity space, including a pool (60’ x 40’ x 4’6”) and a spa (8’ x 14’ x 3’6”).

Signage

The proposed Project would include one LED sign facing west on Wilshire and one LED sign facing east. The signs would be provided according to Los Angeles Municipal Code (LAMC) and are by-right. No off-site signage is proposed.

Open Space

Table 2-2, Open Space, provides the amount of required open space and the amount provided.

Table 2-2
Open Space

Amount Required			
Use	**Amount (units)**	**Rate**	**Total**
Units < 3 habitable rooms	381	100 sf / unit	38,100
Units = 3 habitable rooms	119	125 sf / unit	14,875

[5] *Callison RTKL, Inc., June 2016.*

Units > 3 habitable rooms	6	175 sf / unit	1,050
		Total Required	**54,025**
Amount Provided			
Level 1	Common, Outdoor		13,000
Level 6	Common, Outdoor Common, Indoor		15,800 3,350
Level 35	Common, Outdoor Common, Indoor		2,035 2,640
	Private Balconies (50 sf each)		17,200
		Total Provided	**54,025**

In square feet. Per LAMC Section 12.21 G.2.
Source: Callison RTKL, Inc., June 2016.

Access

Vehicle access would be provided by a new driveway on Serrano, which would provide a ramp up to parking on levels 2 through 5 (including mezzanine). Existing driveways on Serrano Avenue and Oxford Avenue for the existing office building would remain and would be reconfigured to provide access to three expanded subterranean parking levels underneath the Project Site. Pedestrian access would be provided via several walkways that cut through the Site, including commercial access on Wilshire Boulevard, Serrano Avenue, and Oxford Avenue, with a residential lobby on Serrano Avenue.

Parking

Table 2-3, Vehicle Parking, explains the amount of required and provided parking as proposed. Of the 1,143 parking spaces provided, 253 spaces will be reserved for residential (0.5 space per unit).

Table 2-3
Vehicle Parking

Amount Required			
Use	**Amount (size)**	**Rate**	**Total spaces**
Residential = 3 habitable rooms	381 units	1.5 per unit	572
Residential > 3 habitable rooms	125 units	2 per unit	250
Commercial	62,035 sf	1 space / 500 sf	124
		Subtotal Required	**946**
		Bicycle Reduction (15% Residential)	**(123)**
		Bicycle Reduction (30% Retail)	**(19)**
		Total Required	**804**
Amount Provided			
Existing Spaces onsite	Level B3 – 194 Level B2 – 190 Level B1 – 96		480
Proposed Spaces onsite	Level B3 – 121 Level B2 – 121 Level B1 – 100		663

	Level 1 – 0 Level 2 – 75 Level 3 – 91 Level 4 – 91 Level 5 – 91 Level 5 Mezzanine – 50	
	Total Provided	**1,143**
Per LAMC Section 12.21 A.4.P.1 and LA Bicycle Parking Ordinance. *Shared Parking Peak Demand is 1,143, with 253 spaces (0,5 per unit) reserved for residential.* *Source: Callison RTKL, Inc., June 2016.*		

Bicycles

LAMC Section 12.21 A.16(a)(2) requires new projects to provide bicycle parking spaces. Commercial uses require one short term and one long term bicycle parking per 2,000 square feet of floor area. Residential uses require one long-term bicycle parking per dwelling unit or guest room and one short-term bicycle parking per ten dwelling units or guest rooms. Short term bicycle parking shall consist of bicycle racks that support the bicycle frame at two points. Long term bicycle parking shall be secured from the general public and enclosed on all sides and protect bicycles from inclement weather. As shown in Table 2-4, Bicycle Parking Required, the Project will provide, at a minimum, 83 short term and 538 long term bicycle spaces.

Table 2-4
Bicycle Parking Required

Use	Amount	Rate	Short-Term	Long-Term
Residential	506 units	1 per 10 units (short-term) 1 per 1 unit (long-term)	51	506
Retail	62,035 sf	1 per 2,000 sf (short-term) 1 per 2,000 sf (long-term)	32	32
Total			**83**	**538**
Source: Callison RTKL, Inc., June 2016.				

Landscaping

The Site currently has 40 trees, including 19 street (sidewalk) trees. The proposed Project would result in the removal of all 40 trees[6] and would replace them per the City's Tree Replacement Program. The Project is required to provide 127 trees onsite (per 0.25 trees per dwelling unit). The Project would meet this requirement. The Project is required to provide 25% (or 9,206 square feet) of landscaped open space per LAMC Section 12.21.G.2.A.3. The Project would meet this requirement.

6 *Callison RTKL, Inc., June 2016.*

Green/Conservation Features

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen).[7]

Construction Information

The estimated construction schedule is shown in Table 2-5, Construction Schedule. Operation could begin in 2020.[8] Demolition will remove approximately 5,600 tons of asphalt, hardscape, and softscape. The amount of soils removed or exported would be approximately 88,600 cubic yards (cy).[9] The Project will contain three subterranean levels.

Haul Route

It is anticipated that the demolition and construction debris will be transported to the Sunshine Canyon Landfill in Sylmar. The estimated haul route is approximately 25 miles and will generally include: Wilshire Boulevard to Western Avenue to US-101 North to I-170 freeway to I-5 freeway to Sepulveda Boulevard to San Fernando Road to Sunshine Canyon Landfill.

Table 2-5
Construction Schedule

Phase	Duration	Est. Dates
Demolition	1 month	July 2017 to August 2017
Site Prep	1 month	Part of demolition
Grading and Excavation	3 months	August 2017 to November 2017
Core/shell Construction	30 months	July 2017 to January 2020
Finishing and Tenant Improvements	17 months	July 2019 to December 2020

Construction schedule, including start, end, and duration dates are estimates only.
Client provided information, June 2016
Table: CAJA Environmental Services, June 2016

Project Objectives

The proposed mixed-use project aims to implement/fulfill the following Project Objectives:

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[7] *Los Angeles Department of Building and Safety: http://ladbs.org/LADBSWeb/green-bldg.jsf*

[8] *Page 1, Traffic Study Memorandum of Understanding, June 2016.*

[9] *Client provided information, June 2016.*

- Capitalize on smart growth opportunity by redeveloping an under-utilized site with a mix of residential and commercial uses located along a commercial corridor, within proximity to public transit and existing jobs and services
- Activate the stretch of Wilshire Boulevard with new contemporary commercial opportunities that would serve the dense residential communities to the south.
- Provide housing that contributes towards the City's Regional Housing Needs Assessment.
- Provide residential and commercial uses near the Purple Line Station.

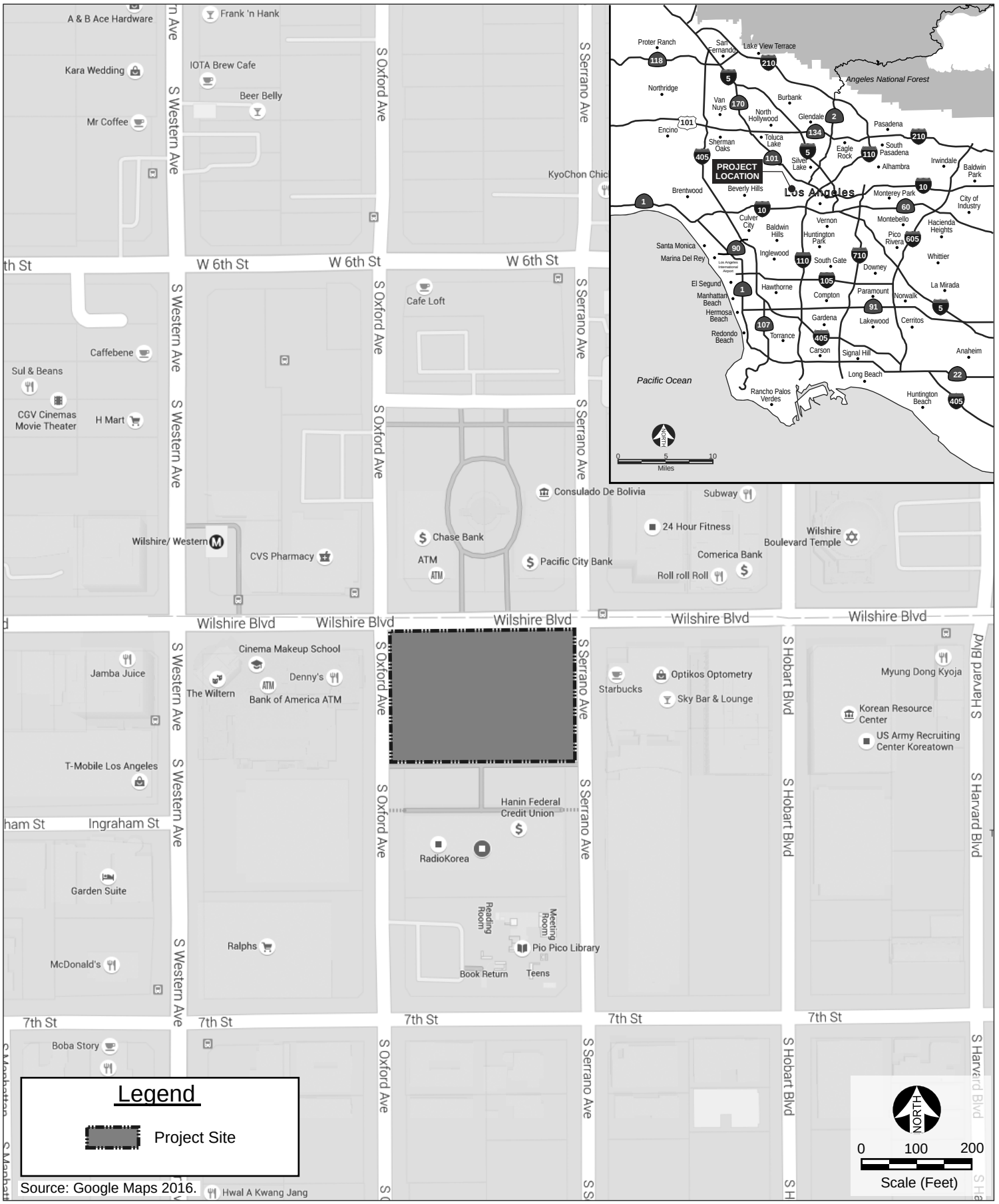
Discretionary Actions

The project will require approval of the following discretionary actions:[10]

1. Vesting Zone Change per Section 12.32.Q from C4-2, CR-2, and P-2 to [Q]C4-2;
2. Building line removal per Section 12.32.R to remove a 5-foot building line on Wilshire Boulevard;
3. Master Conditional Use Permit per Section 12.24.W.1 to permit the on-site sale of alcoholic beverages within four establishments;
4. Zoning Administrator's Determination per Section 12.24.X.20 to permit shared parking between the residential, commercial, and office uses;
5. Site Plan Review per Section 16.05.C.1(b) for the construction of 506 residential dwelling units and 62,035 sf. of non-residential floor area;
6. Vesting Tentative Tract Map per Section 17.15 to create one ground floor lot and 5 airspace lots; and
7. Any additional actions as may be deemed necessary or desirable, including but not limited to, grading, excavation, haul route, and building permits.

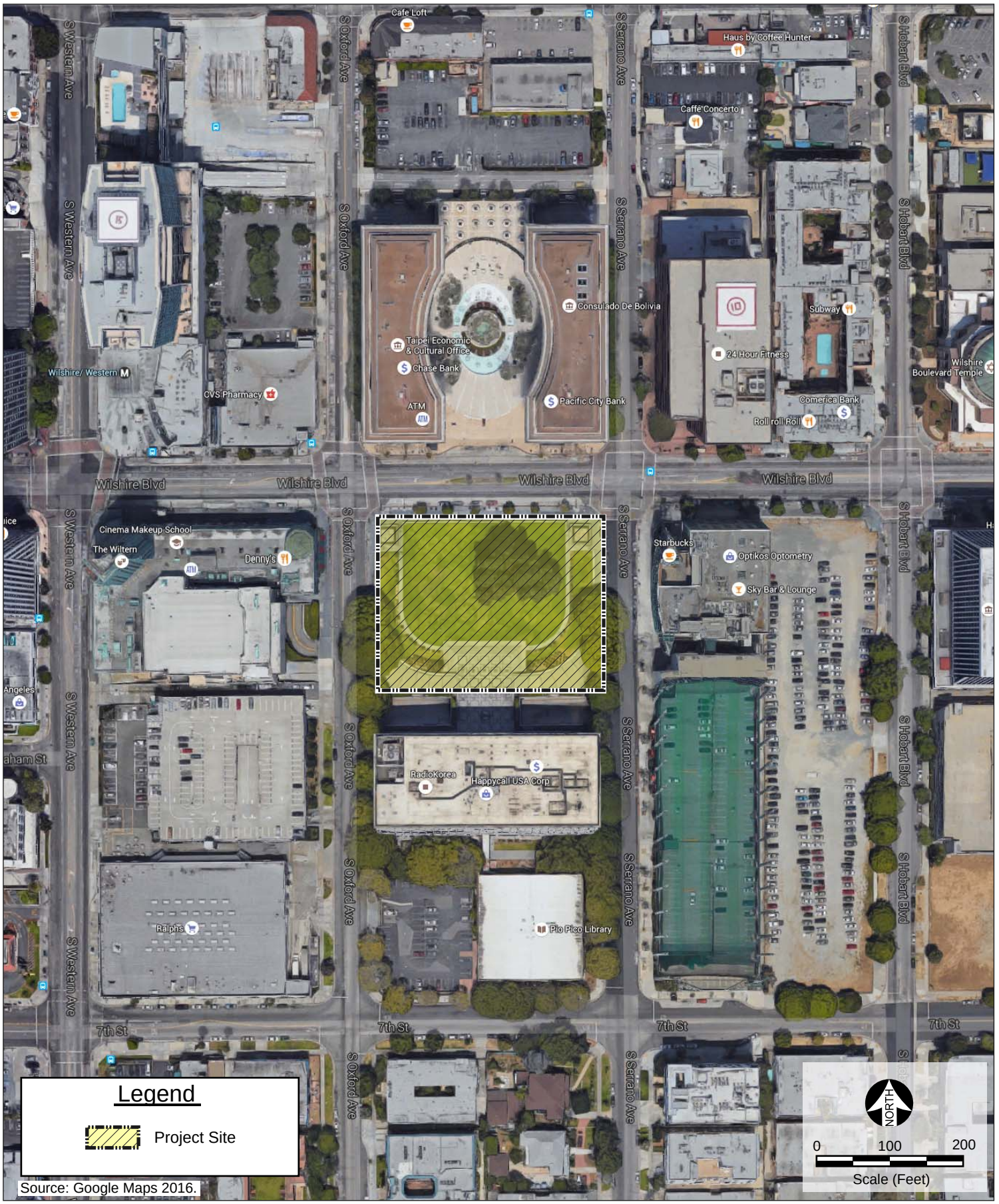
Pursuant to various sections of the LAMC, the applicant would request approvals and permits from the Building and Safety Department (and other municipal agencies) for project construction activities including, but not limited to the following: demolition, excavation, shoring, grading, foundation, haul route, building and tenant improvements. This MND is intended to be the primary reference document in the formulation and implementation of a mitigation monitoring program for the Project. This MND also intended to cover all federal, State, regional and/or local government discretionary approvals that may be required to develop the Project, whether or not they are explicitly listed above.

[10] *http://planning.lacity.org/pdiscaseinfo/CaseId/MjA4OTQw0*



CAJA Environmental Services, LLC

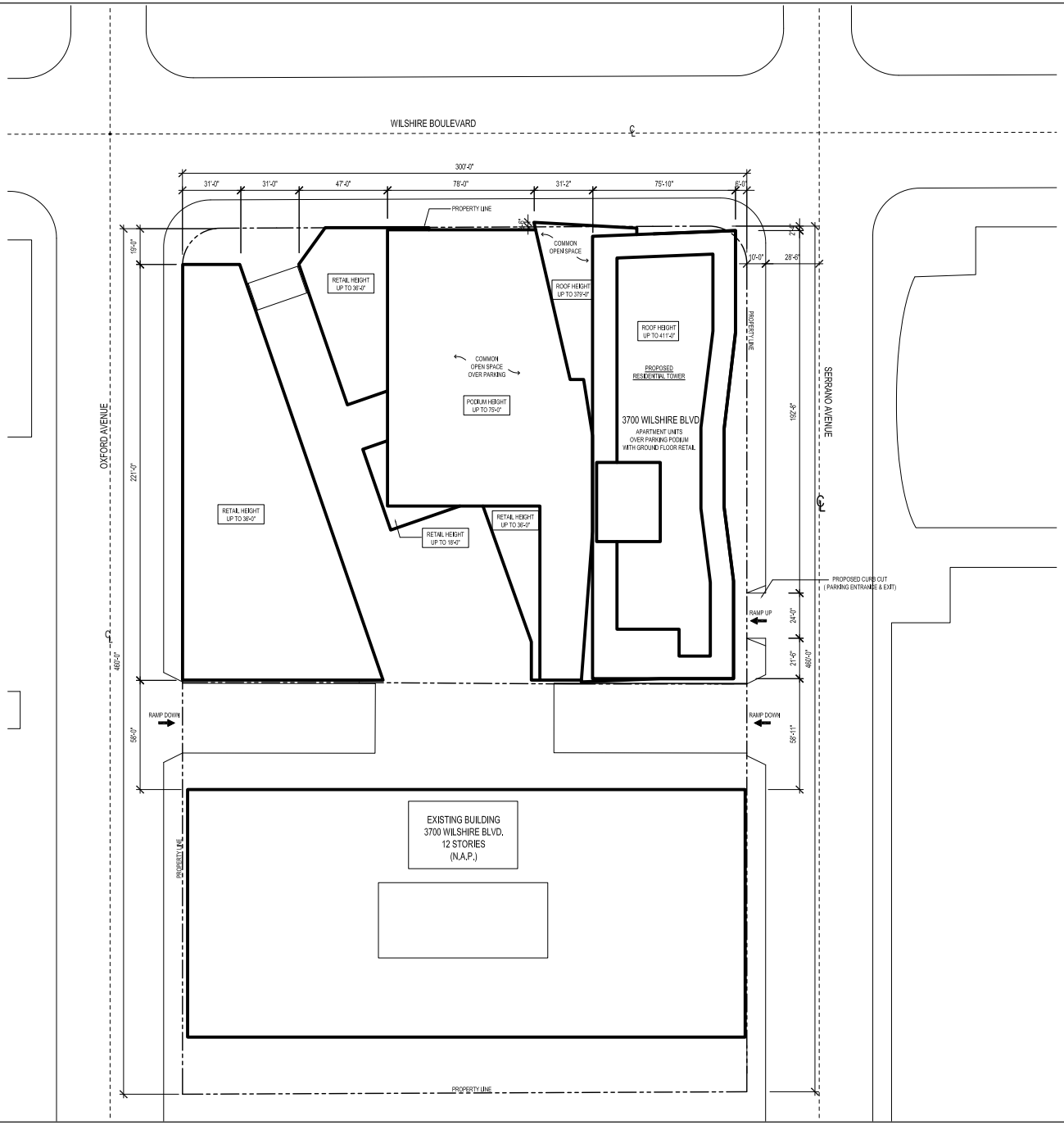
Figure 1
Regional Map



Source: Google Maps 2016.

CAJA Environmental Services, LLC

Figure 2
Aerial Map



Source: Callison Rtkl, Inc, 2016.

CAJA Environmental Services, LLC

Figure 3
Plot Plan

3. ENVIRONMENTAL IMPACT ANALYSIS

1. AESTHETICS

The section is based in part on the following items, included as Appendix B of this IS/MND:

B Shade Study, Scott Johnson, July 2016.

This analysis is provided herein for full disclosure so the public and decision-makers can consider and evaluate this potential impact, even though Senate Bill No. 743[1], effective as of January 1, 2014, amended CEQA in pertinent part to add Public Resources Code Section 21099 to provide that the aesthetics of a project that is a mixed-use residential project on an infill site within a transit priority area shall not be considered a significant impact under CEQA.[2] The City has issued Zoning Information File (ZI) No. 2452, confirming that SB 743 applies to a project's aesthetic impacts, including shade and shadow impacts. The Project contains multiple uses, including residential, retail, and restaurant.[3] The Project Site is an infill site, which is defined in pertinent part as a lot located within an urban area that has been previously developed.[4] As described in the Project Description, the Project Site is currently developed with an office building. The Project Site is within a transit priority area, which is defined in pertinent part as an area within one-half mile of an existing major transit stop.[5] The Project Site is within one block east of the Metro Purple Line Wilshire/Western Station (which is a major transit stop) as well as multiple Metro and LADOT DASH lines.

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

Less Than Significant Impact. A significant impact would occur if a project introduced incompatible scenic elements within a field of view containing a scenic vista or substantially block views of an existing scenic vista. The Project Site is in a relatively flat area of Wilshire Center along a commercial corridor (Wilshire Boulevard) and adjacent to a residential uses (along Oxford and Serrano Avenues, south of 7th Street). Other north/south streets are densely populated with multifamily residential neighborhoods. The existing visual character of the surrounding locale is highly urban and the Project Site is not located within or along a designated scenic highway, corridor, or parkway. The Project Site is located within a

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1 *SB 743: http://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=201320140SB743*

2 *California Public Resources Code Section 21099(a) and (d)(1)*

3 *LAMC Section 12.03.*

4 *California Public Resources Code Section 21099(a)(4)*

5 *California Public Resources Code Section 21099(a)(7) and PRC Section 21155: a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.*

densely developed urban area. Views in the vicinity of the Project Site are largely constrained by the existing structures on the Project Site and structures on adjacent parcels.

No scenic or natural setting views are visible due to the dense urban uses. In addition, CEQA is only concerned with public views with broad access by persons in general, not private views that will affect particular persons.[6] Urban features that may contribute to a valued aesthetic character or image include: structures of architectural or historic significance or visual prominence; public plazas, art or gardens; heritage oaks or other trees or plants protected by the City; consistent design elements (such as setbacks, massing, height, and signage) along a street or district; pedestrian amenities; landscaped medians or park areas; etc.[7] There are no tall features on the Project Site from which scenic vistas may be obtained or which make up part of the scenic landscape of the surrounding community.

At the street level, views in all directions are largely constrained by structures on adjacent parcels. Wilshire Boulevard provides the major east-west view corridor. From the public sidewalks, there are views of the Wiltern Tower and other mid-rise buildings along Wilshire. Views north and south are unremarkable showing the existing urban environment. These views would not be affected by the Project buildings.

There is an approximate 22-story building at 3800 Wilshire Boulevard and 23-story building at 3785 Wilshire Boulevard, both located within one block of the Project Site. The approximate height of the proposed buildings (existing 11-story office building to remain and proposed 36-story residential building) would be taller than other structures in the area, but there are no height restrictions. Height District 2 regulates permitted FAR but does not prescribe a height limit. No designated scenic vistas in the local area would be impeded, and the Project will not substantially block any scenic vistas. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment." Therefore, impacts will be less than significant.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a scenic highway?

Less Than Significant. A significant impact would occur only if scenic resources would be damaged or removed by a project, such as a tree, rock outcropping, or historic building within a designated scenic highway. There are no identified scenic resources such as rock outcroppings located on-site. The Project Site is not located within or along a designated scenic highway, corridor, or parkway. The Pacific Coast

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[6] *Obstruction of a few private views in a project's immediate vicinity is not generally regarded as a significant environmental impact. (See Ocean View Estates Homeowners Assn., Inc. v. Montecito Water Dist., supra, 116 Cal.App.4th at p. 402 [that a project affects "only a few private views" suggests that its impact is insignificant]; Mira Mar Mobile Community v. City of Oceanside, supra, 119 Cal.App.4th at pp. 492-493 [distinguishing public and private views; "[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons"].*

[7] *L.A. CEQA Thresholds Guide, 2006, section A.1 Aesthetics.*

Highway (State Route 1) is an "Eligible State Scenic Highway – Not Officially Designated", and is approximately 10 miles west of the Project Site.[8] The Site is not within a scenic highway.

The Site currently has 40 trees, including 19 street (sidewalk) trees. The Project would result in the removal of all 40 on-site trees[9] and would replace them per the City's Tree Replacement Program. The Project is required to provide 127 trees onsite (per 0.25 trees per dwelling unit). There are no rock outcroppings or historic buildings on the Site, which will develop the lawn and plaza area fronting the office building. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment." The impacts will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project was 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. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment."

The Site is approximately 3 mile west of the Downtown Los Angeles and approximately 11 miles east of the Pacific Ocean. The Site is located within the Wilshire Community Plan (WCP). The majority of the WCP consists of gently sloping plains and includes about 8,954 acres (about 14 square miles), which is approximately 3 percent of the total land in the City of Los Angeles. The WCP is often referred to as the Mid-City section of Los Angeles. The eastern edge of the approximately 2.5-mile wide by 6-mile long plan area is about 6 miles west of Downtown Los Angeles, while the western edge abuts the City of Beverly Hills. The plan area is bounded by Melrose Avenue and Rosewood Avenue to the north; 18th Street, Venice Boulevard and Pico Boulevard to the south; Hoover Street to the east; and the Cities of West Hollywood and Beverly Hills to the west. The WCP area is surrounded by the City of Los Angeles community plan areas of Hollywood to the north; South Central Los Angeles and West Adams Leimert-Baldwin Hills to the south; Silverlake-Echo Park and Westlake to the east; and West Los Angeles to the west. The plan area is generally southwest of the Hollywood Freeway (U.S. 101), which is oriented northwest-southeast across the northeast corner of the Plan Area at Vermont and Rosewood Avenues. The Hollywood Freeway is the only freeway within the Wilshire plan area. The Harbor Freeway (I-110) is located one mile to the east; the Santa Monica Freeway (I-10) is located one mile to the south; and the San Diego Freeway (I-405) is approximately five miles to the west of the community boundaries.

The Metro Red Line subway also serves the WCP, running along portions of Wilshire Boulevard and Vermont Avenue. The WCP Area has a pattern of low to medium density residential uses interspersed with areas of higher density residential uses. Long narrow corridors of commercial activity can be found along major boulevards including Wilshire, Pico, La Cienega, Western and Vermont. The plan area east

[8] *California Scenic Highway Mapping Systems: http://www.dot.ca.gov/hq/LandArch/scenic_highways/index.htm*

[9] *Callison RTKL, Inc., June 2016.*

of Western Avenue contains large concentrations of higher-density residential neighborhoods surrounding the regional commercial area known as Wilshire Center. The street pattern in the Wilshire area is configured in a grid pattern. Most of the street network is oriented on primary compass points with few exceptions. Notably, south of Wilshire Boulevard and west of Wilton Place, the street grid shifts uniformly towards a northeast/southwest alignment, while east/west streets shift somewhat to a northwest/southeast orientation. Wilshire Boulevard between Hoover Street and Western Avenue includes a substantial number of mid-rise buildings, generally with minimal setbacks or setbacks that increase the sidewalk width along the boulevard and some with ground floor shops and services. This highly urbanized section of the boulevard experiences considerable pedestrian activity and is supported by Metro Red Line subway service. The Wilshire Center Regional Commercial Center is approximately 100 acres in size. It includes a dense collection of high-rise office buildings, large hotels, regional shopping complexes, churches, entertainment centers, and both high-rise and low-rise apartment buildings.[10]

Compatibility with Character of Surrounding Community

The proposed Project would result in the development of a new mixed-use development anchored by a residential use and commercial use in the Wilshire Center area which has multiple commercial uses, office uses, and restaurants. The Project would include pedestrian passageways and connections within the interior of the Site, linking the retail podium and the residential tower.

The proposed Project features ground floor retail and restaurant uses designed to activate the street along this block of Wilshire Boulevard. The proposed Project would include uses that are similar to those already found in the area. The residential component of the proposed project would respond directly to the market demand for high-quality accommodations. The proposed Project would redevelop an under-utilized parcel (one-half of the site is a lawn) with new retail and residential uses thereby serving the surrounding community The Project would be compatible with and complementary to the surrounding community as it would combine uses already found in the immediate area within the same parcel in physically separated buildings connected through pedestrian walkways. The WCP designates the area as Regional Center Commercial, which serves as a transition between the commercial corridor (Wilshire Boulevard) and the residential uses (south of the Site). The proposed mixed-use development would contribute to the characteristics of Wilshire Boulevard as a walkable, mixed-use urban district near the Metro Purple Line.

Architectural Style and Design

The Project Site is located in an urbanized and fully developed portion of the City. The built environment is characterized by buildings that range in a variety of architectural styles, age, use, and size. The area is not a collection of buildings unified by size, scale, or design. Buildings in the area range in height. Buildings along Wilshire range from 22-23 stories; and consist of a wide variety of uses, including but not limited to retail, hotels, theaters, apartment buildings, financial institutions, social clubs, restaurants, and offices; and have an eclectic assortment of architectural styles which extends from the vernacular to

[10] *Wilshire Community Plan: http://cityplanning.lacity.org/complan/pdf/wilcptxt.pdf*

the highly ornamental. The area is characterized by a wide variety of building types and architectural styles, such as contemporary glass and steel structures for recently built residential mixed used towers, Moderne styles used for professional buildings and retail stores, Period Revival styles such as the Spanish Colonial Revival used for restaurants and hotels, and Exotic Revival styles used for theaters. Exterior cladding generally consists of stone, or a less substantial material meant to simulate stone such as terra cotta or scored plaster. The smaller buildings are typically of masonry construction and sheathed in stucco.

The existing office building on the southern half the Site would be retained and a new contemporary residential tower would be built on the project site. The Project design for the new residential and commercial center would consist of a contemporary modern style with vertical elements, large glass facades, and exposed colorful tiles. The corner of Wilshire Boulevard and Serrano Avenue would include Code-permitted signage to identify the commercial space and for building identification. The corner of Wilshire Boulevard and Oxford Avenue would include a pedestrian paseo entrance.

The building layout, new building compositions, and material choice allow the existing office building to maintain its identity while integrating it into the overall new design of the Site. The Project will enhance the surrounding streetscape by incorporating a new modern design across what is currently a surface parking lot. Therefore, the Project would not degrade the existing visual character or quality of the site and its surroundings and impacts would be less than significant.

Other visual and aesthetic considerations

The project will include landscaping at the ground floor (around the Site and in the pedestrian paseo), on the level 5 pool deck, and on the 34th level, and will comply with LAMC Section 12.40 and 12.41. While the Project Site is under construction, construction walls and barriers would be erected, which have the potential to attract unauthorized bills and postings. As such, the Project will be required to comply with the following regulatory compliance measures:

Regulatory Compliance Measures

RCM-1-1 Vandalism

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, and free from, debris, rubbish, garbage, trash, overgrown vegetation or other similar material, pursuant to LAMC Section 91.8104.
- The exterior of all buildings and fences shall be free from graffiti when such graffiti is visible from a street or alley, pursuant to LAMC Section 91.8104.15.

RCM-1-2 Signage on Construction Barriers

The Project shall comply with the LAMC Section 91.6205, including but not limited to the following provisions:

- The applicant shall affix or paint a plainly visible sign, on publically accessible portions of the construction barriers, with the following language: "POST NO BILLS".

- Such language shall appear at intervals of no less than 25 feet along the length of the publically accessible portions of the barrier.

- The applicant shall be responsible for maintaining the visibility of the required signage and for maintaining the construction barrier free and clear of any unauthorized signs within 48 hours of occurrence.

RCM-1-3 Aesthetics (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 and 12.41. The final landscape plan shall be reviewed and approved by the City of Los Angeles Department of City Planning during the building permit process.

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. A significant impact may occur if a project were to introduce new sources of light or glare on or from the Project Site which would be incompatible with the area surrounding the Project Site, or which pose a safety hazard to motorists utilizing adjacent streets or freeways. The Project Site and surrounding area are highly urbanized and contain numerous sources of nighttime lighting, including streetlights, security lighting, illuminated signage, indoor building illumination (light emanating from the interior of structures that passes through windows), and automobile headlights. In addition, glare is a common phenomenon in the Southern California area due mainly to the occurrence of a high number of days per year with direct sunlight and the highly urbanized nature of the region, which results in a large concentration of potentially reflective surfaces. Potentially reflective surfaces introduced by the Project include new windows at the Project Site and automobiles traveling and parked on streets in the vicinity of the Project Site. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment."

Light

The surrounding area is illuminated by freestanding streetlights and lighting from the surrounding residential and commercial uses. Vehicle headlights from traffic on Wilshire Boulevard contribute to overall ambient lighting levels. The Project would create additional sources of illumination. The Site

currently contains an existing office building with window illumination. There is existing security lighting as well.

The proposed Project would result in the construction of a 36-story building and would include interior lighting through windows which would increase illumination on the site as compared to the existing setting. In addition, the Project will provide illumination at street level for security purposes. All security lighting on the upper levels will be shielded and focused on the Site and directed away from the neighboring land uses to the maximum extent feasible and consistent with safety requirements. In addition to increasing the ambient "glow" presently associated with urban settings and with this part of the City, project-related light sources could potentially spill over and illuminate off-site vantages including adjacent streets and land uses.

The Project will include architectural features and facades with a low level of reflectivity. The ground floor commercial and dining area will have low reflectivity to allow greater visual access into the building. Upper floor windows will be less visible at the pedestrian level and will be suitably shielded to prevent visual trespass and to allow privacy to the residential units. As such, the Project will not result in a substantial amount of light that would adversely affect the day or night-time views in the project vicinity. Though the Project will increase ambient light levels in the vicinity, the increase will not be substantial because the Project Site is located in an highly urbanized area in Wilshire Center that is already illuminated at night, See also project design features below, which would ensue that lighting would be installed to minimize light trespass to off-site uses. Therefore, the change in levels of ambient illumination as a result of the Project will be less than significant.

Glare

Urban glare is largely a daytime phenomenon occurring when sunlight is reflected off the surfaces of buildings or objects. Excessive glare not only restricts visibility, but also increases the ambient heat reflectivity in a given area. Potential reflective surfaces in the project vicinity include automobiles traveling and parked on streets in the vicinity of the Project Site, exterior building windows, and surfaces of brightly painted buildings in the project vicinity. Glare from building facades include those that are largely or entirely comprised of highly reflective glass or mirror-like material from which the sun reflects at a low angle in the periods following sunrise and prior to sunset.

The Project includes an increase in window and building surfaces in comparison to the existing uses. This increase in surfaces will have the potential to reflect light onto adjacent roadways and land uses. However, the Project will limit reflective surface areas and the reflectivity of architectural materials used. The Project design does not consist of an all-glass façade but instead, it has been designed with facades that are broken up by building articulation and balconies. The building has several curves and indentations that change the orientation of the glass windows. The vehicle drop off and parking access on Serrano and Oxford Avenues would lead to parking structure contained within the building, so that the upper levels of the building provide a shield so that light from vehicles and building lighting does not project upwards. Glass that will be incorporated into the facades of the building will either be of low-reflectivity or accompanied by a non-glare coating as required by the Los Angeles Building Code. The Project will not result in a new source of substantial glare. See also project design features below, which

would ensure that the building will not create substantial glare. Impacts as a result of glare generated by the Project will be less than significant.

In addition, the following Project Design Features will be included in the project design:

Project Design Features

PDF-1-1 Aesthetics (Light)

Outdoor lighting shall be designed and installed with shielding, such that the light sources cannot be seen from adjacent residential properties, the public right-of-way, nor from above.

PDF-1-2 Aesthetics (Glare)

The exterior of the proposed structure shall be constructed of materials such as, but not limited to, high-performance and/or non-reflective glass to minimize glare and reflected heat. Low-E (low emissivity) glass shall be permitted.

Shade/Shadow

The issue of shade and shadow pertains to the blockage of direct sunlight by project buildings, which may affect adjacent properties. Shading is an important environmental issue because the users or occupants of certain land uses have some reasonable expectations for direct sunlight and warmth from the sun. These land uses are termed "shadow-sensitive." Shadow lengths are dependent on the height and size of the building from which they are cast and the angle of the sun. The angle of the sun varies with respect to the rotation of the earth (i.e. time of day) and elliptical orbit (i.e. change in seasons). The longest shadows are cast during the winter months and the shortest shadows are cast during the summer months.

Winter and Summer Solstice

"Solstice" is defined as either of the two points on the ecliptic (i.e., the path of the earth around the sun) that lie midway between the equinoxes (separated from them by an angular distance of 90°). At the solstices, the sun's apparent position on the celestial sphere reaches its greatest distance above or below the celestial equator, about 23 1/2° of the arc. At winter solstice, about December 22, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. At the time of summer solstice, about June 22, the sun is directly overhead at noon at the Tropic of Cancer. In the Northern Hemisphere, the longest day and shortest night of the year occur on this date, marking the beginning of summer. Measuring shadow lengths for the winter and summer solstices represents the extremes of the shadow patterns that occur throughout the year. Shadows cast on the summer solstice are the shortest shadows during the year, becoming progressively longer until winter solstice when the shadows are the longest they are all year.

Screening Criteria[11]

Would the project include light-blocking structures in excess of 60 feet in height above the ground elevation that would be located within a distance of three times the height of the proposed structure to a shadow-sensitive use on the north, northwest or northeast?

- A "yes" response to the preceding question indicates further study in an expanded Initial Study, Negative Declaration, Mitigated Negative Declaration or EIR may be required. Refer to the Significance Threshold for Shading, and review the associated Methodology to Determine Significance, as appropriate.

- A "no" response to the [screening criteria] indicates that there would normally be no significant impact on Shading from the proposed project.

Thresholds of Significance

A project impact would normally be considered significant if shadow-sensitive uses would be shaded by project-related structures for more than three hours between the hours of 9:00 AM and 3:00 PM Pacific Standard Time (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM Pacific Daylight Time (between early April and late October).

Sensitive Uses

Sensitive uses include: routinely useable outdoor spaces associated with residential, recreational, or institutional (e.g., schools, convalescent homes) land uses; commercial uses such as pedestrian-oriented outdoor spaces or restaurants with outdoor eating areas; nurseries; and existing solar collectors. These uses are considered sensitive because sunlight is important to function, physical comfort, or commerce. There are sensitive uses to the northeast, north, northwest, and southeast of the Site:

- Denny's outdoor dining area to the west, along Oxford Avenue.

- Outdoor plaza between the two office buildings at 3701 Wilshire Boulevard.

- Golf driving range to the east, along Serrano Avenue.

Shadow Analysis

[11] *L.A. CEQA Thresholds Guide, 2006, section A.3 Shading.*

The Project would be taller than 60 feet in height above the ground and would be located nearby a shadow-sensitive uses. Therefore, the following is the further analysis required by the threshold. Shadows in the vicinity are created by the proposed uses and the adjacent uses.

The difference between the shadow coverage created by existing uses on adjacent uses, as compared with the proposed Project determines whether the net change of the buildings on the Site create a significant impact. CEQA is concerned with the Project's impact on the environment, or the net change due to the Project. Environmental analyses net out the existing uses and take into account the surrounding existing uses that already are creating shadow impacts.

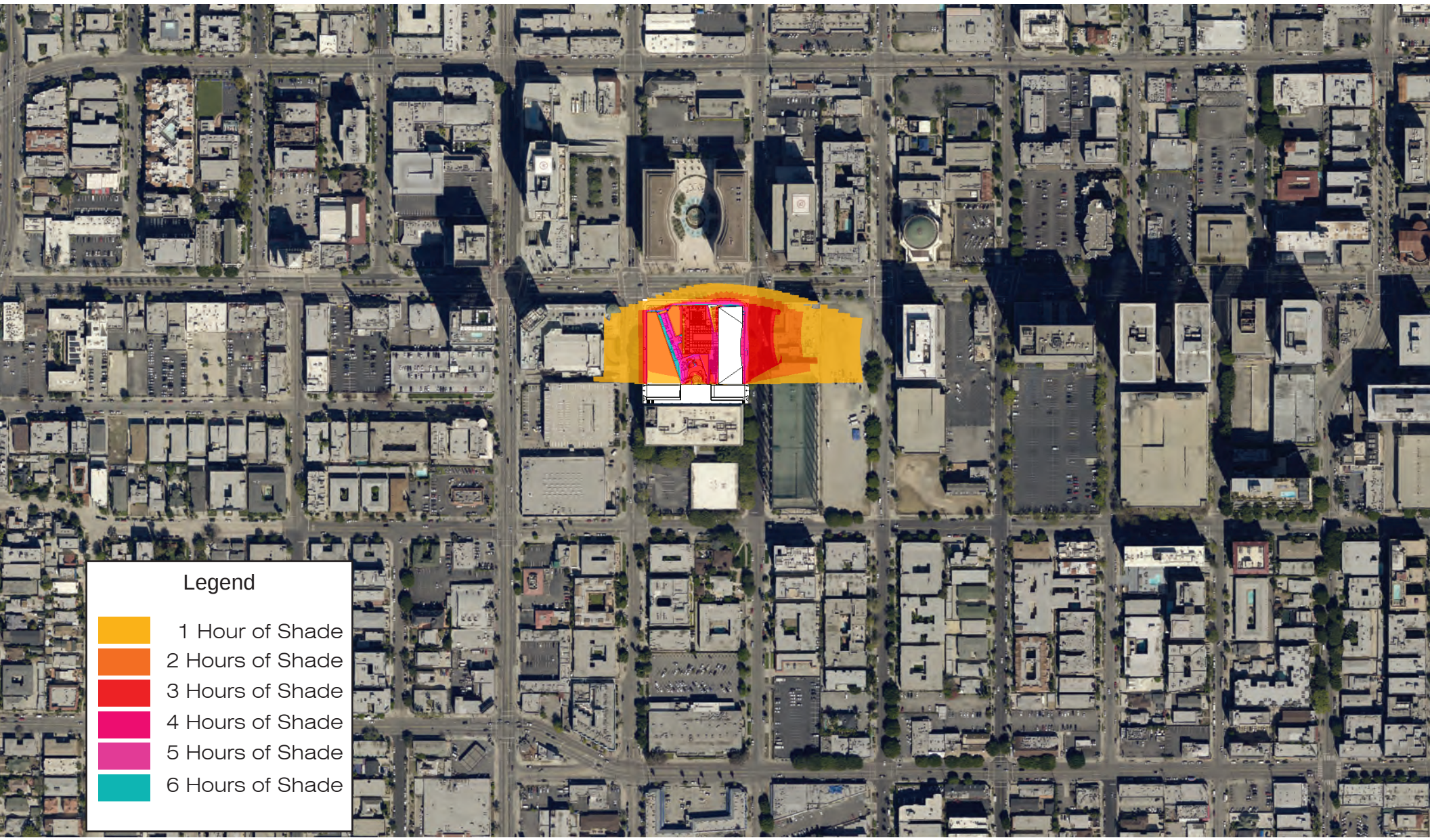
Summer Solstice

Figure 3-1 contains the summer shadows figure, which projects the amount of shadow coverage at a specific location between 1 hour and 6 hours. The shadows cover the Denny's dining area for 1 hour, the golf driving range for 2 hours, and do not go north across Wilshire to the outdoor plaza at 3701 Wilshire. The shadow coverage for 3 hours and longer is contained along Serrano Avenue and the Site itself. The Project would not create a shadow for more than 4 hours during the summer on a sensitive receptor. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment." Therefore, impacts during summer solstice would be less than significant.

Winter Solstice

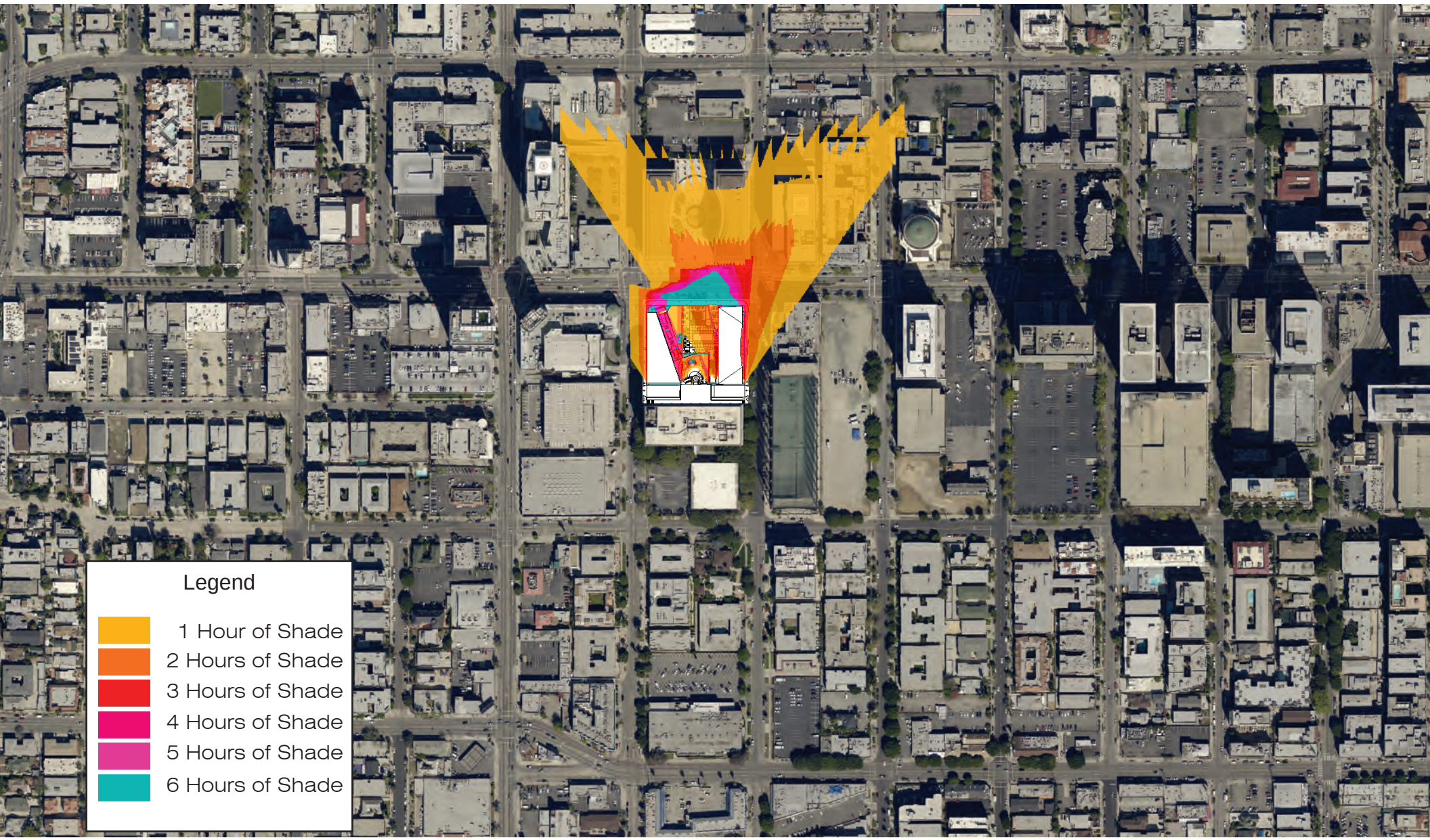
Figure 3-2 contains the winter shadows figure, which projects the amount of shadow coverage at a specific location between 1 hour and 6 hours. The shadows do not cover the Denny's dining area or the golf driving range. The shadows cover the outdoor plaza at 3701 Wilshire for 1 hour, with a small portion for 2 hours. This does not take into account those adjacent buildings' own shadow coverage. The shadow coverage for 3 hours and longer is contained along Wilshire Boulevard and the Site itself. The Project would not create a shadow for more than 3 hours during the winter on a sensitive receptor. As per ZI No. 2452 and SB 743, aesthetic impacts "shall not be considered significant impacts on the environment." Therefore, impacts during winter solstice would be less than significant.

3700 Wilshire Boulevard Shade Shadow Study



Summer Shadows
9:00 AM - 5:00 PM
Pacific Daylight Time

3700 Wilshire Boulevard Shade Shadow Study



Winter Shadows
9:00 AM - 3:00 PM
Pacific Standard Time

2. AGRICULTURE AND FORESTRY RESOURCES

a) Would the project convert prime farmland, unique farmland, or farmland of statewide importance (farmland), as shown on the maps prepared pursuant to the farmland mapping and monitoring program of the California resources agency, to non-agricultural use?

No Impact. A significant impact may occur if a project were to result in the conversion of State-designated agricultural land from agricultural use to another non-agricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is zoned C4, CR, and P2, and the General Plan land use designation for the Site is Regional Center Commercial. The Site is developed with a building and surface parking. The Site is designated Urban and Built-up Land and is not included in the Prime Farmland, Unique Farmland, or Farmland of Statewide Importance category.[12] Therefore, the Project has no impact on the conversion of farmland to non-agricultural uses.

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?

No Impact. A significant impact may occur if a project were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to non-agricultural use. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.[13] The Project Site will not result in the conversion of land zoned for agricultural use to non-agricultural use. Further, the Project will not result in the conversion of land under a Williamson Act Contract from agricultural use to non-agricultural use because the Site is not subject to a Williamson Act contract. Therefore, no impact with respect to land zoned for agricultural use or under a Williamson Act Contract will occur.

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. Neither the Project Site nor surrounding parcels are zoned for forest land or timberland. No impacts related to forest land or timberland will occur.

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[12] *State of California Department of Conservation, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland 2010, Map, website: ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2010/los10.pdf, August 23, 2016.*

[13] *State of California Department of Conservation, Williamson Act Program, website: http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx, accessed August 23, 2016.*

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

No Impact. The Project Site is completely surrounded by urban uses and infrastructure, and is not forest land. No impact related to the loss of forest land or conversion of forest land will occur.

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 or conversion of forest land to non-forest use?

No Impact. A significant impact may occur if a project involves changes to the existing environment that could result in the conversion of farmland to another non-agricultural use or conversion of forest land to non-forest use. The Project Site is in an area of the City that is highly urbanized. Neither the Project Site nor surrounding parcels are utilized for agricultural uses or forest land and such uses are not in proximity to the Project Site. No impacts related to conversion of farmland to a non-agricultural use or conversion of forest land to non-forest use will occur.

3. AIR QUALITY

The section is based in part on the following item, included as Appendix C of this MND:

C Air Quality and Greenhouse Gases Appendices, DKA Planning, September 2016.

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

Less Than Significant Impact. In the case of projects proposed within the City or elsewhere in the South Coast Air Basin (the Basin), the applicable plan is the 2012 Air Quality Management Plan (AQMP), which is prepared by the South Coast Air Management District (SCAQMD). SCAQMD adopted the final 2012 AQMP on December 7, 2012.[14] The SCAQMD is the agency principally responsible for comprehensive air pollution control in the Basin. To that end, the SCAQMD, a regional agency, works directly with the Southern California Association of Governments (SCAG), county transportation commissions, local governments, and cooperates actively with all state and federal government agencies. The SCAQMD develops rules and regulations, establishes permitting requirements, inspects emissions sources, and enforces measures though educational programs or fines, when necessary.

Pollutants and Effects

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards for outdoor concentrations. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O_3), nitrogen monoxide and dioxide (NO and NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), particulate matter ten microns or less in diameter (PM_{10}), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February.[15] The highest concentrations occur during the colder

[14] *SCAQMD, AQMP: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/final-2012-air-quality-management-plan.*

[15] *Inversion is an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air.*

months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.

- Ozone (O_3) is a colorless gas that is formed in the atmosphere when reactive organic gases (ROG) and nitrogen oxides (NO_X) react in the presence of ultraviolet sunlight. O_3 is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of two pollutants directly emitted into the atmosphere. The primary sources of ROG and NO_X, the components of O_3, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O_3 at levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

- Nitrogen Monoxide and Dioxide (NO and NO_2) like O_3, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NO_X and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM_{10}. High concentrations of NO_2 can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 ppm.

- Sulfur Dioxide (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO_2 are coal and oil used in power plants and industries. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO_2 can also yellow plant leaves and erode iron and steel.

- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or $PM_{2.5}$, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as SO_2, NO_X, and VOC. Inhalable particulate matter, or PM_{10}, is about 1/7 the thickness of a human hair. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

- $PM_{2.5}$ and PM_{10} pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. $PM_{2.5}$ and PM_{10} can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM_{10} tends to collect in the upper portion of the respiratory system, $PM_{2.5}$ is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

- Lead (Pb) in the atmosphere occurs as particulate matter. Sources of lead include leaded gasoline; the manufacturers of batteries, paint, ink, ceramics, and ammunition; and secondary lead smelters. Prior to 1978, mobile emissions were the primary source of atmospheric lead. Between 1978 and 1987, the phase-out of leaded gasoline reduced the overall inventory of airborne lead by nearly 95 percent. With the phase-out of leaded gasoline, secondary lead smelters, battery recycling, and manufacturing facilities have become lead-emission sources of greater concern.

  Prolonged exposure to atmospheric lead poses a serious threat to human health. Health effects associated with exposure to lead include gastrointestinal disturbances, anemia, kidney disease, and in severe cases, neuromuscular and neurological dysfunction. Of particular concern are low-level lead exposures during infancy and childhood. Such exposures are associated with decrements in neurobehavioral performance, including intelligence quotient performance, psychomotor performance, reaction time, and growth.

- Toxic Air Contaminants (TAC) are airborne pollutants that may increase a person's risk of developing cancer or other serious health effects. TACs include over 700 chemical compounds that are identified by State and federal agencies based on a review of available scientific evidence. In California, TACs are identified through a two-step process established in 1983 that includes risk identification and risk management.

Regulatory Setting

Federal

United States Environmental Protection Agency (USEPA). The USEPA is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. USEPA has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes emission standards, including those for vehicles sold in States other than California, where automobiles must meet stricter emission standards set by the California Air Resources Board (CARB). As required by the CAA, NAAQS have been established for seven major air pollutants: CO,

NO_2, O_3, $PM_{2.5}$, PM_{10}, SO_2, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in Table 3.3-1. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as nonattainment for O_3 and $PM_{2.5}$, attainment for PM_{10}, maintenance for CO, and attainment/unclassified for NO_2.

State

California Air Resources Board (CARB). In addition to being subject to the requirements of CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in Table 3.3-1. The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

Table 3.3-1
State and National Ambient Air Quality Standards and Attainment Status

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m^3)	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m^3)	/a/	0.075 ppm (147 µg/m^3)	Nonattainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m^3	Nonattainment	150 µg/m^3	Attainment
	Annual Arithmetic Mean	20 µg/m^3	Nonattainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3	Nonattainment
	Annual Arithmetic Mean	12 µg/m^3	Nonattainment	12 µg/m^3	Nonattainment

Table 3.3-1
State and National Ambient Air Quality Standards and Attainment Status

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Maintenance
	1-hour	20 ppm (23 mg/m^3)	Attainment	35 ppm (40 mg/m^3)	Maintenance
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m^3)	Attainment	53 ppb (100 µg/m^3)	Unclassified/ Attainment
	1-hour	0.18 ppm (338 µg/m^3)	Attainment	100 ppb (188 µg/m^3)	Unclassified/ Attainment
Sulfur Dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m^3)	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m^3)	Attainment	75 ppb (196 µg/m^3)	Attainment
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m^3	Nonattainment

/a/ CARB has not determined 8-hour O_3 attainment status.

Source: CARB, Ambient Air Quality Standards, and attainment status, accessed August 1, 2016 (www.arb.ca.gov/desig/adm/adm.htm)

Local

South Coast Air Quality Management District (SCAQMD). The 1977 Lewis Air Quality Management Act merged four air pollution control districts creating the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers an area of 6,745 square miles and is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto mountains to the north and east; and the San Diego County line to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD prepares the Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour $PM_{2.5}$ strategy standard.

The Southern California Association of Governments (SCAG) assists by preparing the transportation portion of the AQMP through the adoption of its Regional Transportation Plan (RTP). This includes the preparation of a Sustainable Communities Strategy (SCS) that responds to planning requirements of SB 375 and demonstrates the region's ability to attain greenhouse gas reduction targets set forth in State law. In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

City of Los Angeles. The City's General Plan includes an Air Quality Element that provides a policy framework that governs air quality planning within the City of Los Angeles. Adopted in November 1992, the Plan includes six goals, 15 objectives, and 30 policies that help define how the City will achieve its clean air goals. In 2006, the City released its Los Angeles CEQA Thresholds Guide that provides guidance in the preparation of environmental documents. This included a chapter focusing on air quality. While it did not set new thresholds of significance for air quality, the LA CEQA Thresholds Guide suggests a process for evaluating projects and attempts to standardize analyses through prescribed protocols.

Air Pollution Climatology

The Project Site is located within the Los Angeles County non-desert portion of the South Coast Air Basin. The Basin is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity. This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO_2 react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains. Air quality problems also occur during the fall and winter, when CO and

NO_2 emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 p.m.) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. NO_2 concentrations are also generally higher during fall and winter days.

Air Monitoring Data

The SCAQMD monitors air quality conditions at 45 locations throughout the Basin. The Project Sites are located in SCAQMD's Central Los Angeles receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. Table 3.3-2 shows pollutant levels, State and federal standards, and the number of exceedances recorded in the area from 2012 through 2014. During this three-year period, the one-hour State standard for O_3 was exceeded three times, the daily State standard for PM_{10} was exceeded eight times, and the daily State standard for $PM_{2.5}$ was exceeded five times. CO and NO_2 levels did not exceed the CAAQS from 2012 to 2014.

Table 3.3-2
2012-2014 Ambient Air Quality Data In Project Vicinity

Pollutant	Pollutant Concentration & Standards	Central Los Angeles County		
		2012	2013	2014
Ozone	Maximum 1-hour Concentration (ppm)	0.093	0.081	0.113
	Days > 0.09 ppm (State 1-hour standard)	0	0	3
	Days > 0.075 ppm (Federal 8-hour standard)	1	0	2
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	N/A	N/A	N/A
	Days > 20 ppm (State 1-hour standard)	N/A	N/A	N/A
	Maximum 8-hour Concentration (ppm)	1.9	2.0	2.0
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.0773	0.0903	0.0821
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}	Maximum 24-hour Concentration ($\mu g/m^3$)	80	57	66
	Days > 50 $\mu g/m^3$ (State 24-hour standard)	4	1	3
$PM_{2.5}$	Maximum 24-hour Concentration ($\mu g/m^3$)	58.7	43.1	N/A
	Days > 35 $\mu g/m^3$ (Federal 24-hour standard)	4	1	N/A
Sulfur Dioxide	Maximum 24-hour Concentration (ppm)	N/A	N/A	N/A
	Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A

Source: SCAQMD annual monitoring data (www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year) accessed August 1, 2016. N/A: Not available at this monitoring station.

Toxic Air Pollution

According to the SCAQMD's Multiple Air Toxics Exposure Study IV (MATES IV), the incidence of cancer over a lifetime in the US population is about 1 in 4, to 1 in 3, which translates into a risk of about 300,000 in 1 million (SCAQMD 2015). One study, the *Harvard Report on Cancer Prevention*, estimated

that, of cancers associated with known risk factors, about 30 percent were related to tobacco, about 30 percent were related to diet and obesity, and about 2 percent were associated with environmental pollution related exposures (Harvard 1996). The potential cancer risk for a given substance is expressed as the incremental number of potential excess cancer cases per million people over a 70-year lifetime exposure at a constant annual average pollutant concentration. The risks are usually presented in chances per million. For example, if the cancer risks were estimated to be 100 per million, this would predict an additional 100 excess cases of cancer in a population of 1 million people over a 70-year lifetime.

As part of the SCAQMD's environmental justice initiatives adopted in late 1997, the SCAQMD adopted the MATES IV study in May 2015, which was a follow-up to the previous MATES I, II, and III air toxics studies conducted in the Basin. The MATES IV study was based on monitored data throughout the Basin and included a monitoring program, an updated emissions inventory of TACs, and a modeling effort to characterize carcinogenic risk across the Basin from exposure to TACs. The MATES IV study applied a 2-kilometer (1.24-mile) grid over the Basin and reported carcinogenic risk within each grid space (each covering an area of 4 square kilometers or 1.54 square miles). The study concluded that the average of the modeled air toxics concentrations measured at each of the monitoring stations in the Basin equates to a background cancer risk of approximately 897 in 1 million primarily due to diesel exhaust particulate matter (DPM). Using the MATES IV methodology, about 94 percent of the cancer risk is attributed to emissions associated with mobile sources, and about 6 percent of the risk is attributed to toxics emitted from stationary sources, which include industries, and businesses such as dry cleaners and chrome plating operations. The MATES IV study found lower ambient concentrations of most of the measured air toxics, as compared to the levels measured in the previous MATES III study finalized in September 2008.

Thresholds of Significance

For the purposes of this analysis, air quality impacts of the Project would be considered significant if they exceed the following Standards of Significance, which are based on Appendix G of the *2013 State CEQA Guidelines*. According to these guidelines, a project would normally have a significant impact on air quality if it would:

- Conflict with or obstruct implementation of the applicable air quality plan;
- Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors);
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation;
- Expose sensitive receptors to substantial pollution concentrations; or
- Create objectionable odors affecting a substantial number of people.

The *State CEQA Guidelines* Section 15064.7 provides the significance criteria established by the applicable air quality management district or air pollution control district, when available, may be relied upon to make determinations of significance. The potential air quality impacts of the proposed project are, therefore, evaluated according to thresholds developed by the SCAQMD in their *CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook*, and subsequent guidance, which are listed below.

Existing Emissions

The Project Site includes 295,942 square feet of office uses on the rear half, which would remain in operation. The front half of the Project Site is occupied by a lawn and plaza area. These uses do not generate any anthropogenic emissions and are assumed to produce de minimis emissions.

Sensitive Receptors

Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. CARB has identified the following typical groups who are most likely to be affected by air pollution: children under 14; the elderly over 65 years of age; athletes; and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. The vicinity of the Project Site is densely developed, with several existing or reasonably foreseeable sensitive receptors, including:

- St. James Episcopal Church; 625 South St. Andrews Place, 1,300 feet northwest of the Project Site.
- Erika J. Glazer Early Childhood Center and Brawerman Elementary School of Wilshire Boulevard Temple; 3663 Wilshire Boulevard, 425 feet east of the Project Site.
- Robert F. Kennedy Community Schools; 701 South Catalina Street; 2,570 feet east of the Project Site.
- Seoul International Park; 3250 San Marino Street; 2,980 feet southeast of the Project Site.
- Wilshire Park Elementary School; 4063 Ingraham Street; 2,300 feet west of the Project Site.
- Hobart Boulevard Elementary School; 980 South Hobart Boulevard; 2,320 feet south of the Project Site.
- Wilton Place Elementary School; 745 South Wilton Place; 2,130 feet southwest of the Project Site.
- Multi-family residences; 3700 block of West 7th Street; 425 feet south of the Project Site.
- Multi-family residences at Avana on Wilshire, 3675 Wilshire Boulevard; 260 feet northeast of the Project Site.

Consistency with Air Quality Plans

SCAQMD Air Quality Management Plan

The proposed residential land use will neither conflict with the SCAQMD's 2012 Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The AQMP focuses on achieving clean air standards while accommodating population growth forecasts by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The 2012 RTP/SCS accommodates up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City of Los Angeles by 2020. The 2016 RTP/SCS, adopted in April 2016, accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040.

The Project Site is located in the Wilshire Community Plan area that implements land use standards of the General Plan Framework at the local level. The Project is consistent with the City's growth capacity, which accommodated a projected population of 337,144 and housing base of 138,330 units by 2010.[16] No further projections beyond 2010 have been prepared by the City.

As shown in Table 3.3-3, the Project would develop approximately 506 residential units and 62,035 square feet of commercial space. The Project could add approximately 1,422[17] residents to the Plan area, based on the City's projected household density. This would marginally increase population in the South Coast Air Basin. This is a conservative projection because the Project residents may not be new to the South Coast Air Basin or the City as they may be relocating from other parts of the South Coast Air Basin or the City. While the Project Site is classified as "Regional Center Commercial" in the Community Plan, these designations allow residential uses. As such, the RTP/SCS' assumptions about growth in the City likely accommodate housing and population growth on this Site. As such, the Project does not conflict with the growth assumptions in the regional air plan and this impact is considered less than significant.

Table 3.3-3
Project Consistency With Air Quality Management Plan's Growth Forecast

Year	City Population	Project	City Households	Project
2020	4,017,000	1,422	1,441,400	506
2040	4,609,400		1,1,690,300	

Source: DKA Planning 2016 based on SCAG 2016 Regional Transportation Plan Growth Forecast. http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf
Assumes 2.81 persons per household per 2010 Census. Employment forecast based on SCAG "Employment Density Study", October 31, 2001.

[16] *Wilshire Community Plan: http://cityplanning.lacity.org/complan/pdf/wilcptxt.pdf. 2001.*

[17] *The 2010 Census also shows that the average household size in Los Angeles is 2.81 persons. Page 1-11 in City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf.*

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City's clean air goals. As illustrated in Table 3.3-4, the Project is consistent with the applicable policies in the General Plan. As such, the Project's impact on the City's General Plan would be considered less than significant. The air quality impacts of residential development on the Project Site are accommodated in the region's emissions inventory for the 2012 and 2016 RTP/SCS and 2012 AQMP. The Project will therefore not conflict with or obstruct implementation of the AQMP, and any impact on the Plan would be less than significant. Similarly, the Project is consistent with the City's General Plan Air Quality Element's policies and does not conflict with its six goals and 15 objectives.

Table 3.3-4
General Plan Air Quality Element

Policy	Analysis
Policy 1.3.1 Minimize particulate emissions from construction sites.	**Consistent**. Construction activities will comply with SCAQMD Rule 403 that governs fugitive dust. Best management practices will be employed that reduce local exposure to PM_{10} and $PM_{2.5}$.
Policy 1.3.2 Minimize particulate emissions from unpaved roads and parking lots, which are associated with vehicular traffic.	**Consistent**. There will be no unpaved roads or parking lots. All areas will be paved and developed.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent.** The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority and the LADOT DASH buses and the Metro Purple Line Western station. Specific lines include Routes 18, 20, 66, 207, 710, 720, 757), Santa Monica Big Blue Bus Route 7, LADOT (Wilshire Center/Koreatown Loop DASH, Hollywood/Wilshire DASH), Foothill Transit Route 481.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	**Consistent.** Where appropriate, the Project could include tenants that encourage telecommuting in the future.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	**Consistent.** Where appropriate, the property management company could encourage future tenants to promote rideshare programs and subsidies. The Project would have WiFi available for guests that would encourage telecommuting.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Consistent.** Where appropriate, the Project could institute parking management practices in the future.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	**Not Applicable.** The Project does not include special events that would require traffic management.
Policy 3.2.1. Manage traffic congestion during peak hours.	**Consistent.** The Project would minimize traffic impacts

Table 3.3-4
General Plan Air Quality Element

Policy	Analysis
	below significance thresholds with mitigation measures described in the Transportation/Traffic section.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent.** The Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Los Angeles County Metropolitan Transportation Authority, and other regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	**Consistent.** The Project would be approved and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.2.2 Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.	**Consistent.** The Project is an infill development that providing residents with proximate access to jobs, shopping, and other uses.
Policy 4.2.3 Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Project includes pedestrian activity on the ground-floor with retail spaces. Bicycle parking will be provided per LAMC as shown in Table 2-4 of Section 2 of this MND. Vehicle parking, including any charging spaces, will be on site per LAMC as shown in Table 2-3 of Section 2 of this MND.
Policy 4.2.4 Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The Project is being evaluated under CEQA for air quality impacts and complies with this policy.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent.** The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority and LADOT DASH buses.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2 Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and	**Consistent.** The Project will comply with CalGreen requirements as required by LA Green Building Code. In addition, the Project will include several features that will

Table 3.3-4
General Plan Air Quality Element

Policy	Analysis
operations.	help to minimize energy consumption, including access to public transportation and designated bike storage areas.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's Water and Power energy plants.
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Not Applicable.** This policy calls for City facilities to reduce solid waste and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	**Not Applicable.** This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric of low-emitting fuels.	**Consistent.** The Project would be designed to meet the applicable requirements of the States Green Building Standards Code and the City of Los Angeles' Green Building Code.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	**Not Applicable.** This policy calls for the City to promote clean air awareness through its public awareness programs.
Table: CAJA Environnemental Services, August 2016.	

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

Less Than Significant Impact with Mitigation Incorporated. A project could have a significant impact where project-related emissions would exceed federal, state, or regional standards or thresholds, or where project-related emissions would substantially contribute to an existing or projected air quality violation. Both short-term impacts occurring during construction (e.g., site grading, haul truck trips) and long-term effects related to the ongoing operation of the Project are discussed. This analysis focuses on two levels of impacts: pollutant emissions and pollutant concentrations. "Emissions" refer to the quantity of pollutants released into the air. "Concentrations" refer to the amount of pollutant material per volumetric unit of air, as measured in parts per million (ppm) or micrograms per cubic meter ($\mu g/m^3$).

Construction Phase

Construction-related emissions were estimated using the South Coast Air Quality Management District's (SCAQMD's) CalEEMod 2013.2.2 model using assumptions from the Project's developer, including the Project's construction schedule of 42 months and a soil export of approximately 88,600 cubic yards. Table 3.3-5 summarizes the proposed construction schedule that was modeled for air quality impacts.

Table 3.3-5
Construction Schedule

Phase	Duration	Est. Dates
Demolition	1 month	July 2017 to August 2017
Site Prep	1 month	Part of demolition
Grading and Excavation	3 months	August 2017 to November 2017
Core/shell Construction	30 months	July 2017 to January 2020
Finishing and Tenant Improvements	17 months	July 2019 to December 2020

Construction schedule, including start, end, and duration dates are estimates only.
Client provided information, June 2016
Table: CAJA Environmental Services, June 2016

As shown in Table 3.3-6 the construction of the Project will produce VOC, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that do not exceed the SCAQMD's regional thresholds. However, NO_X emissions from construction equipment during the concurrent grading and building construction phases would exceed daily thresholds for this ozone precursor pollutant. As a result, construction of the Project could contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered significant but mitigable.

In terms of local air quality, the Project would produce significant emissions that do not exceed the SCAQMD's recommended localized standards of significance for CO during the construction phase. However, construction activities could produce NO_2, PM_{10} and $PM_{2.5}$ emissions that exceed localized thresholds recommended by the SCAQMD, primarily from vehicle exhaust and fugitive dust emissions from off-road construction vehicles during the site preparation and grading phases. As a result, construction impacts on localized air quality are considered significant but mitigable.

Mitigation Measure 3-1 calls for the use of construction equipment that uses EPA-certified Tier 4 engines to reduce combustion-related NO_2, PM_{10} and $PM_{2.5}$ emissions. Regulatory Compliance Measure 1 addresses fugitive dust emissions of PM_{10} and $PM_{2.5}$ that would be regulated by SCAQMD Rule 403, which calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. It should be noted that Table 3.3-6 conservatively does not assume the application of BACMs to control fugitive dust.

There are several regulatory compliance measures that must be implemented under SCAQMD Rule 403, which governs fugitive dust emissions. The following regulatory compliance measures addresses fugitive dust emissions of PM_{10} and $PM_{2.5}$ that would be regulated by SCAQMD Rule 403, which calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. It should be noted that Table 3.3-6 conservatively does not assume the application of BACMs to control fugitive dust. The regulatory measures would also require that all coatings comply with SCAQMD Rule 1113, which governs the VOC content of coatings.

Table 3.3-6
Estimated Daily Construction Emissions - Unmitigated

Year	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2017	19	167	169	<1	23	13
2018	8	52	82	<1	10	4
2019	50	52	88	<1	11	5
2020	50	48	85	<1	11	4
Maximum Regional Total	50	167	169	<1	23	13
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	Yes	No	No	No	No
Maximum Localized Total	50	127	91	<1	13	9
Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	N/A	Yes	No	N/A	Yes	Yes

Numbers may not add up due to rounding.
Source: DKA Planning, 2016 based on CalEEMod 2013.2.2 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in Central Los Angeles County source receptor area.

Regulatory Compliance Measures

RCM-3-1 Construction activities shall comply with SCAQMD Rule 403, including the following measures:

- Apply water to disturbed areas of the site three times a day
- Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes
- Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation.
- Limit soil disturbance to the amounts analyzed in this air quality analysis.
- All materials transported off-site shall be securely covered.
- Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more).
- Traffic speeds (worker vehicles and construction vehicles) on all unpaved roads (including unpaved portions of the Project Site) to be reduced to 15 mph or less.

RCM-3-2 Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule 1113, which governs the VOC content of architectural coatings.

RCM-3-3 In accordance with Sections 2485 in Title 13 of the California Code of Regulations, the idling of all diesel-fueled commercial vehicles (weighing over 10,000 pounds) during construction shall be limited to five minutes at any location.

RCM-3-4 In accordance with Section 93115 in Title 17 of the California Code of Regulations, operation of any stationary, diesel-fueled, compression-ignition engines shall meet specified fuel and fuel additive requirements and emission standards.

Construction Mitigation Measure

MM-3-1 All off-road construction equipment greater than 50 hp shall meet U.S. EPA Tier 4 emission standards, where available, to reduce NO_x, PM_{10}, and $PM_{2.5}$ emissions at the Project site. In addition, all construction equipment shall be outfitted with Best Available Control Technology devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. At the time of mobilization of each applicable unit of equipment, a copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit shall be provided.

Construction Phase Air Quality Impacts After Mitigation

As shown in Table 3.3-7, implementation of **Mitigation Measures MM-3-1** and regulatory compliance measures would substantially reduce on-site NO_x, PM_{10} and $PM_{2.5}$ emissions during the construction process, particularly during the site preparation and grading phases. As a result, construction of the Project is not expected to produce any local violation of air quality standards or contribute substantially to an existing or projected air quality violation.

Table 3.3-7
Estimated Daily Construction Emissions - Mitigated

Year	Pounds Per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
2017	7	50	159	<1	9	4
2018	4	17	83	<1	5	2
2019	46	17	90	<1	6	2
2020	46	16	87	<1	6	2
Maximum Regional Total	46	50	159	<1	9	4
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	46	9	82	<1	2	1

Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	N/A	No	No	N/A	No	No

Numbers may not add up due to rounding.
Source: DKA Planning, 2016 based on CalEEMod 2013.2.2 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in Central Los Angeles County source receptor area.

Operational Phase

The Project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project Site. The Project would add up to 3,501 net vehicle trips to and from the Project Site on a peak weekday at the start of operations in 2020.[18] Operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NO_X, CO, PM_{10} and $PM_{2.5}$ emissions (Table 3.3-8). As a result, the Project's operational impacts on regional air quality are considered less than significant.

With regard to localized air quality impacts, the Project would emit minimal emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from area and energy sources on-site. As shown in Table 3.3-8, these localized emissions would not approach the SCAQMD's localized significance thresholds that signal when there could be human health impacts at nearby sensitive receptors during long-term operations. The Project's operational impacts on localized air quality are considered less than significant. The long-term operation of the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation for regional and localized air quality.

Table 3.3-8
Estimated Daily Operations Emissions - Unmitigated

Emissions Source	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	25	<1	42	<1	<1	<1
Energy Sources	<1	2	2	<1	<1	<1
Mobile Sources	10	25	104	<1	20	6
Regional Total	36	27	147	<1	20	6
Regional Significance Threshold	55	55	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	25	<1	42	<1	<1	<1
Localized Significance Threshold	-	74	680	-	2	1

[18] *Transportation Impact Analysis, Fehr & Peers, August 2016.*

Table 3.3-8
Estimated Daily Operations Emissions - Unmitigated

Emissions Source	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Exceed Threshold?	N/A	No	No	N/A	No	No

Numbers may not add up due to rounding.
Source: DKA Planning 2016 based on CalEEMod 2013.2.2 model runs. Data in Appendix C to this IS/MND.
Numbers may not add up due to rounding.

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 threshold for ozone precursors)?

Less Than Significant Impact with Mitigation Incorporated.

Construction

Construction of the Project could contribute significantly to cumulative emissions of any non-attainment regional pollutants according to Table 3.3-6. For regional ozone precursors, the Project would exceed SCAQMD mass emission thresholds for ozone precursor NO_x during construction. Regional emissions of PM_{10} and $PM_{2.5}$ would not exceed mass thresholds established by the SCAQMD. Therefore, construction emissions impacts on regional criteria pollutant emissions would be considered significant but mitigable.

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. There are two proposed developments nearby the Project Site that were identified by the Project's traffic study.[19]

- No. 2 – 3670 Wilshire, 378 dwelling units and 8,000 square feet of commercial, approximately 225 feet east of the Site.

- No. 72 – 3700 Wilshire, 103,719 square feet of unoccupied office space at the Project Site.

If any other proposed projects were to undertake construction concurrently with the Project, localized CO, $PM_{2.5}$, PM_{10}, and NO_2 concentrations would be further increased. However, the application of LST thresholds to each cumulative project in the local area would help ensure that each project does not produce localized hotspots of CO, $PM_{2.5}$, PM_{10}, and NO_2. Any projects that would exceed LST thresholds (after mitigation) would perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD's LST thresholds recognize the influence of a receptor's

[19] *Transportation Impact Analysis, Fehr & Peers, August 2016.*

proximity, setting mass emissions thresholds for PM_{10} and $PM_{2.5}$ that generally double with every doubling of distance.

Mitigation Measure MM-3-1 would require the use of cleaner off-road construction equipment. Regulatory Compliance Measures **RCM-3-1 to RCM-3-4** call for good housekeeping measures that substantially reduce NO_2, PM_{10} and $PM_{2.5}$ emissions during on-site construction activities, as well as reducing VOC emissions during the application of architectural coatings. These could similarly be implemented at other construction sites for any related projects. In addition, the SCAQMD would regulate fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403, which calls for BACMs that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. This is captured in Regulatory Compliance Measures **RCM-3-1 to RCM-3-4**. These measures could be applied to other related projects as needed to substantially reduce any significant impacts. As shown in Table 3.3-7, above, impacts would be reduced to less than significance.

Operation

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in Table 3.3-8, the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. The Project is a mixed-use development that would not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM_{10} and $PM_{2.5}$ would be minimal. Likewise, existing land uses in the area include land uses that do not produce substantial emissions of localized nonattainment pollutants.

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

Less Than Significant Impact with Mitigation Incorporated. Construction of the Project could produce air emissions that impact several existing sensitive receptors near the Project Site. Some land uses are considered more sensitive to changes in air quality than others, depending on the population groups and the activities involved. ARB has identified the following typical groups who are most likely to be affected by air pollution: children under 14; the elderly over 65 years of age; athletes; and people with cardiovascular and chronic respiratory diseases. According to the SCAQMD, sensitive receptors include residences, schools, playgrounds, childcare centers, athletic facilities, long-term health care facilities, rehabilitation centers, convalescent centers, and retirement homes. Construction of the Project could produce air emissions that impact several existing sensitive receptors near the Project Site, including:

- St. James Episcopal Church; 625 South St. Andrews Place, 1,300 feet northwest of the Project Site.
- Erika J. Glazer Early Childhood Center and Brawerman Elementary School of Wilshire Boulevard Temple; 3663 Wilshire Boulevard, 425 feet east of the Project Site.
- Robert F. Kennedy Community Schools; 701 South Catalina Street; 2,570 feet east of the Project Site.

- Seoul International Park; 3250 San Marino Street; 2,980 feet southeast of the Project Site.
- Wilshire Park Elementary School; 4063 Ingraham Street; 2,300 feet west of the Project Site.
- Hobart Boulevard Elementary School; 980 South Hobart Boulevard; 2,320 feet south of the Project Site.
- Wilton Place Elementary School; 745 South Wilton Place; 2,130 feet southwest of the Project Site.
- Multi-family residences; 3700 block of West 7th Street; 425 feet south of the Project Site.
- Multi-family residences at Avana on Wilshire, 3675 Wilshire Boulevard; 260 feet northeast of the Project Site.

Construction

As illustrated in Table 3.3-6, these nearby receptors could be exposed to substantial concentrations of localized pollutants NO_2, PM_{10} and $PM_{2.5}$ from construction of the Project. Specifically, construction activities would exceed SCAQMD LST thresholds for NO_2, PM_{10} and $PM_{2.5}$ and represent a significant but mitigable impact. LST thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard.

Mitigation Measure MM-3-1 would require the use of off-road construction equipment. Further, regulatory compliance measures **RCM-3-1 to RCM-3-4**call for good housekeeping measures that substantially reduce NO_2, PM_{10} and $PM_{2.5}$ emissions during on-site construction activities, as well as reducing VOC emissions during the application of architectural coatings. In addition, the SCAQMD would regulate fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403, which calls for BACMs that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. This is captured in Regulatory Compliance Measures **RCM-3-1 to RCM-3-4**. These measures could be applied to other related projects as needed to substantially reduce any significant impacts.

Operation

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors.

First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce

the amount of emissions needed to trigger a potential CO hotspot.[20] The Project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.[21] However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs.

In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[22] The Project would not generate a substantial number of truck trips, with approximately 14 trucks per day during demolition and approximately 20 per day during construction. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, Project impacts related to TACs would be less than significant. Long-term operation of the Project would not have any significant impacts on pollutant concentrations at nearby receptors. Impacts would be less than significant.

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

Less Than Significant Impact. Odors are usually associated with industrial projects involving the use of chemicals, solvents, petroleum products, and other strong-smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. The Project will introduce additional commercial and residential uses to the area but would not result in activities that create objectionable odors. It would not include any land uses typically associated with unpleasant odors and local nuisances (e.g., rendering facilities, dry cleaners). SCAQMD regulations that govern nuisances (i.e. Rule 402, Nuisances) would regulate any occasional odors associated with on-site uses, including potential restaurants, such as SCAQMD Rule 1138 (Control of Emissions from Restaurant Operations). As a result, any odor impacts from the Project would be less than significant.

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[20] *Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.*

[21] *California Office of Environmental Health Hazard Assessment. Health Effects of Diesel Exhaust. www. http://oehha.ca.gov/public_info/facts/dieselfacts.html*

[22] *SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.*

4. BIOLOGICAL RESOURCES

The section is based in part on the following item, included as Appendix D of this MND:

D Tree Report, Harmony Gardens, June 20, 2016.

a) Would the project 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 regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact with Mitigation Incorporated. A significant impact would occur if a project were to remove or modify habitat for any species identified or designated 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[23] (CDFW) or the U.S. Fish and Wildlife Service (USFWS). The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with a building and surface parking lot. There are no City or County significant ecological areas on the Project Site.[24] The Project will result in the removal of vegetation around the Project Site and excavation of the ground for subterranean parking. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R Section 10.13). Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Compliance with the regulations of the MBTA and the mitigation measure below would ensure impacts are less than significant.

MM-4-1 Nesting Species

To avoid potential significant impacts to nesting birds, including migratory birds and raptors, one of the following shall be implemented by the Project Applicant:

- Conduct vegetation removal associated with construction from September 1st through January 31st, when birds are not nesting. Initiate grading activities prior to the breeding season (which is generally February 1st through August 31st) and keep disturbance activities constant throughout the breeding season to prevent birds from establishing nests in surrounding habitat (in order to avoid possible nest abandonment); if there is a lapse in activities of more than five days, pre-construction surveys shall be necessary as described in the bullet below.

OR

[23] *Effective January 1, 2013, the California Department of Fish and Game changed its name to the California Department of Fish and Wildlife: http://www.dfg.ca.gov/about/namechange.html.*

[24] *Navigate LA, Significant Ecological Areas layer: http://navigatela.lacity.org/navigatela/.*

- Conduct pre-construction surveys for nesting birds if vegetation removal or grading is initiated during the nesting season. A qualified wildlife biologist shall conduct weekly pre-construction bird surveys no more than 30 days prior to initiation of grading to provide confirmation on the presence or absence of active nests in the vicinity (at least 300 to 500 feet around the individual construction site, as access allows). The last survey should be conducted no more than three days prior to the initiation of clearance/construction work. If active nests are encountered, clearing and construction in the vicinity of the nests shall be deferred until the young birds have fledged and there is no evidence of a second attempt at nesting. A minimum buffer of 300 feet (500 feet for raptor nests) or as determined by a qualified biologist shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area. Construction personnel should be instructed on the sensitivity of the area. A survey report by the qualified biologist documenting and verifying compliance with the mitigation and with applicable state and federal regulations protecting birds shall be submitted to the City and County, depending on within which jurisdiction the construction activity is occurring. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.

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

No Impact. A significant impact would occur if riparian habitat or any other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS were to be adversely modified without adequate mitigation. No riparian or other sensitive habitat areas are located on or adjacent to the Project Site.[25] Therefore, no impact to riparian habitat or sensitive natural community will occur.

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. A significant impact would occur if federally protected wetlands, as defined by Section 404 of the Clean Water Act, would be modified or removed by a project without adequate mitigation. The Project Site is located in an urbanized area of the City. No federally protected wetlands (e.g., estuarine

[25] *U. S. Fish & Wildlife Service, National Wetlands Inventory, Riparian Layer: http://www.fws.gov/wetlands/Data/Mapper.html, September 14, 2016.*

and marine deepwater, estuarine and marine, freshwater pond, lake, riverine) occur on or in the immediate vicinity of the Project Site. The nearest wetland habitat is at MacArthur Park Lake classified as Freshwater Pond and located approximately 1.6 miles from the Project Site.[26] Therefore, the Project will not result in the direct removal, filling, or hydrological interruption of a federally protected wetland as defined by Section 404 of the Clean Water Act. No impact to federally protected wetlands will occur.

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. A significant impact would occur if a project would interfere with or remove access to a migratory wildlife corridor or impede the use of wildlife nursery sites. Due to the existing urban development on the Project Site and in the adjacent surroundings, the Project Site does not function as a corridor for the movement of native or migratory animals. No native wildlife nurseries are located in the project area. Therefore, no impacts to migratory wildlife corridors or native wildlife nursery site will occur.

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 with Mitigation Incorporated. A project-related significant adverse effect could occur if a project would cause an impact that is inconsistent with local regulations pertaining to biological resources. Local ordinances protecting biological resources are limited to the City of Los Angeles Native Tree Preservation Ordinance, which protects certain trees (including Valley Oak and California Live Oak, Southern California Black Walnut, Western Sycamore, and California Bay.[27]

The Project Site has 40 existing trees, including 19 street trees and 21 onsite trees. The Project would remove all the trees replace them per the City's Tree Replacement Program. The Project is required to provide 127 trees onsite (per 0.25 trees per dwelling unit). The street trees are either destroying the sidewalks and causing a hazard or in poor condition. The types of trees found on the Site and in the sidewalk are only unprotected species such as Ficus microcarpa, Pinus canariensis, Cinnamomum camphora, and Prunus cerasifera.[28]

The Project would not impact any protected trees. However, environmental impacts may result due to the loss of the trees on the Project Site and in the right-of-way. The potential impacts will be mitigated to a less than significant level with **Mitigation Measure MM-4-2**.

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[26] *U. S. Fish & Wildlife Service, National Wetlands Inventory, Wetlands Layer: http://www.fws.gov/wetlands/Data/Mapper.html, accessed September 14, 2016.*

[27] *City of Los Angeles, Ordinance No. 177404: http://cityplanning.lacity.org/Code_Studies/Other/ProtectedTreeOrd.pdf.*

[28] *Tree Report, Harmony Gardens, June 20, 2016.*

Mitigation Measure

MM-4-2 Tree Removal

- 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 Project Site proposed for removal shall be replaced at a 1:1 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 of the Department of Public Works, 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 a project is inconsistent with mapping or policies in any conservation plans of the types cited. The Project Site is located in an urbanized area of the City. Due to the existing urban development on the Site and in the adjacent surroundings, there are no known locally designated natural communities on the Project Site. There are no City or county significant ecological areas.[29] The Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No impact with respect to Habitat or Natural Community Conservation Plans will occur.

[29] *Navigate LA, Significant Ecological Areas layer: http://navigatela.lacity.org/navigatela/.*

5. CULTURAL RESOURCES

The section is based in part on the following items, included as Appendix E of this MND:

E-1 Archaeology response, South Central Coastal Information Center, July 22, 2016.

E-2 Paleontology response, Natural History Museum, May 25, 2016.

E-3 Tribal Consultation List, Native American Heritage Commission, May 17, 2016.

a) Would the project cause a substantial adverse change in the significance of a historical resource as defined in *State CEQA Guidelines* §15064.5?

No Impact. *State CEQA Guidelines* Section 15064.5 defines a historical resource as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in a historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related significant adverse effect would occur if a project were to adversely affect a historical resource meeting one of the above definitions.

The Project would construct new buildings on an existing lawn and plaza in front of an existing office building. The office building would not be physically altered by the Project. The Project would not affect the adjacent Wiltern Building, a listed historic resource, which is located across the street from the Project Site. In addition, the tower portion of the Project building will be located on the eastern portion of the Project Site, which is further in distance from the Wiltern Building.

The *Intensive Historic Resources Survey of the Wilshire Center and Koreatown Recovery Redevelopment Area* conducted by the City and the Community Redevelopment Agency in 2009 did not designate the building on the Project site as being eligible or potentially eligible for designation as significant historical resources.[30] The 2015 SurveyLA evaluation of potentially historical resources of the Wilshire Community Plan area did not resurvey the area surveyed in the 2009 survey. As such, the construction of the proposed Project would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines Section 15064.5. Therefore, no impact would occur.

30 *http://preservation.lacity.org/files/Wilshire_Center_Koreatown_Recovery_Redevelopment_Area_Report_June_2009_1_of_2.pdf*

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

Less Than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources that meet the criteria for historical resources, as discussed above, or resources that constitute unique archaeological resources. A project-related significant adverse effect could occur if a project were to affect archaeological resources that fall under either of these categories. The Project Site is located in an urbanized area and has been previously disturbed by past development activities and contains an existing building and parking. The Project would require excavation for three subterranean parking levels, utility and foundation work, and grading. There is a possibility of encountering a resource.

The Project Site has none of the following according to a records search of the South Central Coastal Information Center: archaeology resources, built environment resources, Office of Historic Preservation properties, California Points of Historical Interest, California Historical Landmarks, California Register of Historical Resources, National Register of Historical Places, or City of Los Angeles Historic-Cultural Monuments.[31] The Project will comply with the following regulatory compliance measure, and impacts will be less than significant.

Regulatory Compliance Measure

RCM-5-1 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 Section 21083.2.

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

Less Than Significant Impact with Mitigation Incorporated. A significant adverse effect could occur if grading or excavation activities associated with a project would disturb paleontological resources or geologic features which presently exist within the Project Site. The Project Site, located in an urbanized area, has been previously disturbed by past development activities and contains an existing building and parking. The Project would require excavation for three subterranean parking levels, utility and

[31] *Archaeology response, South Central Coastal Information Center, July 22, 2016.*

foundation work, and grading. However, there is still the potential for buried paleontological resources to be found within the Project Site. The Natural History Museum states the following:[32]

> *We have one vertebrate fossil locality that lies either adjacent to or directly within the proposed project boundaries, and we have other localities nearby from the same sedimentary deposits that occur in the proposed project area.*

The Project will comply with the following regulatory compliance measure and mitigation measure (as recommended by the Natural History Museum), and impacts will therefore be less than significant.

Regulatory Compliance Measure

RCM-5-2 Paleontological

If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

Mitigation Measures

MM-5-1 Vertebrate Resources

Any substantial excavations in the proposed project area shall be monitored closely to quickly and professionally recover any fossil remains discovered while not impeding development. Also, sediment samples from the finer-grained deposits shall be collected and processed to determine the small fossil potential in the proposed project area. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.

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

Less Than Significant Impact. A significant adverse effect would occur if grading or excavation activities associated with a project were to disturb previously interred human remains. The Project Site, located in an urbanized area, has been previously disturbed by past development activities and contains existing buildings and surface parking. The Project would require excavation for three subterranean

[32] *Paleontology response, Natural History Museum, May 25, 2016.*

parking levels, utility and foundation work, and grading. Public Resources Code Sections 21080.3.1 and 21080.3.2 require public agencies to consult with California Native American Tribes identified by the Native American Heritage Commission (NAHC) for the purpose of mitigating impacts tor tribal cultural resources. The Project would comply with this requirement. The NAHC was contacted and a consultation tribal list was received on May 17, 2016 (included as an Appendix to this MND). Environmental impacts may result from Project implementation due to discovery of unrecorded human remains. However, the Project will comply with the following regulatory compliance measure, and impacts will thus be less than significant.

Regulatory Compliance Measure

RCM-5-3 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 (PRC) Section 5097.98. 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 N. 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)

- If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission (NAHC).

- The NAHC would 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 owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

6. GEOLOGY AND SOILS

The section is based in part on the following report, included as Appendix F of this MND:

F Geotechnical Investigation, GeoPentech, August 19, 2016.

a) Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less Than Significant Impact. The Project Site is located in the seismically active region of Southern California. Numerous active and potentially active faults with surface expressions (fault traces) have been mapped adjacent to, within, and beneath the City of Los Angeles. California faults are classified as active, potentially active or inactive. Faults from past geologic periods of mountain building, but do not display any evidence of recent offset are considered "inactive" or "potentially active." Faults that have historically produced earthquakes or show evidence of movement within the Holocene (past 11,000 years) are considered "active faults." Active faults that are capable of causing large earthquakes may also cause ground rupture. The Alquist-Priolo Act of 1971 was enacted to protect structures from hazards associated with fault ground rupture.

Faults

Recent examples of the seismic activity in the region include the 1987 Whittier Narrows earthquake and the 1994 Northridge earthquake. The closest active faults that have ruptured the ground surface in Late Quaternary time are the Hollywood Fault, which is located approximately 5.0 kilometers north of the site, and the Newport-Inglewood Fault, which is located approximately 7.6 kilometers southwest of the site. In addition to the active source faults that have ruptured the ground surface, potentially active blind thrust faults are also believed to exist at depth in the region of the site, including the Upper Elysian Park Thrust (Oskin et al., 2000) and the Puente Hills Blind Thrusts (Shaw and Shearer, 1999). These blind thrust faults do not explicitly rupture the surface by definition, but are inferred to exist at depth based on indirect information, such as seismicity and folded stratigraphy. Recognition of the existence of blind thrust faults in the region was largely triggered by the occurrence of the 1987 Whittier Narrows earthquake and reinforced by the 1994 Northridge earthquake, both of which occurred on blind thrust faults. Other faults in the area have a potential to generate strong ground motions at the site, such as the Raymond Fault located about 10 kilometers to the northeast, the Verdugo Fault located about 14 kilometers to the north, the Santa Monica fault located about 11 kilometers to the northwest, and the San Andreas Fault about 57 km to the northwest.

No known active faults cross or project toward the Project Site, nor is the Site located in a currently established Alquist-Priolo (AP) Zone of Required Investigation. Although the site is located within the

Hollywood Quadrangle, it is not affected by the Earthquake Zone of Required Investigation for the Hollywood Fault (CGS, 2014), as the Earthquake Fault Zone for the Hollywood Fault is almost 4.9 km north of the Site. Therefore, the potential for fault surface rupture at the site is considered low.[33] Impacts would be less than significant.

(ii) Strong seismic ground shaking?

Less Than Significant Impact. The principal seismic hazard to the Project Site and proposed project is strong ground shaking from earthquakes produced by local faults. Modern, well-constructed buildings are designed to resist ground shaking through the use of shear panels, moment-resisting frames and reinforcement. Additional precautions may be taken to protect personal property and reduce the chance of injury, including strapping water heaters and securing furniture and appliances. It is likely that the Project Site will be shaken by future earthquakes produced in southern California.

The California State Legislature enacted the Seismic Hazards Mapping Act of 1990, which was prompted by damaging earthquakes in California, and was intended to protect public safety from the effects of strong ground shaking, liquefaction, landslides, and other earthquake-related hazards. The Seismic Hazards Mapping Act requires that the State Geologist delineate various "seismic hazards zones." The maps depicting the zones are released by the California Geological Survey. The Seismic Hazards Mapping Act requires a site investigation by a certified engineering geologist and/or civil engineer with expertise in geotechnical engineering, for projects sited within a hazard zone. The investigation is to include recommendations for a "minimum level of mitigation" that should reduce the risk of ground failure during an earthquake to a level that does not cause the collapse of buildings for human occupancy. The Seismic Hazards Mapping Act does not require mitigation to a level of no ground failure and/or no structural damage.

As with most locations in southern California, there is a considerable potential for strong seismic shaking at the Project Site. The Project structures would be designed in accordance with seismic parameters contained in the City of Los Angeles and California Building Code. The design and construction of the Project is required to comply with the most current codes regulating seismic risk, including the California Building Code and the LAMC, which incorporates the International Building Code (IBC). Compliance with current California Building Code and LAMC requirements will minimize the potential to expose people or structures to substantial risk or loss or injury. The Project will comply with site-specific ground motion values and seismic design criteria provided in the Geotechnical Investigation. Therefore, impacts related to seismic ground shaking will be less than significant.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction is a process that occurs when saturated sediments are subjected to repeated strain reversals during an earthquake. The strain reversals cause increased pore water pressure such that the internal pore pressure approaches the overburden pressure and the shear

[33] *Geotechnical Investigation, GeoPentech, August 19, 2016.*

strength approaches zero. Liquefied soils may be subject to flow or excessive strain, which can cause settlement. Liquefaction occurs in soils below the groundwater table. Soils commonly subject to liquefaction include loose to medium dense sand and silty sand. Predominantly fine-grained soils, such as silts and clay, are less susceptible to liquefaction. Generally, plastic soils with a clay content of greater than 15 percent, a Plasticity Index greater than 18, and/or a fines content (percent passing the 200 sieve) greater than 30 to 50 percent, are not considered subject to liquefaction.

According to the City of Los Angeles ZIMAS mapping system the Project Site is not classified within an area susceptible to liquefaction.[34] According to the General Plan Safety Element, the Project Site is not within a liquefaction area.[35]

Liquefaction potential is greatest where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of about 15 meters (50 feet) or less below the ground surface. Liquefaction potential decreases as grain size, clay, and gravel content increase. As ground acceleration and shaking duration increase during an earthquake, liquefaction potential increases. According to the CDMG Seismic Hazard Zones Map of the Hollywood Quadrangle (2014), the Site is not within an area of required liquefaction investigation. The recent field investigation, including borings and CPTs, indicate that the soils beneath the site consist of approximately 13 to 16 feet of artificial fill underlain by alluvium to a depth of about 94 to 99 feet below grade. Below the alluvium, bedrock of the Fernando Formation was encountered. Free groundwater was encountered at a depth ranging from 33 feet to 41 feet bgs within the borings at the site. The Project will include an excavation for the basement levels that will extend to approximately 35-40 feet below the existing grade and will encompass the entire Site. This would remove any potentially susceptible material in the upper portion of the site. The sandy layers below the basement levels are thin and discontinuous, and as mentioned above, the remaining sandy layers are beyond a depth of 60 feet bgs. Therefore, the potential for liquefaction beneath the developed site is considered low. [36]

The Project will comply with the following regulatory compliance measures RCM-6-1 and RCM-6-2, and impacts associated with liquefaction will thus be less than significant.

Regulatory Compliance Measures

RCM-6-1 Liquefaction Area

The Project shall comply with the Uniform Building Code Chapter 18, Division 1, Section 1804.5 Liquefaction Potential and Soil Strength Loss.

RCM-6-2 Geotechnical Conditions

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[34] *ZIMAS search: http://zimas.lacity.org/.*

[35] *Los Angeles Safety Element, Exhibit B, Areas Susceptible to Liquefaction in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, September 14, 2016.*

[36] *Geotechnical Investigation, GeoPentech, August 19, 2016.*

The Project shall comply with the recommendations and conditions contained within the Geotechnical Investigation for the Project, and as it may be subsequently amended or modified.

The Project shall comply with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, as it may be subsequently amended or modified.

(iv) Landslides?

No Impact. 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 landslide area is land identified by the State of California that is located in the general area of sites that possess the potential for earthquake-induced rock falls, slope failure, and debris flow. The Project Site is not located within a mapped landslide area. No significant slopes are located near the Project Site.

The City of Los Angeles ZIMAS mapping system does not classify the Project Site as within a landslide area.[37] The General Plan Safety Element does not identify any around the Project Site as a bedrock or probable bedrock landslide area.[38]

The potential for landsliding is highest in areas of moderate to steep terrain that are underlain by unfavorably oriented geologic layering or discontinuities. The Site is located on relatively flat terrain, the underlying sedimentary units are relatively flat lying, and no landslides are mapped in the vicinity of the site (CDMG, 1998). In addition, the Site is not in a designated earthquake-induced landslide hazard zone (CDMG, 2014).[39] Therefore, no impacts with respect to landslides will occur.

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

Less Than Significant Impact. A significant impact may occur if a project exposes large areas to the erosional effects of wind or water for a protracted period of time. Demolition (removal of the existing buildings) and grading would expose minimal amounts of soils for a limited time, allowing for possible erosion. However, due to the temporary nature of the soil exposure during the grading process, substantial erosion will not occur.

The Project includes three subterranean levels. Grading and excavation will also include a depth required foundation footings and soil compaction. All grading activities require permits from the City of Los Angeles Department of Building and Safety, which reviews compliance with requirements and standards

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[37] *ZIMAS search: http://zimas.lacity.org/.*

[38] *Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed April 11, 2016.*

[39] *Geotechnical Investigation, GeoPentech, August 19, 2016.*

designed to limit potential impacts to acceptable levels. In addition, all on-site grading and site preparation will comply with all applicable provisions of LAMC Chapter IX, Division 70, addressing grading, excavation, and fills. The grading plan will conform with the City's Landform Grading Manual guidelines, subject to approval by the Department of City Planning and the Department of Building and Safety's Grading Division.

During construction, the Project will be required to prevent the transport of sediments from the Site by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs will be detailed in a Stormwater Pollution Prevention Plan (SWPPP), which is required to be acceptable to the City Engineer and in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations. With the implementation of the required construction BMPs detailed in the required SWPPP, soil erosion during construction impacts will be less than significant. Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil. The entire Project Site would be covered by the proposed structure; thus, no exposed areas subject to erosion would be created or affected by the Project. Therefore, operation impacts related to erosion or the loss of topsoil will be less than significant.

Regulatory Compliance Measure

RCM-6-3 Erosion/Grading/Short-Term Construction Impacts

- The applicant shall provide staked signage at the site with a minimum of 3-inch lettering containing contact information for the Senior Street Use Inspector (Department of Public Works), the Senior Grading Inspector (LADBS) and the hauling or general contractor.

- The Project shall prepare a Grading Plan that shall conform with the City of Los Angeles Department of Building and Safety Grading Division's Landform Grading Manual Guidelines.

- Appropriate erosion control and drainage devices per the Los Angeles Municipal Code Section 91.7013 shall be provided to the satisfaction of the Los Angeles Department of Building and Safety.

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

Less Than Significant Impact. A significant impact may occur if the project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the project buildings, thus posing a hazard to life and property. Construction activities associated with the Project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions. As discussed in the response to Questions 6(a)(iii) and 6(a)(iv), the Project Site is not at risk for landslides and would contain regulatory

compliance measure **RCM-6-1** and **RCM-6-2** for its liquefaction potential. Therefore, impacts for liquefaction are less than significant.

Seismically-Induced Settlement

Seismically-induced settlement is often caused when unsaturated loose to medium-dense granular soils are intensified during ground shaking. The granular materials encountered in the borings are generally medium dense to very dense and are saturated due to the shallow groundwater level. The remainder of the soil encountered consists of stiff to hard sandy to silty clay. Therefore the potential for seismically-induced settlement at the Site is considered negligible.[40] Therefore, impacts will be less than significant.

Subsidence

Ground surface subsidence generally results from the extraction of fluids or gas from the subsurface that can result in a gradual lowering of the overlying ground surface. Based on the available information from the Division of Gas and Geothermal Resources (DOGGR) the project site is not within an active oil field and no active wells are in the vicinity of the site (i.e. less than 2000 feet). Therefore, the potential for subsidence is considered very low.[41]

Based on the findings from the geotechnical investigation, the Project is considered feasible from a geotechnical perspective provided that the recommendations given in the geotechnical report are included in the design and construction of the Project. [42]

The recommendations incorporated by reference as regulatory compliance measure **RCM-6-2** (requiring compliance with the recommendations and conditions in the Geotechnical Report and LADBS Approval Letter), above would ensure that the Project is developed and constructed as feasible from a geotechnical perspective. Therefore, impacts will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project is built on expansive soils without proper site preparation or design features to provide adequate foundations for project buildings thus posing a hazard to life and property. Expansive soils contain significant amounts of clay which may expand or shrink with moisture variations.

During the investigation, clay material was encountered near the foundation level with an expansion index ranging from 88 to 92, which results in a medium to high expansion potential. However, the clay

[40] *Geotechnical Investigation, GeoPentech, August 19, 2016.*

[41] *Geotechnical Investigation, GeoPentech, August 19, 2016.*

[42] *Geotechnical Investigation, GeoPentech, August 19, 2016.*

material near the foundation level will be below the groundwater table, and as such the effects of expansive soils may be negligible.[43]

The recommendation for any potential expansive soil is included as a regulatory compliance measure **RCM-6-1** (requiring compliance with the recommendations and conditions in the Geotechnical Report and LADBS Approval Letter), above. Therefore, impacts associated with expansive soils will 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. This question would apply to the Project only if it were located in an area not served by an existing sewer system. The Project Site is located in an urbanized area within the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City. No septic tanks or alternative disposal systems are necessary, nor are they proposed. Therefore, no impacts related to alternative wastewater disposal systems will occur.

[43] *Geotechnical Investigation, GeoPentech, August 19, 2016.*

7. GREENHOUSE GAS EMISSIONS

The section is based in part on the following item, included as Appendix C of this IS/MND:

C Air Quality and Greenhouse Gases Appendices, DKA Planning, September 2016.

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

Less Than Significant Impact. The global nature of climate change creates unique challenges for assessing the Project's climate change impact under CEQA, which focuses on cause and effect. When compared to the cumulative inventory of GHG across the globe, a single project's impact will be negligible. To further complicate this, there is debate about whether a project's emissions are adding to the net emissions worldwide, or simply redistributing emissions that would have occurred anyway somewhere in the world. Climate change analyses are also unique because emitting CO_2 into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO_2 in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental affects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to estimate a project's incremental contribution of CO_2 into the atmosphere, it is typically not possible to determine whether or how an individual project's relatively small incremental contribution might translate into physical effects on the environment. Nevertheless, both short-term impacts occurring during construction and long-term effects related to the ongoing operation of the Project are discussed in this section.

Pollutant and Effects

Various gases in the Earth's atmosphere, classified as atmospheric greenhouse gases (GHGs), play a critical role in determining the Earth's surface temperature. Solar radiation entering Earth's atmosphere is absorbed by the Earth's surface. When the Earth emits this radiation back toward space, the radiation changes from high-frequency solar radiation to lower-frequency infrared radiation. GHGs are transparent to solar radiation and absorb infrared radiation. As a result, radiation that otherwise would escape back into space is retained, warming the atmosphere. This phenomenon is known as the greenhouse effect. GHGs that contribute to the greenhouse effect include:

- Carbon Dioxide (CO_2) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO_2 emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. CO_2 comprises over 80 percent of GHG emissions in California.[44]

- Methane (CH_4) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising

[44] *California Environmental Protection Agency, First Update to the Climate Change Scoping Plan, May 2014.*

livestock, natural gas and petroleum systems, stationary and mobile combustion, and wastewater treatment. Methane makes up 8.3 percent of all GHGs, and mobile sources and general fuel combustion represent 0.69 percent of overall methane emissions.[45]

- Nitrous Oxide (N_2O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 12 percent of N_2O emissions.[46] N_2O emissions from motor vehicles generally occur directly from operation of vehicles.

- Hydrofluorocarbons (HFCs) are one of several high global warning potential (GWP) gases that are not naturally occurring and are generated from industrial processes. HFC (refrigerant) emissions from vehicle air conditioning systems occur due to leakage, losses during recharging, or release from scrapping vehicles at end of their useful life.

- Perfluorocarbons (PFCs) are another high GWP gas that are not naturally occurring and are generated in a variety of industrial processes. Emissions of PFCs are generally negligible from motor vehicles.

- Sulfur Hexafluoride (SF_6) is another high GWP gas that is not naturally occurring and are generated in a variety of industrial processes. Emissions of SF_6 are generally negligible from motor vehicles.

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.[47] As shown in Table 3.7-1, the other GHGs are less abundant but have higher GWP than CO_2. To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO_2, denoted as CO_2e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO_2 were being emitted. High GWP gases such as HFCs, PFCs, and SF_6 are the most heat-absorbent.

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven

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[45] *California Environmental Protection Agency, First Update to the Climate Change Scoping Plan, May 2014.*

[46] *United States Environmental Protection Agency, U.S. Adipic Acid and Nitric Acid N2O Emissions 1990-2020: Inventories, Projections and Opportunities for Reductions, December 2001.*

[47] *California Air Resources Board, Climate Change Emission Control Regulations, 2004.*

inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

While efforts to reduce the rate of GHG emissions continue, the State has developed a strategy to adapt the State's infrastructure to the impacts of climate change. The 2009 California Climate Adaptation Strategy (Strategy) analyzes risks and vulnerabilities and proposes strategies to reduce risks. The Strategy begins what will be an ongoing process of adaptation, as directed by Governor Schwarzenegger's Executive Order S-13-08. The Strategy analyzes two components of climate change: (1) projecting the amount of climate change that may occur using computer-based global climate models and (2) assessing the natural or human systems' abilities to cope with and adapt to change by examining past experience with climate variability and extrapolating from this to understand how the systems may respond to the additional impact of climate change.

Table 3.7-1
Global Warming Potential For Greenhouse Gases

Greenhouse Gas	Global Warming Potential Factor (100-Year)
Carbon Dioxide (CO_2)	1
Methane (CH_4)	28
Nitrous Oxide (N_2O)	265
Perfluorocarbons (PFCs)	7,000-11,000
Hydrofluorocarbons (HFCs)	100-12,000
Sulfur Hexafluoride (SF_6)	23,500

Source: California Air Resources Board, First Update to the Climate Change Scoping Plan. May 2014.
Note: Global warming potential measures how much heat a GHG traps in the atmosphere, in this case, over a 100-year period.

Regulatory Setting

International

Kyoto Protocol. In 1988, the United Nations established the Intergovernmental Panel on Climate Change to evaluate the impacts of global warming and to develop strategies that nations could implement to curtail global climate change. In 1992, the United States joined other countries around the world in signing the United Nations' Framework Convention on Climate Change (UNFCCC) agreement with the goal of controlling greenhouse gas emissions. As a result, the Climate Change Action Plan was developed to address the reduction of GHG emissions in the U.S. The plan currently consists of more than 50

voluntary programs for member nations to adopt. The Kyoto Protocol is a treaty made under the UNFCCC and was the first international agreement to regulate GHG emissions. Some have estimated that if the commitments outlined in the Protocol are met, global GHG emissions could be reduced an estimated five percent from 1990 levels during the first commitment period of 2008-2012. Notably, while the U.S. is a signatory to the Kyoto protocol, Congress has not ratified the Protocol and the U.S. is not bound by the Protocol's commitments. In December 2009, international leaders from 192 nations met in Copenhagen to address the future of international climate change commitments post-Protocol.

The major feature of the Protocol is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities." On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11th session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to 3 degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020 and acknowledges that $100 billion is needed each year to enable countries to adapt to climate change. The agreement was signed on April 22, 2016 and ratified by 177 countries.

The Western Regional Climate Action Initiative (WCI). The Western Regional Climate Action Initiative (WCI) is a partnership among seven states, including California, and four Canadian provinces to implement a regional, economy-wide cap-and-trade system to reduce global warming pollution. The WCI will cap GHG emissions from the region's electricity, industrial, and transportation sectors with the goal to reduce the heat trapping emissions that cause global warming to 15 percent below 2005 levels by 2020. When the WCI adopted this goal in 2007, it estimated that this would require 2007 levels to be reduced worldwide between 50 percent and 85 percent by 2050. California is working closely with the other states and provinces to design a regional GHG reduction program that includes a cap-and-trade approach. The California Air Resources Board's (CARB) planned cap and-trade program, discussed below, is also intended to link California and the other member states and provinces.

Federal

The U.S. Environmental Protection Agency has historically not regulated GHG emissions because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S Supreme Court found that GHG emissions could be considered within the Clean Air Act's definition of a pollutant.[48] In December 2009, USEPA issued an endangerment finding for GHG

[48] *Massachusetts v. Environmental Protection Agency et al (127 S. Ct. 1438 [2007])*

emissions under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration and U.S. EPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. This could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon in 2016. In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding $8 billion in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants, investments in renewable energy sources, adaptation programs, and leading international efforts to address climate change. In September 2013, U.S. EPA announced its first steps to implement a portion of the Obama Climate Action Plan by proposing carbon pollution standards for new power plants.

Vehicle Standards

Other regulations have been adopted to address vehicle standards including the USEPA and National Highway Traffic Safety Administration (NHTSA) joint rulemaking for vehicle standards.

Energy Independence and Security Act (EISA)

Among other key measures, the EISA would do the following, which would aid in the reduction of national GHG emissions, both mobile and non-mobile:

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

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

- While superseded by NHTSA and USEPA actions described above, EISA also set miles per gallon targets for cars and light trucks and directed the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for work trucks.

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

State

Assembly Bill 1493. California has adopted a series of laws and programs to reduce emissions of GHGs into the atmosphere. Assembly Bill (AB) 1493 by then-Assemblymember Fran Pavley was enacted in September 2003 and requires regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by vehicles used for personal transportation.

Executive Order S-3-05. On June 1, 2005, Governor Schwarzenegger issued Executive Order S-3-05, which set the following GHG emission reduction targets: by 2010, reduce GHG emissions to 2000 levels;

by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The California Environmental Protection Agency (Cal EPA) formed a Climate Action Team ("CAT") that recommended strategies that can be implemented by state agencies to meet GHG emissions targets. The Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.[49] Furthermore, the report provided to Governor Schwarzenegger in 2006 indicated that smart land use and increased transit availability should be a priority in the State of California.[50] According to the California Climate Action Team, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

Executive Order B-30-15. On April 29, 2015, Governor Brown issued an executive order setting a Statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the State's GHG targets with those set in October 2014 by the European Union and is intended to help the State meets its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on State agencies to implement measures accordingly and directs the CARB to update the Climate Change Scoping Plan. A recent study shows that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15), and to 60 percent below 1990 levels by 2050. Even though this study did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, it demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.[51]

Assembly Bill 32. In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that ARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. AB 32 charges ARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, ARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air

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[49] *California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.*

[50] *California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 57.*

[51] *Greenblatt, Jeffrey, Energy Policy, "Modeling California Impacts on Greenhouse Gas Emissions" (Vol. 78, pp. 158-172).*

conditioning maintenance, and increasing methane capture from landfills.[52] On October 25, 2007, ARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexaflouride emissions from the non-electricity sector. ARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO_2 per year and make up 94 percent of the point source CO_2 emissions in California.

ARB developed an AB 32 Scoping Plan that contains strategies to achieve the 2020 emissions cap. This Scoping Plan, which was developed by ARB in coordination with the CAT, was first published in October 2008 (the "2008 Scoping Plan"). The 2008 Scoping Plan proposed a comprehensive set of actions designed to reduce overall GHG emissions in California, improve the environment, reduce the state's dependence on oil, diversify the state's energy sources, save energy, create new jobs, and enhance public health. It accommodated the State's projected population growth. Moreover, it expressly encouraged called for coordinated planning of growth, including the location of dense residential projects near transportation infrastructure, including public transit.

An important component of the plan is a cap-and-trade program covering 85 percent of the state's emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports. As required by AB 32, ARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

In order to assess the scope of reductions needed to return to 1990 emissions levels, ARB first estimated the 2020 "business-as-usual" (BAU) GHG emissions in the 2008 Scoping Plan. These are the GHG emissions that would be expected to result if there were no GHG emissions reduction measures, and as if the state were to proceed on its pre-AB 32 GHG emissions track. After estimating that statewide 2020 BAU GHG emissions would be 596 metric tons, the 2008 Scoping Plan then identified recommended GHG emissions reduction measures that would reduce BAU GHG emissions by approximately 174 metric tons (an approximately 28.4 percent reduction) by 2020.

On August 19, 2011, following legal action in opposition to the Scoping Plan, ARB approved a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).[53] ARB updated their 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic

[52] *California Air Resources Board, Proposed Early Action Measures to Mitigate Climate Change in California, April 20, 2007.*

[53] *California Air Resources Board, Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED), Attachment D, August 19, 2011.*

recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building energy efficiency standards, and renewable energy.[54] Under that scenario, the State would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent) to achieve 1990 levels.

On May 22, 2014, ARB approved its first update to the AB 32 Scoping Plan (First Update), recalculating 1990 GHG emissions using IPCC Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 million metric tons (MMT) $MMTCO_2e$ 1990 emissions level would be slightly higher than identified in the original Scoping Plan, at 431 $MMTCO_2e$. Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the FED and updated 1990 emissions levels identified in the First Update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 $MMTCO_2e$ or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition. ARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by ARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law by focusing on reductions from several sectors. [55,56]

As shown in Table 3.7-2, these reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program. Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the transportation sector, which is charged with reducing 4.5% of baseline 2020 emissions. Of these actions, only one (GHG reductions through coordinated planning) specifically identifies local governments as the responsible agency.

Table 3.7-2
Emission Reductions Needed To Meet AB 32 Objectives In 2020

Sector	Million Metric Tons of CO_2e Reduction	Percent of Statewide CO_2e Inventory	Summary of Recommended Actions
Energy	-25	-4.9%	Reduce State's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas

[54] *California Air Resources Board, Greenhouse Gas Inventory – 2020 Emissions Forecast, http://www.arb.ca.gov/cc/inventory/data/forecast.htm. Accessed June 2014.*

[55] *CARB, First Update, p. 4, May 2014. See also id. at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."].*

[56] *CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.*

			production, reduce leaks from industrial facilities
Transportation	-23	-4.5%	Phase 2 heavy-duty truck GHG standards, ZEV action plan for trucks, construct High Speed rail system from SF to LA, coordinated land use planning, Sustainable Freight Strategy
High Global Warming Potential	-5	-1.0%	Reduce use of high-GWP compounds from refrigeration, air conditioning, aerosols
Waste	-2	-0.4%	Eliminate disposal of organic materials at landfills, in-State infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Cap and Trade Reductions	-23	-4.5%	Statewide program that reduces emissions from regulated entities through performance-based targets
Total	**-78**	**-15.3%**	
Source: California Environmental Protection Agency, "First Update to the Climate Change Scoping Plan." May 2014.			

Cap and Trade. ARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration. Under the Cap-and-Trade Program, covered entities that emit more than 25,000 metric tons CO_2e per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 metric tons CO_2e per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions (Mandatory Reporting Rule or "MRR"). ARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits.

The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate. In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by ARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures. As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported.

Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

While the 2020 cap would remain in effect post-2020,[57] the Cap-and-Trade Program is not currently scheduled to extend beyond 2020 in terms of additional GHG emissions reductions.[58] However, ARB has expressed its intention to extend the Cap-and-Trade Program beyond 2020 in conjunction with setting a mid-term target. The "recommended action" in the First Update for the Cap-and-Trade Program is: "Develop a plan for a post-2020 Cap-and-Trade Program, including cost containment, to provide market certainty and address a mid-term emissions target."[59] The "expected completion date" for this recommended action is 2017.[60] It is therefore reasonable to assume that the Cap-and-Trade Program will extend beyond 2020.

Senate Bill 1368. Senate Bill (SB) 1368, requires the California Public Utilities Commission and the California Energy Commission to establish GHG emissions performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

SB 97 & CEQA Guidelines. In August 2007, the California State Legislature adopted Senate Bill 97 (SB 97), requiring the Governor's Office of Planning and Research (OPR) to prepare and transmit new CEQA guidelines for the mitigation of GHG emissions or the effects of GHG emissions to the Resources Agency by July 1, 2009. In response to SB 97, the OPR adopted CEQA guidelines that became effective on March 18, 2010. The amendments provide guidance to public agencies on analysis and mitigation of the effects of GHG emissions in CEQA documents, including the following:

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;
- Consistency with the ARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;
- A lead agency may appropriately look to thresholds developed by other public agencies, including the ARB's recommended CEQA thresholds;

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[57] *California Health & Safety Code § 38551(a) ("The statewide greenhouse gas emissions limit shall remain in effect unless otherwise amended or repealed.").*

[58] *See AB 1288 (Atkins, introduced 2015) that would eliminate the December 31, 2020, limit on the Cap-and-Trade Program.*

[59] *CARB, First Update to the Climate Change Scoping Plan: Building on the Framework, at 98 (May 2014).*

[60] *Id.*

- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;

- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and

- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

State Bill 375. On September 30, 2008, SB 375 was instituted to help achieve AB 32 goals through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for ARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations ("MPOs") to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375 does not prevent ARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.[61]

On October 24, 2008, ARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). ARB's preliminary proposal consisted of a quantitative threshold of 7,000 metric tons (MT) of CO_2e per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, ARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines.[62] There is currently no timetable for finalized thresholds. On September 23, 2010, ARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035.[63] For the area under the Southern California Association

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[61] *American Planning Association, California Chapter, Analysis of SB 375, http://www.calapa.org/-en/cms/?2841.*

[62] *California Air Resources Board. http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf.*

[63] *California Air Resources Board. Notice of Decision: Regional Greenhouse Gas Emissions Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375. http://www.arb.ca.gov/cc/sb375/notice%20of%20decision.pdf.*

of Governments' (SCAG) jurisdiction—including the Project area—ARB adopted Regional Targets for reduction of GHG emissions by 8 percent for 2020 and by 13 percent for 2035. On February 15, 2011, the ARB's Executive Officer approved the final targets.[64]

Title 24 Energy Efficiency Standards. California's Energy Efficiency Standards for Residential and Nonresidential Buildings, located at Title 24, Part 6 of the California Code of Regulations and commonly referred to as "Title 24," were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.

California Green Building Standards. The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (CCR), is commonly referred to as the CALGreen Code. CALGreen was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the CALGreen Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated buildings and structures throughout California, including requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. The updated 2013 CALGreen Code became effective January 1, 2014.

Regional

South Coast Air Quality Management District Recommendations for Significance Thresholds. The South Coast Air Quality Management District (SCAQMD) convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members included government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of CO_2 equivalent ($MTCO_2e$) as a screening numerical threshold for stationary sources. The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions that recommended a screening threshold of 3,500 $MTCO_2e$ for residential projects, 1,400 $MTCO_2e$ for commercial projects, and 3,000 $MTCO_2e$ for mixed use projects. Additionally, the

[64] *CARB. 2011. Executive Order No. G-11-024: Relating to Adoption of Regional Greenhouse Gas Emission Reduction Targets for Automobiles and Light Trucks Pursuant to Senate Bill 375.*

Working Group identified project-level efficiency target of 4.8 $MTCO_2e$ per service population as a 2020 target and 3.0 $MTCO_2e$ per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 $MTCO_2e$ and the plan-level target for 2035 was 4.1 $MTCO_2e$. The SCAQMD has not established a timeline for formal consideration of these thresholds.[65] In the meantime, the project level thresholds are used as a non-binding guide. The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG emissions reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which are proposed or required by the Project.

SCAG Regional Transportation Plan/Sustainable Communities Strategy. On April 7, 2016, SCAG adopted its 2016-2040 Regional Transportation Plan Sustainable Communities Strategy (the "RTP/SCS") update, calling for a continuation of integrated planning for land use and transportation that will help achieve the State's goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The Plan calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG from having zero emission vehicles, neighborhood vehicles, and carsharing/ridesourcing make up two percent of the vehicle fleet by 2040. The RTP/SCS also includes a number of measures designed to reduce the potential of development to conflict with AB 32 or any other plan designed to reduce GHG.[66] These measures are particularly important where streamlining mechanisms under SB 375 are utilized.

Local (City of Los Angeles)

Green LA Plan. In May 2007, the City released its Green LA Plan that sets a goal to reduce the generation of GHG emissions 35 percent below 1990 levels by 2030. Key strategies include increasing the generation of renewable energy, improving energy conservation and efficiency, and changing land use patterns to reduce dependence on autos. This Plan included goals for energy, water, transportation, land use, waste, port, airport, and related sources.

ClimateLA Implementation Plan. To implement the Green LA Plan, the City published "ClimateLA", which included a baseline GHG emissions inventory for the City, identified enforceable strategies, and provided a means to monitor and report on progress toward the 2030 goal of reducing GHG emissions by 35 percent from 1990 levels. To achieve these goals, the City developed goals, including the following:

- Green Building: The program includes a goal calling for Los Angeles to be a worldwide leader in green buildings. Action E6 calls for a comprehensive set of green building policies to guide and support private sector development.

- Energy: Increase the amount of renewable energy provided by the Los Angeles Department of Water and Power, present a comprehensive set of green building policies to guide and support private sector

[65] *SCAG, Final PEIR for the 2016-2040 RTP/SCS, Appendix G. Accessible at http://rtpscs, scag.ca.gov/Documents/peir/2012fPEIR_AppendixG_ExampleMeasures.pdf.*

[66] *Southern California Association of Governments, Final PEIR, 2016-2040 RTP/SCS, Chapter 3.8.*

development, reduce energy consumed by City facilities, utilize solar heating where applicable, and help citizens to use less energy.

- Waste: Reduce or recycle 70 percent of trash by 2015.

- Open Space and Greening: Create 35 new parks, revitalize the Los Angeles River to create open space opportunities, plant one million trees, identify opportunities to "daylight" streams, identifying promising locations for stormwater infiltration to recharge groundwater aquifers, and collaborate with schools to create more neighborhood parks.

Mobility 2035 Plan. On January 20, 2016, the City adopted its Mobility 2035 Plan, the Circulation Element of its General Plan. The Plan focuses on developing a multi-modal transportation system that can address the City's mobility needs through 2035. The Plan calls for strategies that advance five goals: 1) Safety First, 2) World Class Infrastructure, 3) Access for All Angelenos, 4) Collaboration, Communication, and Informed Choices, and 5) Clean Environments and Healthy Communities. While the Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. It includes a key strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled. As such, the Plan's call for integrated land use planning, clean fuel vehicles are consistent with State and regional plans calling for more compact growth in areas with transportation infrastructure.

Green Building Ordinance. The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.[67] Larger projects must meet the equivalent of the certification at the Leadership in Energy and Environmental Design (LEED) certified level. LEED certification generally ensures that projects exceed Title 24 (2013) standards by at least 10 percent.[68] The City's ordinance affects the following types of development:[69]

1. New non-residential building or structure of 50,000 gross square feet or more of floor area;

2. New mixed-use or residential building of 50,000 gross square feet or more in excess of six stores;

3. New mixed-use or residential building of six or fewer stories consisting of at least 50 dwelling units in a building, which has at least 50,000 gross square feet of floor area, and in which at least 80 percent of the building's floor area is dedicated to residential units;

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[67] *City of Los Angeles, Ordinance No. 179820, added to LAMC as Section 16.10 (Green Building Program).*

[68] *U.S. Green Building Council. "Interpretation 10396" accessed at http://www.usgbc.org/leed-interpretations?keys=10396 February 26, 2015.*

[69] *Projects that voluntarily commit to LEED certification at the Silver level or higher received expedited processing from the City.*

4. The alternation or rehabilitation of 50,000 gross square feet or more of floor area in an existing non-residential building for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building;

5. The alteration of at least 50 dwelling units in an existing mixed-use or residential building, which has at least 50,000 gross square feet of floor area, for which construction costs exceed a valuation of 50 percent of the replacement cost of the existing building.

6. The City's Green Building Ordinance has several requirements that call for reductions in GHG emissions from reducing in energy use, water use, and solid waste generation from new non-residential and high-rise residential buildings, including:

Section 99.04.304.1. Irrigation Controllers. When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

1. Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;

2. Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s). Soil moisture-based controllers are not required to have rain sensor input. Buildings on sites with over 2,500 square feet of cumulative irrigated landscaped areas shall have irrigation controllers that meet the criteria in Section 99.04.304.1.

Section 99.04.303.4. Wastewater Reduction. Each building shall reduce by 20 percent wastewater by one of the following methods:

1. The installation of water conserving fixtures (water closets, urinals)

2. Utilizing non-potable water systems (captured rainwater, graywater, and municipally treated wastewater) complying with the current edition of the Los Angeles Plumbing Code or other methods.

Section 99.04.304.2. Outdoor Potable Water. Building on sites with 1,000 square feet or more of cumulative landscaped areas shall have separate meters or submeters for indoor and outdoor potable water use.

Section 99.04.304.3. Irrigation Design. Buildings on sites with 1,000 square feet or more of cumulative irrigated landscaped areas shall have irrigation controllers and sensors which include the following criteria and the manufacturer's recommendations.

Section 99.05.407.1. Weather Protection. Provide a weather-resistant exterior wall and foundation envelope as required by the Los Angeles Building Code section 1403.2 (Weather Protection) and California Energy Code Section 150, manufacturer's installation instructions, or local ordinance, whichever is more stringent.

Section 99.05.408. Construction Waste Reduction, Disposal And Recycling. Construction Waste Reduction of at Least 50 Percent. Comply with Section 66.32 et seq. of the LAMC.

Section 99.05.408.4. Excavated Soil and Land Clearing Debris. 100 percent of trees, stumps, rocks and associated vegetation and soils resulting primarily from land clearing shall be reused or recycled. For a phased project and when approved by the Department, such material may be stockpiled on site until the storage site is developed.

Section 99.05.410.1. Recycling by Occupants. Provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of non-hazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

Section 99.05.504.3. Covering of Duct Openings and Protection of Mechanical Equipment During Construction. At the time of rough installation, or during storage of the construction site and until final startup of the heating and cooling equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheetmetal or other methods acceptable to the Department to reduce the amount of dust or debris which may collect in the system.

Section 99.05.504.4.6. Resilient Flooring Systems. For 50 percent of floor area receiving resilient flooring, install resilient flooring complying with the VOC-emission limits defined in the 2009 Collaborative for High Performance Schools criteria and listed on its Low-emitting Materials List or certified under the Resilient Floor Covering Institute FloorScore program.

Existing Emissions

The portion of the Project Site that would be developed is open space and does not generate any anthropogenic GHG emissions.

Methodology

The methodology utilized for this analysis is based on a Technical Advisory released by the Governor's Office of Planning and Research (OPR) on June 19, 2008 titled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and

industry-specific activities.[70] The General Reporting Protocol is based on the "Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard" developed by the World Business Council for Sustainable Development and the World Resources Institute through "a multi-stakeholder effort to develop a standardized approach to the voluntary reporting of GHG emissions."[71] Although no numerical thresholds of significance have been developed, and no specific protocols are available for land use projects, the General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this analysis is consistent with the General Reporting Protocol's reporting requirements. The General Reporting Protocol recommends the separation of GHG emissions into three categories that reflect different aspects of ownership or control over emissions. They include the following:

Scope 1: Direct, on-site combustion of fossil fuels (e.g., natural gas, propane, gasoline, and diesel).

Scope 2: Indirect, off-site emissions associated with purchased electricity or purchased steam.

Scope 3: Indirect emissions associated with other emissions sources, such as third-party vehicles and embodied energy (e.g., energy used to convey, treat, and distribute water and wastewater).[72]

The General Reporting Protocol provides a range of basic calculations methods. However, the General Reporting Protocol calculations are typically designed for existing buildings or facilities. These retrospective calculation methods are not directly applicable to planning and development situations where buildings do not yet exist.

ARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to ARB to be considered for future strategies.[73] For example, ARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the Office of Planning and Research has noted that lead agencies "should make a good-faith effort, based on available information, to calculate, model, or estimate… GHG emissions from a project, including the emissions associated with vehicular traffic, energy consumption,

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[70] *California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf, accessed March 2, 2015.*

[71] *Ibid.*

[72] *Embodied energy is a scientific term that refers to the quantity of energy required to manufacture and supply to the point of use a product, material, or service.*

[73] *California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, www.arb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed March 2, 2016.*

water usage and construction activities."[74] Therefore, direct and indirect emissions have been calculated for the Project.

GHG emissions were quantified from construction and operation of the Project using SCAQMD's California Emissions Estimator Model (CalEEMod). Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[75]

Significance Criteria

As discussed below, there are no adopted federal, State, or local thresholds of significance for judging a Project's impact on greenhouse gases and climate change applicable to this Project. As a result, this analysis relies on primary direction from the CEQA Guidelines. OPR's amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009, indicating that a project could have a significant impact if it would:

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

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

Section 15064.4 of the CEQA Guidelines was adopted to assist lead agencies in determining the significance of the impacts of GHGs. It urges the quantification of GHG emissions where possible and includes language necessary to avoid an implication that a "life-cycle" analysis is required. It also recommends considering other qualitative factors that may be used in the determination of significance (i.e., extent to which the project may increase or reduce GHG emissions; whether the project exceeds an applicable significance threshold; and extent to which the project complies with regulations or requirements adopted to implement a reduction or mitigation of GHGs). Further, it states that:

- A lead agency should consider the following factors, among others, when assessing the significance of greenhouse gas emissions on the environment;

[74] *OPR Technical Advisory, p. 5.*

[75] *See www.caleemod.com.*

- The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;

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

- The extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of greenhouse gas emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

The current CEQA Guidelines do not establish a threshold of significance for GHG emissions. Lead agencies are to establish thresholds in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative. The CEQA Guidelines were amended in response to Senate Bill 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[76] Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of greenhouse gas emissions."[77] Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of non-significance for GHG emissions if a project complies with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.[78]

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[76] *See www.caleemod.com.*

[77] *See www.caleemod.com.*

[78] *See, for example, San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance tor Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Further, the South Coast Air Quality Management District (SCAQMD) has taken this position in CEQA documents it produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 MTCO$_2$e/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See: SCAQMD, Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH No.*

Although GHG emissions can be quantified, ARB, SCAQMD and the City of Los Angeles, have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.[79] Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[80]

Executive Orders S-3-05 and B-30-15, SB 375, SCAG's Sustainable Communities Strategy, and the City of Los Angeles Green Building Ordinance all apply to the Project and are all intended to reduce GHG emissions to meet the statewide targets set in AB 32.

Thus, in the absence of any adopted, quantitative threshold, the Project would not have a significant effect on the environment if it is found to be consistent with the applicable regulatory plans and policies to reduce GHG emissions:

- Executive Orders S-3-05 and B-30-15;
- SB 375;
- SCAG's Sustainable Communities Strategy; and
- Appropriate transportation and air quality plans from the City of Los Angeles, including the Green Building Ordinance, ClimateLA implementation Plan, and Mobility 2035 Plan.

Project Impacts

Construction

2012041014 (October 2014)(www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2); SCAQMD, Final Negative Declaration tor Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014)(www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (April 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2).

[79] *The South Coast Air Quality Management District formed a GHG Significance Threshold Working Group. Information on this Working Group is available at www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2.*

[80] *14 CCR § 15064(h)(3).*

Construction of the Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project site. These impacts would vary day to day over the 42-month duration of construction activities. As illustrated in Table 3.7-3, construction emissions of CO_2 would peak in 2017, when up to 31,344 pounds of CO_2e per day are anticipated following implementation of recommended **Mitigation Measure 3-1**. These emissions are further incorporated in the assessment of long-term operational impacts in Table 3.7-4 by amortizing them over a 30-year period, pursuant to guidance from the State and SCAQMD.

Table 3.7-3
Estimated Construction Emissions - Mitigated

Construction Year	CO_2	CH_4	N_2O	CO_2e
2017	31,261	4	0	31,344
2018	15,071	1	0	15,101
2019	16,544	1	0	16,575
2020	16,120	1	0	16,150

Pounds per day
Source: DKA Planning, 2016 based on CalEEMod 2013.2.2. Data in Appendix to this MND.

Operation

Greenhouse gas emissions were calculated for long-term operations. Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year period because no significance threshold has been adopted for such emissions. The Project emission reductions are results of Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard (RPS) of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard (LCFS).

This analysis compares the Project's GHG emissions to the emissions that would be generated by the Project in the absence of any GHG reduction measures (i.e., the No Action Taken ("NAT") Scenario. This approach mirrors the concepts used in the ARB's *Climate Change Scoping Plan* for the implementation of AB 32. This methodology is used to analyze consistency with applicable GHG reduction plans and policies and demonstrate the efficacy of the measures contained therein, but it is not a threshold of significance.

The analysis in this section includes potential emissions under NAT scenarios and from the Project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in the *Climate Change Scoping Plan* that have not been approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out.

The NAT scenario is used to establish a comparison with project-generated GHG emissions. The NAT scenario does not consider site-specific conditions, project design features, or prescribed mitigation measures. As an example, a NAT scenario would apply a base ITE trip-generation rate for the project and would not consider site-specific benefits resulting from the proposed mix of uses or close proximity to public transportation. The analysis below establishes NAT as complying with the minimum performance level required under Title 24. The NAT scenario also considers State mandates that were already in place when ARB prepared the *Supplemental FED* (e.g., Pavley I Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California Low Carbon Fuel Standard).

Emissions calculations for the Project include credits or reductions for the regulatory compliance measures and project design features set forth throughout this analysis, such as reductions in energy or water demand. In addition, as mobile source GHG emissions are directly dependent on the number of vehicle trips, a decrease in the number of Project generated trips as a result of project features will provide a proportional reduction in mobile source GHG emissions. This scenario conservatively did not include actions and mandates that are not already in place but are expected to be in force in 2020 (e.g., Pavley II), which could further reduce GHG emissions from use of light-duty vehicles by 2.5 percent.

As shown in Table 3.7-4, the emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 8,731 and 13,276 $MTCO_2e$ per year, respectively, which shows the Project will reduce emissions by 34 percent from the CARB 2020 NAT scenario. Based on these results, the Project is consistent with the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan.

Table 3.7-4
Estimated Annual CO_2e Greenhouse Gas Emissions

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	9	9	-	0%
Energy Sources	7,023	4,073	-2,950	-42%
Mobile Sources	5,355	3,759	-1,596	-30%
Waste Sources	211	211	-	0%
Water Sources	505	505	-	0%
Construction	174	174	-	0%
Total Emissions	13,277	8,731	-4,546	-34%

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.
** NAT scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*
Source: DKA Planning, 2016.

The analysis uses the 2014 Revised AB 32 Scoping Plan's statewide goals as one approach to evaluate the proposed project's impact (i.e., 15.3 percent reduction from NAT). The report's methodology is to compare the Project's emissions as proposed to the Project's emissions if the Project were built using a NAT approach in terms of design, methodology, and technology. This means the Project's emissions were calculated as if it was constructed with project design features to reduce GHG and with several regulatory measures adopted in furtherance of AB 32.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT comparison based on the Scoping Plan is appropriate because the project would contribute to statewide GHG reduction goals. Specifically, the project's mixed-use nature and location in an existing urban setting provide opportunities to reduce transportation-related emissions. First, it would capture vehicle travel on-site that would have normally been destined for off-site locations. This produces substantial reductions in the amount of vehicle trips and vehicle miles traveled that no longer are made. Second, it would eliminate many vehicle trips because travel to and from the project site could be captured by public transit and pedestrian travel instead. Finally, it would attract existing trips on the street network that would divert to the proposed uses.

As illustrated in Table 3.7-5, the Project's profile as an urban infill, mixed-use project with proximity to substantial public transit will produce substantial reductions over land uses that are located in a more typical community that has not coordinated its land use and transportation planning. The projected reductions in vehicle trips and VMT would range up to 15 percent from internal capture, from 0-50 percent in reductions from pass-by trips and up to 35 percent reductions from the substantial mode share from public transit and pedestrian travel. These would result in concomitant reductions in CO_2e emissions that far exceed the State's AB 32 Scoping Plan goal of a 4.5 percent reduction from the overall transportation sector by 2020. As such, this analysis concludes that the Project would meet and exceed its contribution to statewide climate change obligations that are under the control of local governments in their decisionmaking.

Table 3.7-5
Daily Vehicle Travel Reductions Associated with Project

Land Use	Reduction from Internal Capture	Reduction from Pass-By Trips	Reduction from Transit/Walk-In Trips
Apartments	15%	0%	35%
Fast Food Restaurant	15%	50%	35%
Sit Down Restaurant	15%	20%	35%
Quality Restaurant	15%	10%	35%
Retail	15%	50%	35%

Source: Fehr & Peers, Project Transportation Impact Analysis 3700 Wilshire Boulevard, August 2016.

It should be noted that each source category of GHG emissions from the Project is subject to a number of regulations that directly or indirectly reduce climate change-related emissions:

- Stationary and area sources. Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.

- Transportation. Both construction and operational activities from the Project site would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.

- Energy Use. Both construction and operational activities from the Project site would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.

- Building structures. Operational efficiencies will be built into the project that reduce energy use and waste, as mandated by the City's Green Building code.

- Water and wastewater use. The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.

- Major appliances. The Project would include major appliances that are regulated by California Energy Commission requirements for energy efficiency.

- Solid waste management. The Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

In addition to the GHG emission reductions described above, it is important to note that the CO_2 estimates from mobile sources (particularly CO_2, CH_4, and N_2O emissions) are likely much greater than the emissions that would actually occur. The methodology used assumes that all emissions sources are new sources and that emissions from these sources are 100 percent additive to existing conditions. This is a standard approach taken for air quality analyses. In many cases, such an assumption is appropriate because it is impossible to determine whether emissions sources associated with a project move from outside the air basin and are in effect new emissions sources, or whether they are sources that were already in the air basin and just shifted to a new location. Because the effects of GHGs are global, a project that shifts the location of a GHG-emitting activity (e.g., where people live, where vehicles drive, or where companies conduct business) would result in no net change in global GHG emissions levels.

For example, if a substantial portion of California's population migrated from the South Coast Air Basin to the San Joaquin Valley Air Basin, this would likely decrease GHG emissions in the South Coast Air Basin and increase emissions in the San Joaquin Valley Air Basin, but little change in overall global GHG emissions. However, if a person moves from one location where the land use pattern requires auto use (e.g., commuting, shopping) to a new development that promotes shorter and fewer vehicle trips, more

walking, and overall less energy usage, then it could be argued that the new development would result in a potential net reduction in global GHG emissions.

As described throughout this analysis, the Project contains regulatory compliance measures and project design features (utility and service system section) that would reduce the Project's GHG emissions profile and would represent improvements vis-à-vis the NAT scenario. Thus, the Project's emissions reductions as compared to the NAT Scenario demonstrate consistency with GHG Reduction Plans, Executive Orders S-3-05 and B-30-15, SCAG's Sustainable Communities Strategy, and the City of Los Angeles' Green Building Ordinance. As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant. Project-specific impacts related to the emission of greenhouse gases would be less than significant.

b) Would the project conflict with an applicable plan, policy or regulations adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The Project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. As noted earlier, the Project would be consistent with relevant plans and policies that govern climate change:

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan;
- SCAG's Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles ClimateLA implementation plan; and
- City of Los Angeles Green Building Ordinance

Consistency with Executive Orders S-03-05 and B-30-15.

The Project is consistent with the State's Executive Orders S-3-05 and B-30-15, which are orders from the State's Executive Branch for the purpose of reducing GHG emissions. These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use as it is a mixed-used development located in an urban infill area well-served by transportation infrastructure that includes robust public transit provided by Metro and other transit providers.

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the Project's emissions profile to decline as the regulatory initiatives identified by ARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at build-out presented in this analysis represents the maximum emissions inventory for the Project as

California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project is consistent with the Executive Order's horizon-year goal.

Many of the emission reduction strategies recommended by ARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law and help lay the foundation "…for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in ARB's First Update to the AB 32 Scoping Plan.[81,82] As such, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

Consistency with the AB 32 Scoping Plan

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. Table 3.7-6 evaluates the Project's consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global climate change. Based on this evaluation, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan. The Project is consistent with the AB 32 Scoping Plan's focus on emission reductions from several key sectors:

- **Energy Sector:** Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the Project's emissions level.[83] Additionally, further additions to California's renewable resource portfolio would favorably influence the Project's emissions level.[84]

- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project's emissions level.[85]

- **Water Sector:** The Project's emissions level will be reduced as a result of further desired enhancements to water conservation technologies.[86]

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[81] *CARB, First Update, p. 4, May 2014. See also id. at pp. 32–33 [recent studies show that achieving the 2050 goal will require that the "electricity sector will have to be essentially zero carbon; and that electricity or hydrogen will have to power much of the transportation sector, including almost all passenger vehicles."].*

[82] *CARB, First Update, Table 6: Summary of Recommended Actions by Sector, pp. 94-99, May 2014.*

[83] *CARB, First Update, pp. 37-39, 85, May 2014.*

[84] *CARB, First Update, pp. 40-41, May 2014.*

[85] *CARB, First Update, pp. 55-56, May 2014.*

- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the Project's emissions level.[87]

Table 3.7-6
Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
California Cap-and-Trade Program. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	**Not Applicable.** The statewide program is not relevant to the Project.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Not Applicable.** The development of standards is not relevant to the Project.
Energy Efficiency. Maximize energy efficiency building and appliance standards, and pursue additional efficiency efforts including new technologies, and new policy and implementation mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	**Consistent**. The Project will be constructed in compliance with the standards of Title 24 that are in effect at the time of development. In addition, with compliance with the City's Green Building Ordinance, the Project will exceed Title 24 standards.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	**Consistent.** The Project will utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy. LADWP had an average of 23% renewables as of 2013.
Low-Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	**Not Applicable.** The statewide program is not relevant to the Project.
Regional Transportation-Related Greenhouse Gases. Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	**Not Applicable.** The development of regional planning goals is not relevant to the Project. The project's infill location near several bus routes (i.e., Metro) and Metro's Purple Line stations make it consistent with the smart growth objectives of the region's Sustainable Communities Strategy (SCS).
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not Applicable.** State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Neutral.** This is a state-wide goal and that the Project, whether it does or does not do solar roofs will not affect the state-wide implementation of this

[86] *CARB, First Update, p. 65, May 2014.*

[87] *CARB, First Update, p. 69, May 2014.*

Table 3.7-6
Project Consistency with AB 32 Scoping Plan Greenhouse Gas Emission Reduction Strategies

Strategy	Project Consistency
	program.
Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures.
Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	**Not Applicable.** This measure addresses industrial facilities. The Project is not an industrial facility.
High Speed Rail. Support implementation of a high speed rail system.	**Not Applicable.** This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** The Project will be compliant with the City's Green Building Ordinance, and would incorporate water saving features and energy efficient features into its design.
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	**Not Applicable.** State agencies are responsible for implementing these measures.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	**Consistent.** Under City of Los Angeles requirements, the Project would divert/recycle at least 50% of construction debris, re-use existing materials in new construction, use recycled content materials; and recycle during operation.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not Applicable.** Resource Agency departments are responsible for implementing this measure.
Water. Continue efficiency programs and use cleaner energy sources to move and treat water.	**Consistent**. The Project will be compliant with the City's Green Building Ordinance and will incorporate water saving features and energy efficient fixtures into its design.
Agriculture. In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not Applicable.** The Project does not include agricultural facilities.
Source: CAJA Environmental Services, 2016.	

Consistency with SCAG's 2016-2040 RTP/SCS

At the regional level, the 2016-2040 RTP and Sustainable Communities Strategy represent the region's Climate Action Plan that defines strategies for reducing GHGs. In order to assess the Project's potential to conflict with the RTP/SCS, this section analyzes the Project's land use profile for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the

provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

The Project is an infill development that is also consistent with the 2016 RTP/SCS and its focus on integrated land use planning. Specifically, the Project Site's location near substantial local transit and bus services places it in a High Quality Transit Area (HQTA). The 2016 RTP/SCS projects that these areas, while comprising only three percent of land area in the region make up 46 percent of future household growth and 55 percent of future job growth.

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

At least 5 percent of the total code-required parking spaces will be equipped with EV charging stations. Plans will indicate the proposed type and location(s) of charging stations, and plan design will be based on Level 2 or greater EVSE at its maximum operating capacity. When the application of the 5 percent requirement results in a fractional space, round up to the next whole number.

Table 3.7-7 demonstrates the Project's consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. The Project would also be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

Table 3.7-7
Project Consistency With SCAG 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis [a]
Land Use Strategies		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	**Consistent.** The Project would include residences that would add to the supply of housing in metropolitan Los Angeles County.
Focus new growth around transit.	Local Jurisdictions	**Consistent.** The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing near transit facilities.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions	**Consistent.** The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing along the 2,980 miles of Livable Corridors in the region.
Provide more options for short trips through Neighborhood Mobility Areas	SCAG, Local Jurisdictions	**Consistent.** The Project would help further jobs/housing balance objectives. The Project is also

Table 3.7-7
Project Consistency With SCAG 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis [a]
and Complete Communities.		consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	**Not Applicable.** While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the Project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	**Consistent.** The Project is an infill development that would help reduce demand for growth in urbanizing areas that threaten greenfields and open spaces.
Transportation Strategies		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy calls on investing in the maintenance of our existing transportation system, the Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions Local Jurisdictions	**Consistent.** The Project is an infill development that will minimize congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density of population and jobs.
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy aims to improve the safety of the transportation system and protect users from security threats, the Project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The Project would not interfere with this larger goal of investing in the transportation system.
Technological Innovation and 21st Century Transportation		
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure.
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure.
Implement shared mobility programs.	SCAG Local Jurisdictions	**Not Applicable.** While this strategy is designed to integrate new technologies for last-mile and

Table 3.7-7
Project Consistency With SCAG 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis [a]
		alternative transportation programs, the Project would not interfere with these emerging programs.

Source: Southern California Association of Governments; 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth; April 2016.

Consistency with the City of Los Angeles Mobility 2035 Plan

While the Mobility 2035 Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. The Project, as proposed, is fully consistent with these general objectives, including the most relevant strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled.

Consistency with the City of Los Angeles ClimateLA Implementation Plan

Construction of the Project would generally be consistent with "ClimateLA" implementation plan, including its goal of making Los Angeles a worldwide leader in green buildings. Specifically, compliance with the City's LEED-based requirements will produce energy savings for construction projects that is envisioned in the implementation of Action E6 (Present a comprehensive set of green building policies to guide and support private sector development). Therefore, the Project would result in a less-than-significant impact related to construction GHG emissions.

Construction of the Project is consistent with the "ClimateLA" plan's goal of reducing or recycling 70 percent of trash (including construction waste) by 2015. The Project would promote this goal by complying with waste reduction measures mandated by CALGreen and City's Green Building Code, as well as solid waste diversion policies administered by CalRecycle that in turn reduce GHG emissions.

Long-term operations of the Project would be consistent with the "ClimateLA" focus on transportation, energy, water use, land use, waste, open space and greening, and economic factors to achieve emissions reductions.

With regard to transportation, the proposed Project would be consistent with the Plan's focus on reducing emissions from private vehicle use. Specifically, the Site's infill location with immediate access to significant public transit, pedestrian, and bicycle facilities results in a transit-oriented development that will reduce auto dependence. Further, the mixed-use nature of the proposed Project would be consistent with the Plan's land use policies that promote high density near transportation, transit-oriented development, and making underutilized land available for housing and mixed-use development, especially when near transit.

To reduce emissions from energy usage, the proposed Project would be consistent with "ClimateLA" and its focus on increasing the amount of renewable energy provided by the Los Angeles Department of Water and Power; presenting a comprehensive set of green building policies to guide and support private sector development; and helping citizens to use less energy. Both construction and operational activities from the Project site would generate energy-related emissions that are reduced by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers come from renewable energy sources by December 31, 2030.

With regard to water, the proposed Project would be consistent with reducing water from growth through water conservation and recycling; reducing per capita water consumption by 20 percent; and implementing the City's water and wastewater integrated resources plan that will increase conservation, and maximize the capture and reuse of storm water. Specifically, the Project is subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions, as well as CALGreen and City Green Building Code that call for water-conserving fixtures and processes. These elements of the Project would be consistent with goals set forth in the "ClimateLA" plan.

With regard to waste, the Project would be consistent with the "ClimateLA" goal of reducing or recycling 70 percent of trash by 2015 (which was met). Operational efficiences will be built into the Project that reduce energy use and waste, as mandated by the City's Green Building Code and CALGreen building code. With regard to ongoing operations, the Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

With regard to open space and greening, the Project would not interfere with, and instead of would contribute funds to the General Fund which supports, "ClimateLA" and its focus on creating 35 new parks; revitalizing the Los Angeles River to create open space opportunities; planting one million trees throughout the City; identifying opportunities to "daylight" streams; identifying promising locations for stormwater infiltration to recharge groundwater aquifers; and collaborating with schools to create more parks in neighborhoods.

Consistency with the City of Los Angeles Green Building Ordinance

The Los Angeles Green Building Ordinance requires that all Projects filed on or after January 1, 2014 comply with the Los Angeles Green Building Code as amended to comply with the 2013 CALGreen Code. Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include short and long term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Project would comply with these mandatory measures, as the Project would provide on-site bicycle parking spaces. Furthermore, the Green Building Ordinance includes measures that would increase energy efficiency on the Project Site, including installing Energy Star rated appliances and installation of water-conserving fixtures. Therefore, the Project is consistent with the Los Angeles Green Building Ordinance. The Project will comply with the City of Los Angeles' Green Building Ordinance standards, reduce emissions beyond a "Business-as-Usual" scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development:

The Project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level or equivalent. Projects that are LEED certified or the equivalent generally exceed Title 24 (2013) standards by at least 10 percent.[88] As such, the Project would incorporate several design elements and programs that will reduce its carbon footprint, including:

1. GHG Emissions Associated with Planning and Design. The Project will implement measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings. This would include:

- Access to several public transportation lines, the Metro, bus lines, LADOT DASH lines, and Metro Purple Line Western Station. The Project site's proximity to medium- and high-density residential neighborhoods increases the likelihood that more travel to and from the development will be made by non-motorized modes that will reduce potential GHG emissions.

2. GHG Emissions Associated with Energy Demand. The Project will meet Title 24 2013 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities. This would include:

- Use of low-emitting paints, adhesives, carpets, coating, and other materials.
- Equipment and fixtures will comply with the following where applicable:
    - Installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .90 or higher.
    - Installed electric heat pumps will have a Heating Seasonal Performance Factor of 8.0 or higher.
    - Installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio of at least 11.5.
    - Installed tank type water heaters will have an Energy Factor higher than .6.
    - Installed tankless water heaters will have an Energy Factor higher than .80.
    - Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
    - Building lighting in the kitchen and bathrooms within the dwelling units will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).

[88] *U.S. Green Building Council. "Interpretation 10396" accessed at http://www.usgbc.org/leed-interpretations?keys=10396 July 20, 2016.*

- An electrical conduit will be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit will be adequately sized by the designer but shall not be less than one inch. The conduit will be labeled as per the Los Angeles Fire Department requirements. The electrical panel will be sized to accommodate the installation of a future electrical solar system.

- A minimum of 250 square feet of contiguous unobstructed roof area will be provided for the installation of future photovoltaic or other electrical solar panels. The location will be suitable for installing future solar panels as determined by the designer.

- Appliances will meet Energy Start designations as applicable for that appliance.

3. GHG Emissions Associated with Water Use. The Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It will also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. Wastewater reduction measures must be included that help reduce outdoor potable water use. This would include:

- A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:

    - Each plumbing fixture and fitting shall meet reduced flow rates specified on Table 4.303.2; or

    - A calculation demonstrating a 20 percent reduction in the building "water use" baseline will be provided.

- When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads will not exceed specified flow rates.

- When automatic irrigation system controllers for landscaping are provided and installed at the time of final inspection, the controllers shall comply with the following:

    - Controllers shall be weather- or soil moisture-based controllers that automatically adjust irrigation in response to changes in plants' needs as weather conditions change;

    - Weather-based controllers without integral rain sensors or communication systems that account for local rainfall shall have a separate wired or wireless rain sensor that connects or communicates with the controller(s).

4. GHG Emissions Associated with Solid Waste Generation. The Project is subject to construction waste reduction of at least 50 percent. In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and

composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

5. GHG Emissions Associated with Environmental Quality. The Project will meet the strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during constructions, and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities. This would include:

- Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.

- Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

Consistency with the City of Los Angeles Mobility 2035 Plan

While the Mobility 2035 Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. The Project is consistent with these general objectives, including the most relevant strategy, Program No. D7, which calls for the development of GHG tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled. Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles. As a result, the Project would be consistent with applicable State, regional and local GHG reduction strategies. Given that the Project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

Cumulative Impacts

The emission of GHGs by a single project into the atmosphere is not itself necessarily an adverse environmental effect. Rather, it is the increased accumulation of GHG from more than one project and many sources in the atmosphere that may result in global climate change. The consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically would be very small in comparison to state or global GHG emissions and, consequently, they would, in isolation, have no significant direct impact on climate change. The State has mandated a goal of reducing statewide emissions to 1990 levels by 2020, even though statewide population and commerce is predicted to continue to expand. In order to achieve this goal, ARB is in the process of establishing and implementing regulations to reduce statewide GHG emissions. At a minimum, most project-related emissions, such as

energy, mobile, and construction, are source categories targeted for emission reductions by the Cap-and-Trade Program.

Currently, there are no quantitative ARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emissions: Executive Orders S-3-05 and B-30-15; the RTP/SCS and the City of Los Angeles policies (e.g., Green Building Ordinance, Mobility 2035 Plan, ClimateLA).

Implementation of the Project's regulatory compliance measures and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from NAT and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the ARB's *Climate Change Scoping Plan* for the implementation of AB 32. The Project is consistent with the approach outlined in ARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by ARB's *Climate Change Scoping Plan*, the Project would use "green building" features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of CALGreen.

As part of SCAG's 2016-2040 SCS/RTP, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by ARB. The Project results in significant VMT reduction in comparison to NAT and would be consistent with the SCS/RTP. The Project also would comply with the City of Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's regulatory compliance measures and project design features provided above and throughout this analysis would advance these objectives. Further, the related projects would also be anticipated to comply with many of these same emissions reduction goals and objectives (e.g., City of Los Angeles Green Building Code). Additionally, the Project would incorporate sustainability design features in accordance with regulatory requirements and transit credits to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, the Project results in a 34 percent reduction in GHG emissions from NAT. The Project's GHG reduction measures make the Project consistent with AB 32.

The Project would also be consistent with applicable land use policies of the City of Los Angeles and SCAG's RTP/SCS pertaining to air quality, including reducing GHG emissions. As discussed above, the Project is consistent with the applicable GHG reduction plans and policies. The NAT comparison demonstrates the efficacy of the measures contained in these policies. Moreover, while the Project is not

directly subject to the Cap and Trade Program, that Program will indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions should California's direct regulatory measures reduce GHG emissions less than expected. This will ensure that the GHG reduction targets of AB 32 are met. Thus, given the Project's consistency with State, SCAG, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, the Project's impacts are not cumulatively considerable. Project-specific and cumulative impacts related to the emission of greenhouse gases would be less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS

This section is based on the following items, included as Appendix G of this IS/MND:

G-1 Phase I Environmental Site Assessment, Western Environmental Engineers, Co., September 7, 2015.

G-2 Hazardous Gas Assessment, Geoscience Analytical, Inc., May 7, 2016.

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. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations, or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors. Construction of the Project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any urban mixed-use project. All of these materials would be used temporarily during construction. Thus, construction of the Project does not involve the routine transport, use, or disposal of hazardous materials.

Additionally, all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations, which further minimizes the potential risk associated with construction-related hazardous materials. Finally, the construction activities are contained on the Project Site and, thus, any emissions from the use of such materials would be minimal and localized to the Project Site. Therefore, construction of the Project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards. Potential impacts associated with the potential release of hazardous substances during construction of the Project would be less than significant.

Similarly, from an operational perspective, the Project does not involve the routine use, transport, or disposal of hazardous materials. The Project includes the development of hotel, residential, commercial, and parking uses. These typical urban uses do not involve the routine use of hazardous materials**.** Instead, the operation of the Project has limited hazardous materials similar to any other mixed-use urban development. For example, the proposed uses would involve the use and storage of small quantities of potentially hazardous materials such as cleaning solvents, paints, and pesticides for landscaping. Likewise, the Project's commercial and office uses could include commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial land uses. In other words, the Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. Thus, none of the Project's operational features, or the type of hazardous materials used on the Project Site, creates a significant hazard to the environment or public.

Moreover, the Project would adhere to regulatory requirements for source hazardous waste reduction measures (e.g., recycling of used batteries, recycling of elemental mercury, etc.) that would further minimize the generation of hazardous waste. In addition, the Project will comply with the applicable City ordinances regarding implementation of hazardous waste reduction efforts on-site (i.e., the City's Green Building Ordinance). The applicable regulatory requirements further ensure that the minimal amount of hazardous materials associated with the Project are properly treated and disposed of at licensed resource recovery facilities or hazardous waste landfills. Therefore, potential impacts associated with the operation of the Project would be less than significant.

The potential transport of any hazardous materials and wastes, i.e., paints, adhesives, surface coatings, cleaning agents, fuels, and oils, if it occurs, would occur in accordance with federal and state regulations that govern the handling and transport of such materials. In accordance with such regulations, the transport of hazardous materials and wastes would only occur with transporters who have received training and appropriate licensing. Therefore, potential impacts associated with the minimal transport of any hazardous materials would also be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project utilizes hazardous materials as part of its routine operations and could potentially pose a hazard to nearby sensitive receptors under accident or upset conditions.

Site Reconnaissance[89]

The existing office building was constructed in 1966 and will not be disturbed as part of the project. However, a visual inspection was performed by Western Environmental Engineers, Co. showing that no hazardous materials were being used or stored at the Site. No 55-gallon industrial drums were observed at the Site. No 5-gallon buckets were observed at the Site. No trash-bins were observed at the Site. From the visual inspection, no aboveground storage tanks (ASTs) were observed at the Site. No evidence of concrete scaring, fill pipes, and/or vent pipes that would indicate the past or present existence of underground storage tanks (UST) were detected at the Site. From the visual inspection, no stained areas were observed around the Site that could impose an environmental threat upon the Site. Polychlorinated Biphenyls (PCBs) had been commonly used in dielectric fluids for electrical transformers or light ballasts before 1978. However, manufacturing of PCBs was discontinued in the United States because of its toxicity. No electrical transformers were observed at the Site.

Commercial use of ACM and lead-based paint as a building material was banned by the federal government in 1978. Since the subject building was built prior to 1978, asbestos containing materials may still be present at the Site. Per the Phase 1: [90]

[89] *Phase I Environmental Site Assessment, Western Environmental Engineers, Co., September 7, 2015.*

"Prior to any renovation or demolition work which could disturb any potential asbestos containing materials or potential lead paint, they should be sampled by a California Certified Asbestos Consultant and lead paint consultant, who may also assist with proper removal of any materials found to contain asbestos or lead paint. Such materials must be removed by a properly licensed asbestos and/or lead paint abatement contractor and oversight and monitoring of the work must be performed by a California Certified Asbestos/Lead consultant."

Vapor Encroachment Screening

ASTM E 2600-10 Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions (VES) was used as guidance for conducting a VES for the Site. The purpose of the screening is to determine whether a Vapor Encroachment Condition (VEC) exists from chemicals of concern (COC) that may migrate as vapors onto a property as a result of contaminated soil and groundwater on or near the Site.

VES Tier I- Search Distance Test/Chemicals Of Concern Test

The search distance test involves a review of the regulatory database report and available historical records to make a determination if any known or suspect potentially contaminated properties exist within the Area of Concern (AOC). High risk sites are typically current and former gas stations, former and current dry cleaners, manufactured gas plants, and industrial sites. The AOC is defined as any up gradient sites within the ASTM Practice E 1527-13 standard search distances and any cross or down gradient sites within 1/3 mile for solvents and petroleum products. If the contamination at the known or potentially contaminated site within the AOC consists of COCs, then a potential Vapor Encroachment Condition (p VEC) exists and Tier II screening is recommended. If no known or potentially contaminated sites with COCs exist within the AOC, no further inquiry is necessary. No release sites were identified in the BBL Radius Map Report within the AOC that are considered to pose a p VEC at the Site based on the Tier I evaluation.

VES Tier II-Plume Test

The Plume Test assesses whether: or not a plume is close enough to the property to result in a VEC.

1. Critical Distance Determination - Determine distance from property to edge of plume in any direction (vertical, horizontal, lateral).

2. A VEC exists if there is a plume of VOCs, semi-volatile organic compounds (SVOCs), Volatile Inorganic Compounds (VICs), or free petroleum product have accumulated above a water table within 100 feet of the Site or if a plume of dissolved volatile petroleum hydrocarbons is present within 30 feet of the property. The sites were manually mapped to determine the location of the Site and any potential plumes of contamination relative to the Site and groundwater gradient. In addition, the case information for each site was reviewed.

[90] *Phase I Environmental Site Assessment, Western Environmental Engineers, Co., September 7, 2015.*

Government Records

Eighty-four (84) environmental concerns are listed in the government databases, which are located within a ½ mile radius from the Site. The neighborhood sites up to 1.00-mile distance have been investigated by government agencies to determine if any hazardous chemical spills occurred in the past. There are a number of hazardous sites within a 1 mile radius of the Site. The Site is not listed as having any environmental concerns or operating permits in the list of 51 government databases reviewed.

NPL - National Priority List

EPA has prioritized sites with significant risk to human health and the environment. These sites receive remedial funding under the Comprehensive Environmental Response Conservation and Liability Act (CERCLA). No listings within 1 mile radius of the Site.

CERCLIS- Comprehensive Environmental Response, Compensation, and Liability Information System

CERCLIS is a database used by the EPA to track activities conducted under the Comprehensive Environmental Response and Liability Act CERCLA (1980) and the amendment the Superfund Amendments and Reauthorization Act SARA (1986). No listings within ½ mile radius of the Site.

NFRAP - No Further Remedial Action Planned sites (CERCLIS)

As of February 1995, CERCLIS sites designated 'No Further Remedial Action Planned' NFRAP have been removed from CERCLIS. NFRAP sites may be sites where, following an initial investigation, no contamination was found, contamination was removed quickly without the site being placed on the NPL, or the contamination was not serious enough to require Federal Superfund action or NPL consideration. EPA has removed these NFRAP sites from CERCLIS to lift unintended barriers to the redevelopment of these properties. No listings within ½ mile radius of the Site.

LUST - Leaking Underground Storage Tanks - California State

The Leaking Underground Storage Tank (LUST) database is maintained by the Water Resources Control Board and their regional branches, and tracks sites contaminated by releases from underground storage tanks pursuant to Section 25295 of the Health and Safety Code. Thirteen (13) Leaking Underground Storage Tank (LUST) Sites were identified within a 1/2 mile of the Site. However, because of the distance from the Site, the nearby leaking site could not have adversely impacted subsurface soil and/or groundwater at the Site. If indeed, soil and/or groundwater at the Site have been adversely impacted, the ultimate responsible party of remediation costs will be the LUST site.

Conclusion

- Western Environmental Engineers contacted the Los Angeles City Fire Department Hazardous Materials Division to review any records pertaining to hazardous materials and aboveground/underground storage tanks used or stored at the subject site. As of the date of the Phase 1, Western Environmental Engineers has not yet received a response from the Los Angeles City Fire

Departments Hazardous Materials Division for inclusion into the Phase I; however, based on over 30 years of experience in environmental services, the results are not likely to change any recommendations made in this Phase I Environmental Site Assessment report.

- Western Environmental Engineers contacted the Los Angeles City Fire Departments Underground Tank Unit to review any records pertaining to aboveground/underground storage tanks at the Site. As of the date of the Phase 1, Western Environmental Engineers has not yet received a response from the Los Angeles City Fire Departments Hazardous Materials Division for inclusion into the Phase I. According to the Geotracker - California State Water Resources Control Board's sponsored website, the Site has an underground storage tank containing diesel used for emergency generator.

- Western Environmental Engineers researched data from the South Coast AQMD Database to review any records regarding Hazardous Waste/Materials and violations for the Site. Records were found for the subject site. According to the records found, an operating permit for the boiler was issued on July 31, 2009. Records of notices to comply were found for the subject site; however, they are currently case closed and in compliance.

- Western Environmental Engineers contacted the Department of Toxic Substances Control, EnviroStor website to review any records pertaining to hazardous materials used or stored at the Site and to review any records pertaining to aboveground/underground storage tanks at the Site. No records were found for the Site.

- The Site was not listed as a LUST (Leaking Underground Storage Tank) site on the Geotracker-California State Water Resources Control Board's sponsored website.

- Based on Western Environmental Engineers review of the historical and current usage of the Site as well as our review of the Federal, State, and Regional databases for onsite and adjacent properties of potential concern for vapor encroachment, no pVEC (potential Vapor Encroachment Condition) was identified in connection with the Property, and it is Western Environmental Engineers professional opinion that a VEC is not suspected of having encroached into the Site.

- Due to the former or/and current businesses, the Site is listed as having three (3) operating permits in the list of 51 government databases reviewed in the Phase I.

- The following describes the potential environmental conditions (PECs) that have been identified in Western Environmental Engineers Phase I Environmental Site Assessment for the Site. Western Environmental Engineers classifies a concern as a potential environmental condition (PEC) when the possible presence of any hazardous substances or petroleum products on a property under conditions that indicate the possibility of an existing release, a past release, or the threat of a release of any hazardous substances or petroleum products into structures on the property or into the ground, ground water or surface water of the property.

- Western Environmental Engineers has performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of ASTM Practice E 1527-13 of 3700 Wilshire

Boulevard, Los Angeles, California, the Site. This assessment has revealed no evidence of any recognized environmental conditions (RECs) or potential environmental conditions (PECs) in connection with the subject property except for the item listed above. Therefore, Western Environmental Engineers concludes that the risk of contamination at the site is so minimal that no further investigation is warranted at this time.

Methane[91]

The Project Site is within a Methane Buffer Zone.[92] A methane soil gas survey was conducted, The Site contains methane significantly below the Lower Explosive Limit (50.000 ppm v/v) and more typical of background levels. Mitigation is not required for site development since the project is included within a Methane Buffer Zone at a Site Design Level of II and a pressure of <2.0 in H20.

Operational Health Hazards

The Project shall be maintained in a neat, attractive, and safe condition at all times. On-site activities shall be conducted so as not to create noise, dust, odor, or other nuisances to surrounding properties. Trash and Recycling bins shall be maintained with a lid in working condition; such lid shall be kept closed at all times. Trash and garbage collection bins shall be maintained in good condition and repair such that there are no holes or points of entry through which a rodent could enter. Trash and garbage collection containers shall be emptied a minimum of once per week. Trash and garbage bin collection areas shall be maintained free from trash, litter, garbage, and debris. Operational impacts would be less than significant.

The Project would maintain the existing office building and remove and excavate the front lawn and plaza of the Site. Exposure to materials, such as asbestos and lead, during demolition or construction activities could be hazardous to the health of the demolition workers, as well as area residents, employees, and future occupants. The Project Site is required to comply with methane regulations per the LAMC. Compliance with regulations will ensure that impacts are less than significant. The Project will comply with the following regulatory compliance measures:

Regulatory Compliance Measures

RCM-8-1 Explosion/Release (Existing Toxic/Hazardous Construction Materials)

(**Asbestos**) Prior to the issuance of any permit for the demolition or alteration of the existing structure(s), the applicant shall provide a letter to the Department of Building and Safety from a qualified asbestos abatement consultant indicating that no Asbestos-Containing Materials (ACM) are present in the building. If ACMs are found to be present, it will need to be abated in compliance with the South Coast Air Quality

[91] *Hazardous Gas Assessment, Geoscience Analytical, Inc., May 7, 2016.*

[92] *ZIMAS search: http://zimas.lacity.org/.*

Management District's Rule 1403 as well as all other applicable State and Federal rules and regulations.

(**Lead Paint**) Prior to issuance of any permit for the demolition or alteration of the existing structure(s), a lead-based paint survey shall be performed to the written satisfaction of the Department of Building and Safety. Should lead-based paint materials be identified, standard handling and disposal practices shall be implemented pursuant to OSHA regulations.

(**Polychlorinated Biphenyl**) Prior to issuance of a demolition permit, a polychlorinated biphenyl (PCB) abatement contractor shall conduct a survey of the project site to identify and assist with compliance with applicable state and federal rules and regulation governing PCB removal and disposal.

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

Less Than Significant Impact. A project-related significant adverse effect may occur if the Project Site is located within 0.25-mile (1,320 feet) of an existing or proposed school site, and is projected to release toxic emissions, which would pose a health hazard beyond regulatory thresholds. The Project Site is in proximity to the following schools:[93]

- Erika J. Glazer Early Childhood Center and Brawerman Elementary School of Wilshire Boulevard Temple; 3663 Wilshire Boulevard, 425 feet east of the Project Site.

The Project will have a less than significant impact during construction (with regulatory compliance measures for asbestos and lead-based paint) and will not emit any hazardous substances during operation. The Project would ensure that adaptive reuse of existing structures does not emit hazardous materials. The school would still be generally shielded from the Project Site by the distance noted above, intervening urban buildings, and standard construction walls and sheeting to reduce dust and other emissions from the Site as listed in the project design feature below. Therefore, impacts of hazardous materials within one-quarter mile of a school will be less than significant.

Project Design Feature

Temporary construction fencing and sheeting typical for a demolition and construction project shall be placed along the periphery of the active construction areas to reduce dust and other emissions from the Project Site.

[93] *LAUSD and Google Maps.*

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

No Impact. California Government Code Section 65962.5 requires various state agencies to compile lists of hazardous waste disposal facilities, unauthorized release from underground storage tanks, contaminated drinking water wells, and solid waste facilities from which there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. This question would apply only if the Project Site is included on any of the above referenced lists (see question b), above) and would therefore pose an environmental hazard to the public or the environment. In meeting the provisions in Government Code Section 65962.5, commonly referred to as the "Cortese List," database resources that provide information regarding identified facilities or sites include EnviroStor, GeoTracker, and other lists compiled by the California Environmental Protection Agency:

According to EnviroStor, there are no cleanup sites (either Federal Superfund, State Response, voluntary, school evaluation, school investigation, military evaluation, tiered permit, or corrective action), permitted sites (either operating, post-closure, or non-operating), LUFT (leaking underground fuel tanks) or SLICS (Spills, Leaks, Investigation, and Cleanup) on, in or under the Project Site.[94]

According to GeoTracker, there are no LUST sites, other cleanup sites, land disposal sites, military sites waste discharge requirement (WDR) sites, permitted UST facilities, monitoring wells, or California Department of Toxic Substance Control cleanup sites or hazardous materials permits on, in or under the Project Site.[95]

The Project Site has not been identified as a solid waste disposal site having hazardous waste levels outside of the Waste Management Unit.[96] There are no active Cease and Desist Orders or Cleanup and Abatement Orders from the California Water Resources Control Board associated with the Project Site.[97] The Project Site is not subject to corrective action pursuant to the Health and Safety Code, as it has not

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[94] *California Department of Toxic Substance Control, EnviroStor, website: http://www.envirostor.dtsc.ca.gov/public/, August 20, 2016.*

[95] *California State Water Resources Control Board, GeoTracker, website: http://geotracker.waterboards.ca.gov/map, August 20, 2016.*

[96] *California Environmental Protection Agency, Cortese List Data Resources, Sites Identified with Waste Constituents Above Hazardous Waste Levels Outside the Waste Management Unit, website: http://www.calepa.ca.gov/SiteCleanup/CorteseList/CurrentList.pdf, August 20, 2016.*

[97] *California Environmental Protection Agency, Cortese List Data Resources, List of "Active" CDO and CAO from Water Board, website: http://www.calepa.ca.gov/sitecleanup/corteselist/, August 20, 2016.*

been identified as a hazardous waste facility.[98] Therefore, as the Project Site is not located on a list of hazardous material sites and will not result in a significant hazard to the public or environment, no impact would occur.

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?

No Impact. A significant project-related impact may occur if a project were placed within a public airport land use plan area or within two miles of a public airport, and subject to a safety hazard. The Project is not within an airport hazard area.[99] The Project Site is not located within two miles of a public airport. Therefore no impact would occur.

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

No Impact. This question would apply to a project only if it were in the vicinity of a private airstrip and would subject area residents and workers to a safety hazard. There are no nearby private airstrips. Therefore, no impacts will occur.

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

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan, or would generate sufficient traffic to create traffic congestion that would interfere with the execution of such a plan. Construction of the Project will not substantially impede public access or travel on public rights-of-way such as Wilshire Boulevard, and would not interfere with any adopted emergency response plan or emergency evacuation plan.

Full-time closures to the sidewalk and parking lane are anticipated for the project along Oxford Avenue and Serrano Avenue. Oxford Avenue is classified as a Collector Street and Serrano Avenue is classified as a Local Street - Standard. In addition, there are no emergency services located within the immediate vicinity of the affected streets. Since the closures during construction would be for the parking lane, the temporary construction impacts on the roadway network would be considered less than significant.

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[98] *California Environmental Protection Agency, Cortese List Data Resources, Cortese List: Section 65962.5(a), website: http://www.calepa.ca.gov/SiteCleanup/CorteseList/SectionA.htm#Facilities, August 20, 2016.*

[99] *ZIMAS search: http://zimas.lacity.org/.*

Major roadways throughout the City, such as Western Avenue, are selected disaster routes.[100] Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. Immediate emergency debris clearance and road/bridge repairs for short-term emergency operations will be emphasized along these routes. The Project will not impede the routes, and emergency access would be maintained at all times. The future traffic conditions with the Project show that none of the 15 study intersections would have a significant impact.[101]

The Project Site is not within a Hillside Area.[102] The Project would comply with emergency evacuation requirements according to the LAMC and LAFD. Therefore, impacts would be less than significant.

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. A significant impact may occur if a project is located in proximity to wildland areas and would pose a potential fire hazard, which could affect persons or structures in the area in the event of a fire. The Project Site is not located in a Very High Fire Hazard Severity Zone[103] or in the wildlands fire hazard Mountain Fire District.[104] The Project Site is not on the direct edge of a rural or wildland area. Therefore, no impact would occur.

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[100] *Los Angeles Safety Element, Exhibit H, Critical Facilities and Lifeline Systems in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

[101] *Transportation Impact Analysis, Fehr & Peers, August 2016.*

[102] *ZIMAS search: http://zimas.lacity.org/.*

[103] *ZIMAS search: http://zimas.lacity.org/.*

[104] *Los Angeles Safety Element, Exhibit D, Selected Wildfire Hazard Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

9. HYDROLOGY AND WATER QUALITY

This section is based on the following report, included as Appendix H of this IS/MND:

H Flood Hazard Letter, Fuscoe Engineering, July 20, 2016.

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

Less Than Significant Impact. A significant impact may occur if a project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into stormwater drainage systems. The National Pollutant Discharge Elimination System (NPDES) program establishes a comprehensive stormwater quality program to manage urban stormwater and minimize pollution of the environment to the maximum extent practicable. Pursuant to the NPDES, the Project is subject to the requirements set forth in the County's Standard Urban Stormwater Mitigation Plan (SUSMP). The goals and objectives of the SUSMP are achieved through the use of Best Management Practices (BMPs) to help manage runoff water quality. The City of Los Angeles has adopted the regulatory requirements set forth in the SUSMP of the Los Angeles Regional Water Quality Control Board (LARWQCB) under the City of Los Angeles Ordinance No. 173,494. BMPs typically include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets; cleaning parking lots on a regular basis; incorporating peak-flow reduction and infiltration features (such as grass swales, infiltration trenches, and grass filter strips) into landscaping; and implementing education programs. The SUSMP identifies the types and sizes of private development projects that are subject to its requirements.[105] Requirements of the SUSMP are enforced through the City's plan approval and permit process.

Low Impact Development (LID) is a stormwater management strategy that seeks to prevent impacts of runoff and stormwater pollution as close to its source as possible. Ordinance No. 181,899 was adopted in 2011 to amend LAMC 64.70, the City's stormwater code, and expand the City's existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements. LID is different from the previous SUSMP because it requires a larger scope of development and redevelopment projects to comply with stormwater measures, and incorporating new LID practices and measures. All development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area need to comply with the LID Ordinance. A project must comply with the LID Best Management Practices (LID BMPSs)

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[105] *Project applicants are required to prepare and implement a Standard Urban Stormwater Mitigation Plan when their projects fall into any of these categories: Single-family hillside residential developments; Housing developments of 10 or more dwelling units (including single family tract developments); Industrial /Commercial developments with one acre or more of impervious surface area; Automotive service facilities*; Retail gasoline outlets"; Restaurants* Parking lots of 5,000 square feet or more of surface area or with 25 or more parking spaces; Projects with 2,500 square feet or more of impervious area that are located in, adjacent to, or draining directly to designated Environmentally Sensitive Areas (ESA). http://www.lastormwater.org/green-la/standard-urban-stormwater-mitigation-plan/.*

(determined on a case by case basis by Public Works), and if that is not feasible only then do SUSMP BMPs apply. Possible BMPs include

1. Infiltration Systems

2. Stormwater Capture and Use

3. High Efficiency Biofiltration/Bioretention Systems

4. Combination of Any of the Above

Construction

Demolition and construction activities at the Project Site have the potential to affect the quality of storm water runoff. Typically, runoff picks up pollutants as it flows over the ground or paved areas and carries these pollutants into the storm drain system or directly into natural drainages. There are three general sources of short-term construction-related stormwater pollution associated with the Project: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion. During construction, the Project Site would contain a variety of construction materials that are potential sources of stormwater pollution, such as adhesives, cleaning agents, landscaping, plumbing, painting, heat/cooling, masonry materials, floor and wall coverings, and demolition debris. Construction material spills can also be a source of stormwater pollution and/or soil contamination.

The Project will include any required temporary (construction) and permanent (operational) de-watering, as required by the Los Angeles Department of Building and Safety according to compliance with RCM-6-2.

The Project will not be required to obtain a NPDES water quality permit from the LARWQCB since the discharge will be sent to the City's Stormwater System and not directly to surface waters.[106] The City is in compliance with all requirements of the NPDES Municipal Permit.[107] Implementation of appropriate project design features and compliance with the local, State, and federal regulations, code requirements, and permit provisions would prevent significant impacts related to the release of potentially polluted discharge into surface water.

Construction activities associated with the Project are subject to City inspection and implementation of storm water BMPs. Since the construction of the Project will disturb greater than one acre of land (the lawn and plaza site area is approximately 1.5 acres)[108], the Project Applicant will be required to obtain

[106] *http://water.epa.gov/polwaste/npdes/.*

[107] *http://www.lastormwater.org/about-us/npdes-municipal-permit/.*

[108] *See Section 2, Project Description Table 2-1, Project Site.*

coverage under the General Construction Activity Storm Water Permit (GCASP), which requires development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).[109] Construction projects that include grading activities during the rainy season must also develop a Wet Weather Erosion Control Plan (WWECP). The Project will comply with LID requirements. The Project will comply with LAMC Chapter IX, Division 70, which addresses grading, excavations, and fills. Compliance with the LAMC would ensure that construction would not violate any water quality standards, or discharge requirements, or otherwise substantially degrade water quality. BMPs are methods to prevent or control stormwater runoff and the discharge of pollutants. The plan requires (1) advance planning and training to ensure implementation of the BMPs, (2) erosion and sediment control BMPs in place until the area is permanently stabilized, (3) pollution prevention BMPs to keep the construction site clean and (4) regular inspection of the construction site to ensure proper installation and maintenance of BMPs.[110]Construction-related impacts to water quality will be less than significant. The Project shall comply with the following regulatory compliance measures:

Regulatory Compliance Measures

RCM-9-1 National Pollutant Discharge Elimination System General Permit

Prior to issuance of a grading permit, the Applicant shall obtain coverage under the State Water Resources Control Board National Pollutant Discharge Elimination System General Permit for Storm Water 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 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 Storm Water Pollution Prevention Plan shall be prepared and implemented for the proposed Project in compliance with the requirements of the Construction General Permit. The Storm Water Pollution Prevention Plan shall identify construction Best Management Practices 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-9-2 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.

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[109] *California Environmental Protection Agency, State Water Resources Control Board, Storm Water Program, Construction Storm Water Program, website: http://www.swrcb.ca.gov/water_issues/programs/stormwater/construction.shtml, accessed August 11, 2016.*

[110] *http://www.lastormwater.org/about-us/regulatory-mandates/*

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-9-3 Development Best Management Practices

The Best Management Practices 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.

RCM-9-4 Waste Discharge Requirements (WDR)

The Regional Water Quality Control Board (RWQCB) has issued a general permit for construction dewatering (Waste Discharge Requirements for Discharges of Groundwater from Construction Projects Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties Order No. R4-2013-0095, and CAG994004). Discharges covered by this permit include but not limited to, treated or untreated groundwater generated from permanent, temporary dewatering operations or other applicable wastewater discharges not specifically covered in other general or individual NPDES permits. If dewatering is required for construction or operation the project would have to obtain coverage under this permit.

Operation

The Project will not include industrial discharge to any public water system. Under existing conditions, runoff at the Project Site may contain typical urban pollutants such as automotive fluids (including oil and grease) commercial cleaning and landscaping pollutants discharged into the storm drainage system. Because there would be no substantial change in the type of runoff as a result of the Project (which would continue to have automobiles, cleaning supplies, and similar elements), urban contaminants that may be present in urban runoff from the Project Site would not differ substantially in type than that which currently exists. The parking for the Project would be located within the building and not subject to rain that can create runoff. The Project would be required to submit site drainage plans to the City Engineer and other responsible agencies demonstrating compliance with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles and the State Water Resources Control Board (SWRCB) for review and approval prior to development of any drainage improvements. In addition, design criteria as established in the SUSMP would be incorporated into the Project to minimize the off-site conveyance of pollutants. Therefore, operation-related impacts to water quality will be less than significant.

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 of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. A significant impact may occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement or includes withdrawal of groundwater or paving of existing permeable surfaces important to groundwater recharge. The nearest surface water in the vicinity is MacArthur Park Lake, approximately 1.6 miles away. No settling ponds, lagoons, surface impoundments, wetlands or natural catch basins are on the Project Site or nearby.

Free groundwater was not observed during drilling due to the use of mud-rotary drilling methods, which obscure groundwater within the borehole during drilling. One monitoring well was installed within boring B-1 during the current investigation. The groundwater depth was measured within the B-1 well on May 4, 2016 at 33.3 feet and recently on August 16, 2016 at 34.1 feet. Groundwater levels were also measured during the CPT investigation after the cone and rods were removed from the hole. The groundwater depth was measured in CPT-1 and CPT-4 at 33 feet bgs; and in CPT-2 at 41 feet bgs. A water level measurement was not able to be perfomed on CPT-3 due to the hole caving. According to the seismic hazard zone report for the Hollywood Quadrangle, the historically highest groundwater in the vicinity of the site is between about 10 to 20 feet below the ground surface. In addition, groundwater levels measured in the monitoring wells at 3675 Wilshire Boulevard from 1994 to 2008 indicated groundwater as shallow as 9 feet and as deep as 46 feet. In general, the two wells closest to the project site (E-13 and E-14, each approximately 200 to 300 feet from 3700 Wilshire Boulevard respectively) showed depths to groundwater of about 20 to 30 feet over a period from 1994 to 2008. Groundwater was observed at about 35 feet deep in 2015 during drilling of a single 80 feet deep boring at the project site by Pacific Geotech, Inc. It should be recognized that groundwater levels can fluctuate over time, depending on seasonal rainfall and other influences. While groundwater shallower than 30 feet has not been observed at the site, the groundwater levels observed in borings and wells near the site indicate that the static groundwater level could be encountered at depths shallower than 10 feet. Furthermore, there may be a potential for perched water seepage to occur locally in sandy zones of the alluvium deposits above the static groundwater level..[111]

The Project will include any required temporary (construction) and permanent (operational) de-watering, as described in the Geotechnical Investigation (see **RCM-6-2**) and required by the Los Angeles Department of Building and Safety.

A public water system operated by the Los Angeles Department of Water and Power (LADWP) serves the Project Site. The sources of public water for the City of Los Angeles are surface water from California Water Project and Colorado River purchased through the Metropolitan Water District (MWD) and groundwater.[112] The Project Site is located in an urbanized area of the City. The Project Site is primarily

[111] *Geotechnical Investigation, GeoPentech, August 19, 2016.*

[112] *LADWP, Water, Sources of Water: https://www.ladwp.com/, accessed August 11, 2016.*

covered with a lawn and plaza (hardscape). The Project will similarly occupy the entire Project Site with a new building. Thus, the Project would not be altering the amount of impervious surface that affects groundwater recharge.

The development of the Project will not involve direct groundwater withdrawal, and therefore, it will not deplete groundwater supplies. The Project will not interfere with groundwater recharge since current recharge is negligible due to the existing and proposed impervious surface covering the Project Site. Therefore, impacts will 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 which would result in substantial erosion or siltation on- or off-site?

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project. Proper surface drainage is critical to the future performance of the Project. Saturation of a soil can cause it to lose internal shear strength and increase its compressibility, resulting in a change in the designated engineering properties. Proper site drainage should be maintained at all times. The Project Site is located in an urbanized area of the City. The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with a lawn and plaza (hardscape). The Project will similarly occupy the entire Project Site with a new building. Thus, the Project would not be altering the amount of impervious surface that affects drainage patterns. The Project Site is within a developed area of the City, which is connected to the municipally-owned separated storm sewer system (MS4); therefore, the development of the proposed project will not cause changes in existing drainage patterns or surface water bodies in a manner that could cause erosion or siltation. The Project Site is not near and will not alter a stream or river. Therefore, impacts related to site drainage and erosion will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties. The Project Site is located in an urbanized area of the City. The Project Site is primarily covered with a lawn and plaza (hardscape). The Project will similarly occupy the entire Project Site with a new building. Thus, the Project would not be altering the amount of impervious surface that affects drainage patterns. No flooding is expected to occur on- or off-site due to the relatively flat grades of the Project Site and the vicinity. The Project Site is also not near, nor would be altering, a stream or river. Therefore, impacts related to site drainage and flooding will be less than significant.

e) Would the project create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. A significant impact may occur if a project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the Project Site. A project-related significant adverse effect would also occur if a project would substantially increase the probability that polluted runoff would reach storm drains. No natural watercourses exist on or in the vicinity of the Project Site. Water runoff flows toward the existing storm drain system on Wilshire Boulevard.[113] Urban runoff discharged from municipal storm drains is one of the principal causes of water quality problems in most urban areas. Oil and grease from parking lots, pesticides, cleaning solvents, and other toxic chemicals can contaminate stormwater, which can then contaminate receiving waters downstream and, eventually, the Pacific Ocean. As discussed in the response to Question 9(a), the Project is required to comply with the NPDES program, LID Best Management Practices, as well as the LAMC. These regulations control water pollution by regulating point sources that discharge pollutants. Additional discussion of the construction and operation impacts is provided below.

Construction

The Project would require excavation for three subterranean levels and utility and foundation work. Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth-moving activities which, when not controlled, may generate soil erosion and the transportation of pollutants via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials can effectively mitigate the potential pollution of stormwater by these materials. The same types of common sense, "good housekeeping" procedures can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes. Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids onto the construction site are also common sources of stormwater pollution and soil contamination. Earth-moving activities that can greatly increase erosion processes are another source of stormwater pollution contamination.

Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. When properly designed and implemented, these "good-housekeeping" practices would reduce short-term construction-related impacts to a less than significant level by controlling dust and erosion that may occur onsite and leaks from any construction equipment. The Project is required to comply with the LID Best Management Practices, which are determined on a case by case basis by the Department of Public Works. Approval will not be granted or issued until appropriate and applicable stormwater BMPS are incorporated into the Project

[113] *Navigate LA, Storm Drains Layer: http://navigatela.lacity.org/navigatela/.*

design plans. Compliance with existing regulations would reduce the potential for construction water quality impacts to a less than significant level.

Operation

Activities associated with operation of the Project will not generate substances that could degrade the quality of water runoff. The deposition of chemicals by cars in the existing parking lot could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. By removing the existing surface parking lot and developing a mixed-use project, the type of urban runoff would likely improve in quality. The parking for the Project would be located below grade, within the building and not subject to rain that can create runoff. In addition, impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles and the SWRCB. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and the City of Los Angeles (such as LID), would be incorporated into the project to minimize the off-site conveyance of pollutants. Compliance with existing regulations would reduce the potential for operational water quality impacts to a less than significant level.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality. Other than the sources described in the response to Question 9(e), the Project does not include other sources of contaminants that could substantially degrade water quality. Therefore, impacts to water quality would be less than significant.

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

No Impact. This question would apply to the Project only if it were placing housing in a 100-year flood zone. The Project would not be located in a 100-year flood hazard area according to the Los Angeles General Plan Safety Element map.[114] Lands designated as special flood hazard areas that are identified by the Federal Emergency Management Agency (FEMA) and published in the Flood Insurance Rate Map (FIRM) to establish the flood risk premium zone. These areas are subject to inundation by a flood having a one-percent or greater probability of being equaled or exceeded during any given year. This flood, which is referred to as the 1% annual chance flood (or base flood), is the national standard on which the floodplain management and insurance requirements of the National Flood Insurance Program (NFIP) are based. The Site is not within a Flood Zone.[115] Therefore, the Project will not place housing within a 100-

[114] *Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

[115] *ZIMAS search: http://zimas.lacity.org/.*

year flood hazard area and no impact will occur.

h) Would the project place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. A significant impact may occur if a project were located within a 100-year flood zone, which would impede or redirect flood flows. According to the Federal Emergency Management Agency (FEMA) the Flood Insurance Rate Map (FIRM) indicates that the Project Site is located within Flood Zone X, which is an area determined to be outside the 0.2 percent annual chance floodplain.[116] Additionally, the Project Site is not located within a City-designated 100-year floodplain.[117] Therefore, the Project will not be at risk of flooding and would not place structures in an area that would impede or redirect flood flows. No impacts to flood flows would occur.

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

No Impact. A significant impact may occur if a project were located in an area where a dam or levee could fail, exposing people or structures to a significant risk of loss, injury, or death. The nearest surface water in the vicinity is the Hollywood Reservoir, approximately 4.2 miles northwest of the Project Site. The Project Site is not located within a potential inundation area.[118] In addition, the result of the Baldwin Hills dam failure in 1963 and the near collapse of the Van Norman Dam during the 1971 San Fernando Earthquake resulted in strengthening of the federal, state, and local design standards and retrofitting of existing facilities. None of the 13 dams in the greater LA area was severely damaged during the 1994 Northridge Earthquake. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act following the San Fernando earthquake. [119]

The LADWP maintains a Water System Reservoir Surveillance Program. Most of LADWP's dams and reservoirs are under the jurisdiction of the California Department of Water Resources, Division of Safety of Dams (DSOD). DSOD issues operating licenses for dams and reservoirs under its jurisdiction, and the owner must comply with certain operation, maintenance, and inspection procedures in order to retain the license to operate the facility. LADWP maintains an assertive dam safety program, consisting of a six-person Reservoir Surveillance Group dedicated to inspecting each in-City reservoir monthly and each of its Owens Valley reservoirs annually or semi-annually. Reservoir inspections include reading groundwater monitoring wells in and around the dams, reading flows at seepage drains, and performing a

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[116] *FEMA, Flood Map Service Center: https://msc.fema.gov/portal, August 11, 2016.*

[117] *Los Angeles Safety Element, Exhibit F, 100-Year and 500-year Flood Plains in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

[118] *Los Angeles Safety Element, Exhibit G, Inundation & Tsunami Hazard Areas Map: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

[119] *Page II-16, Los Angeles Safety Element, http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

thorough visual inspection. Many LADWP reservoirs have Movement and Settlement (M&S) survey points installed on, and near, the dams. The M&S survey, groundwater, and seepage data are plotted on long-term charts to determine if there has been any significant change over time. At least once per year, State DSOD inspectors accompany LADWP Reservoir Surveillance personnel into the field to inspect each dam and reservoir. The Water System's Geotechnical Engineering Group maintains a program for periodically analyzing its dams and reservoirs for earthquake safety.[120] Therefore, the dams in the Los Angeles basin, as with other dams in California, are continually monitored by various governmental agencies (such as the California Division of Safety and Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake for the site. Flooding from other sources is not expected; thus the minimal risk of flooding from potential dam or levee failure will not be exacerbated by the Project. No impacts related to flooding will occur.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving 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 for the effects of seismically-induced tidal phenomena (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. Seiches are oscillations generated in enclosed bodies of water that can be caused by ground shaking associated with an earthquake. Mitigation of potential seiche action has been implemented by the LADWP through regulation of the level of water in its storage facilities and providing walls of extra height to contain seiches and prevent overflows. Dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow.[121] The Project is located approximately 11 miles away from the Pacific Ocean and is not located within an area potentially impacted by a tsunami.[122] The Project Site is not classified as within a landslide area.[123] The City's General Plan Safety Element has no areas around the Project Site identified as a bedrock or probable bedrock landslide area.[124] Thus, there is no potential for mudflow. Therefore, development of the Project will not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow. No impacts will occur.

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[120] *LADWP, Water System Reservoir Surveillance Program: http://eng.lacity.org/projects/fmp/pdf/handout4_042009.pdf.*

[121] *Page II-16, Los Angeles General Plan Safety Element, http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

[122] *ZIMAs search: http://zimas.lacity.org/.*

[123] *ZIMAs search: http://zimas.lacity.org/.*

[124] *Los Angeles Safety Element, Exhibit C, Landslide Inventory and Hillside Areas in the City of Los Angeles: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed August 11, 2016.*

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

Less Than Significant Impact. A significant impact may occur if a project were sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. A typical example would be a project that involved a continuous right-of-way such as a roadway, which would divide a community and impede access between parts of the community. The Project is not of a scale or nature that would physically divide an established community. The Project is not affecting any right-of-ways. The Project will be built on an existing urban infill site currently improved with a lawn and plaza in front of an existing office building that will remain. The Project's uses are compatible with the residential uses along Wilshire Boulevard and the residential uses to the south, which are higher density multi-family units located in an urbanized area. Throughout the City and near the Project Site, there are similar residential uses, especially in dense areas, such as Downtown Los Angeles, Hollywood, and West Long Angeles. As such, impacts related to physical division of an established community will be less than significant.

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, a 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. A significant impact may occur if a project is inconsistent with applicable land use plans or zoning designations and would cause adverse environmental effects, which these regulations are designed to avoid or mitigate.

The legal standard that governs consistency determinations is that a project must only be in "harmony" with the applicable land use plan to be consistent with that plan. (See *Sequoyah Hills Homeowners Assn. v. City of Oakland (*1993) 23 Cal.App.4th 704, 717-18 [upholding a city's determination that a subdivision project was consistent with the applicable general plan]). As the Court explained in *Sequoyah*, "state law does not require an exact match between a proposed subdivision and the applicable general plan." To be "consistent" with the general plan, a project must be "compatible with the objectives, policies, general land uses, and programs specified in the applicable plan," meaning, the project must be "in agreement or harmony with the applicable plan." (see also *Greenebaum v. City of Los* Angeles (1984) 153 Cal.App.3d 391, 406; *San Franciscans Upholding the Downtown Plan, supra*, 102 Cal.App.4th at p. 678.) Further, "[a]n action, program, or project is consistent with the general plan if, considering all its aspects, it will further the objectives and policies of the general plan and not obstruct their attainment." (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 817.) Courts also recognize that general plans "ordinarily do not state specific mandates or prohibitions," but instead provide "policies and set forth goals." (*Friends of Lagoon Valley*).

The following is a list of applicable land use plans, policies, and regulations:

Regional Level

- *Southern California Association of Governments*
    - *Regional Comprehensive Plan and Guide (RCPG)*
    - *Regional Comprehensive Plan (RCP)*
    - *Regional Transportation Plan (RTP)*
- *South Coast Air Quality Management District's (SCAQMD)*
    - *Air Quality Management Plan (AQMP)*
- *Los Angeles County Metropolitan Transportation Authority's (Metro)*
    - *Congestion Management Plan (CMP) for Los Angeles County.*

City of Los Angeles

- *City of Los Angeles General Plan*
- *Wilshire Community Plan*
- *ZI-2410 Metro Westside Subway Extension Project*
- *ZI-1117 MTA Project*
- *ZI-2452 Transit Priority Area in the City of Los Angeles*
- *ZI-2374 Los Angeles State Enterprise Zone*
- *ZI-1940 Wilshire Center/Koreatown Redevelopment Project and the Adaptive Reuse Incentive Area.*
- *Los Angeles Municipal Code*

Consistency with Regional Plans

Southern California Association of Governments (SCAG)

Regional Comprehensive Plan and Guide (RCPG)

The RCPG was adopted in 1996 by the member agencies of SCAG to set broad goals for the Southern California region, with the exception of the County of San Diego, and to identify strategies for agencies at all levels of government to use in guiding their decision-making. The RCPG identifies significant issues and changes that can be anticipated by the year 2015 and beyond. Adopted policies related to land use are contained primarily in the Growth Management chapter of the RCPG. The primary goal of the Growth Management chapter is to address issues related to growth and land use by encouraging local land use

actions that could ultimately lead to the development of an urban form that will help minimize development costs, save natural resources, and enhance the quality of life in the region. SCAG uses the criteria in CEQA Guidelines, Section 15206 to define what a regionally significant project is:

1. A proposed local general plan, element, or amendment thereof for which an EIR was prepared.

2. A proposed residential development of more than 500 dwelling units.

3. A proposed shopping center or business establishment employing more than 1,000 persons or encompassing more than 500,000 square feet of floor space.

4. A proposed commercial office building employing more than 1,000 persons or encompassing more than 250,000 square feet of floor space.

5. A proposed hotel/motel of more than 500 rooms.

6. A proposed industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or encompassing more than 650,000 square feet of floor area.

7. A project that would result in the cancellation of a Williamson Act Contract for any parcel of 100 or more acres.

8. A project for which an EIR was prepared and which is located in and substantially impacting an area of critical environmental sensitivity. This includes the California Coastal Zone.

9. A project that would substantially affect sensitive wildlife habitats such as riparian lands, wetlands, bays, estuaries, marshes, and habitats for rare and endangered species.

10. A project that would interfere with the attainment of regional water quality standards as stated in the approved areawide wastewater management plan.

11. A project that would provide housing, jobs, or occupancy for 500 or more people within 10 miles of a nuclear power plant.

12. A project that has the potential for causing significant effects on the environment extending beyond the city or county in which the project would be located.

The Growth Management chapters overall goals are to:[125]

- re-invigorate the region's economy,

[125] *SCAG, RCPG Growth Management Chapter, page 3-1: http://www.scag.ca.gov/rcp/pdf/pastprojects/1996RCPGGrowthManagementChapter.pdf.*

- avoid social and economic inequities and the geographical dislocation of communities, and
- maintain the region's quality of life.

The proposed Project is of the scale to be considered regionally significant based on the criteria above, and as such the Project will be consistent with and not interfere with implementation of the goals of the Growth Management Chapter of the RCPG. The Project would include a residential, retail, restaurant uses providing additional jobs, revenue, and economic activity in the area. The Project would not dislocate a community or increase social or economic inequalities. The Project would include uses near similar compatible uses, in mid-Wilshire area.

Regional Comprehensive Plan (RCP)

SCAG's RCP is a guidance document that was developed in response to the Regional Council directive in the 2002 Strategic Plan to develop a holistic, strategic plan for defining and solving the region's inter-related housing, traffic, water, and air quality challenges. The RCP incorporates input from the RCP Task Force, SCAG's policy committees and subregions, local governments, and other key stakeholders. RCP defines a vision for the SCAG region that includes balancing resource conservation, economic vitality, and quality of life. It also provides a long-term planning framework that describes comprehensive responses to growth and infrastructure challenges and recommends an Action Plan targeted for the year 2035. The RCP does not mandate integrated resources planning; however, SCAG does request that local governments consider the recommendations set forth on the RCP in their General Plan updates, municipal code amendments, design guidelines, incentive programs, and other actions. The RCP is an advisory document that contains policies that apply to public and/or private sectors. Public sector includes SCAG, local and state governments, transportation commissions, and resource agencies and conservation groups. Many of the policies apply to SCAG and the public sector, and are intended to inform how SCAG and local governments should work to integrate growth and land use planning. The RCP policies are organized in the following categories: Land Use and Housing, Open Space and Habitats, Water, Energy, Air Quality, Solid Waste, Transportation, Security and Emergency Preparedness, and Economy. Table 3.10-1, SCAG Regional Comprehensive Plan, lists the policies that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable (developer-controlled or focused) policies of the Regional Comprehensive Plan.

Regional Transportation Plan (RTP)

On April 7, 2016, SCAG adopted the 2016-2040 Regional Transportation Plan (RTP). The Sustainable Communities Strategy (SCS) is a required element of the RTP. The RTP is a blueprint for making the best transportation and land use choices for the future and supporting those choices with wise investments. The RTP will result in more and better travel choices as well as safe, secure, and efficient transportation systems that provide improved access to opportunities, such as jobs, education, and healthcare for our residents. Furthermore, the RTP will create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for

the region's 22 million residents by 2040. The RTP is built on the vision of mobility, economy, and sustainability.[126] The RTP contains goals and policies that are directed to transportation planners and decision-makers. They are not applicable to local and private projects, such as this Project. Nonetheless, they are provided below:

Goals

1. Align the plan investments and policies with improving regional economic development and competitiveness

2. Maximize mobility and accessibility for all people and goods in the region

3. Ensure travel safety and reliability for all people and goods in the region

4. Preserve and ensure a sustainable regional transportation system

5. Maximize the productivity of our transportation system

6. Protect the environment and health of our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)

7. Actively encourage and create incentives for energy efficiency, where possible

8. Encourage land use and growth patterns that facilitate transit and non-motorized transportation

9. Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies

Policies

1. Transportation investments shall be based on SCAG's adopted regional Performance Indicators

2. Ensuring safety, adequate maintenance, and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region

3. RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives

4. Transportation demand management (TDM) and non-motorized transportation will be focus areas, subject to Policy 1

[126] *SCAG, RTP: http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx.*

5. HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1

6. The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.

7. The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run

8. Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan

Applicability of SCAG Plans

The goals and policies of the RCPG, RCP, and RTP address projects considered to be regionally significant. To monitor regional development, CEQA requires regional agencies, such as SCAG, to review projects and plans throughout its jurisdiction. In the Southern California region, with exception of the County of San Diego, SCAG acts as the region's "Clearinghouse," and collects information on projects of varying size and scope to provide a central point to monitor regional activity.

The Project is considered to be a regionally significant project pursuant to CEQA Guidelines 15206, which SCAG uses to determine regionally significant projects.[127] The threshold size for a proposed residential development is more than 500 dwelling units. The threshold size for a commercial building is employing more than 1,000 persons or more than 250,000 square feet. As such, the Project would be consistent with and not impeded the implementation of SCAG policies contained in the RCPG, RCP, or RTP.

South Coast Air Quality Management District (SCAQMD)

Air Quality Management Plan (AQMP)

In the South Coast Air Basin, cumulative impacts on regional ozone air quality are judged by a project's consistency with the SCAQMD's 2012 Air Quality Management Plan (AQMP).[128] The AQMP works with the Southern California Association of Governments (SCAG) to forecast population growth for the region and develops a long-term attainment plan to accommodate the air pollution impacts of such growth. Because population growth drives the demand for jobs and housing that contribute to regional air pollution, projects that are consistent with regional population forecasts built into the AQMP are

[127] *CEQA, Section 15206, Projects of Statewide, Regional, or Areawide Significance: http://www.dot.ca.gov/hq/tpp/offices/ocp/igr_ceqa_files/Handout_CCR_15206_Statewide,Regional,Areawide_052007.pdf, accessed August 20, 2016.*

[128] *SCAQMD, AQMP: http://www.aqmd.gov/aqmp/aqmpintro.htm.*

considered to have less-than-significant impacts on regional air quality. Consistency with jobs and housing projections are also considered as secondary barometers for growth.

The 2012 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management. As demonstrated in the Air Quality analysis section above, the Project would not result in significant regional emissions. In addition, implementation of the Project would not interfere with air pollution control measures listed in the 2012 AQMP. Additionally, the Project is infill development that generally produces a smaller impact on regional emissions because it accommodates growth in an urban area with commercial density and transportation infrastructure that ultimately reduces vehicle travel demand and activity. The Project is consistent with the SCAQMD's 2012 AQMP and is considered to have a less-than-significant cumulative effect on regional air pollution.

Los Angeles County Metropolitan Transportation Authority (Metro)

Congestion Management Plan (CMP) for Los Angeles County.

The CMP for Los Angeles County is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. The CMP also seeks to develop a partnership among transportation decision-makers to devise appropriate transportation solutions that include all modes of travel, and to propose transportation projects that are eligible to compete for state gas tax funds. Within Los Angeles County, Metro is the designated congestion management agency responsible for coordinating the CMP. See Section 16, Transportation and Traffic, question b), in this IS/MND, for a discussion of the CMP. The traffic study provided the following conclusion: [129]

> *The CMP arterial monitoring station closest to the proposed project site is at Western Avenue & Wilshire Boulevard located west of the proposed project site. Based on the project trip distribution and trip generation, the project is expected to add approximately 37 trips in the AM peak hour and 47 trips in the PM peak hour through the CMP arterial monitoring station. The proposed project is not expected to add enough new traffic to exceed the arterial analysis criteria of 50 vehicle trips at the above-mentioned location. Therefore, no further CMP arterial analysis is required.*
>
> *Since fewer than 150 trips would be added during the AM or PM peak hours in either direction at any of the freeway segments in the vicinity of the study area, no further analysis of the freeway segments is required for CMP purposes.*

Consistency with City and Local Plans

City of Los Angeles General Plan

[129] Transportation Impact Analysis, Fehr & Peers, August 2016.

State law requires that every city and county prepare and adopt a long-range comprehensive General Plan to guide future development and to identify the community's environmental, social, and economic goals.[130] The City's General Plan is a dynamic document consisting of 11 elements, including 10 citywide elements (Air Quality Element, Conservation Element, Historic Preservation and Cultural Resources Element, Housing Element, Infrastructure Systems Element, Noise Element, Open Space Element, Public Facilities and Services Element, Safety Element, and Transportation Element) and the Land Use Element, which provides individual land use consistency plans for each of the City's 35 Community Plan Areas.

City of Los Angeles General Plan Framework Element

The Project Site is designated Regional Center Commercial.[131]

Regional Centers[132]

The General Plan Framework Element is a strategy for long-term growth that sets a citywide context to guide the update of the community plan and citywide elements. The General Plan Land Use Framework Element identifies the Project Site as Regional Center Commercial. Regional centers are intended to serve as the focal points of regional commerce, identity, and activity. They cater to many neighborhoods and communities and serve a population of 250,000 to 500,000 residents. They contain a diversity of uses such as corporate and professional offices, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. Region-serving retail commercial malls and retail services should be integrated where they complement and support the other uses in the regional center. The development of sites and structures integrating housing with commercial uses is encouraged in concert with supporting services, recreational uses, open spaces, and amenities. Regional centers, typically, provide a significant number of jobs and many non-work destinations that generate and attract a high number of vehicular trips. Consequently, each center shall function as a hub of regional bus or rail transit both day and night. Good quality street, area, and pedestrian lighting is essential to generating feelings of safety, comfort, and wellbeing necessary for ensuring public nighttime use of transit facilities. They are typically high-density places whose physical form is substantially differentiated from the lower-density neighborhoods of the City. Their densities and functions support the development of a comprehensive and inter-connected network of public transit and services. Physically, the regional centers are generally characterized by three forms of development:

1. Areas containing mid- and high-rise structures concentrated along arterial or secondary highway street frontages (e.g., Wilshire and Hollywood Boulevards). The intensity of activity and incorporation of retail uses in the ground floor of these structures should induce considerable pedestrian activity.

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[130] *California Government Code Section 65300.*

[131] *ZIMAS search: http://zimas.lacity.org*

[132] *General Plan, Chapter 3-Land Use: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm.*

2. Areas containing mid- and high-rise structures sited on large independent lots, set back from the property frontages (e.g., Warner Center and most of Century City). Though inhibited by the separation of structures, it is encouraged that buildings and sites be designed to improve pedestrian activity within the center.

3. Areas containing retail commercial "malls," characterized by low- and mid-rise buildings clustered around common pedestrian areas. It is encouraged that these buildings be sited and designed to improve their relationships to their principal street frontages, enhancing pedestrian activity.

Table 3.10-2, General Plan Land Use, lists the goals, objectives, and policies for land use that apply to developers in collaboration with local government. As shown, the Project will be consistent with the applicable policies of the General Plan for each land use (within a developer's control or developer focused).

Wilshire Community Plan

The Project Site is located within the Wilshire Community Plan (WCP), which was adopted in September 2001.[133] Table 3.10-3, Wilshire Community Plan, sets forth the WCP's objectives for residential and commercial land use and discusses the Project's consistency and applicability with each of them. The Project would not conflict with any of the goals, objectives, and policies of the Wilshire Community Plan. The Project would be consistent with all applicable policies related to the buildings siting, location, uses, and design features.

The Project would also implement and be consistent with the applicable goals and policies of the General Plan and the General Plan Framework. The Project includes a mix of urban infill uses (residential, retail restaurant) with bicycle parking and is located near public transit. Additionally, the Project would promote economic development by providing a number of construction and permanent jobs. The Project supports and promotes a pedestrian oriented streetscape along Wilshire Boulevard.

The Project will comply with the Los Angeles Green Building Code (LAGBC), which is based on the 2010 California Green Building Standards Code (CalGreen). The Project would provide natural surveillance and transition zones due to the large glass windows and distinction between public space and private building.

ZI-2410 Metro Westside Subway Extension Project

Prior to the issuance of any building permit meeting the below criteria within an identified Metro Rail planning area (five hundred foot radius of future alignments), consultation with Metro is required and will be conducted prior to start of construction.[134]

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[133] *Wilshire Community Plan: http://cityplanning.lacity.org/complan/pdf/wilcptxt.pdf*

[134] *http://zimas.lacity.org/documents/zoneinfo/ZI2410.pdf*

ZI-1117 MTA Project

Prior to the issuance of any building permit within 100 feet of the Metro Rail construction area, the Applicant shall obtain clearance from Metro.[135]

ZI-2452 Transit Priority Area in the City of Los Angeles

On September 2013, the Governor signed into law Senate Bill (SB) 743, which instituted changes to the California Environmental Quality Act (CEQA) when evaluating environmental impacts to projects located in areas served by transit. While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and

2. The project is located on an infill site within a transit priority area.[136]

The Project contains multiple uses, including residential and commercial. The Project Site is an infill site, which is defined in pertinent part as a lot located within an urban area that has been previously developed.[137] The Project Site is within a transit priority area, which is defined in pertinent part as an area within one-half mile of an existing major transit stop.[138] The Project Site is within one block of the Metro Purple Line Western Park Station as well as multiple Metro and LADOT DASH lines.

ZI-2374 Los Angeles State Enterprise Zone

The Site is within an Enterprise Zone/Employment and Economic Incentive Program Area (EZ). The Federal, State and City governments provide economic incentives to stimulate local investment and employment through tax and regulation relief and improvement of public services. EZ special provisions applicable to plan check include parking standards and height.[139]

ZI-1940 Wilshire Center/Koreatown Redevelopment Project and the Adaptive Reuse Incentive Area.

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[135] *http://zimas.lacity.org/documents/zoneinfo/ZI1117.pdf*

[136] *http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf.*

[137] *California Public Resources Code Section 21099(a)(4).*

[138] *California Public Resources Code Section 21099(a)(7).*

[139] *ZI-2374: http://zimas.lacity.org/documents/zoneinfo/ZI2374.pdf.*

All applications within the Wilshire Center/Koreatown Redevelopment Project requesting a permit for construction, remodeling, improvements, alterations including seismic compliance, demolition and/or signs must be referred to the Community Redevelopment Agency (CRA) for both CEQA clearance and permit approval.[140] On December 29, 2011, the California Supreme Court issued its decision in *California Redevelopment Association v. Matosantos*. The decision upheld recently enacted state law dissolving all California redevelopment agencies including the CRA/LA and made the dissolution of the agencies effective February 1, 2012. For purposes of this analysis, any references to the former CRA/LA are intended to mean the Designated Local Authority pursuant to changes in state law as discussed above. CRA is statutorily prohibited from entering any new agreements and is currently only allowed to wind down CRA affairs, including honoring existing obligations and addressing land use issues consistent with CRA's land use powers under the Redevelopment Plan. To date, the CRA has not transferred its land use powers to the Los Angeles Department of City Planning.

The Wilshire Center Redevelopment Plan sets forth an array of goals promoting business retention and expansion, attracting new businesses and developing public improvements.[141] The Project would promote the economic well-being of the area by increasing the tax revenue at the Site, redevelop the lawn and plaza into a residential and commercial project. The Project would enhance the safety of the area by increasing the population and employees at the Site providing a natural surveillance around the Site into the night. The Project would add housing to the Site. The other objectives are for government policies and services.

City of Los Angeles Planning and Zoning Code

The Project will require approval of the following discretionary actions:[142]

1. Vesting Zone Change from C4-2, CR-2, and P-2 to [Q]C4-2.

2. Removal of 5 foot Building Line on Wilshire Boulevard (Ordinance 59577)

3. Zoning Administrator's Determination for Shared Parking

4. Site Plan Review for the construction of 506 residential dwelling units and 62,035 square feet of non-residential floor area.

5. Vesting Tentative Tract Map

6. Master Conditional Use Permit for the onsite sale of alcohol within the Project Site.

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[140] *http://zimas.lacity.org/documents/zoneinfo/ZI1940.pdf*

[141] *http://www.crala.org/internet-site/Projects/Wilshire_Center/upload/WilshireCenter.pdf*

[142] *Project representative, July 2016.*

7. Any additional actions as may be deemed necessary or desirable, including but not limited to, grading, excavation, haul route, and building permits.

Conclusion

The requested discretionary actions do not conflict with existing land uses in the area, and the Project would not introduce incompatible uses. The Project is consistent with SCAG guides and other regional guides, the General Plan, the WCP goals, objectives and policies related to commercial use and urban design guidelines, to the extent feasible and applicable, as discussed above and below in Tables 3.10-1 to 3.10-3. As such, impacts would be less than significant.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. A significant adverse effect could occur if a project site were located within an area governed by a habitat conservation plan or natural community conservation plan. The Project Site is located in an urbanized and fully developed portion of the City. Due to the existing urban development on the Project Site and in the adjacent surroundings, there are no known locally designated natural communities on the Project Site or in the vicinity. Therefore, the Project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or State habitat conservation plan. No impact with respect to Habitat or Natural Community Conservation Plans will occur.

Table 3.10-1

SCAG Regional Comprehensive Plan

Policies	Discussion
Land Use and Housing [1]	
LU-6.2 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Programs.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, through regulatory compliance measures. The Project would also be consistent with the City of Los Angeles Building Code, including the Los Angeles Green Building Code (LAGBC) for all new buildings (residential and non-residential). The Building Codes are designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
Open Space and Habitat [2]	
OSN-14 Developers and local governments should implement mitigation for open space impacts through the following activities: • Individual projects should either avoid significant impacts to regionally significant open space resources or mitigate the significant impacts through measures consistent with regional open space policies for conserving natural lands, community open space and farmlands. All projects should demonstrate consideration of alternatives that would avoid or reduce impacts to open space. • Individual projects should include into project design, to the maximum extent practicable, mitigation measures and recommended best practices aimed at minimizing or avoiding impacts to natural lands, including, but not limited to FHWA's Critter Crossings, and Ventura County Mitigation Guidelines. • Project level mitigation for RTP's significant cumulative and growth-inducing impacts on open space resources will include but not be limited to the conservation of natural lands, community open space and important farmland through existing programs in the region or through multi-party conservation compacts facilitated by SCAG. • Project sponsors should ensure that transportation systems proposed in the RTP avoid or mitigate significant impacts to natural lands, community open space and important farmland, including cumulative impacts and open space impacts from the growth associated with transportation projects and improvements. • Project sponsors should fully mitigate direct and indirect impacts to open space	**Consistent.** The Project is an urban infill development that avoids significant impacts to regionally significant open space resources. The Project is located in a developed and urban area of the City surrounded by other buildings. There are no rural, agricultural, recreational, or environmentally sensitive areas on the Project Site. The Project would not impact any protected trees. However, environmental impacts may result due to the loss of any trees on the Site. The potential impacts will be mitigated to a less than significant level with **Mitigation Measure 4-2**.

Policies	Discussion
resulting from implementation of regionally significant projects.	
OSC-9 Developers and local governments should increase the accessibility to natural areas lands for outdoor recreation.	**Consistent.** The Project Site would not impede access to natural lands for outdoor recreation.
OSC-10 Developers and local governments should promote infill development and redevelopment to revitalize existing communities.	**Consistent.** The Project is an infill development in an existing community.
OSC-11 Developers should incorporate and local governments should include land use principles, such as green building, that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as air quality (pollution) and solid waste recycling and reduction mitigation measures. The Project would also be consistent with the City of Los Angeles Building Code, including the LAGBC (Los Angeles Green Building Code) for all new buildings (residential and non-residential). The Building Codes are designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
OSC-12 Developers and local governments should promote water-efficient land use and development.	**Consistent.** The Project would comply with CalGreen requirements of the California Building Code and incorporates green and conservation features, such as water-efficient features, through regulatory compliance measures. The Project would also be consistent with the City of Los Angeles Building Code, including the LAGBC for all new buildings (residential and non-residential). The Building Codes are designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
OSC-13 Developers and local governments should encourage multiple use spaces and encourage redevelopment in areas where it will provide more opportunities for recreational uses and access to natural areas close to the urban core.	**Consistent.** The Project contains multiple uses and be a redevelopment of an urban area.
Water [3]	
WA-9 Developers and local governments should consider potential climate change hydrology and resultant impacts on available water supplies and reliability in the process of creating or modifying systems to manage water resources for both year-round use and ecosystem health.	**Consistent.** The Project includes conservation features to reduce operational water use.
WA-10 Developers and local governments should include conjunctive use as a water management strategy when feasible.	**Consistent.** Conjunctive use is the coordinated management of surface water and groundwater supplies to maximize the yield of the overall water resource. An active form of conjunctive use utilizes artificial recharge, where surface water is intentionally percolated or injected into aquifers for later use. The Project would not conflict or preclude the City from exploring conjunctive use as a water management strategy.

Policies	Discussion
WA-11 Developers and local governments should encourage urban development and land uses to make greater use of existing and upgraded facilities prior to incurring new infrastructure costs.	**Consistent**. The Project would confirm with the City that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. The Project Applicant will implement any upgrade to the water infrastructure serving the Project Site that is needed to accommodate the Project's water consumption needs.
WA-12 Developers and local governments should reduce exterior uses of water in public areas, and should promote reduced use in private homes and businesses, by shifting to drought-tolerant native landscape plants (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives.	**Consistent.** The Project includes landscaping around the periphery of the Project Site, on the amenity decks of the residential tower and in courtyard plaza areas. The landscaping will be irrigated with water conservation techniques.
WA-13 Developers and local governments should protect and preserve vital land resources—wetlands, groundwater recharge areas, woodlands, riparian corridors, and production lands. The federal government's 'no net loss' wetlands policy should be applied to all of these land resources.	**Not Applicable.** The Project will not impact wetlands.
WA-27 Developers and local governments should maximize pervious surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. New impervious surfaces should be minimized to the greatest extent possible, including the use of in-lieu fees and off-site mitigation.	**Consistent.** The Project Site consists of impermeable surfaces as it is almost fully paved and developed. The Project will not result in a change in the amount of impervious surface area at the Project Site.
WA-32 Developers and local governments should pursue water management practices that avoid energy waste and create energy savings/supplies.	**Consistent.** The Project will comply with CalGreen requirements of the California Building Code, for water and energy conservation. The Project would also be consistent with the LAGBC for all new buildings (residential and non-residential). The Building Codes are designed to reduce the building's energy and water use; reduce waste; and reduce the carbon footprint.
Energy [4]	
EN-8 Developers should incorporate and local governments should include the following land use principles that use resources efficiently, eliminate pollution and significantly reduce waste into their projects, zoning codes and other implementation mechanisms: • Mixed-use residential and commercial development that is connected with public transportation and utilizes existing infrastructure.	**Consistent.** The Project is a mixed-use residential and commercial development that is located near local and regional transit lines. The Project will encourage biking and walking trips with bicycle parking and ground-floor pedestrian attractions.

Policies	Discussion
• Land use and planning strategies to increase biking and walking trips.	
EN-10 Developers and local governments should integrate green building measures into project design and zoning such as those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Energy saving measures that should be explored for new and remodeled buildings include: • Using energy efficient materials in building design, construction, rehabilitation, and retrofit • Encouraging new development to exceed Title 24 energy efficiency requirements. • Developing Cool Communities measures including tree planting and light-colored roofs. These measures focus on reducing ambient heat, which reduces energy consumption related to air conditioning and other cooling equipment. • Utilizing efficient commercial/residential space and water heaters: this could include the advertisement of existing and/or development of additional incentives for energy efficient appliance purchases to reduce excess energy use and save money. Federal tax incentives are provided online at http://www.energystar.gov/index.cfm?c=Products.pr_tax_credits. • Encouraging landscaping that requires no additional irrigation: utilizing native, drought tolerant plants can reduce water usage up to 60 percent compared to traditional lawns. • Encouraging combined heating and cooling (CHP), also known as cogeneration, in all buildings. • Encouraging neighborhood energy systems, which allow communities to generate their own electricity • Orienting streets and buildings for best solar access. • Encouraging buildings to obtain at least 20% of their electric load from renewable energy.	**Consistent.** The Project will be in compliance with the City's Green Building Ordinance, which contains energy efficient practices.
EN-11 Developers and local governments should submit projected electricity and natural gas demand calculations to the local electricity or natural gas provider, for any project anticipated to require substantial utility consumption. Any infrastructure improvements necessary for project construction should be completed according to the	**Consistent.** Electrical service is available and will be provided in accordance with the LADWP's Rules Governing Water and Electric Service. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety, as included in **PDF**

Policies	Discussion
specifications of the energy provider.	**17-1** and **17-2**. Southern California Gas (SCG) will conduct system analysis and determine the best method to provide gas to the customer, when the total requested load for the Project is received.
EN-12 Developers and local governments should encourage that new buildings are able to incorporate solar panels in roofing and tap other renewable energy sources to offset new demand on conventional power sources.	**Consistent.** The Project will have pre-wiring for future solar facilities and off-grid pre-wiring for future solar facilities, in accordance with LAMC
EN-14 Developers and local governments should explore programs to reduce single occupancy vehicle trips such as telecommuting, ridesharing, alternative work schedules, and parking cash-outs.	**Consistent.** The Project is located in an urban area with significant infrastructure to facilities providing alternative transportation to reduce single occupancy vehicle trips, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority and the LADOT DASH buses and the Metro Purple Line Western station.
Solid Waste[5]	
SW-14 Developers and local governments should integrate green building measures into project design and zoning including, but not limited to, those identified in the U.S. Green Building Council's Leadership in Energy and Environmental Design, Energy Star Homes, Green Point Rated Homes, and the California Green Builder Program. Construction reduction measures to be explored for new and remodeled buildings include: • Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. • An ordinance that requires the inclusion of a waste management plan that promotes maximum C&D diversion. • Source reduction through (1) use of building materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed building materials, and (5) use of structural materials in a dual role as finish material (e.g. stained concrete flooring, unfinished ceilings, etc.). • Reuse of existing building structure and shell in renovation projects. • Building lifetime waste reduction measures that should be explored for new and remodeled buildings include: • Development of indoor recycling program and space.	**Consistent.** The Project would include a demolition and construction waste recycling program as well as an operational recycling program. The Project will recycle demolition and construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete, bricks, metals, wood, and vegetation. During operation, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass, and other recyclable material.

Policies	Discussion
• Design for deconstruction. • Design for flexibility through use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable components.	
SW-17 Developers and local governments should develop and site composting, recycling, and conversion technology facilities that are environmentally friendly and have minimum environmental and health impacts.	**Not Applicable.** The Project is not a composting, or composting, recycling, or conversion technology facility.
SW-18 Developers and local governments should coordinate regional approaches and strategic siting of waste management facilities.	**Not Applicable.** The Project is not a waste management facility.
SW-19 Developers and local governments should facilitate the creation of synergistic linkages between community businesses and the development of eco-industrial parks and materials exchange centers where one entity's waste stream becomes another entity's raw material by making priority funding available for projects that involve co-location of facilities.	**Not Applicable.** The Project is not an eco-industrial park.
SW-20 Developers and local governments should prioritize siting of new solid waste management facilities including recycling, composting, and conversion technology facilities near existing waste management or material recovery facilities.	**Not Applicable.** The Project is not a solid waste management facility.
SCAG Regional Comprehensive Plan: http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP_Complete.pdf *[1] Page 21; [2] Pages 34 and 39; [3] Pages 59-61; [4] Pages 75-76; [5] Pages 105-106;* *Table: CAJA Environmental Services, September 2016.*	

Table 3.10-2
General Plan Land Use

Goal, Objective, Policies	Discussion
Regional Centers	
GOAL 3F Mixed-use centers that provide jobs, entertainment, culture, and serve the region.	**Consistent.** The Project would create a mix of uses (residential and commercial) that provides jobs and culture, and serves the region.
Objective 3.10 Reinforce existing and encourage the development of new regional centers that accommodate a broad range of uses that serve, provide job opportunities, and are accessible to the region, are compatible with adjacent land uses, and are developed to enhance urban lifestyles.	**Consistent.** The Project would create a mix of uses that provides jobs and is served by the Metro Purple Line at a nearby station, which provides access to the greater region. The uses are compatible with other existing uses in the area. The Project will also enhance urban lifestyles by developing a size and scale more appropriate for an urban regional center compared to the Project Site's existing underutilized condition.
Policy 3.10.1 Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 and 3-6. Retail uses and services that support and are integrated with the primary uses shall be permitted. The range and densities/intensities of uses permitted in any area shall be identified in the community plans	**Consistent.** The Project would create a residential development that serves the region and is accessible due to the Metro Purple Line at a nearby stations. The commercial uses support the residential uses and also would be available to the public. Table 3-1 of General Plan Land Use policy 3.10.1 states that Regional Commercial typically includes eating and drinking establishments, retail/commercial, and commercial overnight accommodations, among other uses. The Project would satisfy this requirement.
Policy 3.10.2 Accommodate and encourage the development of multi-modal transportation centers, where appropriate.	**Not Applicable.** A multi-modal transportation center is typically a location served by a variety of transportation agencies, types, services, and frequencies. The Project is an infill development in Wilshire.
Policy 3.10.3 Promote the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, in accordance with Pedestrian-Oriented District Policies 3.16.1 through 3.16.3, and provide adequate transitions with adjacent residential uses at the edges of the centers. *Policy 3.16.1* Enhance pedestrian activity in areas designated as a Pedestrian-Oriented District ("-PD") by the design and siting of buildings in accordance with the policies contained in Chapter 5: Urban Form and Neighborhood Design.	**Consistent.** The Project is located along Wilshire Boulevard, which is a high pedestrian activity area. The Project includes ground-floor commercial uses and a design that enhances the pedestrian experience with glass storefronts and material and design changes on the upper levels to scale to pedestrians. Policy 3.16.1 is not applicable because the area is not designated –PD. The Project would comply with the standards of the Urban Design Chapter of the Community Plan. Policy 3.16.2 is applicable, and parking would be provided on-site in a subterranean

Goal, Objective, Policies	Discussion
Policy 3.16.2 Locate parking in pedestrian districts to the rear, above, or below the street-fronting uses. *Policy 3.16.3* Require that the ground floor of parking structures located along primary street frontages in pedestrian-oriented districts be designed to promote pedestrian activity and, where appropriate, incorporate retail uses.	level consistent with this policy. Policy 3.16.3 is not applicable because the Project does not include ground level parking. Parking would be in subterranean levels and within the building.
Policy 3.10.4 Provide for the development of public streetscape improvements, where appropriate.	**Not Applicable.** The Project is not impacting public streets or right-of-ways and there is no basis for improvements.
Policy 3.10.5 Support the development of small parks incorporating pedestrian-oriented plazas, benches, other streetscape amenities and, where appropriate, landscaped play areas.	**Not Applicable.** The Project is an infill development with landscaping.
Policy 3.10.6 Require that Regional Centers be lighted to standards appropriate for nighttime access and use.	**Consistent.** The Project lighting would be standard for a residential and commercial building. Lighting will be designed and installed with shielding if necessary.
Community Commercial	
GOAL 3H Lower-intensity highway-oriented and local commercial nodes that accommodate commercial needs outside centers and districts.	**Consistent.** The Project uses are highway-oriented and provide local commercial uses (such as cultural center).
Objective 3.12 Generally, maintain the uses, density, and character of existing low-intensity commercial districts whose functions serve surrounding neighborhoods and/or are precluded from intensification due to their physical characteristics.	**Consistent.** The Project would provide residential uses.
Policy 3.12.1 Accommodate the development of uses in areas designated as "General Commercial" in the community plans in accordance with Tables 3-1 and 3-7. The range and densities/intensities of uses permitted in any area shall be identified in the community plans.	**Not Applicable.** Table 3-1 (as part of the General Plan Land Use policy 3.10.1) states that General Commercial allow permitted uses by existing zoning for C4. The Project's uses are permitted by the zoning. Table 3-7 (of the General Plan) states that General Commercial Land Use designation corresponds to C4. The Project would seek a vesting zone change C4-2, CR-2, and P-2 to [Q]C4-2.
Policy 3.12.2 Consider adjusting permitted densities of areas designated for General Commercial, where existing buildings are developed at densities substantially below the maximum permitted by amendments to the community plans, where appropriate, based on consideration of the following: a. Where commercial parcels of less than 150 feet in depth abut areas designated for single-family residential; b. Where the total area and/or configuration of the commercial parcel precludes the	**Not Applicable.** The Site is not a commercial parcel of less than 150 feet in depth. The Site does not preclude the development of adequate on-site parking. The driveways on Serrano and Oxford would not adversely impact traffic flows. The Project is of a scale and character that fits with the local area.

Goal, Objective, Policies	Discussion
development of adequate on-site parking, unless adjacent to a transit station or code-required parking is provided in a common parking facility in proximity to the site; c. Where site driveways may adversely impact traffic flows along principal streets or in adjacent residential neighborhoods; and/or d. Where there are local community objectives for the preservation of the prevailing scale and character of development.	
Policy 3.12.3 Permit the re-construction of existing commercial structures destroyed by fire, earthquakes, flooding, or other natural catastrophes to their pre-existing intensity.	**Not Applicable.** The Project is not proposing reconstruction of existing commercial structures that were destroyed by a natural catastrophe.
General Plan, Chapter 3-Land Use: http://cityplanning.lacity.org/cwd/framwk/chapters/03/03207.htm and http://cityplanning.lacity.org/cwd/framwk/chapters/03/03205.htm *Table: CAJA Environmental Services, September 2016.*	

Table 3.10-3
Wilshire Community Plan

Objective and Policies	Discussion
Residential	
Objective 1-1 Provide for the preservation of existing quality housing, and for the development of new housing to meet the diverse economic and physical needs of the existing residents and expected new residents in the Wilshire Community Plan Area to the year 2010.	**Consistent**. The Project provides residential uses with a variety of bedroom sizes.
Policy 1-1.1 Protect existing stable single family and low density residential neighborhoods from encroachment by higher density residential uses and other uses that are incompatible as to scale and character, or would otherwise diminish quality of life.	**Consistent.** The Project includes development of mixed-use structures (residential units over commercial), similar in height and massing to other existing buildings along Wilshire Boulevard in the Project area. Additionally, no single-family/low-density residential neighborhoods are located near the Project Site.
Policy 1-1.2 Promote neighborhood preservation in all stable residential neighborhoods.	**Consistent.** The Project would promote neighborhood stabilization through infill development of the Project site and replacing a lawn and plaza 506 dwelling units and commercial. None of the residential neighborhoods near the Project Site would be affected by the Project.
Policy 1-1.3 Provide for adequate Multiple Family residential development.	**Consistent.** The Project includes development of multi-family residential units, consistent with the land use designation for the Project site.
Policy 1-1.4 Provide for housing along mixed-use boulevards where appropriate.	**Consistent.** The Project includes development of multi-family residential units, consistent with the land use designation for the Project site.
Objective 1-2 Reduce vehicular trips and congestion by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus route stops.	**Consistent**. The Project provides residential uses with a variety of bedroom sizes.
Policy 1-2.1 Encourage higher density residential uses near major public transportation centers.	**Consistent.** The Project includes development of 506 multi-family residential dwelling units and commercial uses, which is in proximity to several transit lines and within one block of the Metro Purple Line Western Station.
Objective 1-3 Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods.	**Not Applicable**. The Project Site does not contain existing residential uses.
Policy 1-3.1 Promote architectural compatibility and landscaping for new Multiple Family residential development to protect the character and scale of existing residential neighborhoods.	**Consistent.** The Project site is located in a fairly densely developed area of the City. The visual character of the Project area is dominated by the mix of low-, mid-, and high-rise residential development. The scale of the proposed buildings

Objective and Policies	Discussion
	would be consistent with the scale of existing buildings along Wilshire Boulevard. The design, architecture, construction, and landscaping of the Project would comply with the City's design requirements for mixed-use buildings and the Project would be compatible with the existing residential land uses within the area.
Policy 1-3.2 Support historic preservation goals in neighborhoods of architectural merit and/or historic significance.	**Not Applicable**. The Project Site does not contain historic uses.
Policy 1-3.3 Promote the preservation and rehabilitation of individual residential buildings of historic significance.	**Not Applicable**. The Project Site does not contain historic uses.
Policy 1-3.4 Monitor the impact of new development on residential streets. Locate access to major development projects so as not to encourage spillover traffic on local residential streets.	**Not Applicable**. The Project Site would be on Wilshire, which is not a residential street.
Objective 1-4 Provide affordable housing and increased accessibility to more population segments, especially students, the handicapped and senior citizens.	**Consistent**. The Project provides residential uses with a variety of bedroom sizes.
Policy 1-4.1 Promote greater individual choice in type, quality, price and location of housing.	**Consistent.** The Project includes development of 506 multi-family residential units.
Policy 1.4-2 Ensure that new housing opportunities minimize displacement of residents.	**Consistent.** The Project site currently does not contain any residential development.
Policy 1.4-3 Encourage multiple family residential and mixed use development in commercial zones.	**Consistent.** The Project would develop residential uses in a commercial zone.
Commercial	
Objective 1 To conserve and strengthen viable commercial development in the community and to provide additional opportunities for new commercial development and services.	**Consistent**. The Project provides a mix of uses that would strengthen viable commercial development and provide new services within existing commercial areas. The Project will rehabilitate an existing historic commercial building and would also help to further activate Wilshire Boulevard.
Objective 2 To provide a range of commercial facilities at various locations to accommodate the shopping needs of residents and to provide increased employment opportunities within the community.	**Not Applicable**. The Project Applicant has no authority on other commercial developments.
Objective 3 To improve the compatibility between commercial and residential uses.	**Consistent**. Commercial and residential uses are compatible with each other.
Objective 2-1 Preserve and strengthen viable commercial development and provide	**Consistent**. The Project includes commercial uses along Wilshire Boulevard, a

Objective and Policies	Discussion
additional opportunities for new commercial development and services within existing commercial areas.	major street.
Policy 2-1.1 New commercial uses should be located in existing established commercial areas or shopping centers.	**Consistent**. The Project includes commercial uses along Wilshire Boulevard, a major street.
Policy 2-1.2 Protect existing and planned commercially zoned areas, especially in Regional Commercial Centers, from encroachment by stand alone residential development by adhering to the community plan land use designations.	**Consistent**. The Project includes commercial uses along Wilshire Boulevard, a major street. The commercial uses would be separate from any stand alone residential development, which is located south of 7th Street.
Policy 2-1.3 Enhance the viability of existing neighborhood stores and businesses which support the needs of local residents and are compatible with the neighborhood.	**Consistent**. The Project would add residential uses which could support existing neighborhood stores and businesses.
Objective 2-2 Promote distinctive commercial districts and pedestrian-oriented areas.	**Consistent**. The Project includes commercial uses along Wilshire Boulevard, a major street.
Policy 2-2.1 Encourage pedestrian-oriented design in designated areas and in new development	**Consistent**. The Project includes commercial uses along Wilshire Boulevard, a major street.
Policy 2-2.2 Encourage large mixed use projects to incorporate facilities beneficial to the community such as libraries, child care facilities, community meeting rooms, senior centers, police sub-stations, and/or other appropriate human service facilities as part of the project.	**Consistent**. The Project includes commercial uses and open space plazas to enhance the walkability along Wilshire.
Policy 2-2.3 Encourage the incorporation of retail, restaurant, and other neighborhood serving uses in the first floor street frontage of structures, including mixed use projects located in Neighborhood Districts.	**Consistent**. The Project includes commercial uses on the Wilshire street frontage.
Objective 2-3 Enhance the visual appearance and appeal of commercial districts.	**Consistent**. The Project would include a new iconic building.
Policy 2-3.1 Improve streetscape identity and character through appropriate controls of signs, landscaping, and streetscape improvements; and require that new development be compatible with the scale of adjacent neighborhoods.	**Consistent**. The Project would include a new iconic building, with landscape, wayfinding signage, and scaled to match similar buildings along Wilshire.
Source: Wilshire Community Plan, http://cityplanning.lacity.org/complan/pdf/wilcptxt.pdf *Table: CAJA Environmental Services, August 2016.*	

11. MINERAL RESOURCES

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

No Impact. A significant impact may occur if the Project Site is located in an area used or available for extraction of a regionally-important mineral resource, or if the Project would convert an existing or future regionally-important mineral extraction use to another use, or if the Project would affect access to a site used or potentially available for regionally-important mineral resource extraction. Mineral Resources Zone-2 (MRZ-2) sites contain potentially significant sand and gravel deposits which are to be conserved. Any proposed development plan must consider access to the deposits for purposes of extraction. Much of the area within the MRZ-2 zone in Los Angeles was developed with structures prior to the MRZ-2 classification and, therefore, are unavailable for extraction.[143] MRZ-2 sites are identified in two community plan elements of the city's general plan, the Sun Valley and the Sunland-Tujunga-Lake View Terrace-Shadow Hills-East La Tuna Canyon community plans.[144] Neither the Project Site nor the surrounding area is in an MRZ-2 zone, nor identified as an area containing mineral deposits of regional or statewide significance. Therefore, no impact to known mineral deposits would occur.

The Project Site is not located within any Major Oil Drilling Areas, which are 25 city designated major oil drilling areas. The nearest one is #10 LA City Oil Field, located near 3rd Street and Alameda Street.[145] The California Department of Conservation has more detailed online mapping of wells. No oil wells exist on the Project Site.[146] Therefore, no impacts to mineral resources of regional or statewide significance will occur.

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

No Impact. A significant impact would occur if a project is located in an area used or available for extraction of a locally-important mineral resource and the Project converted an existing or potential future locally-important mineral extraction use to another use or if the Project affected access to a site in use or potentially available for locally-important mineral resource extraction. The Project Site is not delineated as a locally important mineral resource recovery site on any City plans. Additionally, as stated in the

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[143] *City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-58: http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed August 11, 2016.*

[144] *City of Los Angeles Department of City Planning, Conservation Element, adopted September 2001, page II-59: http://cityplanning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed August 11, 2016.*

[145] *City of Los Angeles Department of City Planning, Safety Element Exhibit E, Oil Field and Oil Drilling Areas: http://cityplanning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed August 11, 2016.*

[146] *California Department of Conservation, Division of Oil, Gas & Geothermal Resources, Online Mapping System, District 1, website: http://www.conservation.ca.gov/dog/Pages/WellFinder.aspx, August 11, 2016.*

response to Question 11(a), no oil wells exist on the Project Site. Furthermore, the Project Site is surrounded by dense urban uses. Thus, the Project Site would not be an adequate candidate for mineral extraction. Therefore, no impacts to loss of availability of a locally important mineral resource will occur.

12. NOISE

The section is based in part on the following item, included as Appendix I of this IS/MND:

I Noise Appendices, DKA Planning, September 2016.

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?

Less Than Significant Impact with Mitigation Incorporated. Sound is technically described in terms of the loudness (amplitude) and frequency (pitch) of the sound. The standard unit of measurement for sound is the decibel (dB). The human ear is not equally sensitive to sound at all frequencies. The "A-weighted scale," abbreviated dBA, reflects the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Table 3.12-1 provides examples of A-weighted noise levels from common sources.

Table 3.12-1
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA, L_{eq})
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35
Source: US Occupational Safety & Health Administration, Noise and Hearing Conservation Technical Manual, 1999.	

Noise Definitions

This noise analysis discusses sound levels in terms of Community Noise Equivalent Level (CNEL) and Equivalent Noise Level (L_{eq}).

- Community Noise Equivalent Level. CNEL is an average sound level during a 24-hour period. CNEL is a noise measurement scale, which accounts for noise source, distance, single event duration, single event occurrence, frequency, and time of day. Human reaction to sound between 7:00 p.m. and 10:00 p.m. is as if the sound were actually 5 dBA higher than if it occurred from 7:00 a.m. to 7:00 p.m when background ambient noise levels are higher. From 10:00 p.m. to 7:00 a.m., humans perceive sound as if it were 10 dBA higher due to an even lower background noise level. Accordingly, the CNEL is obtained by adding an additional 5 dBA to measured or projected sound levels in the evening from 7:00 p.m. to 10:00 p.m. and 10 dBA to sound levels in the night from 10:00 p.m. to 7:00 a.m. Because

CNEL accounts for human sensitivity to sound, the CNEL 24-hour figure is always a higher number than the actual 24-hour measured or projected average.

- Equivalent Noise Level. L_{eq} is the average noise level on an energy basis for any specific time period. The L_{eq} for one hour is the energy average noise level during the hour. The average noise level is based on the energy content (acoustic energy) of the sound. L_{eq} can be thought of as the level of a continuous noise that has the same energy content as the fluctuating noise level. The equivalent noise level is expressed in units of dBA.

Effects of Noise

The degree to which noise can impact the environment ranges from levels that interfere with speech and sleep to levels that cause adverse health effects. Human response to noise is subjective and can vary from person to person. Factors that influence individual response include the intensity, frequency, and pattern of noise, the amount of background noise present before the intruding noise, and the nature of work or human activity that is exposed to the noise source.

Audible Noise Changes

Small perceptible changes in sound levels for a person with normal hearing sensitivity is approximately 3 dBA. A change of at least 5 dBA would be noticeable and could produce a community reaction. A 10 dBA increase is heard as a doubling in loudness and would produce a community response. Noise levels decrease as the distance from the noise source to the receiver increases. Noise generated by a stationary noise source, or "point source," will decrease by approximately 6 dBA over hard surfaces (e.g., reflective surfaces such as parking lots or smooth bodies of water) and 7.5 dBA over soft surfaces (e.g., absorptive surfaces such as soft dirt, grass, or scattered bushes and trees) for each doubling of distance. For example, if a noise source produces a noise level for a hard surface of 89 dBA at a reference distance of 50 feet, the noise level would be 83 dBA at a distance of 100 feet from the noise source, 77 dBA at a distance of 200 feet, and so on. Noise generated by a mobile source will decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.

Noise is most audible when traveling by direct line-of-sight, an unobstructed visual path between noise source and receptor. Barriers such as walls or buildings that break line-of-sight between sources and receivers can greatly reduce source noise levels by allowing noise to reach receivers by diffraction only. As a result, sound barriers can reduce source noise levels by up to 20 dBA or more. However, if barriers are not high or long enough to break line-of-sight from sources to receivers, their effectiveness can be greatly reduced.

Regulatory Setting

Federal

Federal noise standards do not regulate environmental noise associated with short-term construction or long-term operation of development projects.

State

The State of California's 2003 General Plan Guidelines establish county and city guidelines for acceptable exterior noise levels based on land use. These standards and criteria are incorporated into the land-use planning process to reduce future noise and land-use incompatibilities. Table 3.12-2 illustrates State guidelines on considering the compatibilities between various land uses and outdoor noise levels.

Table 3.12-2
Land Use Compatibility for Community Noise Environments

Land Use Compatibility	Community Noise Exposure (dBA, CNEL)							
	<	55	60	65	70	75	80	>
Residential – Low Density Single-Family, Duplex Mobile Homes	NA							
		CA						
					NU			
						CU		
Residential – Multi-Family	NA							
			CA					
					NU			
						CU		
Transient Lodging – Motels, Hotels	NA							
			CA					
					NU			
							CU	
Schools, Libraries, Churches, Hospitals, Nursing Homes	NA							
			CA					
					NU			
							CU	
Auditoriums, Concert Halls, Amphitheaters								
	CA							
				CU				
Sports Arenas, Outdoor Spectator Sports								
	CA							
					CU			
Playgrounds, Neighborhood Parks	NA							
				NU				
						CU		
Golf Courses, Riding Stables, Water Recreation, Cemeteries	NA							
				NU				
								CU
Office Buildings, Business Commercial and Professional	NA							
				CA				
						NU		
Industrial, Manufacturing, Utilities, Agriculture	NA							
				CA				
						NU		

NA = 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.

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

NU = 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.

CU = Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Noise Control, Department of Health Services.

City of Los Angeles

Construction Noise Standards

The City of Los Angeles Municipal Code (LAMC) contains the following regulations applicable to the Project's construction activities:

> *SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.*
>
> *(a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.*

Section 41.40(a) would prohibit Project construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

> *(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…*

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance to Project construction would be

subdivision (a), which institutes a maximum noise limit of 75 dBA for the types of construction vehicles and equipment that would be necessary for Project demolition and grading, especially.

> *SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS*
>
> *Between the hours of 7:00 A.M. and 10:00 P.M., in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:*
>
> *75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;*
>
> *75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;*
>
> *65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.*
>
> However, the LAMC goes on to note that these limitations would not necessarily apply if proven that the Project's compliance therewith would be technically infeasible despite the use of noise-reducing means or methods.
>
> *Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.*

Section 41.40 of the LAMC prohibits construction activity from occurring between 9:00 p.m. and 7:00 a.m. Monday through Friday, and before 8 a.m. and after 6 p.m. on Saturday and national holidays.[147] Construction is prohibited on Sunday. This is intended to protect persons occupying sleeping quarters in any hotel, apartment, or other place of residence. Construction noise intruding onto property zoned for manufacturing or industrial uses is exempt from these standards.

The City released the L.A. CEQA Thresholds Guide in 2006 to provide further guidance determining the significance of noise impacts. According to the Guide, a project's construction noise levels would, under normal circumstances, have a significant impact if:

- Construction activities lasting more than one day exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;

[147] *City of Los Angeles, Municipal Code Chapter IV-Public Welfare (Section 41.40), 1984.*

- Construction activities lasting more than ten days in a three-month period exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or

- Construction activities exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday, before 8:00 a.m. or after 6:00 p.m. on Saturday, or anytime on Sunday.[148]

Additionally, a project would, under normal circumstances, have a significant impact on community noise levels if:

- The Project causes 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" categories recommended by the land-use compatibility guidelines set forth in the State of California's 2003 General Plan; or

- The Project causes the ambient noise level measured at the property line of affected uses to increase 5 dBA or greater.[149]

Operation Noise Standards

LAMC Chapter XI, "Noise Regulation," regulates noise from non-transportation noise sources such as commercial or industrial operations, mechanical equipment use, or residential activities. Although these regulations do not apply to vehicles operating on public rights-of-way, they do apply to noise generated by vehicles on private property, such as truck operations at commercial or industrial facilities. The exact noise standards vary depending on the type of noise source, but allowable noise levels are generally determined relative to existing ambient noise levels at affected locations. According to LAMC Chapter XI, ambient noise is "the composite of noise from all sources near and far in a given environment, exclusive of occasional and transient intrusive noise sources and of the particular noise source or sources to be measured," and that "ambient noise shall be averaged over a period of at least 15 minutes…"[150] Table 3.12-3 summarizes minimum ambient noise levels for various land uses. In the event that ambient levels at a subject location are lower than that provided in the table, the level in the table shall be assumed.

[148] *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.1-3.*

[149] *City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.2-3.*

[150] *City of Los Angeles, Municipal Code Chapter XI. Section 111.01.*

Table 3.12-3
City Of Los Angeles Minimum Ambient Noise Levels

Zone	Allowable Average Noise Level (L_{eq})	
	Daytime (7 a.m. – 10 p.m.)	Nighttime (10 p.m. – 7 a.m.)
A1, A2, RA, RE, RS, RD, RW1, RW2, R1, R2, R3, R4, and R5	50 dB(A)	40 dB(A)
P, PB, CR, C1, C1.5, C2, C4, C5, and CM	60 dB(A)	55 dB(A)
M1, MR1, and MR2	60 dB(A)	55 dB(A)
M2 and M3	65 dB(A)	65 dB(A)
Source: City of Los Angeles Municipal Code, Section 111.03, 1982		

At the boundary line between two zones, the allowable noise level of the quieter zone shall be used.[151] The allowable noise levels are then adjusted if certain conditions apply to the alleged offensive noise, as follows:

- For steady tone noise with an audible fundamental frequency or overtones (except for noise emanating from any electrical transformer or gas metering and pressure control equipment existing and installed prior to September 8, 1986) – reduce allowable noise level by 5 dBA.
- For repeated impulsive noise – reduce allowable noise level by 5 dBA.
- For noise occurring less than 15 minutes in any period of 60 consecutive minutes between the hours of 7:00 a.m. and 10:00 p.m. – increase allowable noise level by 5 dBA.

Additionally, the LAMC states that a noise level increase of 5 dBA or more over the existing average ambient noise level at an adjacent property line is considered a noise violation.[152] This standard applies to sources such as consumer electronics, HVAC systems, powered equipment intended for repeated use in residential areas, and motor vehicles driven onsite. The LAMC also prohibits use of air conditioning, refrigeration, heating, pumping, or filtering equipment that increases ambient noise levels by 5 dBA or more.[153] It also limits noise increases from motor driven vehicles on private property to no more than 5 dBA at adjacent residential properties.[154] Finally, between 10:00 p.m. and 7:00 a.m. the City prohibits the

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[151] *The City's noise ordinance does not define the length of time over which an average noise level should be assessed. However, based on the noted reference to "60 consecutive minutes," it is concluded that the one-hour L_{eq} metric should be used. Regarding the location at which the noise measurements should be taken, the LAMC states that "except when impractical, the microphone shall be located four to five feet above the ground and ten feet or more from the nearest reflective surface. However, in those cases where another elevation is deemed appropriated, the latter shall be utilized."*

[152] *City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.04), 1986.*

[153] *City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.02), 1982.*

[154] *Ibid.*

loading or unloading of vehicles, or use of dollies, carts, forklifts, or other wheeled equipment that causes any impulsive sound and/or raucous or unnecessary noise within 200 feet of any residential building.[155]

The L.A. CEQA Thresholds Guide states that a project's operations would normally have a significant impact if:

- The Project causes 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" categories recommended by the land-use compatibility guidelines set forth in the State of California's 2003 General Plan; or

- The Project causes the ambient noise level measured at the property line of affected uses to increase 5 dBA or greater.[156]

Construction Noise Impacts

During ground clearing, grading, construction, and other Project phases, noise-generating activities could occur at the Project site between the hours of 7:00 am. and 9:00 pm., in accordance with the LAMC. Table 3.12-4 summarizes projected noise levels at nearby sensitive receptors during construction. Land uses on the properties surrounding the Project site include single and multi-family residential buildings, institutional land-uses, commercial land-uses, and offices. Of these, there are a number of nearby sensitive receptors to the Project site, including:

- CBD College: an educational center located approximately 175 feet northeast of the Project Site. The receptor is located on the 4th floor of 3699 Wilshire Boulevard.

- Avana on Wilshire Apartments: a multi-story mixed-use building with residential units located atop ground-floor commercial and other uses. The receptor is located approximately 260 feet northeast of the Project Site at 3675 Wilshire Boulevard.

- 3700 Wilshire Office Building Receptors[157]: an existing multi-story office building that would remain as part of the Project. Currently, the building houses a number of noise sensitive uses, including:

    - Stanton University: a higher education school.

    - Kumon Math and Reading Center: an afterschool learning center.

    - A1 College Prep: an afterschool learning center.

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[155] *City of Los Angeles, Municipal Code Chapter XI-Noise Regulation (Section 112.03), 1982.*

[156] *City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, page I.2-3.*

[157] *While not required, the Wilshire Office is analyzed for a worse case and conservative analysis.*

- Radio Korea: an AM radio station studio.

- Oxford Avenue Residences: multi-family residential land uses located up to approximately 485 feet south of the Project Site along Oxford Avenue.

- Serrano Avenue Residences: residential land uses located up to approximately 500 feet south of the Project Site along Serrano Avenue.

- Pio Pico Library: a public library located approximately 250 feet south of the Project Site at 694 S. Oxford Avenue.

On September 9, 2016, DKA Planning took short-term, 15-minute noise readings at these receptors using a Quest Technologies SoundPro DL Sound Level Meter.[158] At all receptors, ambient noise levels were primarily a product of motor vehicles traveling on adjacent roadways, including Wilshire Boulevard, Oxford Avenue, Serrano Avenue, and 7th Street. As shown in Table 3.12-4, ambient noise levels ranged from 62.6 dBA L_{eq} at Serrano Avenue Residences and Pio Pico Library to 70.1 dBA L_{eq} at CBD College and Avana on Wilshire Apartments.

Construction activities would generate noise from a variety of on- and off-site activities, and would include the use of on-site heavy equipment such as excavators and loaders, as well as smaller equipment such as saws, hammers, and pneumatic tools. Secondary noise could also be generated by construction worker vehicles and vendor deliveries. For this analysis, construction noise impacts were modeled using the noise reference levels of equipment to be operated during the Project's grading and shoring phases, specifically excavators and front-end loaders, as these vehicles typically operate in tandem. Excavators can produce average peak noise levels of 81 dBA at a reference distance of 50 feet; front-end loaders, 79 dBA.[159] Other construction phases would not utilize equipment as loud as those required for site grading and shoring activities. Therefore, this analysis examines a "worst-case-scenario"; the noise impacts of all other construction phases would not exceed those analyzed here.

Table 3.12-4
Construction Noise Levels - Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
CBD College	175	68.3	70.1	72.3	2.2

[158] *The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental noise measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurements, and set at approximately five feet above the ground.*

[159] *Federal Highway Administration. Construction Noise Handbook, 2006.*

Table 3.12-4
Construction Noise Levels - Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Avana on Wilshire Apartments	260	64.8	70.1	71.2	1.1
3700 Wilshire Office Building	70	76.2	66.7	76.7	10.0
Oxford Avenue Residences	485	59.4	64.9	66.0	1.1
Serrano Avenue Residences	500	59.1	62.6	64.2	1.6
Pio Pico Library	250	55.2	62.6	63.3	0.7

Source: DKA Planning, 2016.

Given the ambient conditions in the Project area and the proximity of receptors, significant noise impacts could occur at one of the six Project receptors during construction of the Project:

- 3700 Wilshire Office Building Receptors are projected to experience noise levels of 76.7 dBA, an increase of 10.0 dBA. These elevated noise levels would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.

However, it is important to consider that these receptors are located within the 3700 Wilshire office building, some at higher levels and others not facing the Project site at all. While the exterior of this building could experience 10 dBA increases as a result of Project construction activities, it would be unlikely for interior sensitive uses to experience noise increases in excess of 5 dBA, due to the attenuation of modern building materials (up to 30 dBA).

Additionally, the Project's construction noise levels would exceed the City's 75 dBA limit for powered construction equipment within 500 feet of residential zones.

These on-site construction-related noise impacts would be considered significant but mitigable. **Mitigation Measures MM-12-1** and **MM-12-2** are recommended to reduce incremental increases in noise levels and limit construction noise levels to below 75 dBA.

With regard to off-site construction-related noise impacts, approximately 140 haul trips per day would export excavated soils from the Project Site to regional landfills over the course of the Project's grading phase, potentially exposing roadway-adjacent receptors to noise from heavy-duty hauling vehicles. Given that hauling operations would be anticipated to take place between 7:00 am and 5:00 pm on working days, Project hauling would, on average, generate an estimated 14 haul trips per hour. While this vehicle activity would marginally increase ambient noise levels along the haul route, it would not be expected to significantly increase ambient noise levels by 5 dBA or greater at any noise sensitive land uses.

According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speed and fleet mix remain constant. Though the addition of haul trucks would alter the fleet mix of the Project haul route, their minimal addition to local roadways would not nearly double those roads' traffic volumes, let alone augment their traffic to levels capable of producing 5.0 dBA increases. This is especially because haul vehicles would both access and exit the Project Site via Wilshire Boulevard, a busy arterial with limited roadside sensitive receptors. As a result, off-site construction noise impacts related to haul trucks would be less than significant.

Concerning delivery vehicles, the Project's Traffic Impact Study concluded that up to 20 delivery trucks could access the Project Site on days of peak activity.[160] For the reasons explained above, this vehicle activity would not be capable of creating significant and sustained noise impacts at roadside noise-sensitive land uses.

The Project would comply with the following requirements of the City:

Regulatory Compliance Measures

RCM-12-1 Demolition, Grading, and Construction Activities

- The project shall comply with the City of Los Angeles Noise Ordinance No. 144,331 and 161,574, and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

- The Project shall comply with the City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided that includes the following information: job site address, permit number, name and phone number of the contractor and owner or owner's agent, hours of construction allowed by code or any discretionary approval for the site, and City telephone numbers where violations can be reported. The notice shall be posted and maintained at the construction site prior to the start of construction and displayed in a location that is readily visible to the public.

Project Design Feature

PDF-12-1 Two weeks prior to commencement of construction, notification shall be provided to the off-site residential and school uses within 500 feet of the Project site that discloses the construction schedule, including the types of activities and equipment that would be used throughout the duration of the construction period.

Mitigation Measures

[160] *Transportation Impact Analysis, Fehr & Peers, August 2016.*

MM-12-1 All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA at 50 feet of distance.

MM-12-2 Temporary sound barriers capable of attenuating on-site construction noises by at least 5 dBA shall be installed around the area of the Project site proposed to be developed.

Impacts After Mitigation

Implementation of **Mitigation Measures MM-12-1** and **MM-12-2** would ensure that construction-related noise increases at 3700 Wilshire Office Building Receptors are minimized to below the L.A. CEQA Thresholds Guide's 5 dBA threshold of significance for construction activities lasting more than 10 days in a three month period. As shown in Table 3.12-5, these measures would also reduce construction noise to below the LAMC's 75 dBA limit for powered equipment operations within 500 feet of residential zones.

At 3700 Wilshire Office Building Receptors, the temporary noise barriers recommended by **Mitigation Measure MM-12-2** would be less capable of mitigating construction noises for any sensitive receptors located above the height those barriers. Because of this, exterior construction noise at upper levels of 3700 Wilshire Office Building could still reach 74.1 dBA, an increase of 7.4 dBA over existing ambient noise levels. However given that receptors at 3700 Wilshire are all located within the building itself (which provides for noise attenuation of up to 30 dBA[161] and would therefore not be exposed to these exterior noise levels, they would not experience noise increases of 5.0 dBA or greater, and the Project's construction noise impacts at these receptors would be considered less than significant. As shown in Table 3.12-5, temporary noise barriers would reduce construction-related noise increases at the building's ground level receptors to 3.8 dBA.

Given the Project's own height, some construction activities would occur at levels above the temporary sound barriers required by **Mitigation Measure 12-3**, thus negating their abilities to block line-of-sight noise travel from Project to receptors in these instances. However, construction activities at these heights would mainly utilize hand-held tools, pneumatic devices, and other smaller types of equipment that produce considerably less noise than heavy-duty construction vehicles[162] that operate on the ground. As a result, these specific construction noise impacts would be less than significant.

[161] *http://planning.lacity.org/eir/Clarendon/DEIR/files/4.5%20Noise%20formatted.pdf*

[162] *U.S. EPA, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971; City CEQA Thresholds Guide, 2006.*

Table 3.12-5
Construction Noise Levels - Mitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
CBD College	175	65.3	70.1	71.3	1.2
Avana on Wilshire Apartments	260	61.8	70.1	70.7	0.6
3700 Wilshire Office Building—Upper Stories	70	73.2	66.7	<71.7	<5.0
3700 Wilshire Office Building—Ground Level	70	68.2	66.7	70.5	3.8
Oxford Avenue Residences	485	56.4	64.9	65.5	0.6
Serrano Avenue Residences	500	56.1	62.6	63.5	0.9
Pio Pico Library	250	55.2	62.6	63.3	0.7

Source: DKA Planning, 2016.

Operational Phase Noise Impacts

During project operations, the development would produce direct noise impacts on the site from residential and commercial activities, as well as indirect noise impacts from vehicles traveling on local roads to access the site. The direct impacts would include:

Mechanical Equipment: Rooftop heating, ventilation, and air conditioning units typically produce noise levels of up to approximately 56 dBA at 50 feet.[163] Based on the distance from the Project site to nearby receptors, ambient noise levels, and the relatively quiet operation of modern HVAC systems, these on-site noise sources would be incapable of causing the ambient noise levels of affected uses to increase by 3 dBA CNEL to or within their appropriate L.A. CEQA Thresholds Guide's "normally unacceptable" or "clearly unacceptable" land use compatibility categories, or by 5 dBA or greater overall. Powered pool equipment would also be too quiet and distant to be audible at nearby sensitive receptors, especially because the proposed pool would be located at the Wilshire Boulevard-facing side of the development that experiences persistent elevated ambient noise levels from vehicle traffic.

Activity Uses: Noise from recurrent activities (e.g., conversation, consumer electronics) or non-recurrent activities (e.g., social gatherings) would elevate ambient noise levels to differing degrees. The City's noise ordinance would provide a means to address nuisances related to residential noise. Noises such as ambient music or patron conversations would elevate ambient levels to differing degrees. Given the area's ambient noise levels and the distance between these land uses and nearby sensitive receptors, noise from

[163] *Los Angeles Department of City Planning, San Pedro Community Plan Draft EIR, August 2012.*

restaurants or retail uses would not contribute to significant noise increases at Project receptors, and would likely not be audible at these receptors at all.

Auto-Related Activities: Operational noises related to the proposed onsite parking would include intermittent noise events, such as door slamming and vehicle engine start-ups. These activities generally produce 60-70 dBA at 50 feet of distance. However, these noise events are infrequent and do not significantly increase ambient noise levels. Furthermore, the majority of the Project's parking is proposed to be, or would continue to be, subterranean. Auto-related noises from the Project's below-grade parking would not be audible at nearby receptors. The Project would contain only 166 above-grade parking spaces. Per FTA guidance, a parking facility with a maximum hourly usage of 166 vehicles would be expected to produce a noise level of 48.6 dBA L_{eq} at a reference distance of 50 feet.[164] This would not elevate ambient noise levels at any nearby sensitive receptors, the closest which is onsite at 70 feet and off-site at least 250 feet, and especially considering the unlikelihood that the Project's above-grade parking would have an hourly usage equaling its total vehicle capacity. These direct sources of on-site noise would generate impacts on a seasonal, irregular, or infrequent basis and would not individually or collectively elevate ambient noise levels substantially at nearby sensitive receptors. The potential noise impact from these on-site operational sources would be considered less than significant.

The majority of the Project's operational noise impacts would be from indirect noise impacts associated with its 3,501 net new daily weekday vehicle trips.[165] The impact of this additional traffic on ambient noise levels in the Project's vicinity was modeled with FHWA TNM 2.5, comparing an existing year (2016) no project scenario to an existing year (2016) with project scenario. As shown in Tables 3.12-6, the greatest project-related noise increases would be 0.1 dBA along multiple roadway segments during both the A.M. and P.M. peak hours. These and all other increases would be imperceptible, far below the 5 dBA increase necessary to be considered noticeable by the public at large. Mobile noise generated by the Project would also not cause ambient noise levels measured at the property lines of affected land uses to rise by 3 dBA CNEL to or within their respective "normally unacceptable" or "clearly unacceptable" categories as defined by the 2003 California General Plan Guidelines.

Vehicle ingress and egress at Project driveways located on Serrano Avenue and Oxford Avenue could have localized noise impacts at residential land-uses along these streets. As determined by the Project's Traffic Impact Analysis, Serrano Avenue south of 7th Street has a weekday two-way daily existing base of 4,024 vehicle trips; Oxford Avenue south of 7th Street, 7,724 trips.[166] While the addition of Project traffic at these street segments would raise roadside ambient noise levels, it would not cause noise increases of 3 dBA CNEL or greater. As previously discussed, an approximate doubling of traffic is required to create sustained traffic-related noise increases of 3 dBA or greater. Project traffic would not create such a doubling at these street segments, as the Project would only generate an estimated 3,501 net daily trips,

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[164] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*

[165] *Transportation Impact Analysis, Fehr & Peers, August 2016.*

[166] *Ibid.*

and not all of these trips would access or exit the site via the aforementioned residential street segments. The majority of Project trips, both accessing and exiting the site, would be expected to utilize Wilshire Boulevard, not the residential streets south of 7th Street. As a result of these findings, the Project's off-site vehicular noise impacts would be considered less than significant.

Table 3.12-6
Estimated Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2016)	With Project (2016)	Project Change	Significant Impact?
E/B Wilshire Blvd., E of Serrano Ave.	AM	70.3	70.4	0.1	No
	PM	70.1	70.1	0.0	No
WB Wilshire Blvd., E of Serrano Ave.	AM	70.2	70.3	0.1	No
	PM	70.1	70.1	0.0	No
E/B 8th St., E of Irolo St.	AM	69.0	69.1	0.1	No
	PM	69.8	69.9	0.1	No
W/B 8th St., E of Irolo St.	AM	69.3	69.3	0.0	No
	PM	69.8	69.9	0.1	No

Source: DKA Planning, 2016.

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

Less Than Significant Impact. Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Unlike noise, vibration is not a common environmental problem. It is unusual for vibration from sources such as buses and trucks to be perceptible. Sources of vibration include trains, buses, and construction activities.

Vibration Definitions

Peak particle velocity (PPV) can be used to describe vibration impacts to both buildings and humans. PPV represents the maximum instantaneous peak of a vibration signal, and it is usually measured in inches per second.[167] Root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on vibration-sensitive land uses, such as hospitals and recording studios. RMS amplitude is

[167] *Caltrans. Transportation and Construction Vibration Guidance Manual, September 2013.*

defined as the average of the squared amplitude of a vibration signal. Decibel notation (VdB) is commonly used to measure RMS, as it compresses the range of numbers required to describe vibration.[168]

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can affect concentration or disturb sleep. Ground-borne vibrations can also interfere with certain types of highly sensitive equipment or machines, especially medical imaging devices.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. The background vibration velocity level in residential areas is usually 50 RMS or lower, well below the threshold of perception for humans, which is around 65 RMS.[169] Most perceptible indoor vibration is caused by sources within buildings, such as movement of people or slamming of doors. Typical outdoor sources of ground-borne vibration are construction equipment, trains, and traffic on rough roads. If the roadway is smooth, the vibration from traffic is typically not perceptible.

Regulatory Settings

Federal

The Federal Transit Administration has published guidelines establishing significance criteria for ground-borne vibration disrupting various land uses. Table 3.12-6 summarizes these thresholds, which are measured in VdB. Project construction activity would be considered a frequent event.

Table 3.12-6
Land Use Distribution Vibration Thresholds (VdB)

Land Use	Significance Thresholds (VdB)		
	Frequent Events	Occasional Events	Infrequent Events
Buildings where vibration would interfere with interior operations.	65	65	65
Residences and buildings where people normally sleep.	72	75	80
Institutional land uses with primarily daytime uses.	75	78	83
Concert halls, TV studios, and recording studios	65	65	65
Auditoriums and theaters	72	80	80

[168] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.*

[169] *California Department of Transportation. Transportation and Construction Vibration Guidance Manual, September 2013.*

Table 3.12-6
Land Use Distribution Vibration Thresholds (VdB)

Land Use	Significance Thresholds (VdB)		
	Frequent Events	Occasional Events	Infrequent Events
Source: Federal Transit Administration, 2006			

State

In 2013, the California Department of Transportation (Caltrans) published the Transportation and Construction Vibration Guidance Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when considering the impacts construction-related vibrations. Table 3.12-7 summarizes Caltrans' vibration thresholds for building and structural damage.

Table 3.12-7
Building Damage Vibration Thresholds

Structure and Condition	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous/Frequent/ Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5
Source: California Department of Transportation, 2013.		

City

The City of Los Angeles has not adopted any thresholds associated with building damage or land use disruption caused by ground-borne vibration.

Construction Vibration Impacts

Ground-borne vibration would be generated by a number of on-site construction activities. As a result of auger drilling, bulldozing, and other large tractor-type equipment operations, vibration velocities of up to 0.032 inches per second PPV could occur at 3700 Wilshire Office Building [170], the structure nearest to areas of proposed construction activities. However, this vibration intensity is far below the 0.5 inches per second PPV threshold that is considered potentially harmful to modern industrial/commercial buildings.

[170] *While not required, the Wilshire Office is analyzed for a worse case and conservative analysis.*

As shown in Table 3.12-8, more distant structures would experience even lower peak vibration velocities. Other potential construction equipment and activities would produce less vibration and also have reduced impacts on nearby structures. As a result, construction-related structural vibration impacts would be considered less than significant.

Table 3.12-8
Vibration Velocities at Off-Site Sensitive Uses from Project Construction

Off-Site Structures	Distance to Project Site (ft.)	Estimated PPV (in/sec)	Structural Significance Threshold (in/sec)	Significant?
CBD College	175	0.013	0.5	No
Avana on Wilshire Apartments	260	0.009	0.5	No
3700 Wilshire Office Building	70	0.032	0.5	No
Oxford Avenue Residences	485	0.005	0.3	No
Serrano Avenue Residences	500	0.004	0.3	No
Pio Pico Library	250	0.009	0.5	No
Source: DKA Planning 2016.				

In terms of land use disruption, the Project's construction-related vibration would also have a less than significant impact. As shown in Table 3.12-9, vibration levels experienced by most receptors would be imperceptible and far below FTA thresholds of significance. The greatest construction-related vibrations would be experienced by receptors located within the 3700 Wilshire Office Building, itself located on the Project site. Here, ground-level sensitive uses including Kumon Math and Reading Center and A1 College Prep would experience vibrations of up to 73.6 VdB, below the FTA's 75 VdB impact criteria for "institutional land uses with primarily daytime use." Radio Korea, located on the building's 6th floor, would be considered a studio land use given that it is an AM radio broadcasting station. After adjusting for the attenuation of vibration through these floor levels, Radio Korea would not be expected to experience vibrations greater than 60.6 VdB, below the FTA's 65 VdB impact criteria for recording studios.

Table 3.12-9
Land Use Interference Vibration Levels (Unmitigated)

Off-Site Receptor – Land Use	Distance to Project Site (ft.)	Estimated VdB	Land Use Interference Threshold (VdB)	Significant?
CBD College	175	61.6	75	No
Avana on Wilshire Apartments	260	56.5	72	No
3700 Wilshire Office Building—Radio Korea	70	60.6	65	No
3700 Wilshire Office Building—Ground Floor	70	73.6	75	No
Oxford Avenue Residences	485	48.4	72	No
Serrano Avenue Residences	500	48.0	72	No
Pio Pico Library	250	57.0	75	No
Source: DKA Planning 2016.				

The Project could also generate vibration from the hauling of cut and demolished materials and the delivery of construction materials and equipment. This could increase vibration levels at receptors along haul route roadways. However, given that these vehicles would primarily be confined to travel along Wilshire Boulevard when accessing or leaving the Project site, it is unlikely that they would contribute to sustained, perceptible increases in vibration at roadside receptors. As a major arterial with high existing levels of traffic, Wilshire Boulevard has a limited number of sensitive roadside land uses in the Project area, especially on ground floors immediately adjacent to the roadside. Vibration impacts from haul and delivery trucks would be considered less than significant.

Operational Vibration Impacts

During operation of the Project, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment operations. Operational ground-borne vibration in the Project vicinity would be generated by vehicular travel on the local roadways. Road vehicles rarely create enough ground-borne vibration to be perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. If traffic, typically heavy trucks, induces perceptible vibration in buildings, such as window rattling or shaking of small loose items, then it is most likely an effect of low-frequency airborne noise or ground characteristics. Project-related traffic would expose nearby land uses and other sensitive receptors during long-term operations to vibration levels far below levels associated with land-use disruption and would be considered less than significant.

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

Less Than Significant Impact. The majority of any long-term noise impacts would come from traffic traveling to and from the Project site. This, the addition of future traffic from any new developments in the Project area, and overall ambient traffic growth would elevate ambient noise levels surrounding local roadways. However, the Project's incremental contribution to permanent off-site ambient noise levels along local roads would be minimal. As shown in Tables 3.12-10, off-site increases in mobile noise generated by Project-related traffic would be negligible in both the A.M. and P.M. peak hours, respectively, when compared to year 2020 projected traffic volumes. The maximum projected noise increase in either period is only 0.1 dBA. This noise increase would be far below thresholds of perceptibility. As a result, the Project's individual and cumulative mobile source noise impacts would be considered less than significant**.**

Table 3.12-10
Future Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2020)	With Project (2020)	Project Change	Significant Impact?
E/B Wilshire Blvd., E of Serrano Ave.	AM	71.0	71.1	0.1	No
	PM	70.9	70.9	0.0	No
WB Wilshire Blvd., E of Serrano Ave.	AM	71.0	71.0	0.0	No
	PM	70.8	70.9	0.1	No

Table 3.12-10
Future Peak Hour Mobile Source Noise Levels

Roadway Segment	Peak Hour	Estimated dBA, CNEL			
		No Project (2020)	With Project (2020)	Project Change	Significant Impact?
E/B 8th St., E of Irolo St.	AM	70.2	70.2	0.0	No
	PM	71.0	71.0	0.0	No
W/B 8th St., E of Irolo St.	AM	70.5	70.5	0.0	No
	PM	71.0	71.0	0.0	No

Source: DKA Planning, 2016.

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?

Less Than Significant Impact with Mitigation Incorporated. As discussed earlier, construction activities would temporarily increase ambient noise levels at nearby receptors, particularly at residences near the Project site. Moreover, any other future developments that are built concurrently with the Project could further contribute to these temporary increases in ambient noise levels. However given the relatively high ambient noise levels of the Project area, it is unlikely that construction noise from concurrent developments would be simultaneously audible at Project receptors, let alone contribute to cumulatively considerable noise increases. Persistent traffic noise from Wilshire Boulevard would largely mask any distant construction sounds in a manner largely similar to the effects of white noise, and the presence of numerous multi-story structures would obstruct these sounds' line-of-sight travel. Nevertheless, Project construction itself would have significant but mitigable noise impacts.

With regard to off-site construction noise from haul and delivery trucks, the Project itself would have less than significant impacts. Given the Project's location, its haul route would not be expected to intersect with haul routes of other projects along roadways with numerous roadside sensitive receptors. As a result, any cumulative off-site haul and delivery truck noise impacts would be considered less than significant.

Mitigation Measures MM-12-1 and **MM-12-2** would reduce the Project's noise impacts from on-Site construction activity. With these mitigation measures in place, the Project's construction noise impacts would be less than significant.

e) For a proposed 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 proposed project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project is not located within the vicinity (i.e., five miles) of any public airport. The Project would not expose people to excessive noise levels related to the operation of a public airport. Therefore, the Project would not result in an impact related to public airport noise levels.

f) For a proposed project within the vicinity of a private airstrip, would the proposed project expose people residing or working in the proposed project area to excessive noise levels?

No Impact. The Project is not located within the vicinity (i.e., five miles) of any private airstrip. As a result, the Project would not expose any people to excessive noise levels associated with any private airstrip activities. Therefore, the Project would not result in an impact related to private airstrip noise levels.

13. POPULATION AND HOUSING

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. A significant impact would occur if a project would locate new development such as homes, businesses, or infrastructure, with the effect of substantially inducing growth in the project area that would otherwise not have occurred as rapidly or in as great a magnitude.

Construction Impacts

Construction job opportunities created as a result of the Project are not expected to result in any substantial population growth in the area. The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Additionally, the construction workers would likely be supplied from the region's labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Project, and as such, significant housing or population impacts will not result from construction of the Project. Therefore, construction-related population growth impacts will be less than significant.

Operational Impacts

Population generation is shown in Table 3.13-1 and employee generation is shown in Table 3.13-2. This is a conservative estimate as it does not take into account the residential bedroom mix of 381 1-bedroom units, 119 2-bedroom units, and 6 penthouse 3-bedroom units. It is estimated that the Project would have approximately 1,422 residents and 174 employees.

Table 3.13-1
Project Estimated Population Generation

Land Use	Quantity	Population Generation Rates	Total Population
Residential	506 DU	2.81 person / DU	1,422
		Proposed Population	**1,422**

Note: DU = dwelling unit
Source: The 2010 Census shows that the average household size in Los Angeles is 2.81 persons. Page 1-11 in City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf
Table: CAJA Environnemental Services, August 2016.

Table 3.13-2
Project Estimated Employment Generation

Land Use	Size	Employee Generation Rates	Total Employees
Retail	40,322 sf	1 employee / 369 sf	109
Restaurant	21,713 sf	1 employee / 333 sf	65
		Proposed Employees	**174**

Note: sf = square feet
Source: LAUSD 2012 Developer Fee Justification Study, February 9, 2012. Table 11:
Restaurant is based on RCLCO assumptions from the NoHo West EIR (Case No ENV-2015-888-EIR).
Table: CAJA Environnemental Services, October 2016.

The July 2016 unemployment rate is Los Angeles-Long Beach-Glendale area is approximately 5.5 percent.[171] Thus, there is still potential for employment capacity (jobs) to increase to fulfill demand. The Project is not a unique use to compel substantial new residents to the area to fulfill the jobs. Rather the jobs could be filled by workers already counted within the Los Angeles area.

The Project would have approximately 1,422 residents and increase of 174 employees. The Project would not conflict with SCAG's projections, the City's projections, or represent any population or housing increase as compared to existing levels. The Project is consistent with SCAG's growth projections which are based on macroeconomic data and socioeconomic variables independent of parcel-level land use designation and zoning. Thus, it does not represent a substantial or significant growth as compared to the existing characteristics. The potential to induce substantial growth may be indicated by the introduction of a project in an undeveloped area or the extension of major infrastructure.[172] The Project does not include introduction in an undeveloped area or the extension of major infrastructure (such as roadways, bridges, infrastructure). The Project would result in a less than significant impact to population and housing.

Localized Growth Forecasts

The following tables provide different geographic scales of population and housing, from the community plan and citywide. This acknowledges that growth does not occur in a vacuum but in a larger context.

Table 3.13-3 Population and Households in the City of Los Angeles, lists the 2010 and 2016 population, households, and subsequent persons/housing ratio, the SCAG forecast for 2035.

[171] *Bureau of Labor Statistics: http://www.bls.gov/eag/eag.ca_losangeles_md.htm.*

[172] *LA City CEQA Thresholds Guide, page J.1-3.*

Table 3.13-4 shows the Southern California Association of Government's (SCAG) planned growth of the City of Los Angeles in population, housing, and employment from 2014 to 2035.[173]

Table 3.13-5, Population and Households in the Wilshire Community Plan Area, provides data from the WLA CP, adopted in 2001, and the more recent 2014 Growth and Infrastructure Report.

Table 3.13-3
Population and Households in the City of Los Angeles

Year	Population	Households	Persons/Household
2010	3,792,621	1,412,006	2.69
2016	4,030,904	1,453,271	2.77
2035	4,442,500	1,618,900	2.74
Change 2010 to 2016			
Number Changed	+238,283	+41,265	+0.08
Change 2016 to 2035			
Number Changed	+411,596	+165,629	-0.03
2010: Census data, reported 4/1/2010. *2016: As of January 1, 2016, Department of Finance: http://www.dof.ca.gov/research/demographic/reports/estimates/e-5/2011-20/view.php.* *2035: Based on the adopted 2016-2040 Regional Transportation Plan by SCAG: http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf.* *Table: CAJA Environmental Services, August 2016.*			

Table 3.13-4
SCAG Population, Housing and Employment of the City of Los Angeles

	Population	Housing (units)	Employment (jobs)
2014	3,904,657	1,432,553	1,753,559
2035	4,442,500	1,618,900	2,104,100
Change (2014-2035)	+537,843	+186,347	+350,541
2014: SCAG Local Profile for City of Los Angeles, dated May 2015: http://www.scag.ca.gov/Documents/LosAngeles.pdf *2035: Based on the adopted 2016-2040 Regional Transportation Plan by SCAG: http://www.scag.ca.gov/Documents/2016DraftGrowthForecastByJurisdiction.pdf.* *Table: CAJA Environmental Services, August 2016.*			

[173] *The 2014 data was from a May 2015 report and profile. The 2035 projection was from the 2016 RTP adopted April 2016.*

Table 3.13-5
Population and Housing Units in the Wilshire Community Plan Area

	2010 (Projection)	2010 Census	2014 Estimate	Change 2010-2014
Population	337,144	278,392	290,383	+ 11,991
Housing Units	138,330	125,832	127,540	+ 1,708

2010 Projection from 2001: Wilshire Community Plan, http://cityplanning.lacity.org/complan/pdf/wilcptxt.pdf. This has been superseded by 2010 Census data.

2010 Census: Census data, reported 4/1/2010.

2014 Estimate: City Planning Dept, Demographics Research Unit, Population/Housing Estimate, July 1, 2014.

Table: CAJA Environmental Services, August 2016.

Housing Element

The City updated its Housing Element portion of the General Plan for the period of 2013-2021. On December 3, 2013, the City Council adopted the update to the Housing Element of the General Plan.[174] The Housing Element provides the Regional Housing Needs Assessment (RHNA) allocation, which is the number of housing units that each community must plan for and accommodate during the 8-year period. The Housing Element does not alter the development potential of any site in the City, nor modify land use of the Zoning Code. It also does not undermine, in any way, neighborhood planning efforts such as Community Plans, Specific Plans or Historic Preservation Overlay Zones. While the State requires the City to evaluate and plan for the existing capacity to accommodate future projected growth, the Housing Element does not have any material effect on development patterns, nor specify areas for increased height or density.[175]

The Housing Element has identified 4,019 sites (1,014.2 acres) in the Wilshire Community Plan Area as having housing capacity for 51,490 net units.[176] The Project Site does not currently provide housing but will add 506 housing units. The Project will not conflict with the Housing Element, which requires that the City must show it has adequate land zoned to accommodate the RHNA allocation of 82,002 housing units for 2013-2021.[177] Thus, the Project, which is adding housing units, will not result in a net loss of housing inventory in the area.

[174] *City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm.*

[175] *City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/TOCHousingElement.htm.*

[176] *City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, Table 3.1, page 3-4.*

[177] *City of Los Angeles, Housing Element, 2013-2021, adopted December 3, 2013, page 3-3.*

Infrastructure Impacts

The Project Site is located within an urbanized area. There is adequate infrastructure such as roads and utilities. Thus, the construction of potential growth-inducing roadway or other infrastructure extensions would not be required. The Project would not induce substantial population growth and would be supported by existing infrastructure such as roadways. Impacts will be less than significant.

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

No Impact. A significant impact may occur if a project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain any housing. The Project does not represent a displacement of substantial numbers of existing housing. Therefore, no impact will occur.

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

No Impact. A significant impact may occur if a project would result in the displacement of existing occupied housing units, necessitating the construction of replacement housing elsewhere. The Project Site does not contain any housing. The Project does not represent a displacement of substantial numbers of existing housing. Therefore, no impact will occur.

14. PUBLIC SERVICES

This section is based on the following letters, included as Appendix J of this IS/MND:

J-1 Los Angeles Department of Recreation and Parks response, May 16, 2016.

J-2 Los Angeles Public Library response, June 24, 2016.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government 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 objective for any of the following public services:

i) Fire protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Fire Department (LAFD) could not adequately serve a project, and a new or physically altered fire station would be necessary. LAFD considers fire protection services for a project adequate if a project is within the maximum response distance for the land use proposed. A total of 1,104 uniformed firefighters (included 242 serving as Firefighters/Paramedics), are always on duty at 106 neighborhood fire stations located in the LAFD's 471-square-mile jurisdiction.[178] Pursuant to Table 507.3.3 of the 2014 Fire Code, the maximum response distance between commercial land use and a LAFD station that houses an engine company[179] is 1.0 mile and a station that houses a truck company[180] is 1.5 miles. If these response distances are exceeded, installation of an automatic fire sprinkler system is required.[181] The Project Site is served by several fire stations, as shown in Table 3.14-1, Fire Stations.

Response Distance

The Project Site is located within the response distance specified by Table 507.3.3 of the 2014 Fire Code. Station No. 29 is within 1 mile away and contains a Task Force (truck company and engine company)[182] and additional engine and ambulance, respectively. Additionally, the Project will be constructed with fire

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[178] *http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.*

[179] *LAFD: All LAFD Engines are Triple Combination apparatus, meaning they can pump water, carry hose, and have a water tank: http://lafd.org/about/apparatus.*

[180] *LAFD: Aerial Ladder Fire Engines: http://lafd.org/about/apparatus.*

[181] *http://www.ecodes.biz/ecodes_support/free_resources/2014LACityFire/PDFs/Chapter%205%20-%20Fire%20Service%20Features.pdf.*

[182] *LAFD: http://www.lafd.org/about/about-lafd/apparatus.*

protection as required by the LAFD Chief, unless other building and safety codes supersede this. The LAFD goal is to reach EMS incidents within 5 minutes 90 percent of the time and fire incidents within 5:20 minutes 90 percent of the time. The Project is within the maximum response distance of a fire station with adequate equipment. There are additional fire stations located nearby. Therefore, impacts related to response distance will be less than significant.

Table 3.14-1
Fire Stations

No.	Address	Distance	Equipment	Ave. Time (Turnout + Travel)	Incident Counts
29	4029 W. Wilshire	2,380 feet	Task Force Paramedic Rescue BLS Rescue Ambulance Decon Tender	Non-EMS: 4:27 min EMS: 4:57 min	Non-EMS: 696 EMS: 1,867
13	2401 W. Pico	2.0 miles	Engine Paramedic Rescue EMS Battalion Captain	Non-EMS: 5:02 min EMS: 4:53 min	Non-EMS: 636 EMS: 3,493

Incident counts: year 2016 (January to June). Non-EMS is fire emergency. EMS is emergency medical service.
Response Time: year 2016 (January to June) average time (turnout time + travel time) in the station area.
Response time listed above does not include call processing, which averages 1:02 minutes citywide in 2016. Call processing is done at a central location and does not differ by fire stations.
Fire Department Call Processing Time: The time interval that starts when the call is created in CAD by a Fire Dispatcher until the initial Fire or EMS2 unit is dispatched. Turnout Time: The time interval between the activation of station alerting devices to when first responders put on their PPE3 and are aboard apparatus and en-route (wheels rolling). Both station alarm and en-route times are required to measure this for each unit that responds.
Travel Time: The time interval that begins when the first unit is en route to the incident and ends upon arrival of any of the units first on scene. This requires one valid en-route time and one valid on-scene time for the incident. Travel time can differ considerably amongst stations. Many factors, such as traffic, topography, road width, public events and unspecified incident locations, may impact travel time.
Incident Count: The number of incidents that result in one or more LAFD units being dispatched, regardless of record qualification.
http://lafd.org/sites/default/files/pdf_files/11-03-2014_AllStations.pdf
Task Force: Truck company and two fire engines.
LAFD April 2016 Fire Station Directory.
Table: CAJA Environmental Services, August 2016.

Emergency Access

Emergency vehicle access to the Project Site will continue to be provided from local and major roadways near the Project Site. The routes from the fire stations to the Project Site would likely pass through several of the 15 study intersections. The future traffic conditions with the Project show that none of the 14 study intersections would have a significant impact.[183]

[183] *Transportation Impact Analysis, Fehr & Peers, August 2016.*

Division 118 of the Fire Code requires that all new high-rise buildings greater than 75 feet in height (measured from the lowest point with fire access) to include a fire control station containing a public address system and telephones for LAFD use. The fire control station must contain a fire detection and fire alarm system, an elevator recall switch and status panel for all elevator cars, a sprinkler control system, standby power and emergency electrical power controls, controls for unlocking stair shaft doors, smoke evacuation and fan controls, stairway pressurization control switches, and status indicators for fire pumps and water supply. A sound-powered telephone communication system must be located at every floor level in each enclosed exit stairway, at every exterior location where an enclosed stairway exits to a public way, on the roof, and in every elevator car. In addition, a high-rise building must have at least one emergency and fire control elevator in each bank of elevators (Section 57.118.05), a dependable method of sounding a fire alarm throughout the building (Section 57.118.06), an emergency smoke control system (Section 57.118.07), a standby and emergency power system (Section 57.118.08), stair shaft doors for fire department use (Section 57.118.09), pressurized stair shafts (Section 57.118.10), and other devices operable from the fire control station, as previously listed.

Division 118 also requires the installation of automatic sprinkler systems in all new high-rise buildings in addition to a rooftop emergency helicopter landing facility (EHLF) on each high-rise building in a location approved by the Chief of the LAFD (Section 57.4705.4). However, if specific life safety features are provided as outlined in LAFD Requirement No. 10, the EHLF is not required.[184] Such life safety measures include; providing an additional Fire Service Access Elevator in addition to the number of elevators required in the CBC; two (2) stairways (and a third if added) shall have roof access; enclosed elevator lobbies; escalator openings or stairways that are not part of the means of egress system and connect more than two stories protected by approved power-operated automatic shutters at every penetrated floor; automatic sprinkler systems; and a Video Camera Surveillance System with cameras located in all Firefighter Elevator Vestibules and on every 5th floor landing in exit stairway shafts, with an additional camera at the top of the exit stairway shaft.

For high-rise buildings, LAMC Section 57.33.19 requires the preparation of an Emergency Plan that establishes dedicated personnel and emergency procedures to assist the LAFD during an emergency incident, and establishes a drill procedure to prepare for emergency incidents. The Emergency Plan is required to designate at each building a Fire Safety Director, Floor Wardens, Private First Responders, and Essential Building Personnel. Among other tasks, these individuals would be required to call 911 during an emergency incident; report to the building's Emergency Assistance Center; direct evacuation operations; report conditions to the LAFD; conduct monthly inspections; know the location of all exits; direct emergency evacuations and fire drills; and assist the LAFD, emergency responders, and on-site personnel during emergency evacuations. A description of the procedures all occupants should follow in an emergency evacuation or drill is also required in the Emergency Plan. The Emergency Plan also designates appropriate evacuation signs and requires the Fire Safety Director to establish the on-site Emergency Assistance Center. Lastly, LAMC Section 57.33.19 requires that mandatory fire drills be conducted at least once annually. A Fire Safety Officer is required to be present to witness and document

[184] *http://www.lafd.org/sites/default/files/pdf_files/EHLF-Reg10.pdf*

the total building evacuation. The Emergency Plan must be submitted to the LAFD for approval prior to implementation, and must be submitted annually (and revised if required by the LAFD).

The Project would be in compliance with the Fire Code, including any additional access requirements of the LAFD. Additionally, emergency access to the Project Site will be maintained at all times. Therefore, impacts related to emergency access will be less than significant.

Fire Flow

The adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The quantity of water necessary for fire protection varies with the type of development, occupancy rates, life hazard, and the degree of fire hazard. City-established fire flow requirements vary from 2,000 gallons per minute (gpm) in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any case, a minimum residual water pressure of 20 pounds per square inch is to remain in the water system while the required gpm is flowing. The fire flow is set at 6,000 to 9,000 gpm. The following fire hydrants are the nearest to the Project Site:[185]

- Hydrant (ID 13990, size 2 ½ x 4D, 6-inch main) on southeast corner of Wilshire and Oxford.
- Hydrant (ID 5546, size 2 ½ x 4D, 8-inch main) on northwest corner of Wilshire and Serrano.
- Hydrant (ID 9699, size 2 ½ x 4D, 8-inch main) on southeast corner of Wilshire and Serrano.

Upgrades to the hydrants and system will be evaluated at the plan check phase. The Project will submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the Project area is sufficient as is standard practice. If it is not, then upgrades to the existing infrastructure may be required. No changes are planned in the near future for new or expanded fire stations in the area, which contains the Project Site.

To ensure that fire protection services are adequate within the proposed buildings and around the Project Site, the Project will comply with the required Regulatory Compliance Measures listed below. These measures allow the LAFD to ensure that the Project will not increase demand on the fire department to the extent that a new or expanded facility is needed, the construction of which may cause a significant impact on the environment.

Regulatory Compliance Measures

RCM-14-1 Fire Flows and Hydrants

The Project shall submit a request to the City of Los Angeles Department of Water and Power (LADWP) to determine whether the pressure in the project area is sufficient. If it

[185] *Navigate LA, Fire Hydrants Layer: http://navigatela.lacity.org/navigatela/.*

is not, then onsite or offsite upgrades to the existing infrastructure, as determined by the LADWP and LAFD shall be required by the applicant.

RCM-14-2 Public Services (Fire)

The Project shall comply with the required regulations and feasible recommendations of the Fire Department relative to fire safety and emergency access, and shall be incorporated into the building plans, which includes the submittal of a plot plan for approval by the Fire Department prior to the approval of a building permit.

ii) Police protection?

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives. The Project Site is served by the City of Los Angeles Police Department's (LAPD) West Bureau, which oversees LAPD operations in the Hollywood, Olympic, Pacific, West LA, and Wilshire.[186] The Olympic Community Police Station, located at 1130 South Vermont, is approximately 1.65 miles driving distance from the Project Site. The Olympic Community is 6.2 square miles in size, has approximately 200,000 residents, and has approximate 293 sworn officers.[187]

Each community police station is broken down into approximately one dozen smaller Reporting Districts (RD) that consist of a few blocks. The Project is within RD 2033, which is bound by Wilshire to the north, San Marino to the south, Western to the west, and Harvard to the east.[188]

Deployment

Deployment of police officers to existing area stations in the City is based on a number of factors and is not calculated solely based on police-need-per-population standards. The LAPD presently uses a quantitative workload model, known as Patrol Plan, to determine the deployment level in each of the area stations. Patrol Plan, which was developed by a private consultant, is a computer program which mathematically formulates 25 data variables (factors) to provide patrol officer deployment recommendations for the 18 geographic areas in the City to meet predetermined constraints (response time and available time). These factors include patrol speed, number of units fielded, forecast call rate, percent of calls with 1-6+ units dispatched, average service time, dispatching policy, percent of calls dispatched by priority, square miles of an area, average travel time and street miles (length of streets, alleys and other routes in an area). Police units are in a mobile state; hence the actual distance between the Station and the Project Site is often of little relevance to service performance. Instead the realized

[186] *LAPD, West Bureau: http://www.lapdonline.org/west_bureau*

[187] *LAPD: http://www.lapdonline.org/olympic_news/news_view/40566*

[188] *http://assets.lapdonline.org/assets/pdf/bwOLYM%20STREET%20MAP.pdf*

response time is more directly related to the number of officers deployed. Police assistance is prioritized based on the nature of a call.

Crime Rate

Crime statistics (Part 1 violent and property crimes) are shown in Table 3.14-2, Crime Statistics. The crime rate, which represents the number of crimes reported, affects the "needs" projection for staff and equipment for the LAPD to some extent.

Table 3.14-2
Crime Statistics

Type of Crime	Olympic	Citywide
Homicide	7	199
Rape	44	1,186
Robbery	413	6,955
Aggravated Assault	456	10,611
Burglary	470	10,542
Motor Vehicle Theft	504	12,485
Burglary Theft from Vehicle	1,147	21,138
Personal/Other Theft	872	22,032
Total (Part 1 Crimes)	**3,913**	**85,150**

Year-to-date: September 10, 2016
Olympic: http://assets.lapdonline.org/assets/pdf/olyprof.pdf
Citywide: http://assets.lapdonline.org/assets/pdf/cityprof.pdf
Table: CAJA Environmental Services, September 2016.

Construction Impacts

Construction sites can be sources of attractive nuisances, providing hazards, and inviting theft and vandalism. Therefore, when not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters that require their attention. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site to keep out the curious. The Project Site is generally open on the Wilshire Boulevard, and Serrano and Oxford Avenues and the area in front of the existing office building. The boundaries will need to be secured during construction. The Project Applicant will employ construction security features, such as fencing, which would serve to minimize the need for LAPD services (see **Project Design Feature PDF-14-1**). These security measures would ensure that valuable materials (e.g., building supplies, metals such as copper wiring) and construction equipment are not easily stolen or abused. This measure would reduce potential construction impacts on police protection services to less than significant.

Operational Impacts

The Project is seeking a Master Conditional Use Permit for the on-site sale of alcohol (CUB). Some CUBs require Standardized Training for Alcohol Retailers (STAR Training). If the Project's CUB requires such training, then all employees involved with the sale of alcoholic beverages shall enroll in the LAPD STAR Training.

The Project will generate jobs and an increase in visitors and patrons, especially over the evening and night hours due to the residential uses. As such, the Project could potentially increase the number of police service calls due to an increase in onsite employees and visitors. The potential for crime can be reduced with site-specific designs and features (see **Project Design Feature PDF-14-2)**. The Project will include standard security measures such as adequate security lighting, secure key access to residential areas, and residential lobby and leasing area that offers a visual deterrent and human surveillance feature. Parking would be provided in an enclosed below grade facility as part of the building. The LAPD will require that the commanding officer of the Community Area be provided a diagram of each portion of the property showing access routes, and any additional information that might facilitate police response. This is formally included as **Mitigation Measure MM-14-1**.

The current approximate ratio of residents to officers is approximately 683 residents to officer.[189] The addition of the Project's 1,422 residents would equate to 2 officers.[190] 2 officers represents approximately 0.68 percent increase compared to existing staffing levels. This change is not substantial and the Project will contribute sales and property tax revenue into the City's General Fund, which can be used to fund additional resources per the planning and deployment strategies of the LAPD. The Project will not require the construction of a new or expanded police station. Project design features and mitigation measures will reduce the impacts associated with police services to less than significant.

Project Design Features

PDF-14-1 Public Services (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.

PDF-14-2 Public Services (Police)

The plans shall incorporate a design that enhances the 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

[189] *200,000 / 293 = 683.*

[190] *1,422 / 683 = 2.08*

of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed. The design shall reference "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. These measures shall be approved by the Police Department prior to the issuance of building permits.

Mitigation Measure

MM-14-1 Upon completion of the Project, the Olympic Area commanding officer shall be provided with a diagram of each portion of the property. The diagram shall include access routes and any additional information that might facilitate police response.

iii) Schools?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth, which could generate demand for additional school facilities. The Project Site is served by the following Los Angeles Unified School District (LAUSD) schools:[191]

- Charles H. Kim Elementary School (K-5), located at 225 South Oxford Avenue had 720 students enrolled in 2015-16 School Year.[192] The school consists of two smaller units:
  - Transitional Bilingual Korean
  - Duel Language Spanish
- Berendo Middle (6-8), located at 1157 South Berendo Street, had 848 students enrolled in 2015-16 School Year.[193]
- Young Oak Kim Middle (6-8), located at 615 Shatto Place, had 930 students enrolled in 2015-16 School Year.[194]
- RFK School Choice Area (9-12):
  - RFK Community Schools, located at 701 South Catalina Street:
    - Ambassador School Global Leadership had 603 students enrolled in 2015-16 School Year.[195]

[191] *LAUSD School Finder: http://rsi.lausd.net/ResidentSchoolIdentifier/.*

[192] *http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=2701*

[193] *http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8057*

[194] *http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8064*

- Los Angeles High School of the Arts had 428 students enrolled in 2015-16 School Year.[196]
- School for Visual Arts and Humanities had 433 students enrolled in 2015-16 School Year.[197]

- RFK Community Schools New Open World Academy K-12, located at 3201 West 8th Street, had 1,161 students enrolled in 2015-16 School Year.[198]
- RFK Community Schools UCLA Community School K-12, located at 700 South Mariposa Avenue, had 991 students enrolled in 2015-16 School Year.[199]

Enrollment Generation

As shown on Table 3.14-3, the Project (directly through the residential use and indirectly through its employees) would generate an increase of approximately 229 elementary, 58 middle, and 114 high school students, for a total increase of approximately 401 students. To be conservative, this analysis assumed that all students generated by the Project will be new to LAUSD. As discussed below, payment of required school fees is deemed to provide full and complete mitigation.

Table 3.14-3
Project Estimated Student Generation

Project		Students Generated			
Source	**Quantity**	**Elementary**	**Middle**	**High**	**Total**
Residential units	506	202	51	101	354
Employees	174	27	7	13	47
Total		**229**	**58**	**114**	**401**

Residential land uses: Elementary:0.4 students per household; Middle: 0.1 students per household; High: 0.2 students per household
Commercial and Industrial land uses: 0.2691 students per employee. Note that there is no breakdown by elementary, middle, or high. Therefore the same ratio as residential, 4:1:2, is used.
Source (rates): LAUSD 2012 Developer Fee Justification Study, February 9, 2012.
Table: CAJA Environmental Services, September 2016.

Proximity to Schools

[195] *http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=7771*

[196] *http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8501*

[197] *http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=8206*

[198] *http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=7783*

[199] *http://notebook.lausd.net/portal/page?_pageid=33,54194&_dad=ptl&_schema=PTL_EP&school_code=7780*

The Project Site is in proximity to the following schools:[200]

- Erika J. Glazer Early Childhood Center and Brawerman Elementary School of Wilshire Boulevard Temple; 3663 Wilshire Boulevard, 425 feet east of the Project Site.

The Project will have a less than significant impact during construction (with regulatory compliance measures for asbestos, lead-based paint) and will not emit any hazardous substances during operation. The Project would ensure that the development and operations does not emit hazardous materials. The school would still be generally shielded from the Project Site by the distance noted above, intervening urban buildings, and standard construction walls and sheeting to reduce dust and other emissions from the Site.

School Fees

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or other state or local law (Government Code Section 65996). Furthermore, per Government Code Section 65995.5-7, LAUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, impacts related to schools will be less than significant.

Regulatory Compliance Measure

RCM-14-3 Payment of School Development Fee

Prior to issuance of a building permit, the Project Applicant shall pay all applicable school facility development fees in accordance with California Government Code Section 65995.

iv) Parks?

Less Than Significant Impact. A significant impact to parks would occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the

[200] *LAUSD and Google Maps.*

construction of which could cause substantial adverse physical impacts. The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipally owned and operated recreation and park facilities within the City. The Public Recreation Plan, a portion of the Service Element of the City's General Plan sets a goal of a parkland acres-to-population ratio of neighborhood and community parks of 4.0 (or 4 acres per 1,000 persons). The Wilshire Community Plan Area has a ratio of 0.23 acres or parkland per 1,000 persons. [201]

Table 3.14-4, Parks and Recreation Centers lists the parks and recreation centers that are located nearby the Project Site. While the LADRP is currently in the process of implementing the 50 Parks Initiative, these are small pocket parks typically less than half an acre, often only one tenth of an acre, and have a service radius of one half mile. None of these parks will be sited within half mile from the Project Site.[202]

Table 3.14-4
Parks and Recreation Centers

Name	Address	Acres
Neighborhood Park (between one and 10 acres and with one mile radius of the Site)		
LA (High School) Memorial Park	4625 West Olympic Boulevard	2.51
Seoul International Park	3250 West San Marino Avenue	3.47
Community Park (between 10 and 50 acres and with two mile radius of the Site)		
Lafayette Park	4800 West Hollywood Boulevard	10
MacArthur Park	2230 West 6th Street	29.87

NavigateLA with Recreation and Parks Department layer: http://navigatela.lacity.org/index01.cfm
Source: LADRP response, May 16, 2016. Included in the Appendices.
Table: CAJA Environmental Services, September 2016.

The Project would increase the number of residents and employees at the Project Site. However, employees of commercial developments do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. The Project would include open space, a pool, an amenities deck and fitness center, and private open space and decks. As shown in Table 2-2, Open Space, of Section 2 of this MND, the amount of open space required and provided is 54,025 square feet. While Project residents would use the on-site open spaces and recreational facilities, it is reasonably foreseeable that Project residents would use nearby parks and recreation facilities. However, with the provided on-site and open space and payment of applicable fees, impacts would be less than significant.

According to the standards provided in the Public Recreation Plan, the 1,422 net new residents would require 5.69 acres to maintain the standard of four acres per 1,000 people. The City requires developers to

[201] *Los Angeles Recreation and Parks Department response, May 16, 2016.*

[202] *Los Angeles Recreation and Parks Department response, May 16, 2016.*

dedicate parkland or pay applicable fees (such as dwelling unit construction tax) in lieu of parkland dedication. Therefore, with payment of fees per the following regulatory compliance measures, impacts to parks and recreation centers from the Project would be less than significant.

Regulatory Compliance Measures

RCM-14-4 Recreation (Increased Demand for Parks or Recreational Facilities)

- (*Subdivision*) Pursuant to Section 17.12-A or 17.58 of the Los Angeles Municipal Code, the applicant shall pay the applicable Quimby fees for the construction of dwelling units.
- *(Apartments)* Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.
- *(Zone Change)* Pursuant to Section 12.33 of the Los Angeles Municipal Code, the applicant shall pay the applicable fees for the construction of dwelling units.

v) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project includes substantial employment or population growth that could generate a demand for other public facilities, such as libraries, which would exceed the capacity to service the project site. The City of Los Angeles Public Library (LAPL) provides library services throughout the City through its Central Library, 8 regional branches, and 64 community branches. The LAPL collection has 6.4 million books, magazines, electronic media, 120 online databases, and 34,000 e-books and related media.[203] On February 8, 2007, The Board of Library Commissioners approved a new Branch Facilities Plan. This Plan includes Criteria for new Libraries, which recommends new size standards for the provision of LAPL facilities – 12,500 square feet for communities with less than 45,000 people, 14,500 square feet for community with more than 45,000 people, and up to 20,000 square feet for a Regional branch. It also recommends that when a community reaches a population of 90,000, an additional branch library should be considered for the area. Table 3.14-5 describes the libraries that would serve the Project.

The Project would not directly necessitate the need for a new library facility. This is because the LAPL has indicated that there are no planned improvements to add capacity through expansion. There are no plans for the development of any other new libraries to serve this community. The LAPL uses the most recent Census figures to determine if a branch should be constructed in a given area. Employees do not typically frequent libraries during work hours, but are more likely to use facilities near their homes during non-work hours.

[203] *LAPL website: http://www.lapl.org/about-lapl/press/2012-library-facts.*

The *L.A. CEQA Thresholds Guide* considers features (on-site library facilities, direct support to LAPL) that would reduce the demand for library services. It is likely that the residents of the Project would have individual access to internet service, which provides information and research capabilities that studies have shown reduce demand at physical library locations.[204,205,206] Further, Measure L has provided funds to restore adequate services to the existing library system. For all of these reasons, it is not anticipated that the Project would result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios or other performance objectives for library services. Impacts to library service would be less than significant.

Table 3.14-5
Los Angeles Public Libraries

Name	Address	Size (sf)	Volumes/Circulation	Current Service	Staff
De Neve	2820 West 6th Street	9,273	34,538 / 119,340	85,581	9.0
Memorial	4625 West Olympic Boulevard	10,578	37,362 / 116,588	59,479	9.0
Washington-Irving	4117 West Washington	12,269	40,032 / 109,640	52,025	9.5
Pico Union	1030 South Alvarado Street	12,500	46,562 / 140,640	34,339	10.5
Pio Pico	694 South Oxford Avenue	20,000	77,712 / 253,807	83,534	10.5
Wilshire	149 North St Andrews Place	6,258	33,988 / 107,838	50,715	9.5

Staffing is full-time equivalent. Current Service – 2010 Census.
The LAPL does not make targeted projections but rather uses the most recent Census figures to determine if a branch should be constructed in a given area, according to the new Branch Facilities Plan.
Source: Written response from LAPL, June 24, 2016. Included in the Appendices.
Table: CAJA Environmental Services, September 2016.

[204] *"To Read or Not To Read", see pg. 10: "Literary reading declined significantly in a period of rising Internet use":* http://www.nea.gov/research/toread.pdf.

[205] *"How and Why Are Libraries Changing?" Denise A. Troll, Distinguished Fellow, Digital Library Federation:* http://old.diglib.org/use/whitepaper.htm.

[206] *"Use and Users of Electronic Library Resources: An Overview and Analysis of Recent Research Studies", Carol Tenopir:* http://www.clir.org/pubs/reports/pub120/contents.html.

15. RECREATION

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

Less Than Significant Impact. A significant impact may occur if a project would include substantial employment or population growth which could generate an increased demand for public park facilities that exceeds the capacities of existing parks and causes premature deterioration of the park facilities.

The Project would increase the number of residents and employees at the Project Site. Employees and do not typically frequent parks or recreation centers during work hours, but are more likely to use facilities near their homes during non-work hours. The nearby parks and the open space provided on the Site are discussed under Section 14.iv. Parks, above. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of Recreation and Park Fees, identified as a regulatory compliance measure, will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project includes the construction or expansion of park facilities and such construction would have a significant adverse effect on the environment. While the increased residents may lead to physical deterioration of facilities or accelerate deterioration, the payment of applicable Recreation and Park Fees (identified as **Regulatory Compliance Measure RCM-14-4)** will be used to offset the increased demand and provide a fund for future recreational facilities provided by the LADRP. Therefore, impacts will be less than significant.

16. TRANSPORTATION/TRAFFIC

This section is based on the following report and letters, included as Appendix K of this IS/MND:

K-1 Transportation Impact Analysis, Fehr & Peers, August 2016.

K-2 Approval Letter, LADOT, November 23, 2016.

a) Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for 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. A significant impact may occur if roadways and intersections that would carry project-generated traffic would exceed adopted City of Los Angeles Department of Transportation (LADOT) thresholds of significance.

Traffic Scenarios

Existing Conditions – The analysis of existing traffic conditions is intended to provide a basis for the remainder of the study. The existing conditions analysis includes a description of the transportation system serving the project site, existing traffic volumes, and an assessment of the operating conditions at the study analysis locations.

Existing plus Project Conditions – This traffic scenario provides projected traffic volumes and an assessment of operating conditions under existing conditions with the addition of Project-generated traffic. The impacts of the proposed Project on existing traffic operating conditions were then identified.

Future Base (Year 2020) Conditions – Future traffic projections without the Project were developed for the year 2020. The objective of this analysis was to project future traffic growth and operating conditions that could be expected to result from regional growth, related projects, and transportation network changes in the vicinity of the project site by the year 2020.

Future (Year 2020) plus Project Conditions – This traffic scenario provides projected traffic volumes and an assessment of operating conditions under future conditions with the addition of Project-generated traffic. The impacts of the proposed Project on future traffic operating conditions were then identified.

Study Locations

Fifteen signalized intersections, two stop-controlled intersections, and two local street segments were selected for analysis in consultation with LADOT.

Signalized Intersections

The following 15 signalized intersections, illustrated in Figure 1 (in Transportation Impact Analysis, Fehr & Peers, August 2016, included in the Appendices), were identified in conjunction with LADOT to be analyzed as part of the scope of work for this Project:

1. Wilton Place & Wilshire Boulevard

2. Wilton Place & 8th Street

3. St. Andrews Place & Wilshire Boulevard

4. Western Avenue & 3rd Street

5. Western Avenue & 6th Street

6. Western Avenue & Wilshire Boulevard

7. Western Avenue & 7th Street

8. Western Avenue & 8th Street

9. Western Avenue & Olympic Boulevard

10. Oxford Avenue & 6th Street

11. Oxford Avenue & Wilshire Boulevard

12. Oxford Avenue & 8th Street

13. Serrano Avenue & Wilshire Boulevard

14. Normandie Avenue & Wilshire Boulevard

15. Irolo Street & 8th Street

Unsignalized Analysis

The following 2 stop-controlled intersections, illustrated in Figure 1 (in Transportation Impact Analysis, Fehr & Peers, August 2016, included in the Appendices), were identified in conjunction with LADOT to be considered for signal warrant analyses:

- 7th Street & Oxford Avenue
- 7th Street & Serrano Avenue

Segment Analysis

The following 2 segments, illustrated in Figure 1(in Transportation Impact Analysis, Fehr & Peers, August 2016, included in the Appendices), were identified in conjunction with LADOT to be analyzed as part of the scope of work for this Project:

- Segment A. Oxford Avenue, south of 7th Street
- Segment B. Serrano Avenue, south of 7th Street

Existing Street System

Major arterials serving the study area include Wilton Place, Western Avenue, and Normandie Ave/Irolo St in the north/south direction and 3rd Street, 6th Street, Wilshire Boulevard, 8th Street, and Olympic Boulevard in the east/west direction. Interstate 10 lies approximately 2 miles south of the site and US-101 lies approximately 2 miles north of the site. Each of these interstates provides regional access to and from the study area. The characteristics of the major roadways serving the study area are described below. The street descriptions include the designation of the roadway under the Mobility Plan 2035 (Los Angeles Department of Planning, General Plan Mobility Element, May 2015) approved by the Los Angeles City Council in August 2015.

Freeways

Interstate 10 runs in an east/west direction and extends from the Pacific Ocean eastward through Los Angeles County and beyond. In the vicinity of the study area, the freeway provides four lanes in each direction plus auxiliary lanes. Ramps are provided at Western Avenue and Normandie Avenue.

US-101 runs in the southeast-northwest direction, extending from downtown Los Angeles through Hollywood and the San Fernando Valley and beyond. In the vicinity of the study area, the Hollywood freeway provides four lanes in each direction plus auxiliary lanes. Ramps are provided at Western Avenue, Santa Monica Boulevard, and Melrose Avenue.

East/West Streets

3rd Street is designated as an Avenue II in the City of Los Angles' Mobility Plan 2035 and runs in the north of the project site with two travel lanes in each direction within the project study area. Parking is permitted along portions of the roadway on both sides of the street. Left-turn pockets are present at major intersections. 3rd Street is part of the Bicycle Enhanced Network, the Moderate Transit Enhanced Network, and the pedestrian analysis segments.

4th Street is designated as a Collector Street that runs north of the project site with bike sharrows and one travel lane in each direction. Parking is permitted on both sides of the street. 4th Street is part of the Neighborhood Enhanced Network.

5th Street is designated as a Collector Street that runs north of the project site with one travel lane in each direction. Parking is permitted on both sides of the street.

6th Street is designated as an Avenue II that runs north of the project site with two travel lanes in each direction and with no on-street parking during peak hours. During non-peak hours, parking is permitted on both sides of the street during non-peak hours. Left-turn pockets are present at major intersections.

7th Street is designated as an Avenue II that runs south of the project site with one travel lane in each direction. Parking is permitted on both sides of the street and left-turn pockets are present at major intersections. Portions of 7th Street are part of the Neighborhood Enhanced Network and the pedestrian analysis segments.

8th Street is designated as an Avenue II that runs south of the project site with two travel lanes in each direction. Parking is generally permitted on both sides of the street and left-turn pockets are present at major intersections. A portion of 8th Street near the project site is part of the Neighborhood Enhanced Network and the pedestrian analysis segments.

9th Street/James M. Wood Boulevard is designated a Collector Street that runs south of the project site with one travel lane in each direction. Parking is permitted on both sides of the street. 9th Street/James M Wood Boulevard is part of the Neighborhood Enhanced Network, and the pedestrian analysis segments.

Olympic Boulevard is designated as a Boulevard II that runs south of the project site with three travel lanes in each direction during peak hours and with two travel lanes in each direction during non-peak hours. Parking is permitted on both sides of the street only during non-peak hours. Left-turn pockets are present at major intersections. Olympic Boulevard is part of the Vehicle Enhanced Network and the pedestrian analysis segments.

Wilshire Boulevard is designated as an Avenue I that runs north of the project site with two travel lanes in each direction and turn pockets are major intersections. An additional travel lane in each direction provides dedicated right-of-way for bus only lanes during peak hours. Parking is permitted on both sides of the street during non-peak period times. Wilshire Boulevard is part of the Tier 2 Bicycle Lane Network, the Comprehensive Transit Enhanced Network, and the pedestrian analysis segments.

North/South Streets

Harvard Boulevard is designated as a Collector Street that runs east of the project site. Parking is permitted on both sides of the street. In the study area, south of 4th Street, Harvard Boulevard is part of the Neighborhood Enhanced Network.

Irolo Street is designated as an Avenue III that runs east of the project site, south of Wilshire Boulevard with one travel lane in each direction. Parking is permitted on both sides of the street. Irolo Street is part of the pedestrian analysis segments.

Normandie Avenue is designated as an Avenue III that runs east of the project site, north of Wilshire Boulevard with two southbound travel lanes and one northbound travel lane during the AM peak period and one southbound travel lane and two northbound travel lanes during the PM peak period. Parking is prohibited along the east side of the street during the AM peak period and is prohibited along the west

side of the street during the PM peak period. Left-turn pockets are present at major intersections. In the study area, Normandie Avenue is part of the pedestrian analysis segments.

Oxford Avenue is designated a Collector Street that runs west of the project site with one lane in each direction. Parking is permitted on both sides of the street. Oxford Avenue is designated a pedestrian analysis segment.

Serrano Avenue is designated a Local Street that runs east of the project site with one lane in each direction. Parking is permitted on both sides of the street.

St Andrews Place is designated as a Collector Street that runs north of the project site with one travel lane in each direction. Parking is permitted on both sides of the street. In the study area, St. Andrews Place is designated a Neighborhood Enhanced Network.

Western Avenue is designated as an Avenue II that runs west of the project site with two travel lanes in each direction. South of 6th street, parking is generally only permitted on one side of the street. North of 6th street, parking is permitted on both sides of the street. Left-turn pockets are present at major intersections. Western Avenue is part of the pedestrian analysis segments.

Wilton Place is designated as an Avenue III that runs west of the project site with two travel lanes in each direction from 7 AM to 7 PM and with one travel lane in each direction from 7 PM to 7 AM. Parking is permitted on both sides of the street only from 7 PM to 7 AM. Left-turn pockets are present at major intersections. Wilton Place is part of the Tier 2 Bicycle Lane Network and the pedestrian analysis segments.

Existing Traffic Volumes And Level Of Service

Existing Traffic Volumes

New weekday AM and PM peak hour turning movement counts were collected at the study intersections on Thursday, March 17, 2016. The existing weekday morning and afternoon peak hour volumes at the study intersections are provided in Appendix B and count sheets for these intersections are contained in Appendix C (in Transportation Impact Analysis, Fehr & Peers, August 2016, included in the Appendices).

Level Of Service Methodology

A variety of standard methodologies are available to analyze LOS. According to Traffic Study Policies and Procedures (LADOT, August 2014), the analysis is required to use the Critical Movement Analysis (CMA) method of intersection capacity calculation (Transportation Research Board, 1980) to analyze signalized intersections in the City of Los Angeles. The V/C ratio is then used to find the corresponding LOS based on the definitions in Table 3.16-1. Under the CMA methodology, a V/C ratio is generated for each study intersection based on factors such as the volume of traffic and the number of lanes providing for such vehicle movement and an LOS grade.

For the driveway analysis, the Highway Capacity Manual (HCM) (Transportation Research Board, 2010) methodology was used to analyze the delay. Under HCM methodology, delay is calculated in seconds and given an LOS grade, as shown in Table 3.16-2.

Table 3.16-1
Level of Service Definitions for Intersections

LOS	V/C Ratio	Operating Conditions
A	0.00 - 0.60	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	> 0.60 – 0.70	VERY GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	> 0.70 – 0.80	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	> 0.80 – 0.90	FAIR. Delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups.
E	> 0.90 – 1.00	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	> 1.00	FAILURE. Backups from nearby locations or on cross streets may restrict or prevent movement of vehicles out of the intersection approaches. Tremendous delays with continuously increasing queue lengths.

Transportation Research Circular No. 212, Interim Materials on Highway Capacity, Transportation Research Board, 1980.
Source: Table 2A, Transportation Impact Analysis, Fehr & Peers, August 2016.
Table by CAJA Environmental Services, September 2016.

Table 3.16-2
Level of Service Definition for Stop-Controlled Intersections

Level of Service	Average Control Delay (seconds/vehicle)
A	≤ 10.0
B	> 10.0 ≤ 15.0
C	> 15.0 ≤ 25.0
D	> 25.0 ≤ 35.0
E	> 35.0 ≤ 50.0
F	> 50.0

Highway Capacity Manual, Transportation Research Board, 2010
Source: Table 2B, Transportation Impact Analysis, Fehr & Peers, August 2016.
Table by CAJA Environmental Services, September 2016.

The City of Los Angeles' Automated Traffic Surveillance and Control (ATSAC) system is a computer – based traffic signal control system that monitors traffic conditions and system performance to allow ATSAC operations to manage signal timing to improve traffic flow conditions. The Adaptive Traffic Control System (ATCS) is an enhancement to ATSAC and provides fully traffic-adaptive signal control based on real-time traffic conditions. All of the study intersections located in the City of Los Angeles are currently operating under the City's ATSAC system and ATCS control. ATSAC and ATCS provide

improved operating conditions. Therefore, in accordance with City of Los Angeles procedures, a credit of 0.07 V/C reduction was applied at each intersection where ATSAC is implemented and an additional 0.03 V/C reduction was applied at each intersection where ATCS is implemented.

Existing Levels Of Service

Existing year traffic volumes were analyzed using the intersection capacity analysis methodology described above to determine the existing operating conditions at the study intersections. Table 3.16-3 summarizes the results of the analysis of the existing weekday morning and afternoon peak hour V/C ratio and corresponding LOS at each of the analyzed intersections. As indicated, all of the 15 signalized intersections analyzed for impacts operate at LOS D or better during both peak periods.

Table 3.16-3
Existing Conditions Intersections Levels of Service

No.	Intersection	Peak Hour	Existing (2016)	
			V/C	LOS
1	Wilton Place & Wilshire Boulevard	AM	0.823	D
		PM	0.835	D
2	Wilton Place & 8th Street	AM	0.656	B
		PM	0.578	A
3	St. Andrews Place & Wilshire Boulevard	AM	0.722	C
		PM	0.775	C
4	Western Avenue & 3rd Street	AM	0.758	C
		PM	0.791	C
5	Western Avenue & 6th Street	AM	0.569	A
		PM	0.581	A
6	Western Avenue & Wilshire Boulevard	AM	0.832	D
		PM	0.799	C
7	Western Avenue & 7th Street	AM	0.407	A
		PM	0.463	A
8	Western Avenue & 8th Street	AM	0.562	A
		PM	0.623	B
9	Western Avenue & Olympic Boulevard	AM	0.799	C
		PM	0.856	D
10	Oxford Avenue & 6th Street	AM	0.547	A
		PM	0.599	A
11	Oxford Avenue & Wilshire Boulevard	AM	0.559	A
		PM	0.546	A
12	Oxford Avenue & 8th Street	AM	0.411	A
		PM	0.483	A
13	Serrano Avenue & Wilshire Boulevard	AM	0.532	A
		PM	0.526	A
14	Normandie Avenue & Wilshire Boulevard	AM	0.634	B
		PM	0.685	A

15	Irolo Street & 8th Street	AM PM	0.801 0.806	D D
Source: Table 3, Transportation Impact Analysis, Fehr & Peers, August 2016. *Table by CAJA Environmental Services, September 2016.*				

Project Traffic

Current accepted methodologies, such as the Institute of Transportation Engineers (ITE) Trip Generation methodology, are primarily based on data collected at suburban, single-use, freestanding sites. These defining characteristics limit their applicability to mixed-use or multi-use development projects, such as the Project, which is in a high density walkable urban setting with frequent and nearby local and regional transit service. The land use mix, design features, and setting of the proposed project include characteristics that influence travel behavior differently from typical single-use suburban developments. In order to estimate the project's trip generation within the context of the urban setting, a Main Street analysis was conducted, as detailed in Appendix E (in *Transportation Impact Analysis, Fehr & Peers, August 2016)*. The project trip generation accounts for the mix of uses provided in the project, the dense urban setting in which it is located, and the level of transit service provided in the area.

Project Trip Generation

The Main Street methodology as applied in this study starts by estimating the trip generation based on trip generation rates from Trip Generation, 9th Edition (Institute of Transportation Engineers [ITE], 2012) and then estimates reductions to account for trip internalization and external non-automobile trips. The Main Street methodology estimates that the proposed project would generate about 36-48% percent fewer trips than the unadjusted ITE data. Informed adjustments were made to the ITE trip generation based on the Main Street analysis to account for the improved density and diversity of land uses, pedestrian and bicycle connectivity, and transit service in the future. Internal trip credits can be defined as a reduction that can be applied to the trip generation estimates for individual land uses to account for trips internal to the site. These are trips usually made via walking within the site. Reflective of the travel behavior characteristics of the land uses in the Wilshire corridor as well as the Main Street analysis, a 15% internal credit was incorporated in the trip generation analysis. The Main Street analysis indicated a 35% reduction in project trips due to transit, walk, and bicycle to the project site. Consistent with the City of Los Angeles' Traffic Study Policies and Procedures, which state that developments above or adjacent to a Metro Rail, Metrolink, or Orange Line station, with convenient pedestrian access to the station may qualify for up to a 25% transit credit, the trip generation estimates incorporate a 25% transit credit. An additional 10% walk/bike credit was also applied as reflective of conditions at the project site as identified through the Main Street analysis.

Per LADOT's Traffic Study Policies and Procedures, Attachment I Policy on Pass-By Trips, pass-by credits were applied to portions of the development. A 50% pass-by credit was applied to the retail and fast-food restaurant uses, a 10% credit was applied to the quality restaurant uses, and a 20% pass-by credit was applied to the high turnover uses. Pass-by credits account for the patrons making an

intermediate stop on the way from an origin to a primary trip destination without a route diversion. These trips would be attracted from traffic passing the site on Wilshire Boulevard and other nearby streets.

Lastly, an existing credit was applied to the trip generation due to the internalization of the existing office uses with the new retail development. As the existing office building will remain on the property, be directly linked to the new retail/restaurant and residential uses via a pedestrian courtyard, and share the parking supply with the new uses, the office space was included in the internalization analysis. With the new uses on site, approximately 46 trips (41 inbound/5 outbound) during the AM peak hour and 44 trips (7 inbound/37 outbound) during the PM peak hour were estimated to no longer enter or leave the site by vehicle. As such, these trips were subtracted from the project's overall trip generation as an existing use credit.

As shown in Table 3.16-4, the project would generate an estimated net increase of 3,501 daily trips, including 201 trips (49 inbound/152 outbound) during the AM peak hour and 258 trips (178 inbound/80 outbound) during the PM peak hour.

Table 3.16-4
Trip Generation [a]

Description	ITE Land Use	Rate	Daily Traffic	AM Peak Hour			PM Peak Hour		
				In	Out	Total	In	Out	Total
Trip Generation Rates									
Retail	820	1,000 sf	42.70	62%	38%	0.96	48%	52%	3.71
Quality Restaurant	931	1,000 sf	89.95	50%	50%	0.81	67%	33%	7.49
High Turnover Sit Down Restaurant	932	1,000 sf	127.15	55%	45%	10.81	60%	40%	9.85
Fast Food Restaurant	933	1,000 sf	716	60%	40%	43.87	51%	49%	26.15
Residential Condominiums	230	DU	5.81	17%	83%	0.44	67%	33%	0.52
Proposed Project									
Retail	820	40,322 sf	1,722	24	15	39	72	78	150
Less Internal Capture [b]		15%	(258)	(4)	(2)	(6)	(11)	(12)	(23)
Less Transit Credit [c]		25%	(366)	(5)	(3)	(8)	(15)	(17)	(32)
Less Walk/Bike Credit		10%	(109)	(1)	(1)	(2)	(4)	(4)	(8)
Less Pass-by [d]		50%	(494)	(7)	(4)	(11)	(21)	(22)	(43)
Net External			495	7	5	12	21	23	44
Quality Restaurant	931	6,204 sf	558	3	2	5	31	15	46
Less Internal Capture [b]		15%	(84)	0	0	0	(5)	(2)	(7)
Less Transit Credit [c]		25%	(119)	(1)	(1)	(2)	(7)	(3)	(10)
Less Walk/Bike Credit		10%	(35)	0	0	0	(1)	(1)	(2)
Less Pass-by [d]		10%	(32)	0	0	0	(1)	0	(1)
Net External			288	2	1	3	17	9	26
High Turnover Sit Down Restaurant	932	12,407 sf	1,578	74	60	134	73	49	122
Less Internal Capture [b]		15%	(237)	(11)	(9)	(20)	(11)	(7)	(18)
Less Transit Credit [c]		25%	(335)	(16)	(13)	(29)	(16)	(11)	(27)
Less Walk/Bike Credit		10%	(100)	(4)	(3)	(7)	(4)	(3)	(7)
Less Pass-by [d]		20%	(181)	(8)	(7)	(15)	(8)	(5)	(13)

Net External			725	35	28	63	34	23	57
Fast Food Restaurant	933	3,102 sf	2,221	82	54	136	41	40	81
Less Internal Capture [b]		15%	(333)	(12)	(8)	(20)	(6)	(6)	(12)
Less Transit Credit [c]		25%	(472)	(18)	(12)	(30)	(9)	(9)	(18)
Less Walk/Bike Credit		10%	(141)	(5)	(3)	(8)	(2)	(2)	(4)
Less Pass-by [d]		50%	(637)	(23)	(15)	(38)	(12)	(11)	(23)
Net External			638	24	16	40	12	12	24
Residential Condominiums	230	506 du	2,940	38	185	223	176	87	263
Less Internal Capture [b]		15%	(441)	(6)	(28)	(34)	(26)	(13)	(39)
Less Transit Credit [c]		25%	(625)	(8)	(39)	(47)	(38)	(19)	(57)
Less Walk/Bike Credit		10%	(187)	(2)	(11)	(13)	(11)	(5)	(16)
Total Driveway			1,687	22	107	129	101	50	151
Total Project External Vehicle Trips			**3,833**	**90**	**157**	**247**	**185**	**117**	**302**
Existing Use Credit Office Space Internalization [e]			332	41	5	46	7	37	44
Total Driveway Trips			**7,049**	**362**	**215**	**577**	**271**	**365**	**636**
Net Incremental External Trips			**3,501**	**49**	**152**	**201**	**178**	**80**	**258**

Notes:

[a] Source: Institute of Transportation Engineers (ITE), Trip Generation, 9th Edition, 2012

[b] Internal capture represents the percentage of trips between land uses that occur within the site. Main Street model calibration of base ITE rates reflecting project & site specific characteristics.

[c] The transit credit is based on LADOT's Traffic Study Policies and Procedures, August 2014. The guidelines state that up to 25% transit credit may be taken for projects adjacent to a transit station or Rapid Bus stop.

[d] The pass-by credit is based on Attachment I of LADOT's Traffic Study Policies and Procedures, August 2014.

[e] The addition of the project land uses on site creates internalization opportunities with the existing office space where these trips were otherwise necessary. The office space internalization credit accounts for these trips no long being present with the project.

Source: Table 4, Transportation Impact Analysis, Fehr & Peers, August 2016.

Table by CAJA Environmental Services, September 2016.

Project Traffic Distribution

The geographic distribution of trips generated by the proposed project is dependent on characteristics of the street system serving the project site; the level of accessibility of routes to and from the project site; locations of employment and commercial centers to which residents of the project would be drawn; and residential areas from which the office employees and other commercial visitors would be drawn. A select zone analysis was conducted for the proposed uses using the City of Los Angeles' Travel Demand Model to inform the general distribution pattern for this study. The distribution of project trips is illustrated in Figure 5 (in *Transportation Impact Analysis, Fehr & Peers, August 2016)*.

Project Traffic Assignment

The traffic to be generated by the Project was assigned to the street network using the distribution pattern described in Figure 5 (in *Transportation Impact Analysis, Fehr & Peers, August 2016)*. Appendix B (in *Transportation Impact Analysis, Fehr & Peers, August 2016)* provides the assignment of the Project

generated peak hour traffic volumes at the analyzed intersections during the AM and PM peak hours. The assignment of traffic volumes took into consideration the locations of the proposed project driveways on Oxford Avenue and Serrano Avenue.

Existing Plus Project Traffic Conditions

The Project traffic estimated and assigned to the study intersections was added to the existing traffic volumes to estimate existing plus project traffic volumes. Turning movement traffic volumes for the Existing plus Project scenario are provided in Appendix B. Analysis sheets are provided in Appendix D (in *Transportation Impact Analysis, Fehr & Peers, August 2016)*.

Future Year 2020 Traffic Conditions

To evaluate the potential impacts of the proposed project on future (Year 2020) conditions, it was necessary to develop estimates of future traffic conditions in the area both without and with Project traffic. First, estimates of traffic growth were developed for the study area to forecast future conditions without the Project. These forecasts included traffic increases as a result of both regional ambient traffic growth and traffic generated by specific developments in the vicinity of the Project (related projects). These projected traffic volumes, identified herein as the Future Base conditions, represent the future conditions without the proposed Project. The traffic generated by the proposed Project was then estimated and assigned to the surrounding street system. Project traffic was added to the Future Base conditions to form Future (year 2020) plus Project traffic conditions, which were analyzed to determine the incremental traffic impacts attributable to the Project itself.

Background Or Ambient Growth

Based on historic trends and at the direction of LADOT, it was established that an ambient growth factor of 1% per year should be applied to adjust the existing base year traffic volumes to reflect the effects of regional growth and development by year 2020. This adjustment was applied to the existing (year 2016) traffic volume data to reflect the effect of ambient growth by the year 2020.

Related Project Traffic Generation And Assignment

Future Base traffic forecasts include the effects of known specific projects, called related projects, expected to be implemented in the vicinity of the proposed project site prior to the buildout date of the Project. The list of related projects was prepared based on data from LADOT. A total of 75 cumulative projects were identified in the study area; these projects are listed in Table 5 and illustrated in Figure 6 (both in *Transportation Impact Analysis, Fehr & Peers, August 2016)*. Based on information from the office building owner, at the time the traffic counts were collected, 192,223 square feet of the existing office building space was leased to tenants, representing approximately 65% of the building space. The full occupancy of the office building was included as a related project for the future year analysis to account for the potential additional traffic at the site. As such, the entire trip generation for the site was incorporated into the future year analysis.

Transportation Infrastructure Projects

There are no infrastructure changes in the study area planned for implementation by year 2020 per confirmation by City staff. Therefore, network changes were not included in the analysis.

Future Year 2020 Base Traffic Volumes

Future Plus Project Traffic Projections

The Project traffic volumes were added to the year 2020 Future Base traffic projections, resulting in Future (year 2020) plus Project AM and PM peak hour traffic volumes. The Future (year 2020) plus Project scenario presents future traffic conditions with the completion of the Project.

Intersection Traffic Impact Analysis

The traffic impact analysis evaluates the projected LOS at each study intersection under the Existing plus Project and Future (year 2020) plus Project conditions to estimate the incremental increase in the V/C ratio caused by the proposed Project. This provides the information needed to assess the potential impact of the project using significance criteria established by LADOT.

Criteria For Determination Of Significant Traffic Impact

The City of Los Angeles has established threshold criteria to determine significant traffic impact of a proposed project in its jurisdiction. Under the LADOT guidelines, an intersection would be significantly impacted with an increase in V/C ratio equal to or greater than 0.04 for intersections operating at LOS C, equal to or greater than 0.02 for intersections operating at LOS D, and equal to or greater than 0.01 for intersections operating at LOS E or F after the addition of project traffic. Intersections operating at LOS A or B after the addition of the project traffic are not considered significantly impacted regardless of the increase in V/C ratio. Table 3.16-5 summarizes the impact criteria:

Table 3.16-5
Significant Impact Criteria, City of Los Angeles

Intersection Conditions with Project Traffic		Significant Impact Threshold for Project-related Increase in V/C Ratio
LOS	V/C	
C	> 0.700 – 0.800	Equal to or greater than 0.040
D	>0.800 – 0.900	Equal to or greater than 0.020
E and F	> 0.901	Equal to or greater than 0.010

Source: City of Los Angeles.
Table by CAJA Environmental Services, September 2016.

Existing Plus Project Impact Analysis

The existing plus project traffic volumes were analyzed to determine the projected V/C ratios and LOS for each of the analyzed intersections under this scenario. Table 3.16-6 summarizes the Existing plus

Project LOS. All 15 signalized intersections are projected to operate at LOS D or better during both peak hours. After applying the aforementioned City of Los Angeles significant impact criteria, it is determined that the Project would not result in significant impacts under Existing plus Project conditions at any of the study intersections.

Table 3.16-6
Existing + Project Intersection Levels of Service and Impact Analysis

No.	Intersection	Peak Hour	Existing		Existing + Project			Significant Impact
			V/C	LOS	V/C	LOS	V/C Increase	
1	Wilton Place & Wilshire Boulevard	AM	0.823	D	0.827	D	0.004	No
		PM	0.835	D	0.840	D	0.005	No
2	Wilton Place & 8th Street	AM	0.656	B	0.659	B	0.003	No
		PM	0.578	A	0.582	A	0.004	No
3	St. Andrews Place & Wilshire Boulevard	AM	0.722	C	0.725	C	0.003	No
		PM	0.775	C	0.785	C	0.010	No
4	Western Avenue & 3rd Street	AM	0.758	C	0.760	C	0.002	No
		PM	0.791	C	0.796	C	0.005	No
5	Western Avenue & 6th Street	AM	0.569	A	0.575	A	0.006	No
		PM	0.581	A	0.585	A	0.004	No
6	Western Avenue & Wilshire Boulevard	AM	0.832	D	0.837	D	0.005	No
		PM	0.799	C	0.808	D	0.009	No
7	Western Avenue & 7th Street	AM	0.407	A	0.415	A	0.008	No
		PM	0.463	A	0.475	A	0.012	No
8	Western Avenue & 8th Street	AM	0.562	A	0.564	A	0.002	No
		PM	0.623	B	0.629	B	0.006	No
9	Western Avenue & Olympic Boulevard	AM	0.799	C	0.802	D	0.003	No
		PM	0.856	D	0.862	D	0.006	No
10	Oxford Avenue & 6th Street	AM	0.547	A	0.552	A	0.005	No
		PM	0.599	A	0.611	B	0.012	No
11	Oxford Avenue & Wilshire Boulevard	AM	0.559	A	0.570	A	0.011	No
		PM	0.546	A	0.573	A	0.027	No
12	Oxford Avenue & 8th Street	AM	0.411	A	0.417	A	0.006	No
		PM	0.483	A	0.493	A	0.010	No
13	Serrano Avenue & Wilshire Boulevard	AM	0.532	A	0.579	A	0.047	No
		PM	0.526	A	0.563	A	0.038	No
14	Normandie Avenue & Wilshire Boulevard	AM	0.634	B	0.641	B	0.007	No
		PM	0.685	A	0.695	B	0.010	No
15	Irolo Street & 8th Street	AM	0.801	D	0.803	D	0.002	No
		PM	0.806	D	0.810	D	0.004	No

Source: Table 6, Transportation Impact Analysis, Fehr & Peers, August 2016.
Table by CAJA Environmental Services, September 2016.

Future Plus Project Impact Analysis

The year 2020 Future Base peak hour traffic volumes were analyzed to determine the projected V/C ratio and LOS for each of the analyzed intersections. Table 3.16-7 summarizes the future LOS. Nine of the 15 signalized intersections analyzed for impacts are projected to operate at LOS D or better during the morning and afternoon peak hours under Future Base conditions. The following six intersections are projected to operate at LOS E or worse during one or both of the peak hours under Future Base conditions:

1. Wilton Place & Wilshire Boulevard (LOS E during AM and PM)

4. Western Avenue & 3rd Street (LOS D during AM and LOS E during PM)

6. Western Avenue & Wilshire Boulevard (LOS E during AM and PM)

9. Western Avenue & Olympic Boulevard (LOS E during AM and LOS F during PM)

14. Normandie Avenue & Wilshire Boulevard (LOS C during AM and LOS E during PM)

15. Irolo Street & 8th Street (LOS F during AM and PM)

Future Plus Project Traffic Conditions

The resulting Future (year 2020) plus Project peak hour traffic volumes, were analyzed to determine the projected future operating conditions with the addition of the Project traffic. The results of the Future (year 2020) plus Project analysis are also presented in Table 3.16-7. Nine of the 15 signalized intersections analyzed for impacts are projected to operate at LOS D or better during the morning and afternoon peak hours under Future (year 2020) plus Project conditions. The following six intersections are projected to operate at LOS E or worse during one or both of the peak hours under Future (year 2020) plus Project conditions:

1. Wilton Place & Wilshire Boulevard (LOS E during AM and PM)

4. Western Avenue & 3rd Street (LOS D during AM and LOS E during PM)

6. Western Avenue & Wilshire Boulevard (LOS F during AM and LOS E during PM)

9. Western Avenue & Olympic Boulevard (LOS E during AM and LOS F during PM)

14. Normandie Avenue & Wilshire Boulevard (LOS C during AM and LOS E during PM)

15. Irolo Street & 8th Street (LOS F during AM and PM)

Future (Year 2020) Plus Project Intersection Impacts

As shown in Table 3.16-7, using the criteria for determination of significant impacts, it is determined that the Project would not result in significant impacts under Future (year 2020) plus Project conditions.

Table 3.16-7
Future + Project Intersection Levels of Service and Impact Analysis

No.	Intersection	Peak Hour	Future		Future + Project			Significant Impact
			V/C	LOS	V/C	LOS	V/C Increase	
1	Wilton Place & Wilshire Boulevard	AM	0.925	E	0.929	E	0.004	No
		PM	0.948	E	0.953	E	0.005	No
2	Wilton Place & 8th Street	AM	0.748	C	0.751	C	0.003	No
		PM	0.661	B	0.665	B	0.004	No
3	St. Andrews Place & Wilshire Boulevard	AM	0.834	D	0.839	D	0.005	No
		PM	0.887	D	0.896	D	0.009	No
4	Western Avenue & 3rd Street	AM	0.887	D	0.893	D	0.006	No
		PM	0.931	E	0.936	E	0.005	No
5	Western Avenue & 6th Street	AM	0.693	B	0.699	B	0.006	No
		PM	0.711	C	0.716	C	0.005	No
6	Western Avenue & Wilshire Boulevard	AM	0.997	E	1.003	F	0.006	No
		PM	0.978	E	0.986	E	0.008	No
7	Western Avenue & 7th Street	AM	0.503	A	0.511	A	0.008	No
		PM	0.578	A	0.593	A	0.015	No
8	Western Avenue & 8th Street	AM	0.728	C	0.731	C	0.003	No
		PM	0.853	D	0.860	D	0.007	No
9	Western Avenue & Olympic Boulevard	AM	0.982	E	0.984	E	0.002	No
		PM	1.093	F	1.099	F	0.006	No
10	Oxford Avenue & 6th Street	AM	0.637	B	0.643	B	0.006	No
		PM	0.690	B	0.702	C	0.012	No
11	Oxford Avenue & Wilshire Boulevard	AM	0.645	B	0.655	B	0.010	No
		PM	0.656	B	0.683	B	0.027	No
12	Oxford Avenue & 8th Street	AM	0.560	A	0.567	A	0.007	No
		PM	0.604	B	0.615	B	0.011	No
13	Serrano Avenue & Wilshire Boulevard	AM	0.617	B	0.662	B	0.045	No
		PM	0.645	B	0.683	B	0.038	No
14	Normandie Avenue & Wilshire Boulevard	AM	0.774	C	0.780	C	0.006	No
		PM	0.918	E	0.927	E	0.009	No
15	Irolo Street & 8th Street	AM	1.019	F	1.021	F	0.002	No
		PM	1.055	F	1.063	F	0.008	No

Source: Table 7, Transportation Impact Analysis, Fehr & Peers, August 2016.
Table by CAJA Environmental Services, September 2016.

Unsignalized Intersection Signal Warrant Analysis

Two intersections near the project site are currently unsignalized, Oxford Avenue & 7th Street and Serrano Avenue & 7th Street. The City of Los Angeles traffic analysis methodology and significance criteria are for signalized intersections only. The City does not provide impact thresholds for unsignalized intersections. Rather, the LADOT Traffic Study Policies & Procedures states that "unsignalized intersections should be evaluated solely to determine the need for the installation of a traffic signal or other traffic control device." Traffic volumes and lane configurations were used to prepare the signal warrant analysis at the Oxford Avenue & 7th Street and Serrano Avenue & 7th Street unsignalized intersections under existing, existing plus project, future base, and future plus project conditions. As shown in Table 3.16-8, both intersections met the signal warrant thresholds during the PM peak hour under all analysis scenarios. During the AM peak hour, the intersections meet the signal warrants for Future Year and Future plus Project conditions.

Table 3.16-8
Peak Hour Signal Warrant Analysis

No.	Intersection	Peak Hour	Signal Warrant Met?			
			Existing	Existing + Project	Cumulative	Cumulative + Project
A	Oxford and 7th	AM	No	No	Yes	Yes
		PM	Yes	Yes	Yes	Yes
B	Serrano And 7th	AM	No	No	No	No
		PM	Yes	Yes	Yes	Yes

Source: Table 8, Transportation Impact Analysis, Fehr & Peers, August 2016.
Table by CAJA Environmental Services, September 2016.

Transportation Demand Management Plan

A transportation demand management (TDM) program will be prepared as part of the project, even though mitigations would not be required as significant impacts were not identified at study area intersections. Several TDM program elements are project features proposed for implementation. Other TDM program elements would be developed in the preparation of a detailed TDM plan.

TDM Project Design Features

Several project design features would be expected to enhance the usage of walking, biking, and transit modes as alternatives to the automobile, including:

- Site Design – The site will be designed to encourage walking, biking, and transit. Amenities would include:
  - New sidewalks and street trees along the perimeter
  - Improved street and pedestrian lighting
  - Pedestrian walkways through the site including an open-air courtyard

Potential Additional TDM Program Elements

A TDM plan that will detail additional program elements beyond the site design features described above will be prepared. Additional TDM program elements could include unbundled parking, rideshare programs and discounted transit passes, although the exact measures to be implemented will be determined when the plan is prepared.

Unbundled Parking – Unbundling parking typically separates the cost of purchasing or renting parking spaces from the cost of the purchasing or renting a dwelling unit. Saving money on a dwelling unit by forgoing a parking space acts as an incentive that minimizes auto ownership. Similarly, paying for parking (by purchasing or leasing a space) acts as a disincentive that discourages auto ownership and trip-making. The research literature shows that unbundled parking costs can reduce VMT by up to 13% (CAPCOA, 2010).

Rideshare Programs – Rideshare programs typically include the provision of an on-site transit and\ rideshare information center that provides assistance to help people form carpools or access transit alternatives. Rideshare programs often also include priority parking for carpools. The research literature shows that rideshare programs can reduce commuting VMT by up to 15% (CAPCOA, 2010).

Transit Pass Discount Program – Transit pass discount programs are typically negotiated with transit service providers to purchase transit passes in bulk, and therefore at a discounted rate. Discounted passes are then sold to interested residents or employees, helping them to obtain price discounts through the economies of scale of bulk purchasing. The research literature shows that discounted transit passes can reduce commuting VMT by up to 20% (CAPCOA, 2010).

Bicycle Parking and Bike Share Program – The project will provide both long term and short term bicycle parking as well as bicycle showers and lockers for employees per the Los Angeles Municipal Code (LAMC). In addition, the project could provide complementary amenities such as a self-service bike repair area, and potentially a bike share service among residents, employees and visitors of the site.

Car Share Program – The project could allow space for a car share service within its proposed parking facilities. A car share program is a model of car rental where people rent cars for short periods of time, often by the hour. The programs are attractive to customers who make only occasional use of a vehicle, as well as others who would like occasional access to a vehicle of a different type than they use day-to-day.

Upgrade to Transit Amenities – The project, in conjunction with Los Angeles Metropolitan Transportation Authority and Los Angeles Department of Transportation, could identify nearby bus-stops to upgrade stop location to further encourage the use of transit within the area. While the overall reduction in trips due to these TDM measures could be high, to maintain a conservative approach, a TDM credit was not applied to the incremental V/C increase attributable to the project.

Neighborhood Traffic Impact Analysis

This chapter presents the results of an analysis conducted regarding the potential for Project impacts on local residential streets in neighborhoods near the Project. The analysis was conducted on two residential street segments to the south of 7th Street and the project site on Oxford Avenue and Serrano Avenue. These streets were selected in conjunction with the City of Los Angeles, as they were determined to have a greater likelihood of neighborhood cut-through traffic from the Project. The significance of potential impacts was assessed using criteria established by the City of Los Angeles. 24-hour machine counts were conducted on the two analyzed street segments in March 2016. Future daily traffic volumes were projected in a manner similar to the peak hour analysis of the study intersections, including both ambient growth at 1% per year as well as anticipated traffic from cumulative projects that could be constructed by 2020. The net new Project trips were assigned to the street network based on the Project trip distribution pattern and were added to the future base projection to obtain future plus project projections.

Under the City of Los Angeles guidelines, a project impact on a local residential street would be considered significant if the new commercial trips generated by the project result in increases in average daily traffic (ADT) volumes as shown in Table 3.16-9. Daily traffic volumes for the existing and projected future conditions are summarized in Table 3.16-10 and 3.16-11. As shown, the Project would not result in a significant impact at any of the study neighborhood street segments.

Table 3.16-9
Neighborhood Street Impacts

Projected ADT with Project (Final ADT)	Project-related Increase in ADT
0 to 999	120 or more
1,000 to 1,999	12% or more of final ADT
2,000 to 2,999	10% or more of final ADT
3,000 or more	8% or more of final ADT

Table by CAJA Environmental Services, September 2016.

Table 3.16-10
Neighborhood Street Impact Analysis - Existing

Street Segment	Weekday Two-way Daily	With Project Impact Analysis				
	Existing Base	Commercial Project Only	Existing + Project	Project % Increase	Impact Criteria [a]	Significant Impact?
Oxford south of 7th	7,724	215	7,939	2.7%	8%	No
Serrano south of 7th	4,024	239	4,263	5.6%	8%	No

[a] Uses City of Los Angeles impact criteria for residential street segments.
Source: Table 9, Transportation Impact Analysis, Fehr & Peers, August 2016.
Table by CAJA Environmental Services, September 2016.

Table 3.16-11
Neighborhood Street Impact Analysis - Cumulative

Street Segment	Weekday Two-way Daily		With Project Impact Analysis				
	Existing Base	Cumulative Base	Commercial Project Only	Cumulative + Project	Project % Increase	Impact Criteria [a]	Significant Impact?
Oxford south of 7th	7,724	8,321	215	8,536	2.5%	8%	No
Serrano south of 7th	4,024	4.685	239	4,924	4.9%	8%	No

[a] Uses City of Los Angeles impact criteria for residential street segments.
Source: Table 10, Transportation Impact Analysis, Fehr & Peers, August 2016.
Table by CAJA Environmental Services, September 2016.

Construction Impact

LADOT generally considers construction-related traffic to cause adverse but not significant impacts because, while sometimes inconvenient, construction-related traffic effects are temporary. LADOT requires implementation of worksite traffic control plans to ensure that any construction-related effects are minimized to the greatest extent possible. The LA CEQA Thresholds Guide provides four categories to be considered in regards to in-street construction impacts: temporary traffic impacts, temporary loss of access, temporary loss of bus stops or rerouting of bus lines, and temporary loss of on-street parking (LA CEQA Threshold Guide, pages L.8-2 through L.8-4).

The LA CEQA Thresholds Guide provides four categories to be considered in regards to in-street construction impacts. The factors to be considered in each of these categories, and the assessment of the project against these factors, is presented in Table 3.16-12.

Table 3.16-12
Construction Impact Significance Factors

Significance Factor	Assessment	Conclusion
Temporary Traffic Impacts:		
The length of time of temporary street closures or closures of two or more traffic lanes;	Temporary street closures or closures of two or more traffic lanes are not anticipated.	Less than significant
The classification of the street (major arterial, state highway) affected;	The streets affected by any temporary lane or sidewalk closures (Oxford Avenue and Serrano Avenue) are a collector street and local street, respectively.	
The existing traffic levels and LOS on the affected street segments and intersections;	The Oxford/Wilshire and Serrano/Wilshire intersections currently operates at LOS A during both peak periods. Oxford/Wilshire operates at LOS B during both peak periods under cumulative. Serrano/Wilshire operates at LOS B (AM) and LOS C (PM) under cumulative.	
Whether the affected street directly leads to a freeway on- or off-ramp or other state highway;	None of the affected streets directly lead to a freeway on- or off-ramp or other state highways.	
Potential safety issues involved with street or lane closures;	Worksite traffic control plans would be prepared for any temporary lane closures in accordance	

	with applicable City and MUTCD guidelines.	
The presence of emergency services (fire, hospital, etc.) located nearby that regularly use the affected street.	There are no emergency services located within the immediate vicinity of the affected streets.	
Temporary Loss of Access:		
The length of time of any loss of vehicular or pedestrian access to a parcel fronting the construction area;	Blockage of existing vehicle or pedestrian access to parcels fronting the construction area is not anticipated. Access to the office building and parking structure will remain throughout construction.	Less than significant
The availability of alternative vehicular or pedestrian access within ¼ mile of the lost access;		
The type of land uses affected, and related safety, convenience, and/or economic issues.		
Temporary Loss of Bus Stops or Rerouting of Bus Lines:		
The length of time that an existing bus stop would be unavailable or that existing service would be interrupted;	There are no bus stops along the Oxford Avenue and Serrano Avenue along the project frontage. In addition, there is one bus lane on the south side of Wilshire Boulevard, but there are no bus stops on Wilshire Boulevard along the Project frontage. As lane closures are not anticipated along Wilshire Boulevard, project construction would not require blockage of the bus lane.	Less than significant
The availability of a nearby location (within ¼ mile) to which the bus stop or route can be temporarily relocated;		
The existence of other bus stops or routes with similar routes/ destinations within ¼ mile radius of the affected stops or routes;		
Whether the interruption would occur on a weekday, weekend or holiday, and whether the existing bus route typically provides service that/those day(s).		
Temporary Loss of On-Street Parking:		
The current utilization of existing on-street parking;	The Project could require temporary removal of on-street parking spaces along the Project frontages on Oxford Avenue and Serrano Avenue to accommodate temporary truck staging or travel lanes. The precise amount of spaces and duration of removal is unknown at this time. Public transit options are available within 1/4 mile of the Project site, including: Metro Purple Line Wilshire/Western Station and rapid and local bus routes on 6th Street, 8th Street, 9th Street, and Wilshire.	Less than significant in accordance with SB 743/Public Resources Code Section 21099.
The availability of alternative parking locations or public transit options (e.g. bus, train) within ¼ mile of the project site;		
The length of time that existing parking spaces would be unavailable.		

Note: SB 743 as implemented in California Public Resources Code Section 21099 provides that parking impacts of a residential, mixed- use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. This guidance supersedes the significance guidance in the LA CEQA Threshold Guide.
Source: Table 17, Transportation Impact Analysis, Fehr & Peers, August 2016.
Table by CAJA Environmental Services, September 2016.

Construction Worker Parking

During the demolition/excavation phase and the first portion of the building construction while the parking garage is under construction, it is anticipated that construction employees would be parked in the 3550 Wilshire parking lot directly next to the project site. Once the subterranean parking structure component of the Project is complete, construction workers would also be parked in the additional spaces in the garage.

Temporary Traffic Impacts

Full-time closures to the sidewalk and parking lane are anticipated for the project along Oxford Avenue and Serrano Avenue. Oxford Avenue is classified as a collector street and Serrano Avenue is classified as a local street. In addition, there are no emergency services located within the immediate vicinity of the affected streets. Since the closures during construction would be for the parking lane, the temporary construction impacts on the roadway network would be considered less than significant.

The sidewalks along Oxford Avenue and Serrano Avenue fronting the project construction will be closed for the duration of the project. Sidewalk and lane closures are not anticipated along Wilshire Boulevard. The sidewalk on the west side of Oxford Avenue and east side of Serrano Avenue will be open and pedestrians are anticipated to use this as a detour throughout construction. As such, the temporary impacts to pedestrians during construction would be less than significant.

The intersections of Oxford Avenue & Wilshire Boulevard operates at LOS A during both peak hours under existing conditions, and would operate at LOS B during the both peak hours under cumulative conditions. The intersections of Serrano Avenue & Wilshire Boulevard operates at LOS A during both peak hours under existing conditions, and would operate at LOS B in the AM peak hour and LOS C during the PM peak hour under cumulative conditions. Worksite traffic control plans would be prepared for any temporary vehicle lane, bicycle lane, or sidewalk closures in accordance with applicable City and MUTCD guidelines.

Temporary Loss Of Access

The existing office building located directly south of the construction site will remain open throughout construction. In addition, the parking garage will remain open during construction as well providing parking for both the office building tenants and the construction workers. Pedestrian and vehicular access to properties located to the east and west of the project site will be open and unobstructed for the duration of construction. Since the Project construction would not block any vehicle or pedestrian access to other parcels fronting the construction area, impacts would be less than significant.

Temporary Loss Of Bus Stops Or Rerouting Of Bus Lines

Bus stops are not located along Oxford Avenue or Serrano Avenue where the parking lane closures would occur. A bus only lane is located on the south side of Wilshire Boulevard adjacent to the project site and a bus stop is present directly west of Commonwealth Avenue, but construction will not affect bus

operations as there are no bus stops on Wilshire Boulevard along the Project frontage and closures along Wilshire Boulevard are not anticipated. Therefore, the project construction would not require relocation of bus stops and the construction impacts on transit operations would be less than significant.

Temporary Loss Of On-Street Parking

With the lane closures, construction would require temporary removal of on-street parking spaces along the project frontages of Oxford Avenue and Serrano Avenue to accommodate the construction area footprint and/or temporary truck staging. The precise amount of spaces is unknown at this time, but could extend for the entire duration of construction, 31 months. Per the provisions in the California Public Resources Code Section 21099, which implements SB 743, parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. As such, temporary parking impacts would be less than significant.

Construction Period Trip Generation

Based on the aforementioned information, a construction period trip generation analysis was conducted for each phase of construction to estimate daily, morning and evening peak hour passenger car equivalent (PCE) trips. Construction workers often travel to and from a worksite outside of the typical peak commute hours. For the purpose of the analysis, it was assumed that up to 40% of the construction workers will arrive during the peak morning commute hour and 40% will depart during the peak evening commute hour. Haul and delivery/equipment trucks were assumed to occur evening throughout the 11-hour construction day. A PCE factor of 2.5 was assumed for haul trucks assuming the use of double-belly trailer trucks and a PCE factor of 2.0 was used for delivery trucks.

Table 3.16-13 shows a summary of construction period trip generation under each phase of construction. As shown, on a peak construction activity day, a total of up to 82 daily PCE trips are estimated to occur under Phase 1 (demolition and excavation), of which 8 PCE trips would occur during each of the morning and evening peak hours. Phase 2 (construction, finishing) is estimated to generate a total of 452 daily PCE trips on a day with peak construction activity, of which 82 PCE trips are estimated to occur during each of the morning and evening peak hours.

At any given time, the peak construction activity is estimated to generate fewer daily and peak hour trips than are projected for the Project once it is completed and occupied (3,501 daily trips, 201 AM peak hour trips, and 258 PM peak hour trips). Although significant construction impacts are not anticipated, the influx of this material and equipment could create less than significant impacts on the adjacent roadway network based on the following considerations:

- There may be intermittent periods when large numbers of material deliveries are required, such as when concrete trucks will be needed for the parking garage and the buildings.

- Some of the materials and equipment could require the use of large trucks (18-wheelers), which could create additional congestion on the adjacent roadways.

- Delivery vehicles may need to park temporarily on adjacent roadways as they deliver their items. Based on past experience, it is not uncommon for these types of deliveries to result in temporary lane closures.

Table 3.16-13
Construction Period Trip Generation

Phase	Daily PCE Trips [1]	Morning Peak			Evening Peak		
		In	Out	Total	In	Out	Total
Demolition and Site Preparation							
Construction Worker trips [2]	12	2	0	2	0	2	2
Haul Truck Trips [3]	70	3	3	6	3	3	6
Delivery/Equipment Truck Trips [3]	0	0	0	0	0	0	0
Phase 1 Total	**82**	**5**	**3**	**8**	**3**	**5**	**8**
Construction							
Construction Worker trips [2]	372	74	0	74	0	74	74
Haul Truck Trips [3]	0	0	0	0	0	0	0
Delivery/Equipment Truck Trips [3]	80	4	4	8	4	4	8
Phase 2 Total	**452**	**78**	**4**	**82**	**4**	**78**	**82**

PCE - Passenger car equivalent
Notes:
[1] - Daily trips were calculated by counting two trips, one inbound and one outbound trip for each vehicle
[2] - Up to 40% of the construction workers were assumed to arrive during the morning peak hour of adjacent street traffic. A total of up to 40% worker were assumed to depart during the evening peak hour.
[3] - Daily haul, delivery/equipment, and trash truck trips were assumed to occur evenly throughout an 11-hour construction day.
Therefore, the daily truck trips were divided by 11 hours to calculate morning and evening peak hour truck trips.
Source: Table 18, Transportation Impact Analysis, Fehr & Peers, August 2016.
Table by CAJA Environmental Services, September 2016.

Construction Project Design Features

As shown in Table 3.16-12, impacts related to construction traffic were found to be less than significant. In addition, the peak construction activity will generate fewer daily and peak hour trips than are projected for the project once it is completed and occupied. While mitigation measures are not required to mitigate significant impacts, to be conservative a Construction Traffic Management Plan and Construction Worker Parking Plan should be implemented (see **PDF-16-1**).

Conclusion

The LOS analysis for the Existing plus Project and Future plus Project determined that the Project would not result in significant impacts at study area intersections. Therefore, no mitigation measures are required.

LADOT Review and Approval

LADOT reviewed the traffic study and issued an approval letter on November 23, 2016 (included as Appendix K-2 to this MND). The results of the traffic analysis, which accounted for other known development projects in evaluating potential cumulative impacts, adequately evaluated the project's traffic impacts on the surrounding community. The Project would follow the conditions of the approval letter, as described in **RCM-16-1**. The LADOT letter also provided some additional requirements for a traffic signal warrant analysis for the intersections of Oxford Avenue and 7th Street and of Serrano Avenue and 7th Street. See **PDF-16-2**.

Project Design Features

PDF-16-1 A Construction Traffic Management Plan will be developed by the contractor and approved by the City of Los Angeles to alleviate construction period impacts, which may include but is not limited to the following measures:

- Provide off-site truck staging in a legal area furnished by the construction truck contractor.
- Anticipated truck access to the project site will be off Oxford Avenue and Serrano Avenue.
- Schedule deliveries and pick-ups of construction materials during non-peak travel periods to the extent possible and coordinate to reduce the potential of trucks waiting to load or unload for protracted periods.
- As one parking lane and/or sidewalk closures are anticipated, worksite traffic control plan(s), approved by the City of Los Angeles, should be implemented to route vehicular traffic, bicyclists, and pedestrians around any such closures.
- Establish requirements for loading/unloading and storage of materials on the project site, where parking spaces would be encumbered, length of time traffic travel lanes can be encumbered, sidewalk closings or pedestrian diversions to ensure the safety of the pedestrian and access to local businesses and residences.
- Ensure that access will remain unobstructed for land uses in proximity to the project site during project construction.
- Coordinate with the City and emergency service providers to ensure adequate access is maintained to the project site and neighboring businesses and residences.

A Construction Worker Parking Plan will also be developed by the contractor and approved by the City of Los Angeles to ensure that the parking location requirements for construction workers will be strictly enforced. These could include but are not limited to the following measures:

- During construction activities when construction worker parking cannot be accommodated on the project site, the plan shall identify alternate parking location(s) for construction workers and the method of transportation to and from the project site (if beyond walking distance) for approval by the City 30 days prior to commencement of construction.

- Provide all construction contractors with written information on where their workers and their subcontractors are permitted to park, and provide clear consequences to violators for failure to follow these regulations. This information will clearly state that no parking is permitted on residential streets.

PDF-16-2 Traffic Control Improvement

LADOT recommended that at the time of project implementation, the applicant shall contact the DOT Hollywood-Wilshire District Office at 323-957-6843 to request further evaluation to determine the feasibility of a new signal being warranted for installation at the intersection of Oxford Avenue and 7th Street. If either signal is deemed warranted by DOT, the design and construction of the traffic signal would be required of the applicant. DOT's Hollywood-Wilshire District Office will issue a Traffic Control Report (TCR) authorizing the installation of the traffic signal that is warranted per DOT's requirements. The traffic signal warrant analysis shall be prepared pursuant to section 353 of DOT's Manual of Policies and Procedures and submitted to DOT for review.

Regulatory Compliance Measure

RCM-16-1 The Project shall comply with the conditions contained within the Department of Transportation's Approval Letter for the Project, as it may be subsequently amended or modified.

b) Would the project conflict with an applicable congestion management program, including but not limited to level of service standard and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less Than Significant Impact. A significant impact may occur if the adopted Los Angeles County Metropolitan Transportation Authority (Metro) thresholds for a significant project impact would be exceeded. The Congestion Management program (CMP) was adopted to regulate and monitor regional traffic growth and transportation improvement programs. The CMP designates a transportation network that includes all state highways and some arterials within the County of Los Angeles.

Regional Traffic Impact Analysis

The CMP guidelines require that the first issue to be addressed is the determination of the geographic scope of the study area. The criteria for determining the study area for CMP arterial monitoring intersections and for freeway monitoring locations are:

- All CMP arterial monitoring intersections where the proposed project will add 50 or more trips during either the AM or PM peak hours of adjacent street traffic.

- All CMP mainline freeway monitoring locations where the proposed project will add 150 or more trips, in either direction, during either the AM or PM peak hours.

Significant Traffic Impact Criteria

The CMP traffic impact analysis guidelines establish that a significant project impact occurs when a certain threshold is exceeded. If the proposed project increases traffic demand on a CMP facility by 2% of capacity (V/C > 0.02), causing LOS F (V/C > 1.00), a significant impact would occur. If the facility is already at LOS F, a significant impact occurs when the proposed project increases traffic demand on a CMP facility by 2% of capacity (V/C > 0.02).

Arterial Monitoring Stations

The CMP arterial monitoring station closest to the proposed project site is at Western Avenue & Wilshire Boulevard located west of the proposed project site. Based on the project trip distribution and trip generation, the project is expected to add approximately 37 trips in the AM peak hour and 47 trips in the PM peak hour through the CMP arterial monitoring station. The Project is not expected to add enough new traffic to exceed the arterial analysis criteria of 50 vehicle trips at the above-mentioned location. Therefore, no further CMP arterial analysis is required.

Freeway Analysis

Freeway Analysis

The Congestion Management Program for Los Angeles County (CMP) (Metro, 2010) requires that all CMP mainline freeway monitoring locations where a proposed project will add 150 or more trips, in either direction, during either the AM or PM peak hours be analyzed. The Project is not expected to add 150 or more vehicle trips during the AM or PM peak hours on nearby freeways. Therefore, no analysis of freeway segments is required for CMP purposes. In addition, Agreement Between City of Los Angeles and Caltrans District 7 on Freeway Impact Analysis Procedures (October 2013, as amended in December 2015), sets forth criteria for when a freeway impact analysis should be conducted. LADOT determined as part of the traffic study memorandum of understanding for this Project that the Project would not meet the criteria requiring a freeway impact analysis (see Appendix A in Transportation Impact Analysis, Fehr & Peers, August 2016, included in the Appendices). Accordingly, no further analysis under the City's amended agreement with Caltrans was required.

Regional access to the project site is provided by the US-101 Freeway located approximately 2 miles north of the project site and the I-10 Freeway located approximately 2 miles to the south of the project

site, respectively. The CMP freeway monitoring stations closest to the project site includes the US-101 Freeway at Normandie Avenue and the I-10 Freeway at Budlong Avenue. The CMP freeway monitoring station closest to the project site on the US-101 freeway is located at Normandie Avenue. Based on the Project distribution patterns, approximately 7.5% of project traffic is expected to travel through the US-101 freeway monitoring station at Normandie Avenue. The project is projected to result in an increase of 15 trips in the morning and 19 trips in the evening peak hour US-101 at Normandie Avenue. The CMP freeway monitoring stations closest to the project site on the I-10 freeway are at Budlong Avenue. Approximately 7.5% of project traffic is expected to travel east on the I-10 freeway through Budlong Avenue and approximately 7.5% is expected to travel west on the I-10 freeway towards the City of Santa Monica. The project is projected to result in an increase of 15 trips in the morning and 19 trips in the evening peak hour on eastbound and westbound I-10 freeway. Since fewer than 150 trips would be added during the AM or PM peak hours in either direction at any of the freeway segments in the vicinity of the study area, no further analysis of the freeway segments is required for CMP purposes.

Regional Transit Impact Analysis

Potential increases in transit person trips generated by the proposed project were estimated. Appendix C-8 of the 2010 CMP provides a methodology for estimating the number of transit trips expected to result from a proposed project based on the projected number of vehicle trips. This methodology assumes an average vehicle ridership (AVR) factor of 1.4 in order to estimate the number of person trips to and from the project and then provides guidance regarding the percentage of person trips assigned to public transit depending on the type of use (commercial/other versus residential) and the proximity to transit services. Appendix C-8 of the 2010 CMP recommends summarizing the fixed-route local bus services within ¼ mile of the project site and express bus routes and rail service within two miles of the Project Site.

The Project is located within ¼ mile walking distance of the Metro Purple Line at the Wilshire/Western Station. Excluding the transit credit, the Project would have an estimated increase in vehicle trip generation of approximately 317 net vehicle trips during the AM peak hour and 402 during the PM peak hour before the transit credit. Applying the AVR factor of 1.4 to the estimated vehicle trips would result in an estimated increase of approximately 444 and 563 person trips during the AM and PM peak hours, respectively. The CMP provides that, of the total net person trips of a project, 10% of total residential person trips and 15% of total commercial person trips generated would be assigned as transit riders for projects located within ¼ -mile of a transit corridor, in this case the Metro Purple Line. Following this approach, the Project would generate an estimated increase of 30 commercial transit trips during the AM peak hour and 41 commercial transit trips during the PM peak hour. The Project would generate an estimated increase of 25 residential transit trips during the AM peak hour and 29 residential transit trips during the PM peak hour. Given the frequency of the high quality transit service in close proximity to the project site, including the Metro Purple Line subway and multiple Metro Rapid and local bus routes, the incremental transit riders resulting from the Project are not anticipated to result in a significant impact on the transit lines serving the area. Therefore, the Project would have a less than significant impact.

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. This question would apply to the Project only if it were an aviation-related use. The Project Site does not contain any aviation-related uses and the Project does not include development of any aviation-related uses. As such, due to its nature and scope, development of the Project would not have the potential to result in a change in air traffic patterns. Therefore, no impact related to air traffic patterns would occur.

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

Less Than Significant Impact with Mitigation Incorporated. A significant impact may occur if a project were to include a new roadway design, introduce a new land use or project features into an area with specific transportation requirements and characteristics that have not been previously experienced in that area, or if project access or other features were designed in such a way as to create hazardous conditions.

Driveways

The proposed project would have three driveways:

- A full-access driveway on Oxford Avenue.
- Two full-access driveways on Serrano Avenue.

The loading areas for the project uses will be located in the underground parking structure on Level B1 and will be accessible from the Oxford Avenue driveway and the southern Serrano Avenue driveway.

The Project would provide a parking and driveway plan for review and approval by LADOT as listed as **Regulatory Compliance Measure RMC-16-2**. A level of service analysis was conducted to evaluate the ability of the Project access plan to accommodate the anticipated traffic levels at the driveway access points. The driveway locations below will be unsignalized and stop-controlled and were analyzed using the 2-way Stop methodology from the HCM. The HCM methodology determines the average vehicle delay for the stop-controlled approach to find the corresponding LOS. Table 3.16-14 shows the results of the LOS analysis at the unsignalized driveways.

Table 3.16-14
Driveway Service and Impact Analysis

Driveway Location	Peak Hour	Existing + Project (2016)		Future + Project (2020)	
		Delay (seconds)	LOS	Delay (seconds)	LOS
Oxford Avenue driveway	AM	20.1	C	26.0	D
	PM	19.7	C	25.9	D
Serrano Avenue	AM	16.0	C	17.6	C

northern driveway	PM	16.3	C	18.0	C
Serrano Avenue southern driveway	AM	20.2	C	21.9	C
	PM	20.0	C	26.7	D

Source: Table 11, Transportation Impact Analysis, Fehr & Peers, August 2016.
Table by CAJA Environmental Services, September 2016.

Pedestrian Safety

Temporary impacts to pedestrian safety could occur during construction. The Project will comply with **Mitigation Measure MM-16-1** to ensure the safety of pedestrians and other vehicles in general, as the construction area could create hazards of incompatible/slow-moving construction and haul vehicles. Therefore, impacts would be reduced to less than significant.

Pedestrian access to the Project would be provided at entrances along Wilshire and Serrano, as well as from the parking structures within the building. The Project would not mix pedestrian and automobile traffic and, therefore, no pedestrian impacts would occur.

Other Hazards

The Project does not include any sharp curves, dangerous intersections, or incompatible uses. No off-site traffic improvements are proposed or warranted in the area surrounding the Project Site.

Regulatory Compliance Measure

RCM-16-2 Parking Area and Driveway Plan

The applicant shall submit a parking and driveway plan that incorporates design features that reduce accidents and provide code-required emergency access, to the Bureau of Engineering and the Department of Transportation for review and approval.

Mitigation Measure

MM-16-1 Safety Hazards

- The developer shall install appropriate construction related traffic signs around the site to ensure pedestrian and vehicle safety.

- 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) from work space and vehicular traffic, and overhead protection, due to sidewalk closure or blockage, at all times.

- Temporary pedestrian facilities shall be adjacent to the Project Site and provide safe, accessible routes that replicate as nearly as practical the most desirable characteristics of the existing facility.

- Covered walkways shall be provided where pedestrians are exposed to potential injury from falling objects.

- Applicant shall keep sidewalk open during construction until only when it is absolutely required to close or block sidewalk for construction and/or construction staging. Sidewalk shall be reopened as soon as reasonably feasible taking construction and construction staging into account.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. A significant impact may occur if a project design would not provide emergency access meeting the requirements of the LAFD and LAPD, or in any other way threatened the ability of emergency vehicles to access and serve the Project Site. The Project would comply with LAFD and LAPD requirements and provide adequate access for emergency vehicles and service responses. The Project would ensure that adequate and safe access, including access for emergency vehicles, remains available. This would be accomplished through the Construction Traffic Management Plan (listed as **PDF-16-1**). Impacts related to emergency access would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project would conflict with adopted policies or involve modification of existing alternative transportation facilities located on- or off-site.

Existing Public Transit Service

The Project site is served by a high level of public transit. Figure 3 (in Transportation Impact Analysis, Fehr & Peers, August 2016, included in the Appendices) shows the various metro bus routes, rapid bus routes, and Metro Rail lines providing service in the study area. The Project is located one block (approximately 400 feet) east of the Metro Purple Line Wilshire/Western Station. Five local Metro (Route 16/316, 18, 20, 66, 207), three Metro Rapid (Route 710, 720, 757), two DASH (Wilshire Center/Koreatown and Hollywood/Wilshire), one Foothill Transit (Route 481), and one Big Blue Bus (Route R7) bus routes provide service within . mile of the project site along Wilshire Boulevard. In addition, Wilshire Boulevard has east-west dedicated bus lanes. Table 1 details the transit service near the Project Site.

Existing Bicycle And Pedestrian Facilities

Figure 4 (Transportation Impact Analysis, Fehr & Peers, August 2016, included in the Appendices) shows citywide designated bicycle facilities in the project area. Wilshire has peak hour bus/bike lanes.

Approximately 0.3 miles north of the project site, 4th street is designated a Class III sharrowed bicycle route and approximately ½ mile north of the project site, Oxford Avenue includes a Class I bicycle lane. The Mobility Plan 2035 identifies Wilton Place and Wilshire Boulevard as Tier 2 Bike Lane Network, and identifies Norton Ave and Catalina St as part of the Bicycle Enhanced Network. Portions of 8th Street within the study area are identified as part of the Tier 3 Bike Lane Network. The study area generally has a mature network of pedestrian facilities including sidewalks, crosswalks and pedestrian safety features. Approximately 8- to 18-foot sidewalks are provided throughout the study area.

The Project will not conflict with public transit, bicycles, or pedestrian facilities. Therefore, a less than significant impact will occur.

17. UTILITIES AND SERVICE SYSTEMS

This section is based on the following items, included as Appendix L of this IS/MND:

L-1 Response from Los Angeles Bureau of Sanitation, June 13, 2016.

L-2 Water Supply Assessment, Los Angeles Department of Water and Power, November 15, 2016.

L-3 Response from Southern California Gas Company, September 16, 2016.

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

Less Than Significant Impact. A significant impact may occur if a project would discharge wastewater whose content exceeds the regulatory limits established by the governing agency. The Los Angeles Water Quality Control Board (LAWQCB) implements programs to protect all waters in the coastal watersheds for Los Angeles and Ventura counties. LAWQCB's Water Quality Control Plan for the Los Angeles Region (the Basin Plan) establishes guidelines for all municipalities and other entities that use water and/or discharge into the Santa Monica Bay.[207] Wastewater reclamation and treatment in the City of Los Angeles is provided by the City of Los Angeles Department of Public Works' Bureau of Sanitation (LABS), which operates two treatment plants (Hyperion and Terminal Island) and two water reclamation plants in accordance with the treatment requirements of the LAWQCB and/or water reclamation requirements of the Basin Plan.

The Project Site is located within the service area of the Hyperion Treatment Plant (HTP)[208], which has been designed to treat 450 million gallons per day (mgd) to full secondary treatment,[209] and currently treats an average daily flow of approximately 362 mgd.[210] Thus, there is a remaining capacity of approximately 88 mgd. Full secondary treatment prevents virtually all particles suspended in effluent from being discharged into the Pacific Ocean and is consistent with the LAWQCB's discharge policies for Santa Monica Bay. Additionally, the City's Sewer Allocation Ordinance (Ordinance No. 166,060) limits the annual increase in wastewater flow to HTP to five mgd.[211] This allocation allowance is

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[207] *Water Quality Control Plan, Los Angeles Region, Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, California Regional Water Quality Control Board Los Angeles Region (4)(adopted June, 1994, updated July 2006).*

[208] *LA Sewers: http://www.lasewers.org/treatment_plants/about/index.htm.*

[209] *Los Angeles Sanitation: http://www.lacitysan.org/irp/Wastewater.htm.*

[210] *LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website: http://www.lacitysan.org/wastewater/factsfigures.htm.*

[211] *Los Angeles City Clerk, Ordinance 166,060: http://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=87-2121.*

monitored by the HTP and the Project's contribution would not affect the amount. Further, the HTP is a public facility and is, therefore, subject to the state's wastewater treatment requirements. The Project's wastewater discharge would be typical for a mixed-use residential and commercial building and would not require any on-site treatment before flowing to the sewer. Therefore, the Project would have a less than significant impact with regard to wastewater treatment.

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?

Less Than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded.

Wastewater Generation, Treatment Facilities, and Existing Infrastructure

As shown on Table 3.17-1, Project Estimated Wastewater Generation, it is estimated the Project will generate a total of approximately 70,763 gallons per day (gpd) (or 0.071 mgd) of wastewater. This total does not take any credit for the proposed sustainable and water conservation features of the Project.

Table 3.17-1
Project Estimated Wastewater Generation

Land Use	Size	Wastewater Generation Rates	Total (gpd)
Existing Uses			
Lawn and Plaza	46,153 sf	No wastewater	0
Proposed New Uses			
Residential – 1 Bedroom	381 units	110 gallons / unit	41,910
Residential – 2 Bedroom	119 units	150 gallons / unit	17,850
Residential – 3 Bedroom	6 units	190 gallons / unit	1,140
Retail	40,322 sf	50 gallons / 1,000 sf	2,016
Restaurant	21,713 sf	300 gallons / 1,000 sf	6,514
Fitness Center	1,350 sf	650 gallons / 1,000 sf	878
Indoor Amenity Spaces	9,090 sf	50 gallons / 1,000 sf	455
		Total Increase	**70,763**

Note: sf = square feet; cf = cubic feet; gpd = gallons per day
Rates: Sewage Generation Factor, effective date April 6, 2012: http://lacitysan.org/fmd/pdf/sfcfeerates.pdf
Bureau of Sanitation response, June 13, 2016.
Table: CAJA Environmental Services, October 2016.

The wastewater generated by the Project will be similar to other uses in the area. No industrial discharge into the wastewater or drainage system would occur. Additionally, there is adequate treatment capacity within the HTP system which currently treats an average daily flow of approximately 362 mgd.[212] Thus, there is a remaining capacity of approximately 88 mgd. The increase in wastewater generation represents approximately 0.08% of the remaining capacity[213], and would not have a significant impact on treatment plant capacity.

As HTP complies with the state's wastewater treatment requirements and the Project's wastewater generation is well within the existing capacity, the Project will not exceed the wastewater treatment requirements of LAWQCB. Therefore, impacts with regard to wastewater treatment requirements will be less than significant. The Project Site will be served by the LABS, which provides municipal wastewater services to the City.

The Site is served by an 8-inch line on Serrano Avenue, a 12-inch line on Oxford Avenue, and a 15-inch line on Wilshire Boulevard. The sewage from the three existing lines joins to feed into a 33-inch line on Wilshire Boulevard before discharging into a 57-inch sewer line on 9th Street. The current approximate flow level (depth/diameter or d/D) and the design capacities at d/D of 50% is shown in Table 3.17-2.[214]

Table 3.17-2
Sewer Infrastructure

Pipe Diameter (inches)	Location	Current Gauging d/D (%)	50% Design Capacity
8	Serrano	*	280,862 gpd
12	Oxford	*	1.24 MGD
15	Wilshire	*	1.94 MGD
33	Wilshire	35	10.01 MGD
57	9th	19	22.61 MGD

** no gauging available. gpd = gallons per day. MGD = million gallons daily.*
Bureau of Sanitation response, June 13, 2016.
Table: CAJA Environmental Services, September 2016.

The Project Site is currently developed and adequately served by the existing wastewater conveyance system. As part of the building permit process the lead agency would confirm and ensure that there is sufficient capacity in the local and trunk lines to accommodate the Project's wastewater flows. The

[212] *LABS, Wastewater, About Wastewater, Facts and Figures, Treatment Plants, Hyperion Treatment Plant, website: http://www.lacitysan.org/wastewater/factsfigures.htm.*

[213] *0.71 mgd / 88 mgd x 100% = 0.08%.*

[214] *Bureau of Sanitation response, June 13, 2016.*

standard procedure is that further detailed gauging and evaluation will be needed as part of the permit process to identify a specific sewer connection point. If the public sewer has insufficient capacity, then the Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity (see **Project Design Feature PDF-17-1**). A final approval for sewer capacity and connection permit will be made at that time. Implementation of these prescribed measures will ensure that the Project's impacts to the wastewater conveyance system will be less than significant.

The wastewater generated by the Project will be similar to other uses in the area. No industrial discharge into the wastewater or drainage system would occur. Additionally, there is adequate treatment capacity within the HTP system (remaining capacity of approximately 88 mgd or at 80 percent capacity), and thus, the increase in wastewater generation would not have a significant impact on treatment plant capacity. As HTP complies with the state's wastewater treatment requirements and the Project's wastewater generation is well within the existing capacity, the Project will not exceed the wastewater treatment requirements of LAWQCB. Therefore, impacts with regard to wastewater treatment requirements will be less than significant.

Additionally, water conservation measures required by City ordinance (e.g., installation of low flow toilets and plumbing fixtures, limitations on hose washing of driveways and parking areas, etc.) will be implemented as part of the Project and will help reduce the amount of project-generated wastewater.

Water Consumption and Treatment Facilities

The City of Los Angeles Department of Water and Power (LADWP), which provides municipal water services to the City, is responsible for providing water to the Project Site. Using the water demand rates and methodology described in the City of Los Angeles, Department of Public Works, Bureau of Sanitation Sewer Generation Rates (2012), the proposed water demand estimate is shown in Table 3.17-3, Estimated Future Water Demand.

The existing water demand on the Site ranges from approximately 600 HCFs (1 hundred cubic feet is 748 gallons) per month in the winter to approximately 1,000 HCFs in the summer. This is equivalent to approximately 15,000 gallons per day (gpd) to 25,000 gpd.[215] The landscaped areas and the existing building are not billed separately. Therefore, for a conservative analysis to the future water demand, no credit is taken for the existing water demand that occurs on the landscaped lawn and plaza portion that would be removed.

The proposed development land uses will conform to Water-Efficiency Requirements Ordinance No. 180822, 2013 California Plumbing Code, 2013 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2014 Los Angeles Green Building Code.

[215] *600 HCFs x 748 gallons/HCF / 30 days = 15,000 gpd. 1,000 HCFs x 748 gallons/HCF / 30 days = 25,000 gpd.*

As shown on Table 4.17-3, Project Estimated Water Consumption, it is estimated the Project will consume a total of approximately 77,803 gallons per day (gpd) (or 0.078 mgd or 87.16 acre-feet per year[216]) of water.

Table 3.16-3
Estimated Future Water Demand

Use	Size	Water Use Factor[3] (gpd/unit)	Base Demand (gpd)	Required Ordinances Water Savings [4] (gpd)	Water Demand	
					(gpd)	AF/year
Existing Uses[1]						
Lawn and Plaza	46,153 sf	-	-	-	2,421	2.71
Proposed Uses[1]						
Residential: 1 bedroom	381 du	110	41,910			
Residential: 2 bedroom	119 du	150	17,850			
Residential: 3 bedroom	6 du	190	1,140			
Base Demand Adjustment (residential)[5]			5,090			
Residential Units Total	**506 du**		**65,990**	**15,256**	**50,734**	**56.83**
Lobby	3,100 sf	0.05	155			
Indoor Lounges	4,640 sf	0.05	232			
Outdoor Decks [6]	17,835 sf	0.05	892			
Fitness Room/Center	1,250 sf	0.65	878			
Pool and Jacuzzi	1,312 sf		123			
Large Water Feature (Courtyard 1)	530 sf		50			
Small Water Feature (Courtyard 2)	192 sf		18			
Residential Common Total			**2,348**	**445**	**1,903**	**2.13**
Retail	40,322 sf	0.025	1,008			
Restaurant High Quality	207 seats	30	6,204			
Restaurant High Turnover	517 seats	25	12,924			
Base Demand Adjustment (Commercial) [6]			584			
Commercial Total			**20,720**	**5,173**	**15,547**	**17.42**
Landscaping [7]	9,206 sf		860	387	473	0.53
Subterranean and Structure Parking [8]	275,551 sf	0.002	181		181	0.20
Cooling Tower Total	1,000 tons	36	35,640	22,747	12,893	14.44
Proposed Subtotal			**125,739**	**44,008**	**81,731**	**91.56**
Less Existing to be removed					**-2,421**	**-2.71**

[216] *1 acre foot = 325,851.429 US gallons.*

Less Additional Conservation [9]	**-1,507**	**-1.69**
Net Additional Water Demand	**77,803**	**87.16**

[1]Provided by the City of Los Angeles Department of City Planning in the Request for Water Supply Assessment letter and Scope confirmation email.
[2] The existing water demand is based on the LADWP billing data (average of approximately July 2010 to current), and includes water use.
[3] Proposed indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table available at http: www.lacitysan.org/fmd/pdf/sfcfeerates.pdf.
[4] The proposed development land uses will conform to City of Los Angeles Ordinance No. 184248, 2013 California Plumbing Code, 2013 California Green Building Code (Calgreen), 2014 Los Angeles Plumbing Code, and 2014 LA Green Building Code.
[5]Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates. Amenities considered to be fitness center use for a conservative water demand estimate.
[6] Deck is assumed to have water use similar to lobby waiting area.
[7] Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7. Model Water Efficient Landscape Ordinance.
[8]Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumptions.
[9] Water conservation due to additional conservation commitments agreed by the Applicant.
Source: LADWP, Water Supply Assessment, November 15, 2016.

The Water Service Organization (WSO) would be able to provide the domestic needs of the Project from the existing water system. The Once a determination of the fire demands has been made, LADWP will assess the need for additional facilities, if needed. This is described as **Regulatory Compliance Measure RCM-17-1**.LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of LAAFP is 600 mgd with an average plant flow of 550 mgd during the summer months and 450 mgd in the non-summer months. Thus, the facility has between approximately 50 to 150 mgd of remaining capacity depending on the season. The Project's water consumption increase represents approximately 0.05 percent and 0.02 percent of the remaining capacity currently available at LAAFP during the summer and non-summer months, respectively. Therefore, impacts to water treatment facilities and existing infrastructure would be less than significant. If a deficiency or service problem is discovered during the permitting process that prevents the Project from an adequate level of service, the Project Applicant shall fund the required upgrades to adequately serve the Project. **Project Design Feature PDF-17-2** will ensure that the Project's impacts to the water conveyance system would be less than significant.

Regulatory Compliance Measure

RCM-17-1 Fire Water Flow

The Project Applicant shall consult with the LADBS and LAFD to determine fire flow requirements for the Project, and will contact a Water Service Representative at the

LADWP to order a Sewer Availability Request (SAR). This system hydraulic analysis will determine if existing LADWP water supply facilities can provide the proposed fire flow requirements of the Project. If water main or infrastructure upgrades are required, the Applicant would pay for such upgrades, which would be constructed by either the Applicant or LADWP.

Project Design Features

PDF-17-1 Wastewater Service

Prior to the development of a new building, the capacity of the on-site sanitary sewers that would serve the building shall be evaluated based on applicable Bureau of Sanitation and California Plumbing Code standards and replacement or new sanitary sewers shall be installed on-site as necessary to accommodate proposed flows.

As part of the normal construction/building permit process, the Project Applicant shall confirm with the City that the capacity of the local and trunk lines are sufficient to accommodate the Project's wastewater flows during the construction and operation phases. If the public sewer has insufficient capacity, then the Project Applicant shall be required to build sewer lines to a point in the sewer system with sufficient capacity. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan and have flagmen to facilitate traffic flow and safety.

PDF-17-2 Water Service

New on-site water mains and laterals would be installed in accordance with City Plumbing Code requirements, where necessary, to distribute water within the Project Site.

As part of the building permit process, the Project Applicant shall confirm with the LADWP Water Service Organization (WSO) that the capacity of the existing water infrastructure can supply the domestic needs of the Project during the construction and operation phases. If the water infrastructure has insufficient capacity, then the Project Applicant shall be required to build water lines to a point in the system with sufficient capacity. If street closures for construction is required, the Project applicant shall coordinate with LADOT on a traffic control plan.

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. A significant impact may occur if the volume of storm water runoff increases to a level exceeding the capacity of the storm drain system serving the Project Site or if a project would substantially increase the probability that polluted runoff would reach the storm drain system. The Project Site is located in an urbanized area of the City. The Project Site is primarily covered

with a lawn and plaza (hardscape). The Project will similarly occupy the entire Project Site with a new building. Thus, the Project would not be altering the amount of impervious surface that affects runoff.

Runoff currently flows toward the existing storm drain system, and the Project will not substantially alter the amount of runoff.

Impacts to water quality would be reduced since the Project must comply with water quality standards and wastewater discharge BMPs set forth by the County of Los Angeles, SWRC, and Low Impact Development requirements. The Project is required to implement stormwater control measures during its construction phase. Any construction during the rainy season (between October 1 and April 15) would implement a Wet Weather Erosion Control Plan. Furthermore, required design criteria, as established in the SUSMP for Los Angeles County and Cities in Los Angeles County, would be incorporated into the project to minimize the off-site conveyance of pollutants. Regulatory compliance measures **RCM-9-1 to RCM-9-4** would reduce the potential for polluted runoff to a less than significant level.

d) Would the project have significant 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 were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come.

Water Supply Assessment

State CEQA Guidelines Section 15083.5 requires a lead agency to identify water systems to provide water supply assessments for projects over specified thresholds. For any residential subdivision project Senate Bill (SB) 221 requires that the lead agency include a requirement that a sufficient water supply shall be available to serve the residential development. A residential subdivision is a proposed residential development of more than 500 dwelling units. SB 610 requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand for certain development projects that are otherwise subject to CEQA review. Existing law identified those certain projects as follows:

(a) Residential developments of more than 500 dwelling units;

(b) Shopping centers or businesses employing more than 1,000 persons or having more than 500,000 square feet of floor space;

(c) Commercial office buildings employing more than 1,000 persons or having more than 250,000 square feet;

(d) Hotels or motels with more than 500 rooms;

(e) Industrial or manufacturing establishments housing more than 1,000 persons or having more than 650,000 square feet of 40 acres;

(f) Mixed use projects containing any of the foregoing; or

(g) Any other project that would have a water demand at least equal to a 500-dwelling unit project.

WSA Results

The Project is subject to SB 610 and conducted a Water Supply Assessment (WSA). According to the WSA and included in Table 3.17-3 above, the Project total net water demand is estimated to be 87 acre-feet per year (AFY), which includes annual water conservation. Savings due to water conservation ordinances are approximately 49 AFY, and savings due to additional voluntary conservation measures are approximately 2 AFY. LADWP's WSA finds adequate water supplies will be available to meet the total additional water demand of 87 AFY. LADWP anticipates the projected water demand can be met during normal, single-dry and multiple-dry water years, in addition to the existing and planned future demands on LADWP.[217]

Drought Conditions

On January 17, 2014, Governor Jerry Brown officially declared California in a drought emergency. LADWP has activated the Water Conservation Response Unit in order to implement the mandatory Emergency Water Conservation Plan Ordinance - Phase 2. This includes an odd/even numbered address watering calendar. In addition, customers cannot: 1) Use water on hard surfaces such as sidewalks, walkways, driveways, or parking areas (with exception of water brooms); 2) Irrigate landscaping between the hours of 9 a.m. and 4 p.m.; 3) Allow excess water from sprinklers to flood gutters; 4) Use water to clean, fill, or maintain decorative fountains unless the water is part of a recirculation system; 5) Serve water to customers in eating establishments, unless requested; and 6) Allow irrigation leaks to go unattended.[218] The 2015 Urban Water Management Plan (UWMP) takes into account drought conditions. After adjusting for economy and drought conditions, projected water demands can vary by approximately ± 5 percent in any given year due to average historical weather variability. This means that water demands under cool/wet weather conditions could be as much as 5 percent lower than normal demands on average; while water demands under hot/dry weather conditions could be as much as 5 percent higher than normal demands on average.[219]

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[217] *LADWP, Water Supply Assessment, November 15, 2016.*

[218] *LADWP, Drought Information: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-conservation/a-w-c-droughtbusters?_adf.ctrl-state=nviecbhak_4&_afrLoop=932704326968157.*

[219] *2015 Urban Water Management Plan, Los Angeles, pg. ES-12: , June 28, 2016.*

On April 1, 2015, Governor Brown signed Executive Order B-29-15, which provides actions that will save water, increase enforcement to prevent wasteful water use, streamline the state's drought response, and invest in new technologies to make California more drought resilient. The Executive Order provides water savings by directing the State Water Resources Control Board to implement mandatory water reductions in cities and towns to reduce water usage by 25% or approximately 1.5 million acre-feet. The Executive Order calls for local water agencies to implement conservation pricing to discourage water waste.[220] State mandated conservation and reductions are implemented by LADWP.

The Project is estimated to use approximately 87 acre-feet per year. The 2015 UWMP was adopted in June 2016 and projects a demand of 611,800 AFY in 2020 and 644,700,000 AFY in 2025.[221] The UWMP forecasts water demand by estimating baseline water consumption by use (single family, multifamily, commercial/government, industrial), then adjusting for projected changes in socioeconomic variables (including personal income, family size, conservation effects) and projected growth of different uses based on SCAG 2012 RTP.[222] The 2012 RTP models local and regional population, housing supply and jobs using a model accounting for job availability by wage and sector and demographic trends (including household size, birth and death rates, migration patterns and life expectancy).[223] Neither the Urban Water Management Plan forecasts, nor the 2012 RTP include parcel-level zoning and land use designation as an input. The Project does not materially alter socioeconomic variables or projected growth by use [The Project is proposing a General Plan Amendment and other approvals]. Any shortfall in LADWP controlled supplies (groundwater, recycled, conservation, LA aqueduct) is offset with MWD purchases to rise to the level of demand. As set forth above, the Project is consistent with the General Plan.

The following regulatory compliance measures **RCM-17-2** through **RCM-17-4** would ensure that impacts related to the project's water demand remain less than significant:

Regulatory Compliance Measures

RCM-17-2 Water Efficiency Requirements

The Project shall implement all applicable mandatory measures of Ordinance No. 180,822 (Water Efficiency Requirements for New Development), the 2014 LA Plumbing Code, 2013 Cal Green Building Code, and 2014 LA Green Building Code the LA Green Building Code that would have the effect of reducing the Project's water use.

RCM-17-3 Landscape

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[220] *California Governor: http://gov.ca.gov/news.php?id=18910, accessed August 19, 2015.*

[221] *2015 Urban Water Management Plan, Los Angeles, pg. ES-23.*

[222] *2015 Urban Water Management Plan, Los Angeles, pgs. 1-12.*

[223] *SCAG, 2008 Regional Transportation Plan Growth Forecast Report, pgs 2-10.*

The Project shall comply with Ordinance No. 170,978 (Water Management Ordinance), which imposes numerous water conservation measures in landscape, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season).

RCM-17-4 LID Ordinance and Stormwater BMPs

The Project shall comply with the City of Los Angeles Low Impact Development Ordinance (City Ordinance No. 181,899) and implement Best Management Practices that have stormwater recharge or reuse benefits for the Project (as applicable and feasible).

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. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The Project's generation of 0.071 mgd of wastewater would be sufficiently accommodated as part of the remaining 88 mgd of treatment capacity currently available at HTP. Therefore, impacts to wastewater treatment 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?

Less Than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. 43 percent of the waste generated in the City is disposed of at the Sunshine Canyon City/County Landfill (the "Sunshine Canyon Landfill"), with 20 percent to Chiquita Canyon Landfill, and the remaining amounts sent to over a dozen other landfills, recycling, refuse-to-energy, or resource recovery facilities.[224]

Facilities

The Sunshine Canyon Landfill has a permitted intake of 12,100 tons per day (tpd) and accepted an average of 7,582 tpd (2014 daily average).[225] It is expected to close in 2037.[226] It has a remaining daily

[224] *City of Los Angeles, Fact Sheet: Solid Waste Facilities: http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPfacilitySystemInfrastructureFactSheet_032009.pdf.*

[225] *County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: http://dpw.lacounty.gov/epd/swims/, Appendix E-2, Table 1, April 11, 2016.*

[226] *23 years remaining life as of 2014 Annual Report, prepared in December 2015.*

intake availability of 4,993 tpd, and has approximately 96.8 million cubic yards (cy) of remaining capacity out of a total capacity of 140.9 million cy.[227] As of September 30, 2013, Sunshine Canyon Landfill accepted approximately 7,800 tpd during the week and 3,000 tpd on Saturday (due to reduced hours of operation).[228] Space is calculated by volume, with 1.7 cubic yards equaling one ton of trash. Projections of capacity are tied to how tightly the trash is compacted.[229] Therefore, the Sunshine Canyon Landfill has a remaining daily capacity intake of approximately 4,300 tpd during each weekday and 9,100 tpd on Saturday.

There are two solid waste transformation facilities within Los Angeles County. The Commerce Refuse-to-Energy Facility has a permitted intake 1,000 tpd and accepted an average of 337 tpd (2013 daily average). It has a remaining daily intake availability of 663 tpd.[230] The Southeast Resource Recovery Facility, located in the City of Long Beach, has a permitted intake 2,240 tpd and accepted an average of 1,504 tpd (2013 daily average). It has a remaining daily intake availability of 736 tpd.[231] It is expected that these two facilities will continue to operate at their current permitted capacities through the planning period of 2022. The owners and operators of these facilities have indicated that there are no plans to increase the daily capacity. The County is exploring the use of conversion technologies to reduce future disposal needs as well as address global climate change. These technologies encompass a variety of processes that convert normal household trash into renewable energy, biofuels, and other useful products. The County has launched the Southern California Conversion Technology Demonstration Project, which seeks to promote, evaluate, and establish a demonstration facility for the conversion of solid waste into clean energy.[232] Additionally, the County recently completed its final Phase II Conversion Technology Evaluation Report, which provides a comprehensive study of existing technology suppliers and materials recovery facilities throughout southern California.

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[227] *State of California Department of Resources Recycling and Recovery, Solid Waste Facility Listing/Details Page, Facility/Site Summary Details: Sunshine Canyon City/County Landfill (19-AA-2000), website: http://www.calrecycle.ca.gov/SWFacilities/Directory/19-AA-2000/Detail, accessed August 19, 2015.*

[228] *Sunshine Canyon Landfill Newsletter, Fall 2013 (latest newsletter), website: http://www.sunshinecanyonlandfill.com/home/newsletter/fall_2013_newsletter.pdf, accessed August 19, 2015.*

[229] *Sunshine Canyon: http://www.sunshinecanyonlandfill.com/home/Future.html, August 27, 2015.*

[230] *County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: http://dpw.lacounty.gov/epd/swims/, Appendix E-2, Table 1, April 11, 2016.*

[231] *County of Los Angeles Department of Public Works, 2014 Annual Report, December 2015, website: http://dpw.lacounty.gov/epd/swims/, Appendix E-2, Table 1, April 11, 2016.*

[232] *Los Angeles County Phase II Conversion Technology Evaluation Report - October 2007, http://www.socalconversion.org/pdfs/LACo_Conversion_PII_Report.pdf, October 8, 2014.*

Construction

Construction of the Project will generate minimal amounts of construction and demolition debris that would need to be disposed of at area landfills. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California Assembly Bill (AB) 939, also known as the Integrated Waste Management Act, requires each city and county in the state to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, much of this material would be recycled and salvaged. Materials not recycled would be disposed of at local landfills.

Demolition will remove approximately 2,500 cubic yards (cy) of buildings. Demolition would produce demolition waste and recycling opportunities of raw materials and export of approximately 90,000 cy of dirt.[233] Construction of the approximately 531,470 square feet of new floor area would generate approximately 1,164 tons of construction waste.[234] Construction is estimated to take approximately 30 months. Therefore, Project construction would generate approximately 1.61 tons per day of construction waste on average throughout the construction phase.[235]

A majority of the City's construction and demolition waste was sent to the Puente Hills Landfill.[236] The Puente Hills Landfill closed on October 31, 2013, when its permit expired. However, there are other County Sanitation Districts' facilities available for disposal and recycling, including the nearby Puente Hills Materials Recovery Facility (MRF) that shares the same entrance as the Landfill. The Puente Hills MRF accepts all kinds of waste for recycling and disposal, including commercial, construction/demolition, and residential wastes.[237] The Puente Hills MRF is permitted to accept 4,400 tons per day and 24,000 tons per week of municipal solid waste.[238] In 2016, the Puente Hills Intermodal Facility provides a Materials Recovery Facility/Transfer Station for the Waste to Rails system to the Mesquite Regional Landfill in Imperial County.[239] The Mesquite Landfill can accept 20,000 tons per day, with an overall capacity of 600 million tons and a lifespan of 100 years.[240] The Mesquite Landfill would have adequate capacity to accept the Project's demolition and construction waste. Compliance with AB

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[233] *Client provided, July 2016.*

[234] *Based on 4.02 pounds of nonresidential construction and 4.38 lbs for residential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-2, page A-1).*

[235] *30 months x 24 working days per month = 720 working days. 1,164 / 720 days = 1.61 tons per day.*

[236] *City of Los Angeles, Fact Sheet: Solid Waste Facilities: http://www.zerowaste.lacity.org/files/info/fact_sheet/SWIRPfacilitySystemInfrastructureFactSheet_032009.pdf.*

[237] *County Sanitation Districts, Puente Hills Landfill Closing on October 31, 2013: http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1, accessed August 27, 2015.*

[238] *County Sanitation Districts, Puente Hills MRF Fact Sheet: http://www.lacsd.org/news/displaynews.asp?NewsID=214&TargetID=1, accessed August 27, 2015.*

[239] *Puente Hills Landfill: http://www.lacsd.org/civica/filebank/blobdload.asp?BlobID=3708, August 27, 2015.*

[240] *Mesquite Regional Landfill: http://www.mrlf.org/index.php?pid=5, August 27, 2015.*

939 would require a minimum of 50 percent of demolition and construction debris to be recycled. Therefore, construction impacts to landfills and solid waste services will be less than significant.

Operation

As shown on Table 3.17-3, Project Estimated Solid Waste Generation, it is estimated the Project will generate a total of approximately 3,149 pound per day (or 1.57 tons per day) of solid waste. This total takes into account the diversion rate

Table 3.17-3
Project Estimated Solid Waste Generation

Land Use	Size	Solid Waste Generation Rates	Diversion Rate	Total (pounds)
Residential	1,422	4.7 pounds /resident	63%	2,473
Commercial	174 employees	11.1 pounds / employee	65%	676
			Total Increase	**3,149**

Note: sf = square feet
http://www.calrecycle.ca.gov/LGcentral/GoalMeasure/DisposalRate/MostRecent/default.htm
Table: CAJA Environmental Services, September 2016.

The Sunshine Canyon Landfill can accept 12,100 tpd (and currently accepts 7,800 tpd on weekdays and 3,000 tpd on Saturday), and could therefore accommodate the additional approximately 0.25 tons per day increase in solid waste resulting from the Project. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. The City had an accelerated goal of 75 percent by 2013. During fiscal 2013-14, the City exceeded the mandated 75 percent diversion rate goal, achieving 76.4 percent,[241] with the goal to achieve a 90 percent diversion by 2025.[242] The regulatory compliance measures **RCM-17-5** through **RCM-17-7** listed below would ensure that solid waste is separated and disposed/recycled properly during operation further mitigating any potential solid waste impact from Project operations. Therefore, the impact associated with solid waste during operation of the Project would be less than significant.

Regulatory Compliance Measures

RCM-17-5 Designated Recycling Area

[241] *City of Los Angeles, Department of Public Works, Annual Report, 2013-14: http://bpw.lacity.org/DPW-2013-14-ANNUAL-REPORT.pdf, August 11, 2016.*

[242] *City of Los Angeles, Department of Public Works, A Five-Year Strategic Plan, Fiscal Years 2013/14-2017/18: http://www.lacitysan.org/general_info/pdfs/Strategic_Plan2013-14.pdf, accessed August 11, 2016.*

In compliance with Los Angeles Municipal Code, the proposed Project shall provide readily accessible areas that serve the entire building and are identified for the depositing, storage, and collection of nonhazardous materials for recycling, including (at a minimum) paper, corrugated cardboard, glass, plastics, and metals.

RCM-17-6 Construction Waste Recycling

In order to meet the diversion goals of the California Integrated Waste Management Act and the City of Los Angeles, which was 76 percent in 2013, the Applicant shall salvage and recycle construction and demolition materials to ensure that a minimum of 70 percent of construction-related solid waste that can be recycled is diverted from the waste stream to be landfilled. Solid waste diversion would be accomplished though the on-site separation of materials and/or by contracting with a solid waste disposal facility that can guarantee a minimum diversion rate of 70 percent. In compliance with the Los Angeles Municipal Code, the General Contractor shall utilize solid waste haulers, contractors, and recyclers who have obtained an Assembly Bill (AB) 939 Compliance Permit from the City of Los Angeles Bureau of Sanitation.

RCM-17-7 Commercial/Multifamily Mandatory Recycling

In compliance with AB341, recycling bins shall be provided at appropriate locations to promote recycling of paper, metal, glass and other recyclable material. These bins shall be emptied and recycled accordingly as a part of the Proposed Project's regular solid waste disposal program. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB3 41.

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

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste generated on-site by the Project will be disposed of in compliance with all applicable federal, state, and local regulations, related to solid waste, such as AB 939. The amount of project-related waste disposed of at area landfills would be reduced through recycling and waste diversion programs implemented by the City, in compliance with the City's Solid Waste Integrated Resources Plan, which is the long-range solid waste management policy plan for the City through 2025, and the Source Reduction and Recycling Element, which is the strategic action policy plan for diverting solid waste from landfills. The Project would also comply with applicable regulatory measures, including the provisions of City Ordinance No. 171,687 regarding recycling for all new construction and other recycling measures; implementation of a demolition and construction debris recycling plan, with the explicit intent of requiring recycling during all phases of site preparation and building construction, and the provision of permanent, clearly marked, durable, source-sorted bins to facilitate the separation and deposit of recyclable materials. Waste generated by the Project would not alter the projected timeline for landfills within the region to reach capacity. The Sunshine Canyon Landfill has adequate capacity and is slated to close in 2037. The Waste-By-Rails program to the

Mesquite Landfill would have adequate capacity and is slated to operate for 100 years. The Project would comply with federal, state, and local regulations, and as such, impacts would be less than significant.

ENERGY ANALYSIS

Regulatory Framework

State Building Energy Efficiency Standards

New buildings in California are required to conform to energy conservation standards specified in Title 24 of the California Code of Regulations (CCR) [add reference to rehabilitating historic resources]. The California Green Building Standards Code (CalGreen) establishes "energy budgets" for different types of residential and nonresidential buildings, with which all new buildings must comply. The energy budget has a space conditioning component and a water-heating component, both expressed in terms of energy (British thermal units, or BTU) consumed per year. The regulations allow for trade-offs within and between the components to meet the overall budget. The building efficiency standards are enforced through the local building or individual agency permit and approval processes.[243]

California Green Building Code

Part 11 of the Title 24 California Building Standards Code is referred to as the California Green Building Standards Code, or CalGreen. The purpose of the California Green Building Standards Code is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." As of January 1, 2011, the California Green Building Standards Code is mandatory for all new buildings constructed in the state. The California Green Building Standards Code establishes mandatory measures for new residential and non-residential buildings. Such mandatory measures include energy efficiency, water conservation, material conservation, planning and design and overall environmental quality. The California Green Building Standards Code was most recently updated in 2013 to include new mandatory measures for residential as well as nonresidential uses; the new measures took effect on January 1, 2014.

2015 Final Power Integrated Resource Plan[244]

The LADWP released the 2015 Final Power Integrated Resource Plan (IRP) in December 2015, which provides a 20-year framework to ensure LADWP will meet the future energy needs of its ratepayers by forecasting demand for energy and determining how that demand will be met. The IRP is an update of the

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[243] *CalGreen: http://www.documents.dgs.ca.gov/bsc/CALGreen/2010_CA_Green_Bldg.pdf, August 11, 2016.*

[244] *2015 Final Power IRP: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afrLoop=399494189004579.*

2014 IRP, and reflects evolving environmental, regulatory, and economic developments. Major changes from the 2014 IRP include a newly created and redesigned energy efficiency (EE) program to achieve at least 10 percent less customer usage of electricity by 2020; efforts underway to expand upon the existing Power Reliability Program (PRP) by developing a new Power System Reliability Program (PSRP) to incorporate not only distribution, but also generation, transmission, and substations with a new prioritization model to improve system reliability; and plans for an agreement between Intermountain Power Agency and the Intermountain Power Project (IPP) participants to replace IPP coal-fired generation with new highly efficient gas-fired generators by no later than July 1, 2025, two years earlier than recommended in 2012's IRP.

This 2015 IRP incorporates updates to reflect the latest load forecast, fuel price and projected renewable price forecasts, and other modeling assumptions. Major renewable projects approved or implemented include the approval of 460 megawatt (MW) of large scale solar, approval of the 250 MW Beacon Solar Project, implementation of Pine Tree and Adelanto Solar, and implementation of two geothermal projects. An innovative Solar Feed-in-Tariff (FiT) Program was implemented by the Department of Energy, which consists of a FiT 100 – Set Pricing Program and a FiT 50 – Competitive Pricing Program, which bundles Beacon Solar and Local Solar. The Fit 50 - Competitive Pricing Program is an innovative program that combines both a FiT local solar agreement committing to a large block of approximately 10 MW, together with a commitment to a large utility scale project of approximately 50 MW to be built by the same vendor at LADWP's Beacon Solar site.[245] This IRP considers a 20-year planning horizon to guide LADWP as it executes major new and replacement projects and programs. The overriding purpose is to provide a framework to assure the future energy needs of LADWP customers are met in a manner that balances the following key objectives: superior reliability and supply of electric service; competitive electric rates consistent with sound business principles; and responsible environmental stewardship exceeding all regulatory obligations.[246]

Los Angeles Department of Water and Power

The LADWP provides electricity to the Project Site. The LADWP provides its 1.4 million customers with more than 26 million megawatt hours (mw-h) of electricity a year.[247] LADWP serves a 465-square-mile area and is the largest municipal utility in the nation. In total, LADWP operates 20 receiving stations and 174 distribution stations and plans to acquire additional facilities as their load increases.

The LADWP electricity portfolio is made up of coal (39 percent), natural gas (22 percent), renewables[248] (20 percent), nuclear (11 percent), unspecified sources (5 percent), and large hydroelectric (3 percent).[249]

[227 footnote missing]

[246] *LADWP, 2015 IRP, pg ES-1: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afrLoop=399494189004579.*

[247] *LADWP, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-pastandpresent?_adf.ctrl-state=na2o8wvza_4&_afrLoop=81976737428000, April 8, 2016.*

[248] *Renewables include small hydroelectric, solar, wind, geothermal, biomass and waste.*

Table 4.L.4-1, LADWP Electricity Capacity, shows the LADWP electricity system capacity and Table 3.17-5, LADWP Energy Usage, shows the LADWP power usage. Table 3.17-6, Energy Sales and Peak Demand, provides the estimated sales (consumption) by sector (residential, commercial, industrial, etc.) and peak demand over the next 10 years.

Table 3.17-4
LADWP Electricity Capacity

	Amount (megawatts)
Net Maximum Plant Capacity	7,300
Los Angeles Peak Demand	6,177

Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afrLoop=1119458526572567
Table: CAJA Environmental Services, September 2016.

Table 3.17-5
LADWP Energy Usage

	Amount (megawatt-hours)
Residential	8.4
Commercial	12.8
Industrial	1.9
Other	0.4
Total	**23.14**

Fiscal Year 2013. Source: LADWP: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=15ti2xgei0_4&_afrLoop=1119458526572567.
Table: CAJA Environmental Services, September 2016.

Table 3.17-6
Energy Sales and Peak Demand

Year	Sector Sales (gw-h)						Peak Demand (mw)
	Residential	Commercial	Industrial	Misc.	PHEV	Total	

[249] *LADWP, Power Facts and Figures website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=scgxlug8o_21&_afrLoop=82063279159000&_afrWindowMode=0&_afrWindowId=na2o8wvza_1#%40%3F_afrWindowId%3Dna2o8wvza_1%26_afrLoop%3D82063279159000%26_afrWindowMode%3D0%26_adf.ctrl-state%3Dna2o8wvza_33, April 8, 2016.*

2016-17	8,206	12,760	1,985	455	224	26,878	6,721
2017-18	8,215	12,586	1,989	457	270	26,714	5,671
2018-19	8,242	12,413	1,994	458	350	26,638	5,650
2019-20	8,279	12,251	1,997	460	429	26,695	5,634
2020-21	8,328	12,339	1,997	462	512	26,859	5,638
2021-22	8,411	12,576	1,998	464	592	27,297	5,730
2022-23	8,510	12,772	1,997	466	675	27,728	5,812
2023-24	8,613	12,989	1,996	468	755	28,253	5,899
2024-25	8,710	13,230	1,994	469	834	28,649	5,991

gw-h – gigawatt-hours; mw – megawatts
Misc. includes streetlighting, Owens Valley, and intra-departmental
LADWP, 2015 IRP, Table A-1, page A-5: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=11j0xz3uxz_4&_afrLoop=399494189004579
Table: CAJA Environmental Services September 2016.

Power and Energy

When discussing electricity, the appropriate unit of measurement depends on whether one is referring to power or energy. Power is the rate at which energy is consumed (in watts, kilowatts, or megawatts). Energy is the amount of power consumed (in watt-hours). Customers are charged based on their energy use (typically kilowatt-hours). The relationship between power and energy:

- Energy (watt-hours) = power (watts) X time (hours)

For example, a 60-watt light bulb refers to the amount of power the light consumes. If the 60-watt light bulb was on for 12 hours, it would consume 720 watt-hours (or 0.72 kilowatt-hours) of energy.

Load Factor

Load factor represents how consistent the rate of energy usage throughout a given day. A 100 percent load factor means that the same amount of power is used off peak as on peak, so the system is getting full use of its generating resources. A low load factor results in generators being started more often to serve load for a few hours a day, which is not optimum. From the 1990s through 2005, annual system load factors were trending slowly upward, which is a positive movement. Since 2006, system load factors are trending down. Some of this decline in load factor is due to the fact that much of the historic energy

efficiency effort is directed at lighting, which has a higher impact on sales when compared to peak. In the forecast for the future, this downward trend is sustained.[250]

Load factor can be expressed as the ratio of the average load in kilowatts (kw) supplied at a designated period compared to the peak or maximum load in kilowatts occurring in the period. Load factor, in percent, is derived by multiplying the kilowatt-hours (kw-h) in the period by 100 and dividing by the product of the maximum demand in kilowatts and the number of hours in the period:[251]

[250] *LADWP, 2014 IRP, pg 47: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=q463ohn9x_17&_afrLoop=1251830725757441, April 14, 2015.*

[251] *Madison Gas and Electric, Glossary for Load Factor: http://www.mge.com/about/electric/glossary.htm#f, April 11, 2016.*

- Load Factor (%) = (kw-h / hours / kw) X 100%

- Example: Assume a 30-day billing period or 30 days X 24 hours for a total of 720 hours. Assume a customer used 10,000 kw-h and had a maximum demand of 21 kw. The customer's load factor would be 66 percent [(10,000 kw-h / 720 hours / 21 kw)*100].

Natural Gas Supply and Demand

The Southern California Gas Company (SCG), a subsidiary of Sempra Energy and the nation's largest natural gas supplier, distributes natural gas to 19.5 million residential, commercial, and industrial customers throughout southern California, including the Project Site. SCG owns and operates 95,000 miles of gas distribution mains and service lines, gas transmission compressor stations, underground storage facilities, as well as nearly 3,000 miles of transmission and storage pipeline. The total 136.1 billion cubic feet (Bcf) of natural gas storage capacity is divided as follows: 82 Bcf is for core customers, small industrial, and commercial customers; 4 Bcf is for system balancing; and the remaining 49.1 Bcf is available to other customers.[252] Natural gas service is provided in accordance with SCG's policies and extension rules on file with the California Public Utilities Commission (PUC) at the time contractual agreements are made.

The State produces about 15 percent of the natural gas it uses. The remaining 85 percent is obtained from sources outside of the State, 62 percent from the Southwest and Rocky Mountain area, and 23 percent from Canada. In the last ten years, three new interstate gas pipelines were built to serve California, expanding the over one million miles of existing pipelines. However, the availability of natural gas is based upon present conditions of gas supply and regulatory policies. As a public utility, SCG is under the jurisdiction of the PUC, but can be affected by the actions of federal regulatory agencies. Should these agencies take any action affecting natural gas supply or the conditions under which service is available, natural gas service would be provided in accordance with those revised conditions.

The 2016 California Gas Report includes projections regarding future demand for natural gas in the Southern California region. SCG projects total gas demand to decline at an annual rate of 0.6% from 2016 to 2035. The decline in throughput demand is due to modest economic growth, CPUC-mandated energy efficiency (EE) standards and programs, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). From 2016 to 2035, residential demand is expected to decline from 239 Bcf to 218 Bcf. The decline is due to declining use per meter offsetting new meter growth. The core, non-residential markets are expected to grow from 113 Bcf in 2016 to 105 Bcf by 2035. The change reflects an annual growth rate of 0.5% over the forecast period. The noncore, non-EG markets are expected to decline from 170 Bcf in 2016 to 153 Bcf by 2035. The annual rate of decline is approximately 0.5% due to very aggressive energy efficiency goals and associated programs. On the other hand, utility gas demand for enhanced oil recovery (EOR) steaming operations, which had declined since the FERC-regulated Kern/Mojave interstate pipeline began

[252] *2016 California Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, August 31, 2016.*

offering direct service to California customers in 1992, has shown some growth in recent years because of continuing high oil prices and is expected to show further growth in the early years of the forecast period. EOR demand is expected to remain at about its 2015 level through 2035 as gains are offset by the depletion of older oil fields.[253]

In 2016 gas demand for California is projected to average 6,072 million cubic feet per day (cf/day) and is projected to decrease to 4,626 million cf/day by 2035, a decline of 1.35 percent per year.[254] Table 3.17-7, Statewide Total Supplies and Requirements, shows the anticipated statewide total supplies and requirements for natural gas for 2014 to 2030. In 2014 (the latest data available from the 2014 California Gas Report), SCG's highest winter sendout was 4,881 million cf/day and highest summer sendout was 3,393 million cf/day.[255]

Table 3.17-7
Statewide Total Supplies and Requirements

	2016	2018	2020	2025	2030
Utility Supply Source					
California Sources	165	165	165	165	165
Out-of-State	5,060	4,758	4,668	4,599	4,489
Non-Utility Served Load	1,132	985	813	547	258
Statewide Supply Source Total	**6,358**	**5,909**	**5,645**	**5,312**	**4,912**
Utility Requirements					
Residential	1,181	1,185	1,155	1,114	1,076
Commercial	484	481	473	454	443
Natural Gas Vehicles	46	50	54	66	85
Industrial	964	943	932	930	938
Electric Generation	1,897	1,623	1,566	1,548	1,453
Enhanced Oil Recovery Steaming	46	46	46	46	46
Wholesale/International Exchange	241	246	247	247	256
Company Use and Unaccounted-For	79	74	73	72	71

[253] *2016 California Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, August 31, 2016.*

[254] *2016 California Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, August 31, 2016.*

[255] *2016 California Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, August 31, 2016.*

Non-Utility Served Load	1,132	985	813	547	258
Statewide Requirements Total	**6,072**	**5,623**	**5,360**	**5,026**	**4,626**

All measurements in million cf per day. Numbers in the table may not add up exactly due to rounding. Average temperature and normal hydro year.
2016 California Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, August 31, 2016.
Table: CAJA Environmental Services August 2016.

The SCG demands for 2015 and 2035 are shown in Table 3.17-8. Demand is expected to be relatively flat (commercial) or exhibit annual declines (residential, industrial) due to modest economic growth, PUC-mandated demand-side management goals and renewable electricity goals, decline in commercial and industrial demand, and continued increased use of non-utility pipeline systems by EOR customers and savings linked to advanced metering modules.[256]

Table 3.17-8
SCG Natural Gas Demands

	2015	2035	Difference
Residential	239	218	-21
Core Commercial	81	65	-16
Non-Core Commercial	16.4	14.7	-1.7
Industrial	21.6	15.3	-6.3

All measurements in billion cf
2016 California Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, August 31, 2016.
Table: CAJA Environmental Services August 2016.

[256] *2016 California Gas Report: https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf, August 31, 2016.*

ENVIRONMENTAL IMPACTS

Thresholds of Significance

State CEQA Guidelines

Appendix F, Energy Conservation, of the *CEQA Guidelines* directs an EIR[257] to include the following:

(a) The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials maybe discussed;

(b) The effects of the project on local and regional energy supplies and on requirements for additional capacity;

(c) The effects of the project on peak and base period demands for electricity and other forms of energy;

(d) The degree to which the project complies with existing energy standards;

(e) The effects of the project on energy resources; and

(f) The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

City of Los Angeles CEQA Thresholds Guide

As set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis, considering the following:

(a) The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure, or capacity enhancing alterations to existing facilities;

(b) Whether and when the needed infrastructure was anticipated by adopted plans; and

(c) The degree to which the project design and/or operations incorporate energy conservation measures, particularly those that go beyond City requirements.

Based on these factors a project would have a significant impact if:

- The project would result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities; or

- The design of the project fails to incorporate energy conservation measures that go beyond existing requirements.

[257] *The analysis is included in this MND for disclosure purposes.*

Methodology

The South Coast Air Quality Management District (SCAQMD) has electricity[258] and natural gas[259] consumption rates for various land uses based on the square footage of development. Applying the SCAQMD rates to the proposed building square footages and use types, an estimate was made as to the future demand for the Project. Given the existing capacity of the Project Site's electrical and natural gas delivery system and future projected consumption and demand, an assessment was made of the Project's impacts. Appendix F of the State *CEQA Guidelines* further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the Project Description, Environmental Setting and Impact Analysis portions of technical sections, as well as through mitigation measures and alternatives. In accordance with Appendix F of the State *CEQA Guidelines,* this includes relevant information and analyses that address the energy implications of the Project. This section represents a summary of the Project's anticipated energy needs, impacts, and conservation measures.

Project Impacts

Construction

The Project would have short-term construction impacts, as construction activities would consume relatively minor quantities of electricity (i.e., temporary use for lighting and small power tools). These tools and lighting would be powered with charging stations supplied by portable generators. There would be no use of any permanent infrastructure for the delivery of electricity until after construction of the buildings. The electrical demand generated by these tools[260] and lighting[261] is substantially less than the operational demand. Electrical consumption of small power construction tools range from 300 to 6,000 watts during run time (0.3 kw to 6 kw). A typical temporary construction lighting tower would have 4 x 1,000 watt fixtures (4 kw). If running for 8 hours per evening/night, the usage would be 32 kw-h. Electricity, when needed, would be supplied by the local utility provider (LADWP) via existing on-site connections. This would be consistent with suggested measures in the *L.A. CEQA Thresholds Guide* to reduce air pollution by using electricity from power poles, rather than temporary diesel or gasoline powered generators. A temporary water supply, primarily for fugitive dust suppression and street sweeping, would also be supplied by the LADWP. Electricity used to provide temporary power for lighting and electronic equipment (e.g., computers, etc.) inside temporary construction trailers and for lighting when necessary for general construction and renovation activity would generally not result in a net increase in on-site electricity use over existing conditions since the Site is occupied. Therefore, electricity impacts during construction would be less than significant.

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[258] *SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-11-A, Electricity Usage Rate.*

[259] *SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate.*

[260] *Website: http://www.uspowerco.com/articles/power_consumption_chart_for_tools*

[261] *Website: http://www.sunbeltrentals.com/equipment/category.aspx?id=19*

Heavy-duty construction equipment associated with these activities would include diesel-fueled haul trucks, excavators, skid steer loaders, tractors, and water trucks. Heavy-duty construction equipment associated with building construction would include air compressors, concrete pumps, forklifts, lifts, and welders. Heavy-duty construction equipment associated with outdoor hardscape and landscaping would include air compressors, backhoes, dozers, forklifts, lifts, loaders, and rollers. The equipment will be in compliance with the Project Design Features and Regulatory Compliance Measures required in the Air Quality and Noise sections of this MND. Construction equipment fuels (diesel, gas, or natural gas) would be provided by local or regional suppliers and vendors. The transportation fuel required by construction workers would depend on the total number of worker trips estimated for the duration of construction activity. A study by Caltrans found that the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) is projected at 22.711 miles per gallon (mpg) and worse-case diesel trucks is 6.178 mpg in 2015.[262]

In 2012, California consumed a total of 337,666 thousand barrels of gasoline for transportation, which is equivalent to a total annual consumption of 14.1 billion gallons by the transportation sector.[263] Construction of the Project would represent 0.001 percent of the statewide gasoline consumption and 0.001 percent of the statewide diesel consumption. The expected construction gasoline and diesel fuel gas for the Project would be negligible compared with statewide supplies and would be accommodated by local or regional suppliers and vendors. Therefore, gas impacts during construction would be less than significant.

Energy Conservation

The Project would utilize construction contractors who demonstrate compliance with applicable California Air Resources Board (CARB) regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB has adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to diesel particulate matter and other Toxic Air Contaminants. This measure prohibits diesel-fueled commercial vehicles greater than 10,000 pounds from idling for more than five minutes at any given time. CARB has also approved the Truck and Bus regulation (CARB Rules Division 3, Chapter 1, Section 2025, subsection (h))[264] to reduce NOX, PM10, and PM2.5 emissions from existing diesel vehicles operating in California; this regulation will be phased in with full implementation by 2023. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower. The regulation aims to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of

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[262] *California Department of Transportation, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF.*

[263] *US EPA, State Energy Data System, Table F-3: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf.*

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

older, dirtier engines with newer emission-controlled models. Implementation began January 1, 2014 and the compliance schedule requires that best available control technology turnovers or retrofits be fully implemented by 2023 for large and medium equipment fleets and by 2028 for small fleets. Compliance with the above anti-idling and emissions regulations would result in efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. Idling restrictions and the use of newer engines and equipment would result in less fuel combustion and energy consumption, as would use of haul trucks with larger capacities, as previously stated.

Operation

Electricity Demand

Electrical conduits, wiring and associated infrastructure would be conveyed to the Project from existing LADWP lines in the surrounding streets to the Project during construction. The Project could likely require transformer vaults, which are common for buildings of its size. However, the construction of these vaults is part of the overall building construction and would not constitute unusual or unplanned infrastructure that would cause a significant impact on the environment. The analysis compares the electricity demand for the Project to the overall LADWP capacity Citywide. The LADWP forecasts that in 2018-19, the total adjusted electricity sales (load forecast) will be 26,638 gigawatt-hours (gw-h) with residential uses consisting 8.242 gw-h and commercial uses consisting of 12.413 gw-h. The peak demand would be 5,650 megawatts (mw).[265]

As shown in Table 3.17-9, Project Estimated Electricity Demand, the Project would demand approximately 4,423,620 kw-h/year (4.4 gw-h/year) of electricity. This total does not take any credit for the proposed sustainable and energy conservation features of the Project.

Table 3.17-9
Project Estimated Electricity Demand

Land Use	Size	Electricity Rates	Total (kw-h/yr)
Residential	506 units	5,626.5 kw-h / unit	2,847,009
Retail	40,322 sf	13.55 kw-h/sf	546,377
Restaurant	21,713 sf	47.45 kw-h / sf	1,030,234
		Total Increase	**4,423,620**

sf =square feet; kw-h = kilowatt-hour; yr = year
Source: SCAQMD Air Quality Handbook, 1993, Table A9-11-A Electricity Usage Rate
The LADWP does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.
Table: CAJA Environmental Services, October 2016.

[265] *LADWP, 2014 IRP, Table A-1, page A-5: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-p-doc?_adf.ctrl-state=9kjcyeafd_4&_afrLoop=1178238919540287.*

The Project's annual electricity consumption would represent approximately 0.01 percent of the forecasted electricity demand in 2018-19.[266] Thus, the Project is within the anticipated demand of the LADWP system. The LADWP is able to supply 7,300 mw of power with a current peak of 6,177 mw. Thus, there is 1,055 mw of additional power capacity. To put this into perspective, this represents approximately 0.002 percent of the additional power capacity at existing levels. Peak demand is expected to grow to 5,786 mw in 2018-2019 and 6,166 mw in 2023-2024.[267] Despite these growth projections, they would still not exceed the existing capacity of 7,300 mw. Thus, there is adequate supply capacity to serve the Project. Therefore, the LADWP's current and planned electricity supplies would be sufficient to support the Project's electricity consumption.

The Project would not require the acquisition of additional electricity supplies beyond those that exist or anticipated by the LADWP. The Project would be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code. Electrical service would be provided in accordance with the LADWP's Rules Governing Water and Electric Service.[268] It should also be noted that the Project's estimated electricity consumption is based on usage rates that do not account for the Project's energy conservation features or updates to the Los Angeles Building Code. This represents a conservative (worst-case scenario) approach. Therefore, actual electricity consumption from the Project would likely be lower than that forecasted. Based on the above analysis, no operational impacts associated with the consumption of electricity would occur.

Natural Gas Demand

As shown in Table 3.17-10, Project Estimated Natural Gas Demand, the Project is estimated to demand approximately a net increase of 2,209,721 cf/month (73,657 cf/day) of natural gas. This total represents a more conservative result since it does not take any credit for the proposed sustainable and energy conservation features of the Project.

The natural gas demand is based on natural gas usage rates from the SCAQMD and without taking credit for the Project's energy conservation features, which would reduce natural gas usage. The approximate demand is based on the best available data and is intended to provide an analysis of the estimated demand in comparison to SCG's overall supply. The SCG retail core peak day demand in 2014 is estimated at 3,101 million cf/day and 2018 is estimated at 3,027 million cf/day. The Project's 79,697 cf/day represents

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[266] *4.4 / 26,638 x 100% = 0.01%*

[267] *2014 Power Integrated Resource Plan, Table 2-3, Forecasted growth in Annual Peak Demand: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-integratedresourceplanning/a-p-irp-documents?_afrLoop=1185569764107656&_afrWindowMode=0&_afrWindowId=9kjcyeafd_1#%40%3F_afrWindowId%3D9kjcyeafd_1%26_afrLoop%3D1185569764107656%26_afrWindowMode%3D0%26_adf.ctrl-state%3D1ahsnk3itw_4.*

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

approximately 0.003 percent of the 2018 peak demand. Thus, there is adequate supply capacity and no impacts would occur.

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

Table 3.17-10
Project Estimated Natural Gas Demand

Land Use	Size	Natural Gas Rates	Total (cf/mo)
Residential	506 units	4,011.5 cf / mo	2,029,819
Retail	40,322 sf	2.9 cf / mo	116,937
Restaurant	21,713 sf	2.9 cf / mo	62,965
		Total Increase	**2,209,721**

sf =square feet; cf = cubic feet; mo = month
Source: SCAQMD Air Quality Handbook, 1993, Appendix 9, Table A9-12-A, Natural Gas Usage Rate
The SCG does not provide or comment on generation rates to provide an estimate of demand. In addition, the Los Angeles City Planning Department has consistently accepted use of the SCAQMD rates in its EIRs.
Table: CAJA Environmental Services, October 2016.

Project design features for building efficiency would help alleviate natural gas demand. In 2015, the state anticipated a surplus difference of 179 million cf of gas between the supply and demand requirements. Therefore, it is anticipated that adequate supplies exist to accommodate the Project's demand for natural gas. Even if this were not the case, SCG would make the adequate changes in order to provide the load to the customer, as SCG has an obligation to serve projects in its service area. Overall, the Project would not require the acquisition of additional natural gas resources beyond those that are anticipated by SCG.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Project operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The Project would be in compliance with the City's Green Building Ordinance and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards. Therefore, because of energy efficient design features, compliance with the Green Building Ordinance, adequate projected supply and the obligation of SCG to service the three sites, Project impacts related to natural gas would be less than significant.

Transportation Energy Consumption

The Project's location takes advantage of existing transportation alternatives in the vicinity that could reduce energy (gasoline, electric, or natural gas, depending on the mode of travel) consumption for transportation needs. A number of Metro bus routes are within reasonable walking distance (less than one-quarter mile) of the Project Site. As such, the Project Site is located in proximity to numerous Metro bus routes, thereby providing access for employees, patrons, and residents of the Project Site. These services provide an alternative to driving individual vehicles both into the Project Site from the surrounding areas as well as for residents, guests, and visitors at the Project Site to travel to surrounding areas. The increases in land use diversity and mix of uses on the Project Sites would reduce vehicle trips and vehicle miles travelled by encouraging walking, bicycling, and other nonautomotive forms of transportation, which would result in corresponding reductions in energy demand. Regarding bicycling, the Project would provide bicycle parking spaces at least to the City's Bicycle Parking Ordinance.

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers and vendors. Project-related vehicles would require a negligible fraction of the total state's transportation fuel consumption. Based on the Project's estimated VMT of approximately 9,253,321 million miles per year[269], and assuming the Project's mix of vehicle types (automobiles, trucks, and motorcycles) have an average fuel economy of 22.711 mpgs[270], approximately 407,438 gallons of fuel would be required in a year. This would represent less than 0.001 percent of the statewide gasoline consumption. Alternative-fueled, electric, and hybrid vehicles, to the extent these types of vehicles would be utilized by visitors to the Project Sites would reduce the Project's consumption of gasoline and diesel. With compliance with regulatory measures, the Project operations would not result in wasteful, inefficient, and unnecessary consumption of energy.

Alternative Energy Discussion

The use of energy provided by alternative (i.e., renewable) resources, off-site and on-site, to meet the Project's operational demands is constrained by the energy portfolio mix managed by LADPW, the service provider for the Project Site, and limitations on the availability or feasibility of on-site energy generation. LADWP is required to commit to the use of renewable energy sources for compliance with the California Renewable Energy Resources Act, as defined in its 2013 Renewables Portfolio Standard Policy and Enforcement Program. LADWP has committed to meeting the requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020 through the procurement of energy from eligible renewable resources, to be implemented as fiscal constraints, renewable energy pricing, system integration limits, and transmission constraints permit. Eligible renewable resources are defined in the 2013 Renewable Portfolio Standard to include biodiesel; biomass; hydroelectric and small hydro (30

[269] *Operational VMT derived from the Air quality trips and VMT model sheets, included in appendix to the MND.*

[270] *California Department of Transportation, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF.*

MW or less); Los Angeles Aqueduct hydro power plants; digester gas; fuel cells; geothermal; landfill gas; municipal solid waste; ocean thermal, ocean wave, and tidal current technologies; renewable derived biogas; multi-fuel facilities using renewable fuels; solar photovoltaic; solar thermal electric; wind; and "other renewables that may be defined later".[271]

LADWP's target procurement of energy from renewable resources was 20 percent by 2010. As of 2012, the most recent year for which data is available, its existing renewable energy resources included small hydro, wind, solar, and biogas, which accounted for 20 percent of its overall energy mix. This represents the available off-site renewable sources of energy that would meet Project demand. LADWP is committed to reach a goal of 35% renewable energy by 2020.[272]

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

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

99.04.211.4. Solar Ready Buildings [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid after the effective date of the 2013 California Energy Code (Title 24, Part 6) shall comply with the following:

1. All one- and two-family dwellings, shall comply with Section 110.10(b)1A, 110.10(b)2, 110.10(b)3, 110.10(b)4, 110.10(c), 110.10(d) and 110.10(e) of the California Energy Code (Title 24, Part 6).

2. All buildings, other than one- and two-family dwellings, shall comply with Section 110.10(b) through 110.10(d) of the California Energy Code (Title 24, Part 6).

99.04.211.5. Space for Future Electrical Solar System Installation [N]. Buildings for which plans were submitted to the Department for plan check and the plan check fee was paid prior to the effective date of the 2013 California Energy Code (Title 24, Part 6), shall provide a minimum of 250 square feet of

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[271] *City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013.*

[272] *https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-re-rpsprogram?_adf.ctrl-state=2zwwyiver_4&_afrLoop=482029044070877.*

contiguous unobstructed roof area for the installation of future solar photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

Finally, solar and wind power represent variable-energy, or intermittent, resources that are generally used to augment, but not replace, natural gas-fired energy power generation, since reliability of energy availability and transmission is necessary to meet demand, which is constant. Wind-powered energy is not viable on the Project Sites due to the lack of sufficient wind in the Los Angeles basin. The California Energy Commission (CEC) studied the State's high wind resource potential.[273] Based on a map of California's wind resource potential, the Project Site is not identified as an area with wind resource potential. Wind resource areas with winds above 12 mph within Los Angeles County are located in relatively remote areas in the northwestern portion of the County. Additionally, there are no viable sites within the Project Site for placement and operation of a wind turbine. The CEC has identified areas within the State with high potential for viable solar, wind, and geothermal energy production. The CEC rated California's solar potential by county using insolation values available to typical photovoltaic system configurations, as provided by the National Renewable Energy Laboratory. Although Los Angeles as a County has a relatively high photovoltaic potential of 3,912,346 megawatt-hours (MWh)/day, inland counties such as Inyo (10,047,177 MWh/day), Riverside (7,811,694 MWh/day), and San Bernardino (25,338,276 MWh/day) are more suitable for large-scale solar power generation.[274] In addition, most of the high potential areas of greater than 6 KWh/sqm/day in Los Angeles County are concentrated in the northeastern corner of the county around Lancaster, approximately 45 miles away from the Project Site.

Regulatory Compliance Measures

RCM-17-8 The Project shall implement all applicable mandatory measures within the LA Green Building Code that would have the effect of reducing the Project's energy use.

RCM-17-9 The Project shall comply with City Ordinance No. 179,820 (Green Building Ordinance), which establishes a requirement to incorporate green building practices into projects that meet certain threshold criteria.

RCM-17-10 The Project shall comply with the lighting power requirements in the California Energy Code, California Code of Regulations (CCR), Title 24, Part 6.

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

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

18. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. A significant impact may occur only if a project would have an identified potentially significant impact for any of the above issues. The Project Site is located in an urbanized area of the City. The Project Site is entirely covered with buildings and surface parking lot. The Project would not impact any protected trees. However, environmental impacts may result due to the loss of the trees on the Site. The potential impacts will be mitigated to a less than significant level with **Mitigation Measures MM-4-1** and **MM-4-2**. The Project will have no impact on historic resources and a less than significant impact on archeological resources, paleontological resources, and human remains, with implementation of required regulatory compliance measures. The Project will not degrade the quality of the environment, reduce or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, impacts from the Project will be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project, in conjunction with other related projects in the area of the Project Site, would result in impacts that are less than significant when viewed separately, but would be significant when viewed together. The Project will not combine with related projects to create a cumulatively significant impact in any of the environmental issue areas analyzed in the Draft IS/MND.

In accordance with CEQA Guidelines Section 15064(h), this IS/MND includes an evaluation of the Project's cumulative impacts. An adequate discussion of a project's significant cumulative impact, in combination with other closely related projects, can be based on either: (1) a list of past, present, and probable future related impacts; or (2) a summary of projections contained in an adopted local, regional, statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

A total of 75 cumulative projects were identified in the study area; these projects are listed in Table 5 and illustrated in Figure 6 (both in *Transportation Impact Analysis, Fehr & Peers, August 2016)*. The Related Projects include approximately:

- 11,150 residential units (apartments, condominiums)
- 623,761 square feet retail
- 50,369 square feet restaurant and bar
- 313,794 square feet office and church
- 773 hotel rooms
- 1,262 student seats
- 1,272 theater seats
- 20,178 square feet health club

There are two proposed developments nearby the Project Site that were identified by the Project's traffic study.[275]

- No. 2 – 3670 Wilshire, 378 dwelling units and 8,000 square feet of commercial, approximately 225 feet east of the Site.
- No. 72 – 3700 Wilshire, 103,719 square feet of unoccupied office space at the Project Site.

These Related Projects are not within the immediate vicinity (within a block) of the Project, and there are several intervening buildings between them. The other Related Projects have several intervening buildings and major roadways/freeway in between, and are at least 1,000 feet away or more, distances which ensure that any other localized impacts of the Related Projects would not combine with the Project.

Aesthetics

Development of the Project in conjunction with the Related Projects would result in an incremental intensification of existing prevailing land uses in an already heavily urbanized area of Los Angeles. With respect to aesthetics and views, and shade and shadow impacts, none of the Related Projects are located in proximity to the Project Site such that their development would affect the aesthetic character of the site or its immediate surroundings. There are no scenic or protected views in the area. Views in the immediate area would not be affected by the Project or the nearest Related Project. Development of related projects is expected to occur in accordance with adopted plans and regulations. As per ZI No. 2145 and SB 743,

[275] *Transportation Impact Analysis, Fehr & Peers, August 2016.*

aesthetic impacts "shall not be considered significant impacts on the environment." Thus, the Project would not be cumulatively considerable. Therefore, cumulative aesthetic impacts would be less than significant.

Agriculture and Forestry Resources

Development of the Project in combination with the Related Projects would not result in the conversion of State-designated agricultural land from agricultural use to a non-agricultural use, nor result in the loss of forest land or conversion of forest land to non-forest use. The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site and the surrounding area are not included in the Important Farmland category. The Project Site and the surrounding area are highly urbanized area and do not include any State-designated agricultural lands or forest uses. Therefore, no cumulative impact would occur.

Air Quality

AQMP Consistency

Cumulative development can affect implementation of the 2012 AQMP. The 2012 AQMP was prepared to accommodate growth, reduce pollutants within the areas under SCAQMD jurisdiction, improve the overall air quality of the region, and minimize the impact on the economy. Growth considered to be consistent with the 2012 AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Consequently, as long as growth in the Basin is within the projections for growth identified by SCAG, implementation of the 2012 AQMP will not be obstructed by such growth and cumulative impacts would be less than significant. Since the Project is consistent with SCAG's growth projections, it would not have a cumulatively considerable contribution to an impact regarding a potential conflict with or obstruction of the implementation of the applicable air quality plan. Thus, cumulative impacts related to conformance with the 2012 AQMP would be less than significant.

Construction and Operational Emissions

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

Odor Impacts

With respect to odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings, solvents, and asphalt paving. Based on mandatory compliance with SCAQMD Rules, construction activities and materials used in the construction of the Project and related projects would not combine to create objectionable construction odors. None of the Related Projects is close to the Project Site. With respect to operations, SCAQMD Rule 402 (Nuisance) and SCAQMD Best Available Control Technology Guidelines would limit potential objectionable odor impacts from the Related Projects and the Project's long-term operations phase. Thus, cumulative odor impacts would be less than significant.

Biological Resources

The Project would not impact any protected trees. However, environmental impacts may result due to the loss of the trees on the Project Site. The potential impacts will be mitigated to a less than significant level with **Mitigation Measures MM-4-1** and **MM-4-2**. The Project would have no impact upon other biological resources. Development of the Project in combination with the related projects would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or Related Projects due to the existing urban development. Development of any of the related projects would be subject to the City of Los Angeles Protected Tree Ordinance. The Project would not be cumulatively considerable since it is unknown if the Related Projects have potential significant impacts such as tree or habitat removal. Thus, cumulative impacts to biological resources will be less than significant.

Cultural Resources

The Project and Related Projects would comply with applicable federal, state, and city regulations that would preclude significant cumulative impacts regarding cultural resources. This resource area is site and locally specific so that each Related Project would need to be evaluated within its own site-specific context. In addition, any Related Project within a historic district or affecting a historic resource would require a historic resource evaluation to ensure that removal of an existing building, addition of a new building, and/or conversion would not impact the historic resource in the area. The Project will have no historic impact and a less than significant impact on archeological resources, paleontological resources, and human remains, with implementation of required regulatory compliance measures. Cumulative impacts on cultural resource will be less than significant.

Geology and Soils

Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and any of the Related Projects. Similar to the Project, potential impacts related to geology and soils would be assessed on a case-by-case basis and, if necessary, the applicants of the Related Projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's geology and soils impacts concluded that, through the implementation of the

mitigation measures recommended above, Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology and soil impacts would be less than significant.

Greenhouse Gas Emissions

GHG analysis is a cumulative analysis and thus, there would be no cumulative significant impact. The Project's generation of GHG emissions would not make a cumulatively considerable contribution to GHG emissions and impacts would be less than significant.

Hazards and Hazardous Materials

Hazards are site-specific and there is little, if any, cumulative hazardous relationship between the Project and any of the Related Projects. Similar to the Project, potential impacts related to hazards would be assessed on a case-by-case basis and, if necessary, the applicants of the Related Projects would be required to implement the appropriate mitigation measures. Furthermore, the analysis of the Project's hazards and hazardous materials impact concluded that, through the implementation of the mitigation measures recommended above, Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative hazard and hazardous materials impacts would be less than significant.

Hydrology and Water Quality

The Project Site and the surrounding areas are served by the existing City storm drain system. Runoff from the Project Site and adjacent urban uses is typically directed into the adjacent streets, where it flows to the nearest drainage improvements. It is likely that most, if not all, of the Related Projects would also drain to the surrounding street system. However, little if any additional cumulative runoff is expected from the Project Site and the related projects, since this part of the City is already fully developed with impervious surfaces. Under the requirements of the Low Impact Development Ordinance, each related project will be required to implement stormwater BMPs to retain or treat the runoff from a storm event producing ¾ inch of rainfall in a 24-hour period. Mandatory structural BMPs in accordance with the NPDES water quality program will therefore result in a cumulative reduction to surface water runoff, as the development in the surrounding area is limited to infill developments and redevelopment of existing urbanized areas. Therefore, the Project would not make a cumulatively considerable contribution to impacting the volume or quality of surface water runoff, and cumulative impacts to the existing or planned stormwater drainage systems would be less than significant. Therefore, cumulative water quality impacts would be less than significant.

Land Use

Compliance with City's land use standards would ensure that any cumulative impacts related to land use would be less than significant. Further, all related projects would be individually evaluated for consistency with applicable land use standards. None of the Related Projects would physically divide an

established community or conflict with a habitat conservation plan. The Project would not make a cumulatively considerable contribution to land use planning, and cumulative impacts would be less than significant. Therefore, cumulative land use impacts would be less than significant.

Mineral Resources

Development of the Project in combination with the Related Projects would not result in the loss of availability of mineral resources. The Project Site and the surrounding area are highly urbanized area and do not include any MRZ zones. Therefore, no cumulative impact would occur.

Noise

Development of the Project in conjunction with the Related Projects would result in an increase in construction-related and traffic-related noise as well as on-site stationary noise sources in the already urbanized area of the City of Los Angeles. Construction-period noise for the Project and each Related Project (that has not yet been built) would be localized in nature. None of the related projects are in close enough proximity to the Project Site to cause cumulative construction or stationary noise or vibration impacts. Any construction noise from the Related Project, were it to occur concurrently with the Project, would be attenuated by the distance across intervening streets and/or structures that break the line of sight from these sites to the nearby receptors.

Additionally, each of these Related Projects would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. Each related project would also be subject to Section 112.05 of the LAMC, which prohibits any powered equipment or powered hand tool from producing noise levels that exceed 75 dBA at a distance of 50 feet from the noise source within 500 feet of a residential zone. Noise levels are only allowed to exceed this noise limitation under conditions where compliance is technically infeasible. With respect to cumulative traffic noise impacts, it should be noted that the Project's mobile source vehicular noise impacts are based on the predicted traffic volumes as presented in the Project Traffic Impact Study (included as an appendix to this MND). Based on the Project's estimated trip generation, the Project plus future cumulative baseline conditions would not have the potential to create a significant cumulative impact. As such, the Project's noise volumes would not be cumulatively considerable. Thus, the cumulative impact associated with construction noise would be less than significant.

Population and Housing

The Related Projects would introduce additional residential, commercial/retail/restaurant, office, school, and other related uses to the City of Los Angeles. Any residential related projects would result in direct population growth. The Related Projects that involve residential developments would contribute approximately 11,150 new residential dwelling units to the area, generating approximately 31,332 new

residents.[276] The City is expected to increase its population by 199,079 persons between 2010 and 2020. The related project growth would not exceed the projected growth. The net increase of employees is not cumulatively considerable as there are no thresholds for employee impacts. Because the Project would not displace any residents, and the population growth associated with the Project is 1,422 persons, the Project's population growth would not be cumulatively considerable. Therefore, the Project's cumulative impacts to population and housing would be less than significant.

Public Services

Fire

Given the geographic range of the Related Projects, they would be served by a variety of fire stations (Nos. 29, 11, 26, 52).[277] The Project, in combination with the related projects, could increase the demand for fire protection services in the Project area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., property taxes, government funding, and developer fees) to which the Project and related projects would contribute. Similar to the Project, each of the Related Projects in the City of Los Angeles would be individually subject to LAFD review and would be required to comply with all applicable fire safety requirements of the LAFD in order to adequately mitigate fire protection impacts. Specifically, any related project that exceeded the applicable response distance standards described above would be required to install automatic fire sprinkler systems in order to mitigate the additional response distance. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas. Nevertheless, the development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to fire protection services impacts, and, as such cumulative impacts on fire protection would be less than significant.

Police

The Project, in combination with the Related Projects, would increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and Related Projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City of Los

[276] *The 2010 Census also shows that the average household size in Los Angeles is 2.81 persons. Page 1-11 in City of Los Angeles, Housing Element, 2013-2021: http://cityplanning.lacity.org/HousingInitiatives/HousingElement/Text/Ch1.pdf.*

[277] *LAFD Fire Station Finder: http://www.lafd.org/fire_stations/find_your_station.*

Angeles in order to adequately address police protection service demands. Furthermore, each of the related projects would likely install and/or incorporate adequate crime prevention design features in consultation with the LAPD, as necessary, to further decrease the demand for police protection services. To the extent cumulative development causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site, no impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable contribution to police protection services impacts, and cumulative impacts on police protection would be less than significant.

Schools

Given the geographic range of the Related Projects, they would be served by a variety of public schools depending on the location and service boundaries. The Project, in combination with the Related Projects is expected to result in a cumulative increase in the demand for school services. Development of the Related Projects include 1,262 student seats and is projected to generate approximately 11,150 new residential dwelling units to the area, which would generate additional demands upon school services. The Related Project would generate approximately 4,460 elementary school students, 1,115 middle school students, and 2,230 high school students.[278] These Related Projects would have the potential to generate students that would attend the same schools as the Project. However, each of the projects would be responsible for paying mandatory school fees to mitigate the increased demands for school services. Cumulative impacts on schools would be less than significant.

Parks and Recreation

Development of the Project in conjunction with the related projects could result in an increase in permanent residents residing in the Project area. Additional cumulative development would contribute to lowering the City's existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects is required to comply with payment of Quimby (for condominium units) and other fees, such as the Parks and Recreation Fee (for apartment units). Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable recreation fees on a project-by-project basis, the Project would not make a cumulatively considerable impact to parks and recreational facilities and cumulative impacts would be less than significant.

Library

[278] *Residential land uses: Elementary:0.4 students per household; Middle: 0.1 students per household; High: 0.2 students per household.*

Given the geographic range of the Related Projects, they would be served by a variety of libraries (De Neve, Pio Pico, Pico Union, Wilshire, Memorial).[279] Development of the related projects would likely generate additional demands upon library services. The LAPL has no plans for new or expanded libraries; however, the Related Projects, like the Project, would contribute to the City General Fund, which goes to, among other things, library services. Therefore, the cumulative impacts related to library facilities would be less than significant.

Traffic

Development of the Project in conjunction with the Related Projects would result in an increase in average daily vehicle trips and peak hour vehicle trips. The methodology for traffic analysis included both an individual project level analysis (existing with Project scenario) and a cumulative impact analysis (future baseline with Project scenario). The future includes ambient growth (1 percent per year increase) and the related projects. The future traffic conditions with the Project show that none of the 15 study intersections would have a significant impact in either the existing or future baseline (cumulative) condition (see Section 16, Transportation/Traffic, of this MND). Thus, there would be no CMP intersections or freeways impacts. Therefore, the Project's cumulative impact is considered less than significant.

Utilities

Individual sewer and water infrastructure is location and site-specific and made on a case by case basis. Through the 2010 Urban Water Management Plan, the LADWP has demonstrated that it can provide adequate water supplies for the City through the year 2035. Demands on water consumption, wastewater generation, and solid waste generation resulting from the Project would be less than significant with implementation of provided mitigation measures (where applicable). These mitigation measures identified for the Project are standard mitigation measures from the City that would also apply to the Related Projects in the City. In addition, several of the Related Projects could be subject to SB 610, which requires a water supply assessment to evaluate whether total projected water supplies will meet the projected water demand. Ultimately, the wastewater and water facilities (HTP and LAAFP) and the Puente Hills MRF, Sunshine Canyon landfill, and Mesquite landfill have adequate capacity to accommodate the project and related projects along with the general growth within the City. The Project's contribution to cumulative wastewater, water, and solid waste impacts will not be cumulatively considerable and cumulative impacts would be less than significant.

Each of the related projects would be evaluated within its own context with consideration of energy conservation features that could alleviate electrical demand. Each related project would be required to be in compliance with Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the Los Angeles Green Building Code. Further, each related project would need to be consistent with how the LADWP serves each location with its existing distribution infrastructure. Therefore cumulative impacts would be less than significant.

[279] *LAPL Locations: http://www.lapl.org/branches.*

Further, each related project would need to be consistent with the building energy efficiency requirements of Title 24 as well as how SCG serves each location with its existing distribution infrastructure.

LADWP and SCG undertake system expansions and secure the capacity to serve their service areas and take into consideration general growth and development. Operation would result in the irreversible consumption use of non-renewable natural gas and would thus limit the availability of this resource. However, the continued use of natural gas would be on a relatively small scale and consistent with regional and local growth expectations for the area. The related projects would be in compliance with the City's Green Building Ordinance (for the City of Los Angeles) and would thus exceed the standards in Title 24 of the CCR requiring building energy efficiency standards.

All forecasted growth would incorporate design features and energy conservation measures, as required by Title 24 of the CCR (CalGreen) requiring building energy efficiency standards, and would also be in compliance with the LA Green Building Code, which would reduce the impact on natural gas demand. It is also anticipated that future developments would upgrade distribution facilities, commensurate with their demand, in accordance with all established policies and procedures. There would be sufficient statewide supplies to accommodate the statewide requirements from 2018-2030. Thus, there is a plan to secure natural gas supplies to meet demand. Therefore cumulative impacts would be less than significant.

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

Less Than Significant Impact. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. As described throughout this environmental impact analysis, with implementation of the recommended mitigation measures, where applicable, the Project would not result in any unmitigated significant impacts. Thus, the Project would not have the potential to result in substantial adverse effects on human beings and impacts would be less than significant.

4. LIST OF PREPARERS

Lead Agency	**City of Los Angeles** Department of City Planning 200 N. Spring Street, Room 763, Los Angeles, California 90012 Heather Bleemers, City Planner
Environmental Consultant	**CAJA Environmental Services** 11990 San Vicente Boulevard, Suite 250, Los Angeles, California 90049 Chris Joseph, President Seth Wulkan, Project Manager Sherrie Cruz, Senior Graphics Specialist
Project Applicant	**Wilshire Park Place, LLC** **Wilshire Park Place North, LLC** 3470 Wilshire Boulevard, Suite 700, Los Angeles, California 90010
Applicant's Representative	**Armbruster Goldsmith & Delvac LLP** 12100 Wilshire Boulevard, Suite 1600, Los Angeles, CA 90025
Architect	**Callison RTKL** 333 South Hope Street, C-200, Los Angeles, California 90071
Air Quality, GHG, Noise	**DKA Planning, LLC** 1513 W. Sepulveda Boulevard, Suite D, Torrance, California 90501 Douglas Kim, AICP
Geotechnical	**GeoPenTech** 5251 California Avenue, Suite 10, Irvine, California 92617 Ryan Bulataoe, Project Engineer
Hazards	**Western Environmental Engineers, Co.** 1815 East Wilshire Avenue, Suite 905, Santa Ana, California 92705 James Yoon, REPA
Trees	**Harmony Gardens** 1224 Addison Street, Valley Village, California 91607
Traffic Engineer	**Fehr & Peers** 600 Wilshire Boulevard, #1050, Los Angeles, California 90017

Public Agencies and Departments

Los Angeles Department of Public Works

Ali Poosti, Division Manager, Wastewater Engineering Services Division

Los Angeles Department of Recreation and Parks

Ramon Barajas, Assistant General Manager

Los Angeles Department of Transportation

Wes Pringle, Transportation Engineer

Los Angeles Unified School District

Rena Perez, Director

Los Angeles Public Library

Tom Jung, Management Analyst II

Native American Heritage Commission

Gayle Totton, Associate Government Program Analyst

Natural History Museum of Los Angeles County

Samuel A. McLeod, PhD, Vertebrate Paleontology

South Central Coastal Information Center

Stacy St. James