

VERMONT CORRIDOR PROJECT

Draft Environmental Impact Report

State Clearinghouse No. 2017051013

Lead Agency:

County of Los Angeles

c/o Community Development Commission

County of Los Angeles

700 West Main Street

Alhambra, CA 91801

November, 2017



SACHI A. HAMAI
Chief Executive Officer

County of Los Angeles CHIEF EXECUTIVE OFFICE

Kenneth Hahn Hall of Administration
500 West Temple Street, Room 713, Los Angeles, California 90012
(213) 974-1101
<http://ceo.lacounty.gov>

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NOTICE OF COMPLETION AND AVAILABILITY OF DRAFT ENVIRONMENTAL IMPACT REPORT AND NOTICE OF DRAFT EIR COMMUNITY MEETING FOR THE PROPOSED VERMONT CORRIDOR PROJECT STATE CLEARINGHOUSE NO. 2017051013

DATE: November 3, 2017

TO: State Clearinghouse, Responsible/Trustee Agencies, and Interested Individuals

SUBJECT: Notice of Completion and Availability of the Draft Environmental Impact Report

PROJECT: Vermont Corridor Project

PROJECT ADDRESS: Site 1: 500, 510, 526, 532 South Vermont Avenue and 523, 531 South Shatto Place;
Site 2: 540, 542, 550 South Vermont Avenue and 3175 West 6th Street; and
Site 3: 427, 433 South Vermont Avenue.

LEAD AGENCY: County of Los Angeles

Pursuant to the California Environmental Quality Act (CEQA), California Public Resources Code Section 21000 et seq. and the State CEQA Guidelines, the County of Los Angeles (County), as lead agency, by its Community Development Commission is circulating for public review a Draft Environmental Impact Report (DEIR) for the Vermont Corridor Project (Project).

PROJECT LOCATION: The Project proposes the redevelopment of each of three County-owned Project Sites. Site 1 is an irregularly shaped, approximately 110,400 square foot (approximately 2.5 acre) site, located on the east side of Vermont Avenue, north of 6th Street. Site 2 is a rectangular, approximately 43,300 square foot (approximately 1 acre) site located at the northeast corner of the intersection of Vermont Avenue and 6th Street. Site 3 is a rectangular, approximately 21,700 square foot (approximately 0.5 acre) site, located on the west side of Vermont Avenue, north of 5th Street. All three sites are located in the City of Los Angeles. (See Figure 1).

PROJECT SUMMARY:

Site 1

Proposed development on Site 1 would involve removal of the existing County office building, vacant office building, surface parking lots, and parking structure, and construction of a new County office building

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containing 471,000 square feet of office use over a 390,000-square foot parking structure containing 965 spaces, and 10,000 square feet of ground floor retail and restaurant uses. Current County employees located on Site 1 will be relocated to offsite facilities prior to the commencement of construction on Site 1. In addition, a new parking structure would be constructed on the Site of the existing 7-story parking structure on Shatto Place. This new parking structure would contain 768 spaces within a 380,000-square foot, 11-story building with two below grade levels that would serve the new office building. A total of 135 bicycle storage spaces (7 short-term and 128 long-term) would be provided on Site 1.

Site 2

Proposed development on Site 2 would involve reuse and conversion of the existing 154,793 square foot, 12-story County office building into a maximum of 172 residential units (82 studio, 46 one-bedroom, 44 two-bedroom), 4,100 square feet of ground floor retail, 1,375 square feet of ancillary space (office, common area, etc.), and an approximately 7,500 square foot roof deck amenity. Upgrade to existing steel framing and installation of new HVAC, and life/safety systems would be included in the reuse of the existing building, as well as new exterior building facades. The development of Site 2 would involve removal of an existing four-story, approximately 52,000 square foot, office building and two-story parking structure, and construction of a new 116,324 square foot, five-level parking structure (3.5 levels above grade and 1.5 levels below grade). A future option for the development of Site 2 would include construction of a new 66,935 square foot, mixed-use building above the parking structure, containing five residential levels and 74 units (28 studio, 38 one-bedroom, and 8 two-bedroom), and 2,250 square feet of ancillary space. In addition, 3,400 square feet of retail uses would be provided at the ground level of the new mixed-use building on 6th Street. The parking structure would provide 263 auto parking spaces and 290 bicycle storage spaces (30 short-term and 260 long-term) to serve the residential units (new and reused/converted), and the retail uses on Site 2.

Site 3

Proposed development on Site 3 would involve removal of the existing County building and construction of a new 80,837 square foot, six-story, 100 percent senior affordable housing project containing 72 units, and an approximately 13,200 square foot community recreation center, over a three-story, 51,591 square foot underground parking structure containing 116 spaces. In addition, 81 long term and 21 short-term bicycle parking spaces would be provided on the ground floor. Current County employees located on Site 3 will be relocated to offsite facilities prior to the commencement of construction on Site 3.

SUMMARY OF SIGNIFICANT ENVIRONMENTAL EFFECTS: The Project will have no impact or less than significant impacts on Aesthetics, Agricultural Resources, Biological Resources, Cultural Resources (Historical Resources), Geology and Soils, Greenhouse Gas Emissions, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Public Services, and Utilities and Service Systems. With the implementation of mitigation measures, the Proposed Project will result in less than significant impacts to Cultural Resources (Archaeological and Paleontological Resources), and Hazards and Hazardous Materials. Implementation of the Project would result in significant unavoidable environmental impacts relative to: Air Quality (construction daily emissions for NO_x, and overlapping construction and operation phases for NO_x and ROG); Noise (construction noise); and Transportation (10 peak hour impacts at seven intersections at buildout, and cumulative construction traffic).

The Project Sites are not listed on any of the lists of sites enumerated under Section 65962.5 of the Government Code related to hazardous waste and hazardous waste disposal.

PUBLIC REVIEW OF THE DRAFT EIR: The DEIR is available for review and comment. Electronic files of the DEIR and appendices are available for download or viewing at <http://lacdc.org/>. A hardcopy of the DEIR is also available for viewing at:

- Felipe de Neve Branch Library, 2820 W. 6th Street, Los Angeles, CA 90057
- Pico Union Branch Library, 1030 S. Alvarado Street, Los Angeles, CA 90006
- Pico-Koreatown Branch Library, 694 S. Oxford Avenue, Los Angeles, CA 90005
- Wilshire Branch Library, 149 N. Saint Andrews Place, Los Angeles, CA 90004
- Community Development Commission, County of Los Angeles, 700 West Main Street, Alhambra, CA 91801

DEIR REVIEW COMMUNITY MEETING: A public meeting to provide a Project overview and conclusions of the DEIR and status of the review process will be held. Any comments on the DEIR must be in writing and will be included with responses in the Final EIR. You may send a written comment by the deadline date of December 22, 2017 without attending this meeting. The mail, email and fax addresses for DEIR comments are at the end of this notice. Spanish and Korean translation services will be available at this meeting. This Notice is provided in English, Spanish and Korean. The DEIR Review Community Meeting will be held at the time and location listed below:

Date: November 28, 2017
Time: 5:00 p.m. to 7:00 p.m.
Location: Los Angeles County Department of Mental Health Building, 550 South Vermont Avenue, Los Angeles, CA, 90020, 9th Floor (see Figure 2).

County building management requires that all guests check in at the first floor security desk and present a photo ID. **Parking for the meeting will be available at 526 S. Vermont Ave, Los Angeles, CA 90020 (directly north of the building).**

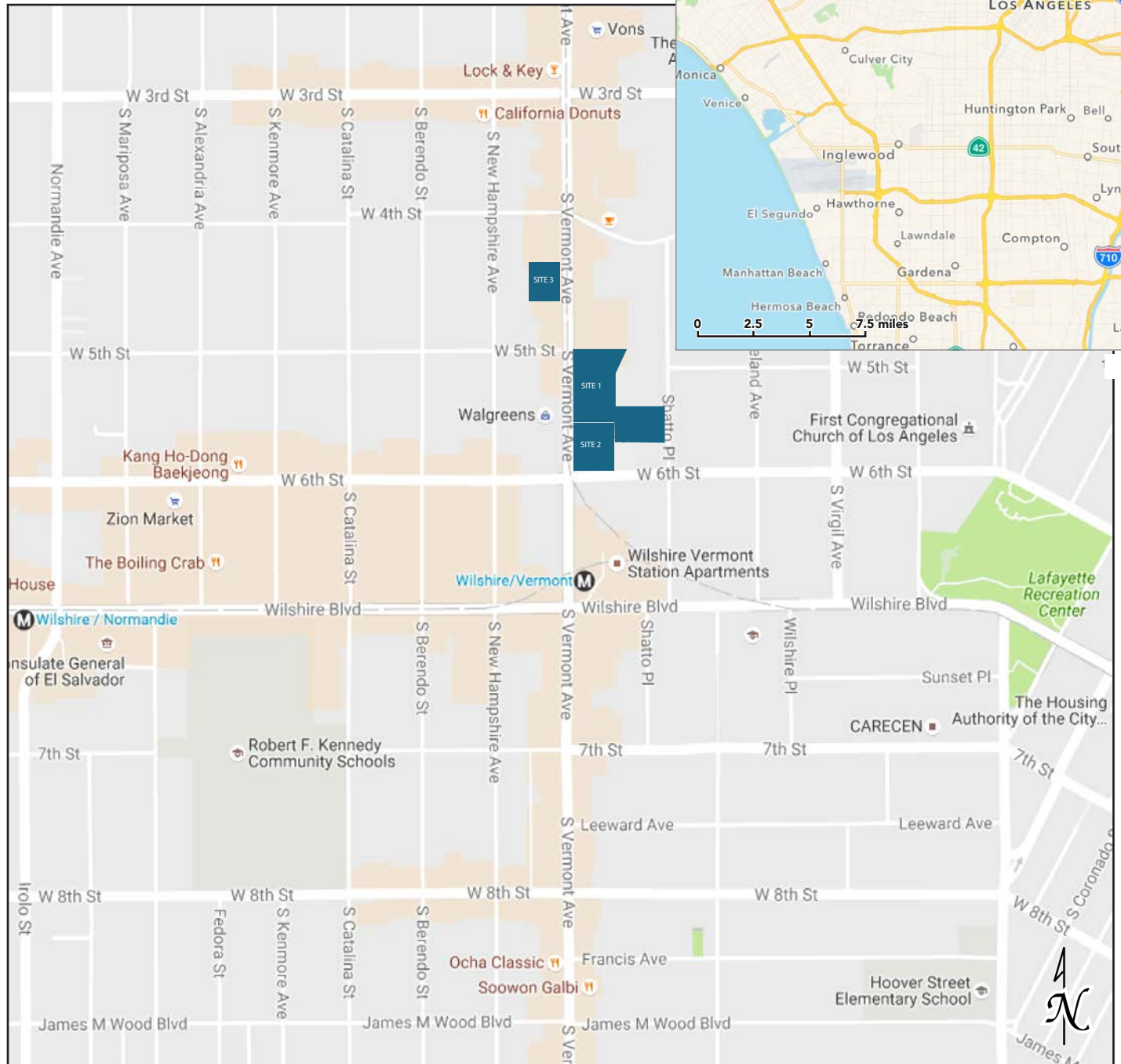
DEIR REVIEW PERIOD: The DEIR will be available for public review for a **50-day public review period** from **November 3, 2017, to December 22, 2017** at the locations listed above.

The County is seeking input from both agencies and the public on the DEIR. Due to the time limits in state law, written comments must be sent via mail, e-mail, or fax no later than **5:00 PM on December 22, 2017**. All comments and responses to this notice should be submitted in writing to:

Mr. Chris Lopez
Development Specialist, Special Projects
Community Development Commission, County of Los Angeles
700 West Main Street Alhambra, CA 91801
Tel: 626-586-1550
Fax: 626-943-3817
Email: CLopez@labtc.org

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PARA OBTENER UNA COPIA DE ESTE AVISO TRADUCIDA EN ESPAÑOL, POR FAVOR CONTACTE:
CAREY JENKINS 626-586-1854 Carey.Jenkins@lacdc.org
OR CHRIS LOPEZ 626-586-1550 CLopez@labtc.org

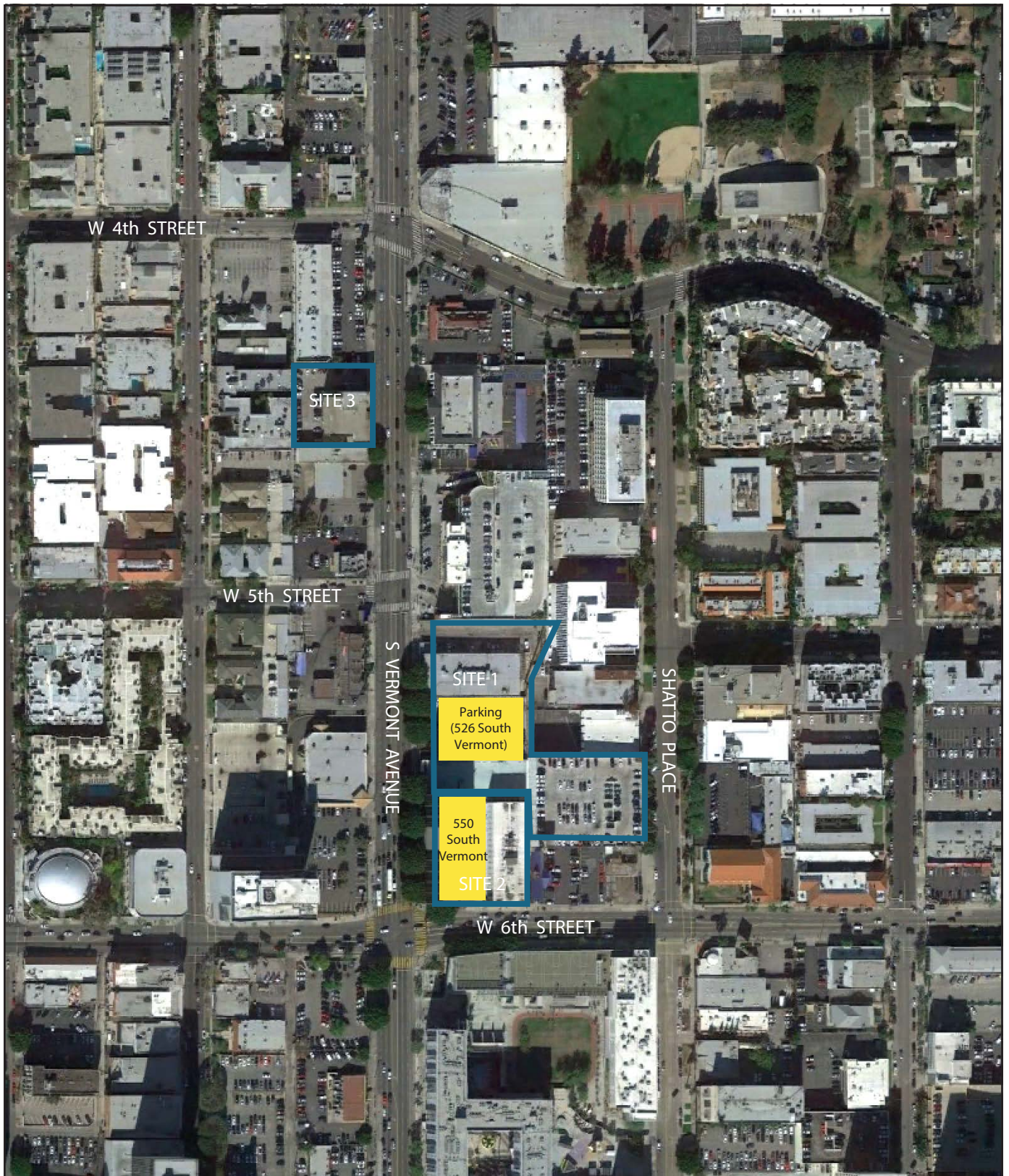
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CAREY JENKINS 626-586-1854 Carey.Jenkins@lacdc.org
OR CHRIS LOPEZ 626-586-1550 CLopez@labtc.org



■ Project Site

Source: Google Earth, December 2016.

0 656
Scale (Feet)



Community Meeting: 550 South Vermont (DMH Building) 9th Floor Los Angeles, CA 90020;
 Parking Located at 526 South Vermont (directly north of DMH Building)

Project Sites
 Source: Google Earth, October 2017.



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1.0 INTRODUCTION

This chapter provides an overview of the purpose and focus of the Draft Environmental Impact Report (“Draft EIR”) for the proposed Vermont Corridor Project (the “Project”), a discussion of the public review process, and a description of the organization of the Draft EIR.

1.1 PURPOSE OF THIS ENVIRONMENTAL IMPACT REPORT

The County of Los Angeles (the “County”) has prepared this Draft EIR for the following purposes:

- To satisfy the requirements of the California Environmental Quality Act (“CEQA”) (Public Resources Code [“PRC”] Section 21000, et seq.), and the State CEQA Guidelines (“CEQA Guidelines”, California Code of Regulations [CCR], Title 14, Chapter 3, Section 15000, et seq.).
- To inform public agency decision makers and the public of the potential significant environmental effects of the Project, as well as possible ways to minimize any significant effects, and reasonable alternatives to the Project.
- To enable the County to consider environmental consequences when deciding whether to approve the Project.

The Project will require discretionary approvals by the County and other governmental agencies. In this context, the term Project refers to the whole of the actions that are evaluated in this Draft EIR, including the redevelopment of three Project Sites (as defined below) and all associated activities. Therefore, the Project is subject to environmental review requirements under CEQA. The County, by its Community Development Commission (“CDC”), is identified as the “Lead Agency” for the Project in accordance with Sections 15051 and 15367 of the CEQA Guidelines, which define the Lead Agency as the public agency that has the principal responsibility for carrying out or approving a project.

The subject of this EIR is the Vermont Corridor Project, which involves three County-owned properties located in the “Vermont Corridor”. These three properties are collectively referred to as the “Project Sites”. The Vermont Corridor is identified as the area located on South Vermont Avenue between 4th Street and 6th Street, in the City of Los Angeles (the “City”). The three Project Sites are generally located at the following addresses: Site 1, located at 510, 526, and 532 South Vermont Avenue and 523 Shatto Place; Site 2, located at 550 South Vermont Avenue and 3175 West 6th Street; and Site 3, located at 433 South Vermont Avenue. References to individual Sites (e.g., Site 1, Site 2, etc.) refer only to the respective Site.

As described in Section 15121 (a) and 15362 of the CEQA Guidelines, an EIR is an informational document that informs public agency decision-makers and the public of any potential significant environmental effects of a project, identifies possible ways to minimize the significant effects, and describes reasonable alternatives to the project. Thus, the purpose of this EIR is to focus the discussion on those potential environmental effects of the Project that the Lead Agency has determined could be significant. In addition, where applicable, feasible mitigation measures are recommended that could reduce or avoid the significant environmental impacts of the Project.

This EIR was prepared in accordance with Section 15151 of the CEQA Guidelines, which defines the standards for EIR adequacy as follows:

An EIR should be prepared with a sufficient degree of analysis to provide decision makers with information which enables them to make a decision which intelligently takes account

of environmental consequences. An evaluation of the environmental effects of a proposed project need not be exhaustive, but the sufficiency of an EIR is to be reviewed in the light of what is reasonably feasible. Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts. The courts have looked not for perfection but for adequacy, completeness, and a good faith effort at full disclosure.

1.2 ENVIRONMENTAL REVIEW PROCESS

Notice of Preparation

The CDC initiated the County's CEQA review process for the Project through the issuance of a Notice of Preparation ("NOP") as required by CEQA Guidelines Section 15082. The NOP for the Project EIR was prepared by the CDC, and distributed to the State Clearinghouse, Office of Planning and Research, responsible agencies, and other interested parties on May 4, 2017. The NOP was also distributed to owners and occupants of properties located within 500 feet of the Project Sites, and included instructions for obtaining a translated version of the NOP in Spanish or Korean. The NOP solicited comments from responsible and trustee agencies, as well as interested parties, on the scope of the EIR. The NOP was circulated for a 30-day scoping period that ended on June 5, 2017. A public scoping meeting was held on May 25, 2017.

The Notice of Preparation is included in Appendix 1-1 to this Draft EIR. Written comments provided in response to the NOP, and comments provided at the scoping meeting, are included in Appendix 1-2 to this Draft EIR. Issues raised during the NOP period included suggestions for the preparation of the air quality, traffic, and land use analyses for the Project, requirements related to wastewater, storm water, and solid waste related to the Project, potential impacts to a nearby school, impacts to transit facilities and services, and requirements related to fire protection related to the Project. Issues raised during the scoping meeting included the parking supply to be provided by the project, the amount of affordable housing to be provided by the Project, the size of the community recreation center that would be included in the Project, the removal of trees, and the reconfiguration of the 6th Street and Vermont Avenue intersection and removal of parking to provide a pedestrian promenade. Appendix I-2 includes a summary matrix of comments raised during the NOP period and during the scoping meeting and the section of the Draft EIR where the issues raised are addressed. In addition, direct outreach to community organizations, neighborhood councils, and elected officials was undertaken throughout the period in which the Draft EIR was prepared.

Environmental Issues Assessed in the EIR

Based on agency and public comments in response to the NOP and a review of environmental issues, this EIR includes analyses of the following environmental topics:

- Aesthetics (Aesthetics/Views, Shade/Shadow, Light/Glare)
- Air Quality
- Cultural Resources (Historical Resources, Archaeological Resources, Paleontological Resources)
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials

- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population, Housing, and Employment
- Public Services
- Recreation
- Transportation and Traffic
- Tribal Cultural Resources
- Utilities and Service Systems

Potential environmental effects in the areas of Agricultural Resources, Biological Resources, and Mineral Resources, as well as other specific areas related to the topics listed above, were determined to be either less than significant or no impact and, therefore, are not evaluated in greater detail in the EIR. These areas are addressed in Section 6.5, Effects Not Found to be Significant, of the Draft EIR. An Initial Study was not prepared for the Project as permitted by CEQA Guidelines Section 15060(d) because the Lead Agency determined it would require an environmental impact report for the Project rather than a mitigated negative declaration.

Agency and Public Review and Comment on the Draft EIR

This Draft EIR was prepared under the direction and supervision of the Lead Agency and reflects the independent judgment of the Lead Agency. This Draft EIR has been subjected to an internal department review prior to release for agency and public review. The Draft EIR will be circulated for review and comment by the public and other interested parties, agencies, and organizations for 50 calendar days, longer than required by CEQA Guidelines Section 15105. During this public review and comment period, interested public agencies, organizations and individuals may submit written comments concerning the Project or the Draft EIR, or obtain instructions for obtaining a translated version of the Draft EIR summary in Spanish or Korean by email or U.S. mail to:

Mr. Chris Lopez
Development Specialist, Special Projects
Community Development Commission, County of Los Angeles
700 West Main Street
Alhambra, CA 91801
Tel: 626-586-1550
Email: CLopez@labtc.org

A public hearing on recommendations for action on the EIR and the Project will be held before the Los Angeles County Board of Supervisors (the “Board”). After the review and comment period, written responses to all written comments will be prepared as part of the Final EIR. As required by CEQA, responses to comments submitted by responsible public agencies will be distributed to those agencies for review prior to consideration of the Final Environmental Impact Report (“Final EIR”) by the Board. Upon completion of the Final EIR and other required documentation, the Board may adopt findings relative to the Project’s environmental effects and a statement of overriding considerations, certify the EIR, and approve the Project.

1.3 ORGANIZATION OF THE DRAFT EIR

This Draft EIR is organized into nine chapters as follows:

1.0 (Introduction): This chapter briefly discusses the purpose of the Draft EIR, identifies the environmental issues assessed in the Draft EIR, and describes the environmental review process for the public and other agencies and organizations, and describes the organization of this Draft EIR.

2.0 (Executive Summary): This chapter provides a summary of the Project description, comments received during the NOP review period and during the scoping meeting, areas of controversy, alternatives to the Project, and environmental impacts, project design features, regulatory requirements, and mitigation measures.

3.0 (Project Description and Environmental Setting): This chapter provides a detailed description of the Project, including Project location, Project objectives, Project characteristics, intended use of this Draft EIR, required discretionary actions, and a description of the environmental setting of the Project Sites.

4.0 (Environmental Impact Analysis): This chapter is a primary focus of this EIR. Each environmental topic section contains a discussion of existing conditions for the project area, an assessment and discussion of the significance of impacts associated with the Project, an assessment of cumulative impacts, an identification of mitigation measures where applicable, and a discussion of level of impact significance after mitigation, where applicable.

5.0 (Alternatives): This chapter includes an assessment of a reasonable range of alternatives to the Project. The range of alternatives selected is based on their ability to feasibly attain most of the basic objectives of the proposed Project and to avoid or substantially lessen any of the significant effects of the Project.

6.0 (Other CEQA Considerations): This chapter provides a discussion of significant unavoidable impacts that would result from the proposed Project, and the reasons why the Project is being proposed notwithstanding the significant unavoidable impacts. An analysis of the significant irreversible changes in the environment also is presented. In addition, this chapter analyzes the Project's potential growth-inducing impacts, which could foster economic or population growth or the construction of additional housing, either directly or indirectly, in the surrounding environment. Finally, a discussion of possible effects of the Project that were determined not to be significant is provided.

7.0 (List of Preparers of the EIR and Persons Consulted): This chapter lists the persons who contributed to the preparation of this Draft EIR.

8.0 (Acronyms, Abbreviations, and Terminology): This chapter provides definitions for all of the acronyms and abbreviations used in this Draft EIR.

9.0 (References): This chapter provides a list of references used in this Draft EIR.

2.0 EXECUTIVE SUMMARY

The Executive Summary contains an overview of the proposed Vermont Corridor Project (“Project”), comments received during the Notice of Preparation period and scoping meeting, known areas of controversy, a summary of the alternatives to the Project, project objectives, and the Project’s potential environmental effects, project design features, regulatory requirements, and mitigation measures.

2.1 INTRODUCTION

This chapter is intended to provide a clear description of the Project and its potential environmental impacts. Section 15123 of the State CEQA Guidelines requires that the summary identify the following:

- “(1) Each significant effect with proposed mitigation measures and alternatives that would reduce or avoid that effect;*
- (2) Areas of controversy known to the Lead Agency including issues raised by agencies and the public; and*
- (3) Issues to be resolved including the choice among alternatives and whether or how to mitigate the significant effects.”*

2.2 PROPOSED PROJECT

The proposed Vermont Corridor Project (the “Project”) is being undertaken by the County of Los Angeles (the “County”) through its Community Development Commission (“CDC”), to generate substantial economic benefit to the area by eliminating blight, creating construction jobs for local residents, as well as providing growth and expansion opportunities for local and small businesses. The Project would include the updated re-development and occupancy of three County-owned properties located in the “Vermont Corridor”, which is identified as the area located on South Vermont Avenue between 4th Street and 6th Street, in the City of Los Angeles (the “City”). The three County-owned sites are collectively referred to as the “Project Sites”, and are generally located at the following addresses: Site 1, located at 510, 526, and 532 South Vermont Avenue and 523 Shatto Place; Site 2, located at 550 South Vermont Avenue and 3175 West 6th Street; and Site 3, located at 433 South Vermont Avenue.

The Vermont Corridor is home to over a half million square feet of County-owned office space, and over a half million square feet of County-leased office space. County departments occupying these spaces include the Department of Mental Health (“DMH”), Department of Parks and Recreation (“DPR”), and Workforce Development Aging and Community Services Department (“WDACS”) (collectively, “Departments”). County-owned facilities, built between 1938 and 1963, have contributed to blight in the surrounding community due to the age of the buildings. These outdated facilities offer few operating efficiencies or amenities for the County employees who occupy the buildings. To promote improved efficiency, reverse blight in the area, and promote redevelopment of the County-owned properties and surrounding areas, the County intends to consolidate these Departments’ locations within new office facilities, and relocate employees accordingly. Further, the aged facilities occupy prominent parcels that offer potential opportunities for economic revitalization through their redevelopment that would also provide public benefits and aesthetic enhancement for the surrounding community.

Site 1 is currently occupied by a two-story abandoned structure with roof parking that has been identified as structurally deficient, a two-story office building occupied by DPR staff, open parking areas, and carport

in the north parking area, and an existing parking structure located at 523 Shatto Place that is connected to the site. Site 2 is currently occupied by two office buildings, which house DMH and WDACS staff, respectively. Site 3 is currently occupied by an office building housing DPR staff.

Land Use Regulation

Sites 1, 2, and 3 are located in the City of Los Angeles Wilshire Community Plan area, with a “Community Commercial” land use designation. The Site 1 City zoning classification is C2-1 (Commercial, Height District 1) for the office buildings and surface parking lot areas, and the zoning classification for the existing 523 Shatto Place parking structure is PB-1 (Parking Building, Height District 1). Sites 2 and 3 are zoned C2-1.

The Project Sites are all located in a “Transit Priority Area” as defined by California Public Resources Code (“PRC”) Section 21099 because they are located within one-half mile of an existing rail transit station (Wilshire/Vermont Metro Rail Red/Purple Line Station). The Project Sites are located in an area that is developed with urban uses, and have each been previously developed with urban uses. Accordingly, the Project Sites are infill sites as defined in PRC Section 21099. The Project is an infill development comprised of a new County office building and parking structure on Site 1, redevelopment of the existing County office building on Site 2 into residential units, along with a new mixed-use building and parking structure, and a new senior affordable housing project and community recreation center on Site 3. The Site 1 office building and associated parking structure is proposed on a property zoned for commercial uses with a floor area ratio (FAR) that exceeds 0.75 to 1 and, therefore, qualifies as an “Employment Center Project” as defined by PRC Section 21099(a)(1).

Site 1 is located in the City of Los Angeles, but the property is owned by the County and would be developed for County use, and thus, is not subject to City of Los Angeles' land use regulations, pursuant to California Government Code Section 53090 *et. seq.* Although exempt from City of Los Angeles building and zoning requirements, Site 1 development would be required to comply with County Building Code requirements, and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. Furthermore, the Los Angeles County Department of Regional Planning will review the proposed development on Site 1 for consistency with the County General Plan.

Site 2 is located in the City of Los Angeles, on land owned by the County. Development on Site 2 would be constructed on County land for mixed use residential and commercial development under a ground lease. Development of Site 2 would be subject to the City of Los Angeles General Plan, Zoning Ordinance and building regulations.

Site 3 is located in the City of Los Angeles, on land owned by the County. Development on Site 3 would consist of (i) a senior affordable housing project to be developed and operated in partnership with a non-profit housing corporation, and (ii) a community recreation center to be operated by the YMCA of Metropolitan Los Angeles (a non-profit organization), under a ground lease as a public benefit. Although exempt from City of Los Angeles building and zoning requirements, Site 3 development would be required to comply with County Building Code requirements, and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. Furthermore, the Los Angeles County Department of Regional Planning will review the proposed development on Site 3 for consistency with the County General Plan.

Proposed Development

Site 1

Proposed development on Site 1 would involve removal of the existing DPR office building, vacant office building, surface parking lots, and parking structure, and construction of a new County office building containing 471,000 square feet of office use over a 390,000-square foot parking structure containing 965 spaces, and 10,000 square feet of ground floor retail (see Table 2-1, Project Summary Development, below). Current DPR employees located on Site 1 will be relocated to offsite facilities with existing capacity prior to the commencement of construction on Site 1. The proposed office building would be up to 280 feet in height to the top of the parapet (286 feet to top of elevator machine room, 296 feet to top of emergency helicopter landing facility ("EHLF")), and would consist of 21 total stories (13 office floors over an eight-story parking structure (seven levels above grade and one level at grade)). County Code Section 2007.9 requires an EHLF to be included in buildings over 12 stories, or 120 feet above the lowest level of Fire Department access. The EHLF consists of a clear area on the roof of the building capable of accommodating a helicopter engaged in firefighting and/or emergency evacuation operations. In addition, a new parking structure would be constructed on the site of the existing 7-story parking structure on Shatto Place. This new structure would contain 768 spaces within a 380,000-square foot, 11-story building with two below grade levels that would serve the new office building. The new parking structure would be up to 110 feet in height to the top of the parapet (130 feet to top of elevator machine room). A total of 135 bicycle storage spaces (7 short-term and 128 long-term) would be provided on Site 1.

When complete, the new 21-story office building would accommodate the relocation of the 973 DMH employees currently located in the existing 12-story building on Site 2, the 250 WDACS employees currently located in the existing four-story building on Site 2, and an additional 840 DMH employees currently located in leased facilities within four miles of the new office building. Accordingly, a total of up to 2,063 County employees would be located on Site 1 when the building opens in 2021.

In order to provide the capability of meeting the County's future needs, the new Site 1 office building would be designed to accommodate future growth, to a maximum of 2,166 employees, between 2021 and 2023. In addition, an estimated 27 new employees associated with the new retail uses would be located on Site 1.

Site 1 would accommodate approximately 2,193 employees at full occupancy (office and retail) by 2023, which would represent a net increase of approximately 2,100 employees on the Site. The majority of these employees would be relocated from existing County offices within the Project area.

Site 2

Proposed development on Site 2 would involve reuse and conversion of the existing 154,793 square foot, 12-story DMH building into a maximum of 172 residential units (82 studio, 46 one-bedroom, 44 two-bedroom), 4,100 square feet of ground floor retail, 1,375 square feet of ancillary space (office, common area, etc.), and an approximately 7,500 square foot roof deck amenity (see Table 2-1, Project Summary Development, below). Upgrade to existing steel framing and installation of new HVAC, and life/safety systems would be included in the reuse of the existing DMH building, as well as new exterior building facades. The existing building height of 173.5 feet (including the elevator machine room) would not change under the Project. The development of Site 2 would involve removal of the existing four-story, approximately 52,000 square foot, WDACS office building and two-story parking structure, and construction of a new 116,324 square foot, five-level parking structure (3.5 levels above grade and 1.5

levels below grade). A future option for the development of Site 2 would include construction of a new 66,935 square foot, mixed-use building above the parking structure, containing five residential levels and 74 units (28 studio, 38 one-bedroom, and 8 two-bedroom), and 2,250 square feet of ancillary space. In addition, 3,400 square feet of retail uses would be provided at the ground level of the new mixed-use building on 6th Street. The parking structure would provide 263 auto parking spaces and 290 bicycle storage spaces (30 short-term and 260 long-term) to serve the residential units (new and reused/converted), and the retail uses on Site 2. The new mixed-use building would be approximately 95 feet from the highest adjacent grade to the top of the parapet (105 feet to top of elevator machine room).

Retail uses on Site 2 would be located along Vermont Avenue and 6th Street. The residential units on Site 2 would be accessed from a lobby facing Vermont Avenue, with secondary access from a new plaza area that would front on 6th Street. The existing repurposed building would be connected to the new mixed-use building via a sky bridge on the 4th floor. Ingress and egress to the new parking structure would be provided from 6th Street. The new residential units would be accessed directly from the parking garage, while the converted units in the existing building would connect to the new parking garage via the 4th floor sky bridge.

Development on Site 2 would generate approximately 30 new employees, while the existing approximately 1,223 employees presently located on Site 2 would relocate to Site 1. Construction on Site 2 would not commence until the completion of the Site 1 development, and following the relocation of the 973 DMH employees currently located in the existing DMH building on Site 2, and the 250 WDACS employees currently located on Site 2 into the new Site 1 building.

As previously discussed, proposed development on Site 2 would involve the construction of 74 residential units (new construction), and the conversion of 154,793 square feet within the existing DMH building for the construction of 172 residential units. The City of Los Angeles estimates that there are approximately 2.51 persons per dwelling unit in the Wilshire Community Plan Area. At this average household size, the Project would be expected to accommodate approximately 618 new residents. Buildout of Site 2 is expected by 2023.

Site 3

Proposed development on Site 3 would involve removal of the existing DPR building and construction of a new 80,837 square foot, six-story, 100 percent senior affordable housing project containing 72 units, and an approximately 13,200 square foot community recreation center, over a three-story, 51,591 square foot underground parking structure containing 116 spaces (see Table 2-1, Project Summary Development, below). Current DPR employees located on Site 3 will be relocated to offsite facilities with existing capacity prior to the commencement of construction on Site 3. The entrance to the proposed community recreation center would be provided on Vermont Avenue. A separate entrance to the proposed residential units, and vehicular access to the below ground parking structure that would serve the residential and community recreation center uses would be also provided from Vermont Avenue. In addition, 81 long term and 21 short-term bicycle parking spaces would be provided on the ground floor. A landscaped courtyard, open to the sky, would be provided on the second level of the Project to serve the Project residents, and would be surrounded by the upper floor units. The new building would be 65 feet in height to the top of the parapet (75 feet to top of elevator machine room).

Site 3 uses would generate approximately 46 employees, which would result in a net decrease of approximately 66 employees on the Site. The City of Los Angeles estimates that there are approximately 2.51 persons per dwelling unit in the Wilshire Community Plan Area. Based on this average household

size, the Project would be expected to accommodate approximately 181 new residents on Site 3 as shown in Table 2-1.

Table 2-1
Project Development Summary

Use	Size
Development	
Site 1	
<i>Existing</i>	
<i>County Office (Occupied)</i>	<i>30,788 sf</i>
<i>County Office (Vacant)</i>	<i>13,325 sf</i>
<i>Employees</i>	<i>93 employees</i>
<i>Proposed</i>	
<i>County Office</i>	<i>471,000 sf</i>
<i>Retail</i>	<i>6,350 sf</i>
<i>Restaurant</i>	<i>3,650 sf</i>
<i>Employees</i>	<i>2,193 employees</i>
Site 2	
<i>Existing</i>	
<i>County Office (Occupied)</i>	<i>154,793 sf</i>
<i>County Office (Occupied)</i>	<i>52,000 sf</i>
<i>Employees</i>	<i>1,223 employees</i>
<i>Proposed</i>	
<i>Residential (Reuse)</i>	<i>172 units</i>
<i>Retail (Reuse)</i>	<i>4,100 sf</i>
<i>Amenity (Reuse)</i>	<i>8,875 sf</i>
<i>Residential (New Construction)</i>	<i>74 units</i>
<i>Retail (New Construction)</i>	<i>3,400 sf</i>
<i>Amenity (New Construction)</i>	<i>2,250 sf</i>
<i>Employees</i>	<i>30 employees</i>
<i>Residents</i>	<i>618 residents</i>
Site 3	
<i>Existing</i>	
<i>County Office (Occupied)</i>	<i>29,292 sf</i>
<i>Employees</i>	<i>112</i>
<i>Proposed</i>	
<i>Senior Affordable Housing</i>	<i>72 units</i>
<i>Community Recreation Center</i>	<i>13,200 sf</i>
<i>Employees</i>	<i>46 employees</i>
<i>Residents</i>	<i>181 residents</i>
Parking Spaces	
Site 1	
<i>Existing</i>	
<i>Parking Structure</i>	<i>864</i>
<i>Surface Parking Lots</i>	<i>99</i>
<i>Vacant Office Building</i>	<i>41</i>
<i>Total Existing</i>	<i>1,004</i>
<i>Proposed</i>	

**Table 2-1
Project Development Summary**

Use	Size
<i>New Office Building</i>	965
<i>New Shatto Place Parking Structure</i>	768
<i>Total Proposed</i>	1,733
Site 2	
<i>Existing</i>	
<i>Parking Structure</i>	53
<i>Proposed</i>	
<i>Parking Structure</i>	263
Sites 1 & 2 Total Parking Spaces	
<i>Existing</i>	1,057
<i>Proposed</i>	1,996
Site 3	
<i>Existing</i>	65
<i>Proposed</i>	116
Bicycle Storage	
Site 1	
<i>Existing</i>	
<i>Short-Term</i>	0
<i>Long-Term</i>	0
<i>Proposed</i>	
<i>Short-Term</i>	7
<i>Long-Term</i>	128
Site 2	
<i>Existing</i>	
<i>Short-Term</i>	5
<i>Long-Term</i>	0
<i>Proposed</i>	
<i>Short-Term</i>	30
<i>Long-Term</i>	260
Site 3	
<i>Existing</i>	
<i>Short-Term</i>	0
<i>Long-Term</i>	0
<i>Proposed</i>	
<i>Short-Term</i>	21
<i>Long-Term</i>	81
Total Existing Bicycle Storage	5
Total Proposed Bicycle Storage	527
<i>Source: Los Angeles County Facilities, Inc., 2016.</i>	

Project Construction

Construction on Site 1 and relocation of existing County employees to the new office building on Site 1 is required before the conversion of the existing building and construction of the new mixed-use building on Site 2 may commence. Site 3 construction would be independent of the Site 1 and Site 2 construction

activities, but will occur during the construction on Site 1. Accordingly, the Project is evaluated in this Draft EIR as a two-phased project.

Phase I of the Project would include construction of the new County office building, retail uses, and parking structure on Site 1, and construction of new senior affordable housing and community recreation center on Site 3. Current County employees on Sites 1 and 3 would be relocated to offsite facilities prior to the commencement of construction. Site 1 construction is anticipated to begin in the summer of 2018, and would take place over a period of approximately 36 months, with occupancy anticipated to be complete in the summer of 2021. Construction on Site 3 is anticipated to commence in the summer of 2019, and be completed and occupied in 2020.

Phase II of the Project would include the reuse and conversion of the existing twelve-story building for residential and retail use, and construction of new residential and retail uses and parking structure on Site 2. Current County employees on Site 2 will be relocated to the completed Site 1 office building prior to the commencement of construction activities on Site 2. Construction on Site 2 is anticipated to commence in the fall of 2021 and be completed and occupied in late 2023.

Actions Required

County of Los Angeles

The Project Sites are located entirely in the City of Los Angeles, but are owned by the County. The County, by its CDC, is the Lead Agency for the Project. Discretionary approvals from the County would be necessary to implement the Project on all Project Sites. Discretionary actions to be considered by the County include, but may not be limited to, the following:

- Certification of the EIR;
- Adoption of required findings and approval of the Project as described in the EIR;
- Approval of Project financing, including bond issuance;
- Approval of ground leases and option to ground leases, or comparable agreements for financing; and
- Other approvals as needed and may be required.

The County would provide ministerial approvals for grading and building permits, and other on-site ministerial actions that may be necessary to construct the Project on Site 1 and Site 3. Although exempt from City of Los Angeles building and zoning requirements, Site 1 and Site 3 development would be required to comply with County Building Code and State Fire Marshal requirements, and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. In addition, the development on Sites 1 and 3 will be reviewed by the County Department of Regional Planning for consistency with the County General Plan.

City of Los Angeles

Proposed development on Site 2 would be subject to the zoning and building regulations of the City of Los Angeles. As an agency with discretionary approval authority over the Project on Site 2, the City is a Responsible Agency under CEQA Guidelines Sections 15381 and 15096. Discretionary actions to be considered by the City include, but may not be limited to, the following:

- Consider the environmental effects of the Site 2 Project as shown in the EIR; and
- Approvals and permits for the Site 2 Project under the Adaptive Reuse Incentive Areas Specific Plan, and other City entitlements that may be required to authorize new Site 2 construction.

The City would provide ministerial approvals for grading and building permits, and other on-site ministerial actions that may be necessary to construct the Project on Site 2. Off-site ministerial permits, including but not necessarily limited to, connection to off-site utilities, any necessary work/improvements within the public right-of-way, and any off-site mitigation would be within the City's jurisdiction.

2.3 COMMENTS RECEIVED DURING THE NOP PERIOD AND SCOPING MEETING

Issues raised during the NOP period included suggestions for the preparation of the air quality, traffic, and land use analyses for the Project, requirements related to wastewater, storm water, and solid waste related to the Project, potential impacts to a nearby school, impacts to transit facilities and services, and requirements related to fire protection related to the Project.

Issues raised by a member of the community during the scoping meeting included contentions that the Project is providing too much parking, that the removal of parking would provide funding to provide a larger community recreation center and more affordable housing, that the Project should preserve existing street trees, and that the 6th Street and Vermont Avenue intersection should be reconfigured and parking removed to provide pedestrian facilities. The parking supply provided by the Project is addressed in Section 3.0, Project Description, of the Draft EIR. The comments related to the provision of a larger community recreation center are addressed in the Draft EIR alternatives analysis provided in Section 5.0 Alternatives, of the Draft EIR. The reconfiguration of the 6th Street/ Vermont Avenue intersection is addressed in Section 4.14, Transportation, of the Draft EIR. Existing trees are addressed in Section 6.5, Effects Found Not to be Significant, of the Draft EIR.

Appendix I-2 includes a summary matrix of comments raised during the NOP period and during the scoping meeting and the section of the Draft EIR where the issues raised are addressed.

2.4 AREAS OF CONTROVERSY

Issues raised in comments submitted to the Lead Agency in response to the NOP and during the scoping meeting include the following: parking supply, the provision of affordable housing, the size of the community recreation center, the preservation of existing trees, and the reconfiguration of the 6th Street/Vermont intersection.

2.5 ISSUES TO BE RESOLVED

Issues to be resolved include whether or how to mitigate potentially significant environmental impacts of the Project, and whether one of the alternatives should be approved rather than the Project.

2.6 SIGNIFICANT AND UNAVOIDABLE IMPACTS

The Draft EIR reviewed 17 environmental topics as listed in the State CEQA Guidelines and recommends 11 mitigation measures, 13 Project design features, and identifies 45 regulatory requirements that would be implemented if the project is approved. The Draft EIR concludes that, even with implementation of these measures, the Project would result in significant unavoidable environmental impacts relative to: Air Quality (construction daily emissions for NO_x, and overlapping construction and operation phases for NO_x

and ROG); Noise (construction noise); and Transportation (10 peak hour impacts at seven intersections at buildout and cumulative construction traffic).

Air Quality

Emissions associated with the Project would exceed the SCAQMD's thresholds of significance for NO_x during overlapping construction on Site 1 and Site 3, and NO_x and ROG during construction and operation overlapping phases and would be significant and unavoidable, as discussed in Section 4.2 (Air Quality) of this Draft EIR.

Noise

Construction noise impacts would be significant and unavoidable at four locations, which include Sensitive Receptor 2, the school/religious use located east of the Shatto Place parking structure; and Sensitive Receptors 12, 14 and 15, which are residential, religious, and residential uses, respectively, located in the vicinity of Site 3, as discussed in Section 4.10 (Noise) of this Draft EIR.

Transportation and Traffic

Cumulative construction traffic impacts would be significant and unavoidable due to the potential for concurrent construction of the related projects in the vicinity of the Project. The Project's contribution to this significant cumulative impact would be cumulatively considerable.

Significant and unavoidable impacts would remain at the following intersections (numbers refer to intersection numbers in Table 4.14-1 in Section 4.14, Transportation and Traffic, of this Draft EIR):

Existing with Project Phases I and II Conditions

- 24. Vermont Avenue & Wilshire Boulevard (PM Peak)

Interim Year 2021 with Project Phase I

- 6. Vermont Avenue & Beverly Boulevard (PM Peak)
- 24. Vermont Avenue & Wilshire Boulevard (PM Peak)

Buildout Year 2023 with Project Phases I and II

- 6. Vermont Avenue & Beverly Boulevard (PM Peak)
- 10. Vermont Avenue & 3rd Street (PM Peak)
- 18. Vermont Avenue & 6th Street (AM and PM Peak)
- 24. Vermont Avenue & Wilshire Boulevard (AM and PM Peak)
- 30. Vermont Avenue & Olympic Boulevard (AM and PM Peak)
- 33. Vermont Avenue & Washington Boulevard (PM Peak)
- 35. Vermont Avenue & I-10 Eastbound Ramps (PM Peak)

2.7 PROJECT OBJECTIVES

As discussed in Section 3.0 (Project Description and Environmental Setting) of this Draft EIR, the basic and fundamental objectives for the Project are:

- 1. Provide a mix of uses that maximizes building density at locations served by public transit and locates residential uses in areas that reduce automobile dependency, replaces obsolete County

facilities with new state-of-the art office facilities and infrastructure that will meet the current and future needs of County Departments located within or near the Vermont Corridor, and provides residential and retail uses to serve the local community, in a transit priority area.

2. Promote revitalization of the currently underutilized project sites, by expediting the elimination of blight and improving the visual character of the Project area through the redevelopment of underutilized sites.
3. Provide needed housing near public transit by constructing high density residential dwelling units to serve a range of potential tenants, and developing new housing stock at infill locations close to commercial and office uses.
4. Provide needed deed restricted senior affordable housing units in the Vermont Corridor.
5. Promote fiscal and community benefits, economic development, and job creation, by creating construction jobs, consolidating DMH and WDACS employees in the Vermont Corridor, providing economic benefit to the County, and providing community benefits through construction of a community recreation center and deed restricted senior affordable housing.
6. Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

2.8 SUMMARY OF PROJECT ALTERNATIVES

This Draft EIR considers a range of alternatives to the Project to allow for informed decision-making in accordance with CEQA Guidelines Section 15126.6. Alternatives to the Project are identified for the purpose of substantially reducing or avoiding the significant impacts of the Project. Alternatives considered and rejected included: a larger community recreation center on Site 3; an alternative location for the community recreation center, on Site 1; a reduced parking alternative; remodel of the existing buildings alternative; an all residential use alternative; and an alternative location.

In addition to these alternatives, as described in more detail in Section 5.0 (Project Alternatives), the alternatives that are analyzed in this Draft EIR include the following:

Alternative 1: No Project

Alternative 2: Reduced Project

Alternative 3: All Office Project

This Draft EIR concludes that the Project would result in significant and unavoidable impacts related to the following: Air Quality (construction daily emissions for NO_x, and overlapping construction and operation phases for NO_x and ROG); Noise (construction noise); and Transportation (10 peak hour impacts at seven intersections at buildout and cumulative construction traffic)

Alternative 1 – No Project Alternative

CEQA requires the alternatives analysis to include a No Project Alternative. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the Project with

the impacts of not approving the Project (State CEQA Guidelines Section 15126.6(e)(1)). Pursuant to State Guidelines Section 15126.6(e)(2):

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans, and consistent with available infrastructure and community services.

In the event the Project is not approved, it is expected that the Project Sites would remain in their current condition and no new development would occur for the foreseeable future. The County would continue to operate the office building and parking facilities on Site 1, the existing DMH and WDACS buildings and parking on Site 2, and the existing DPR and surface parking lot on Site 3. The existing vacant office building on Site 1 would be demolished as it has been determined to be structurally deficient.

The No Project Alternative would avoid all of the significant and unavoidable Project-related impacts that would occur under the Project. However, the No Project Alternative would not realize any of the Project Objectives.

Alternative 2 – Reduced Project

Under Alternative 2, Reduced Project, a new County office building would be constructed on Site 1. However, this building and associated parking facilities would be reduced in size so as to accommodate only the relocation of the existing DMH and WDACS employees presently located on Site 2. No further consolidation or growth in County employees on Site 1 would be accommodated under this Alternative.

The design and configuration of this Alternative would be similar to the Project. The main difference would be the reduced total square footage, building height and mass, and parking facilities compared to the Project on Site 1. The new County office building on Site 1 would be reduced from 471,000 square feet as proposed to 296,000 square feet, and the parking supply would be reduced from 1,733 spaces to 1,013 spaces. The Reduced Project Alternative would include the 10,000 square feet of ground floor retail on Site 1 that would be included in the Project. Parking would be provided at the same ratio under the Alternative as would be provided under the Project. This would result in a building consisting of 7 office levels over three parking levels, compared to 13 office levels over eight parking levels for the Project on Site 1. The Shatto Place parking structure would remain the same under the Alternative.

With this Alternative, development of Sites 2 and 3 would remain the same as under the Project. The existing Site 2 building would be redeveloped into 172 housing units with ground floor retail, and a new building containing 74 housing units would be constructed over a new five level parking structure with ground floor retail on the current site of the WDACS building. Site 3 would be developed with a new building containing 72 senior affordable housing units, and an approximately 13,200 square foot community recreation center, over an underground parking garage.

The Project would result in significant and unavoidable impacts to air quality (construction daily emissions for NO_x, and overlapping construction and operation phases for NO_x and ROG), noise (construction), and transportation (10 peak hour impacts at seven intersections and cumulative construction traffic). Alternative 2, the Reduced Project Alternative would also generate significant and unavoidable Project-related impacts, however these impacts would be less than the Project because the development would be reduced in size. In addition, the Reduced Project Alternative would realize all of the Project Objectives, although in some cases to a lesser degree than the Project.

Alternative 3 – Office Project

Alternative 3, Office Project, would involve using all three Project Sites for County office use, thereby allowing additional consolidation and relocation of County offices to the Vermont Corridor. Under Alternative 3, Site 1 would be developed with a new County office building and parking facilities in the same manner as the Project. Sites 2 and 3 would incorporate the same square footage of use as would occur under the Project. However, this square footage would be provided for office use, rather than residential, retail, and senior affordable housing, and community recreation center uses, as would occur under the Project. The community recreation center use would continue to be included in this Alternative, on the ground floor of Site 3.

Under Alternative 3, the same County office building containing 471,000 square feet of office use over a 390,000-square foot parking structure containing 965 spaces, and 10,000 square feet of ground floor retail and restaurant uses would be provided on Site 1 as would occur under the Project. The existing DMH office building on Site 2 would be upgraded and reused as a 154,793-square foot office building. The same structural and building upgrades as would be included in the Project would also be included under the Alternative. The proposed new construction on the site of the existing WDACS building on Site 2 would include 66,935 square feet of office use over a parking structure, the latter the same as the Project. The proposed new construction on the site of the existing WDACS building on Site 2 would include five levels of office use, totaling 66,935 square feet, over 1.5 levels of subterranean parking, and 3.5 levels of above ground parking, the same configuration as the Project, other than use. The conversion of the residential units on Site 3 to office and community recreation center under the Alternative would result in an approximately 13,200 square foot community recreation center, and five stories of office use totaling 67,637 square feet. The office use would be located over three levels of subterranean parking containing 116 spaces, same as the Project. In the configurations described, office development on Sites 2 and 3 would be able to accommodate an additional 1,020 and 311 County employees, respectively.

The Project would result in significant and unavoidable impacts to air quality (construction daily emissions for NO_x, and overlapping construction and operation phases for NO_x and ROG), noise (construction), and transportation (10 peak hour impacts at seven intersections and cumulative construction traffic). Alternative 3, the Office Project Alternative would also generate similar significant and unavoidable construction impacts, and higher traffic impacts. In addition, due to the lack of residential uses, the Office Project Alternative would not achieve the Project Objectives to the same degree as the Project, and would not meet the Project Objectives related to the provision of housing and affordable housing.

Environmentally Superior Alternative

In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of adverse impacts. In this case, the No Project Alternative (Alternative 1) would result in fewer impacts on the existing environment. However, Section 15126.6(e)(2) of the State CEQA Guidelines states that if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. The environmentally superior alternative is the Reduced Project Alternative (Alternative 2) because it would reduce impacts with respect to air quality, noise, and traffic, but would not avoid the significant and unavoidable impacts of the Project. Additionally, Alternative 2 would meet the Project Objectives, but to a lesser degree than the Project, because the Reduced Project Alternative would accommodate fewer County employees than the Project, and would be less effective than the Project in consolidating DMH employees in the Vermont Corridor, and accommodating County Departments' expected future growth and requirements. The Reduced Project Alternative would also be less effective in implementing key

State, regional and local land use policies that promote the concentration of future development in areas served by transit than would the Project. The Reduced Project Alternative would implement fundamental Project Objectives related to housing and affordable housing because it would include the same residential uses as the Project.

2.9 SUMMARY OF ENVIRONMENTAL IMPACTS, REGULATORY REQUIREMENTS, PROJECT DESIGN FEATURES, AND MITIGATION MEASURES

Table 2-2 (Summary of Project Impacts, Project Design Features, and Mitigation Measures) summarizes the Project impacts associated with the construction and operation of the Project, as well as regulatory requirements (indicated as “RR”), and project design features (indicated as “PDF”) that would be included as part of the Project. Mitigation measures (indicated as “MM”) that would reduce or avoid significant impacts, and the level of significance after mitigation are also identified.

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Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
4.1. AESTHETICS (for informational purposes only, pursuant to SB 743)		
4.1.1 Aesthetics/Views Impact (4.1.1-1) and (4.1.1-2): Scenic Vista and Scenic Resource There are no scenic vistas or prominent topographical features that would provide scenic vistas nor are there scenic corridors or expansive views available at or in the vicinity of the Project Sites. Furthermore, the Project Sites are not located along or within the scenic vistas or viewsheds of this scenic highway. As discussed in Section 6.5 (Effects Not Found to be Significant), the impact would not be considered significant with respect to adverse impacts on a scenic vista (Threshold 4.1.1-1), and impacts to scenic resources within a State scenic highway (Threshold 4.1.1.1-2) because no such scenic vistas or resources exist in the area of the Project Sites. These topics are addressed in Section 6.5, Effects Found Not to be Significant, of this Draft EIR.	Impact (4.1.1-1) and (4.1.1-2): None.	Impact (4.1.1-1) and (4.1.1-2): CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.
Impact (4.1.1-3): Visual Character <u>Construction</u> - Construction activity would vary on a weekly basis, depending largely on the number of workers and construction trucks needed for the activities occurring during each time period. Temporary barriers, which would likely be K-rail and plywood extending to eight feet in height, would be installed around each of the Project Sites during construction to screen the construction activities and equipment from street level views. No visually prominent scenic resources are located in the area of the Project Sites. The existing viewsheds are defined primarily by existing urban development, and the existing urban development prevents the availability of expansive scenic views from around the Project Sites. Construction of structures that include the use of temporary towers and cranes could also interfere with existing views. Some Project construction activities would likely be visible from surrounding properties that currently have views of the Project Sites.	Impact (4.1.1-3): None.	Impact (4.1.1-3): CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
In terms of visual character, Project construction activities would result in temporary changes as viewed from the street and from the adjacent buildings nearby vantage points. These changes would be temporary and limited to the construction period. Thus, while project construction would alter the visual character of the Project Sites, such activities would be partially screened, temporary in nature, and visual impacts associated with construction would cease after completion. Based on the above, Project construction activities would not substantially alter or degrade the existing visual character of the project site or surrounding area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. <u>Operation</u> - The Project’s architectural design and orientation on the Project Sites, would be integrated into the Project area by incorporating appropriate design, architecture, size, and massing. In addition, the Project’s location, height, scale, and architectural features are generally compatible with the existing and planned development for the Wilshire Community Plan Area. The visual character of the areas immediately surrounding the Project Sites is defined by a number of mid- to high-rise buildings located in the vicinity of the Wilshire/Vermont Metro Rail station, and on 6th Street, which include the existing Project building on Site 2. These buildings dominate the visual environment in this area of the City. Moreover, new Project development on all Project Sites would provide urban-scale development that would be reflective of the expected visual character of the area as it develops in accordance with adopted City of Los Angeles land use plans, including the Wilshire Community Plan, which envision the concentration of development in transit station areas in the future. Thus, the Project would not substantially degrade the existing visual character of the Project Sites or surrounding area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project		in a transit priority area.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
which is both mixed use residential and an employment center in a transit priority area.		
4.1.2 Shade/Shadow Impact (4.1.2-1): Shade-sensitive land uses <u>Equinox Shadows</u> No sensitive uses would be covered by shadows from Project Site 1 or Project Site 2 buildings during the spring/fall equinox. Residential land uses to the west of Site 3 would not be shaded by the Project more than four hours between the hours of 8:00 AM and 4:00 PM during the spring/fall equinox. Consequently, spring/fall shadow impacts from Site 1, Site 2, and Site 3 would be below the threshold. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. <u>Winter Shadows</u> The residential land uses would not be shaded by the Project Sites for more than three hours between the hours of 9:00 AM and 3:00 PM. Consequently, winter shadow impacts from Site 1, Site 2, and Site 3 would be below the threshold. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.	Impact (4.1.2-1): None.	Impact (4.1.2-1): CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.
4.1.3. Light and Glare Impact (4.1.3-1): <u>Artificial Light</u> <u>Construction</u> - Construction could include nighttime activities involving the use of on-site lighting during demolition, excavation, framing, and building construction. Lighting would include floodlights focused on the work area that would be shielded to focus the light on-site and preclude light trespass onto nearby properties. This analysis assumes that construction hours would follow	Impact (4.1.3-1) Project Design Features PDF LG-1 Project outdoor lighting shall be designed and installed with shielding from adjacent residential properties, the public right-of-way, and from above. PDF LG-2 All Project buildings, parking structures, and signage within the Project Sites shall be prohibited from using highly reflective building materials such as mirrored glass in exterior façades. Exterior materials, including glazing shall have Visible Light Reflectance (Exterior) of 34 percent or less.	Impact (4.1.3-1): CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
County requirements for Sites 1 and 3, and City requirements for Site 2. Construction would occur primarily during daylight hours, and construction lighting would only be used for the duration needed if construction were to occur in the evening hours when daylight is no longer sufficient. In addition, construction-related illumination would be used for safety and security purposes only, and would be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Sites boundary. Project construction lighting would not adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. <u>Operation</u> - The Project would have the potential to alter nearby lighting patterns. Nighttime sources of light from Project buildings and operations would include interior and exterior building lights, parking structure and other security lighting, and vehicle headlights,. Project lighting for entryways and buildings would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to minimize light trespass onto adjacent properties. Although additional light associated with the Project could incrementally add to the ambient glow of the Project Sites and surrounding area, the area already has high ambient light levels, including street lights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures as it passes through windows) and automobile headlights. Given the high levels of existing ambient lighting, the Project's contributions to ambient glow likely would not be perceptible from the nearby sensitive receptors across West 6th Street, approximately 90 feet from the Project Sites. In general, light dissipates over distance. As such, lighting from the Project would not result in substantial changes to existing artificial light conditions, and would not adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment	Regulatory Requirements The following Regulatory Requirement is applicable to Site 2 only. RR LG-1 Chapter IX, Article 3, Section 93.0117(b) of the LAMC provides that no person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to either be illuminated by more than two footcandles of lighting intensity or receive direct glare from the light source: 1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units. 2. Any elevated habitable porch, deck, or balcony on any other property containing a residential unit or units. 3. Any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units.	because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. <u>Glare</u> The Project would increase the use of reflective materials such as glass compared to current conditions. Sources of glare that may cause daytime glare include exterior building materials, such as glass and metallic façade materials and finishes. The increased glare associated with this building material could increase the amount of glare that the surrounding commercial, retail and residential land uses experience compared to existing conditions. However, Project design would incorporate the use of low-reflectivity materials. Existing sources of daytime glare on the Project Sites (i.e., cars in the surface parking lots that contain light-colored cars, car mirrors, and windshields) would be replaced with less reflective surfaces of building facades and windows, which would result only in a transitory glare condition from certain perspectives during the day. As such, the Project would not include substantial amounts of reflective building materials that would adversely affect day or nighttime views of off-site glare-sensitive uses located on West 6th Street and Shatto Place. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. Project buildings would not result in substantial sources of auto headlight-related glare in close proximity to glare-sensitive land uses. The Site 1 office building would be primarily a daytime use, while the auto entrances to residential uses on Sites 2 and 3 would be provided from 6th Street and Vermont Avenue, respectively, streets which already experience high levels of nighttime traffic. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project		

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
which is both mixed use residential and an employment center in a transit priority area.		
4.2. AIR QUALITY		
Impact (4.2-1): Conflict with Air Quality Plan The 2016 Air Quality Management Plan (AQMP) was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of the South Coast Air Quality Management District (SCAQMD), to return clean air to the region, and to minimize the impact of pollution control on the economy. Projects that are considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the 2016 AQMP. Site 1 would accommodate approximately 2,193 employees at full occupancy (office and retail) by 2023, which would represent a net increase of approximately 2,100 employees on the Site. The majority of these employees would be relocated from existing County offices within the Project area. The increase in employees would be within SCAG’s forecasts of 203,100 additional jobs in the City of Los Angeles between 2012 and 2020 and 269,600 additional jobs between 2020 and 2040 as it represents approximately 1.03 percent and 0.78 percent of the total jobs, respectively. The addition of 618 new residents on Site 2 would be within the SCAG population growth projection, representing approximately 0.10 percent of the Citywide total growth for the period of 2020 to 2040. The addition of 181 new residents on Site 3 would be within the SCAG population growth projection, representing approximately 0.03 percent of the Citywide total growth for the period of 2020 to 2040. Therefore, the project would not conflict with the 2016 AQMP and, as such, would not jeopardize attainment of State and national ambient air quality standards in the area under the jurisdiction of the SCAQMD. This would be a less-than-significant impact. Sites 1 and 3 development would be consistent with goals, objectives, and policies set forth in the County’s General Plan Air Quality Element. Therefore, no	Impact (4.2-1): None.	Impact (4.2-1): Less than significant.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
impact would occur with respect to consistency with the applicable air quality policies in the County General Plan. Site 2 development would be consistent with goals, objectives, and policies set forth in the City's General Plan Air Quality Element. Therefore, no impact would occur with respect to consistency with the applicable air quality policies in the City General Plan.		
Impact (4.2-2): Violate Air Quality Standards <u>Construction</u> - Construction-related daily emissions associated with the Project would exceed the NO_x SCAQMD significance threshold. In addition, Site 3 demolition, grading, and building construction could overlap with Site 1 building construction activities. Overlapping emissions would exceed the SCAQMD thresholds for NO_x under the Grading Phase of Site 3, and the Building Construction Phase of Site 1. As such, regional construction air quality impacts would be significant. MM AQ-1 will reduce the impact but not to less than significant. No additional feasible mitigation is available. <u>Operation</u> - Operational emissions generated by the Project would not exceed the regional thresholds of significance set by the SCAQMD under all scenarios. Therefore, impacts associated with regional operational emissions from the Project would be less than significant. As the Project will occur over two phases of development, Sites 1 and 3 would be operational during the demolition, grading and building construction phases of Site 2. Moreover, Site 3 would become operational during the Building Construction Phase of Site 1. An exceedance in the NO_x SCAQMD threshold of significance may occur after Site 3 is operational and Site 1 is under construction. Additionally, an exceedance in the ROG and NO_x SCAQMD thresholds of significance may occur after Sites 1 and 3 are operational and Site 2 is under construction. As such, impacts during construction and operation overlap would	Impact (4.2-2): Regulatory Requirements RR AQ-1: The Project shall comply with SCAQMD Rule 403 regarding fugitive dust. RR AQ-2: The Project shall comply with SCAQMD Rule 1113 regarding Architectural Coatings. RR AQ-3: Project construction shall comply with the County of Los Angeles Green Building Standards Code (Sites 1 and 3) and City of Los Angeles Green Building Code (Site 2). Mitigation Measures MM AQ-1: Developer shall use Tier IV off-road equipment with the following features if reasonably available: alternative fuels (biodiesel, compressed natural gas, propane, etc.), electric equipment, diesel oxidation catalyst, and newer tier engines with more stringent U.S. EPA tier emissions standards than is anticipated from the statewide fleet mix.	Impact (4.2-2): Significant and unavoidable.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
be significant. MM AQ-1 will reduce the impact but not to less than significant. No additional feasible mitigation is available.		
Impact (4.2-3): Cumulative Considerable Net Increase of Criteria Pollutant Construction - Construction emissions associated with the project would exceed the SCAQMD's thresholds of significance for NO_x during overlapping construction on Site 1 and Site 3, and NO_x and ROG during construction and operation overlapping phases. As these pollutants are classified as ozone precursors, and because the Basin is in nonattainment for ozone, this would be considered a potentially significant cumulative impact. Operation - The operational emissions generated by the Project would not violate an air quality standard or exceed an SCAQMD threshold of significance. However, an exceedance in the ROG and NO_x SCAQMD thresholds of significance may occur after Sites 1 and 3 are operational and Site 2 is under construction. As these pollutants are classified as ozone precursors, and because the Basin is in nonattainment for ozone, this would be considered a potentially significant cumulative impact.	Impact (4.2-3): See above.	Impact (4.2-3): Significant and unavoidable.
Impact (4.2-4): Expose Sensitive Receptors Construction - As Sites 1 and 2 are adjacent to each other, the nearest sensitive receptors for both sites are identified together. The nearest sensitive receptors to Sites 1 and 2 are: school to the south (85 feet), school to the east (90 feet), residences to the west (235 feet), residences to the south (240 feet), residences to the northeast (280 feet), residences to the east (300 feet), residences to the west (300 feet), religious use to the north (320 feet), residences to the southwest (345 feet), religious use to the southeast (385 feet), and hotel to the southwest (485 feet). The nearest sensitive receptors to Site 3 are: residences to the west (50 feet), religious use to the east (90 feet), religious use to the northwest (270 feet), residences to the north (300 feet), residences to the south (335 feet), religious use to the east (400 feet), and recreation center to the northeast (415 feet).	Impact (4.2-4): None.	Impact (4.2-4): Less than significant.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Peak daily emissions generated within Site 1 during construction activities for each phase would not exceed the applicable construction localized significance thresholds (LSTs). Therefore, localized air quality impacts from Site 1 construction activities on the off-site sensitive receptors would be less than significant. Peak daily emissions generated within Site 3 during construction activities for each phase would not exceed the applicable construction LSTs. Therefore, localized air quality impacts from Site 3 construction activities on the off-site sensitive receptors would be less than significant. Peak daily emissions generated within Site 2 during construction activities for each phase would not exceed the applicable construction LSTs. Therefore, localized air quality impacts from Site 2 construction activities on the off-site sensitive receptors would be less than significant. Although Site 1 and Site 2 are adjacent to one another, no overlap in construction activities on Sites 1 and 2 would occur since construction on Site 2 cannot commence until the Site 1 project is complete and the existing employees on Site 2 have been relocated to the new Site 1 office building. <u>Operation</u> - Based on maximum measured concentrations, the 1-hour and 8-hour CO concentrations in SRA 1 have historically been in decline and are substantially below the national and state standards. With the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in localized exceedances of the CO standards. Impacts with respect to localized CO concentrations would be less than significant. As the Project would consist of the development of commercial and residential land uses, and would not include any industrial or other land uses involving the use, storage, or processing of carcinogenic or non-carcinogenic toxic chemicals or air contaminants, or the generation of high levels of diesel truck activity, no toxic airborne emissions would result from its implementation. Therefore, impacts to		

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
sensitive receptors associated with the release of toxic air emissions from the Project Sites would be less than significant.		
4.3. CULTURAL RESOURCES		
4.3.1: Historical Resources Impact (4.3.1-1): The Project would involve demolition of all but one of the existing buildings and structures on the Project Sites. The 540-550 South Vermont Avenue building, located on Site 2 would be adaptively reused as a mixed-use building with ground floor commercial space and upper floor residential uses. The results of the South Central Coastal Information Center’s historical records search for the Project indicate that there are no known historical resources on the Project Sites and the Historical Resource Report determined that none of the existing buildings on the Project Sites are eligible for listing as historical resources. Accordingly, the Project would have no direct impacts on historical resources. There is one historical resource within the study area for Site 3, the Brynmoor Apartments Neon Roof Sign, which is designated HCM #641. In determining impacts of adjacent new construction on the Brynmoor Apartments Neon Roof Sign, the central question is whether the new building would affect the physical integrity of the historical resource to the degree that it would no longer qualify as a historical resource. Site 3 abuts the rear of the parcel containing the five-story Brynmoor Apartments Building, on top of which the historical sign is located. The new six-story building on Site 3 would obscure the view of the roof sign from Vermont Avenue. At the time of its construction, the Brynmoor Apartments Neon Roof Sign was oriented towards Wilshire Boulevard and visible from this major automobile thoroughfare. Although the roof sign is primarily oriented toward Wilshire Boulevard, it is also visible from Vermont Avenue. This secondary view of the sign would be obscured. Furthermore, the Vermont Avenue Corridor is not identified by the City or the County as an important view location, and it is not a defined scenic resource. The new building would introduce a new visual element to the setting of the Brynmoor Apartments Neon Roof Sign; however, the setting in Wilshire Center is already characterized by a	Impact (4.3.1-1): None.	Impact (4.3.1-1): Less than significant.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
variety of mid and high-rise buildings that obscure views of the roof sign from the primary view from Wilshire Boulevard and secondary view from Vermont Avenue. As such, the Project would not result in a substantial adverse change to the Brynmoor Apartments Neon Roof Sign or its immediate surroundings to the degree its eligibility as a resource would be materially impaired. Therefore, the Project would have a less than significant indirect impact on historical resources.		
4.3.2: Archaeological Resources Impact (4.3.2-1): The results of the South Central Coastal Information Center’s archaeological records search for the Project indicate that there are no known archaeological resources on the Project Sites. One archaeological site is located within a half-mile radius of the Project Sites. Construction activities would involve excavation below existing grade up to depths of approximately 28 feet to construct the subterranean levels at each Project Site and, thereby, create a potential to disturb any previously undiscovered archaeological resources. If a unique archaeological resource were to be discovered during construction of the Project, adherence to Regulatory Requirement RR-CU-1 would ensure that potentially significant impacts would not result. Mitigation Measure MM-CU-1 provides that a qualified professional archaeologist shall monitor all ground disturbing activities of the Project. Therefore, impacts on archaeological resources would be less than significant.	Impact (4.3.2-1): Regulatory Requirements RR-CU-1. If a unique archaeological resource were to be discovered during construction of a project, adherence to the following PRC Section 21083.2 protocol is required: • The County of Los Angeles, Department of Regional Planning (for Sites 1 and 3), and Department of City Planning, Office of Historic Resources (for Site 2) shall be notified of the discovery. Ground-disturbing activities shall cease within 50 feet of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Construction activity may continue unimpeded on other portions of the Project Site. • Construction personnel of the Project shall be prohibited from collecting or moving any archaeological materials and associated materials. • The found deposit shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Mitigation Measure MM-CU-1. A qualified professional archaeologist shall monitor all ground disturbing activities of the project. If buried unique archaeological resources are discovered during ground-disturbing activities, work shall stop within 50 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, invoke appropriate treatment measures. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Developer shall implement all measure(s) that the County determines necessary, appropriate and feasible. Within	Impact (4.3.2-1): Less than significant.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
	60 days after grading activities are completed, the Monitor shall prepare and submit a final report to the County and the State Office of Historic Preservation. The report shall include documentation of any recovered unique archaeological resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log and photo documentation, accompanied by a photo key, to the County.	
Impact (4.3.2-2): No known human burials have been identified on the Project Sites or within recorded resources located in the vicinity. The Project would require excavation to potential depth of 28 feet below the existing grade to construct the subterranean parking levels and foundation elements of the Project. As such, it is possible that human remains could be discovered during construction activities. If human remains are encountered unexpectedly during construction demolition and/or grading activities, compliance with Regulatory Requirement RR-CU-2 would ensure that significant impacts do not result. Mitigation Measure MM-CU-1 provides that a qualified professional archaeologist shall monitor all ground disturbing activities of the Project. Therefore, impacts on human remains would be less than significant.	Impact (4.3.2-2): Regulatory Requirements RR-CU-2. California Health and Safety Code Section 7050.5 establishes specific requirements that must be followed in the event that human remains are discovered during excavation activities. The requirements include, but are not limited to the following procedure that shall be observed: • Cease ground-disturbing activities and contact the County Coroner immediately. ▪ If the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner has 24 hours to notify the NAHC. • The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American. • The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. • If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.	Impact (4.3.2-2): Less than significant.
4.3.3: Paleontological Resources Impact (4.3.3-1): Findings of the paleontological resource records search from the Natural History Museum of Los Angeles County (NHMLAC) revealed that there are no known fossil records associated with the Project Sites. Excavation activities, which may achieve depths of up to approximately 28 feet for the proposed subterranean levels, may extend farther into the underlying geologic materials than the previous activity at the Project Sites. Compliance with Regulatory Requirement RR-CU-3 would ensure potentially significant impacts do not result in the event that previously undiscovered paleontological resources	Impact (4.3.3-1): Regulatory Requirements RR-CU-3. If a unique paleontological resource were to be discovered during construction of a project, PRC Section 21083.2 requires adherence to the following protocol: • The County of Los Angeles, Department of Regional Planning, and Department of City Planning, Office of Historic Resources shall be notified of the discovery. Work shall cease in the area of the find until a qualified paleontologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. The Developer shall choose the	Impact (4.3.3-1): Less than significant.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
are encountered. Therefore, impacts on paleontological resources would be less than significant.	qualified paleontologist, subject to the approval of County of Los Angeles, Department of Regional Planning on Sites 1 and 3, and Department of City Planning, Office of Historic Resources on Site 2. Construction activity may continue unimpeded on other portions of the Project Site. • Construction personnel of the Project shall be prohibited from collecting or moving any paleontological materials and associated materials. • The found deposit shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the paleontologist. The Developer shall implement all measure(s) that the County determines necessary, appropriate and feasible. Within 60 days after treatment measures are implemented, the paleontologist shall prepare and submit a final report to the County and the State Office of Historic Preservation. The report shall include documentation of any recovered resources, the significance of the resources, and the treatment of the recovered resources. Any fossils recovered would be deposited in an accredited and permanent scientific institution.	
4.4 Energy		
Impact (4.4-1): Energy Utility System Capacity <u>Construction – Electricity</u> Electrical power would be consumed to construct the new buildings and facilities of the Project. Over the course of construction it is estimated that Site 1 will consume approximately 5,250,000 kwhr, Site 2 would consume approximately 1,600,000 kwhr, and Site 3 will consume approximately 800,000 kwhr. The corresponding temporary construction power estimates would be 2,625,000 kwhr/yr for Site 1, 800,000 kwhr/yr for Site 2, and 400,000 kwhr/yr for Site 3. While these construction estimates are slightly higher than the existing consumption estimates for all three sites, they would be temporary in nature and they would be within available capacity as they are within the projected consumption associated with operation of the Project, as discussed below. This level of consumption has been determined to be within the available capacity of	Impact (4.4-1): Regulatory Requirements RR EN-1: Project construction shall comply with the County of Los Angeles Green Building Standards Code (Sites 1 and 3) and City of Los Angeles Green Building Code (Site 2).	Impact (4.4-1): Less than significant.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
the electrical generation system. Therefore, impacts on electricity supply associated with short-term construction activities would be less than significant. <u>Natural Gas</u> No natural gas usage is expected to occur during construction. Therefore, impacts on natural gas supply associated with short-term construction activities would not occur. <u>Transportation Energy</u> Site 1 construction would use approximately 260,072 gallons of gasoline and approximately 14,675 gallons of diesel fuel, assuming heavy-duty construction equipment (such as haul route trucks) is primarily diesel-fueled. Site 2 construction would use approximately 91,200 gallons of gasoline and approximately 7,659 gallons of diesel fuel. Site 3 construction would use approximately 24,395 gallons of gasoline and approximately 10,181 gallons of diesel fuel. The expected gasoline and diesel fuel gas for Project construction would be negligible compared with statewide supplies and would be accommodated by local or regional suppliers and vendors. As such, impacts regarding transportation energy would be less than significant. <u>Operation – Electricity</u> The net increase in electricity demand for the Project is approximately 10,351,023 kWhr/year. LADWP confirmed that it has sufficient facilities in the area and capacity to serve the Project (all 3 Sites). Impacts related to electrical services would be less than significant for each Project Site. <u>Natural Gas</u> The net increase natural gas demand for the Project is approximately 13,827,325 KBTU/year. SoCal Gas confirmed that it has sufficient facilities in the area and capacity to serve the Project (all 3 Sites). Thus, impacts related to natural gas would be less than significant.		

Table 2-2
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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
<u>Transportation Energy</u> In total, operation of the Project on Sites 1, 2, and 3 would consume approximately 413,544 gallons of fuel per year. This would represent approximately 0.0035 percent of the statewide gasoline consumption which is within the available capacity. As such, impacts of the Project regarding transportation energy would be less than significant. <u>Discussion Regarding Public Resources Code Section 21100(b)(3)</u> The Project would involve a mixed-use project in a High Quality Transit Area, within walking distance of existing bus lines and transit stations. In addition, the Project would provide electric vehicle charging stations in accordance with the requirements set forth in the Los Angeles County Green Building Standards Code (Sites 1 and 3), and LA Green Building Code (Site 2), and would provide bicycle parking, which would maximize the potential for mobility and accessibility for people and reduce the overall consumption of fuel required for transportation. The Project would implement all conservation measures in the Water Supply Assessment as well as the additional conservation measures incorporated in the building design and comply with Title 24 standards. All of the foregoing, along with the incorporation of renewable energy in the generating portfolio of LADWP, the electric service provider to the Project, coupled with the inclusion of solar generating infrastructure within the Site 1 Project, would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy.		
4.5 Geology and Soils		
Impact (4.5-1): Site 1 and 3 <u>Strong Seismic Ground Shaking</u> Sites 1 and 3 are within the seismically active Southern California region and are, therefore, susceptible to ground shaking during a seismic event. Project design and construction would be consistent with all applicable provisions of the State and Los Angeles County Building Codes, including Regulatory Requirements RR	Impact (4.5-1): Regulatory Requirements County Requirements (Sites 1 and 3) RR GS-1: Structural designs will need to consider seismic (earthquake) loading factors in compliance with Title 26 of the Los Angeles County Code.	Impact (4.5-1): Less than significant.

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
GS-1 and RR GS-2, which require consideration of seismic loading factors and engineering geology and geotechnical hazards. The Project development at Sites 1 and 3 would also adhere to the recommendations of the geotechnical assessments including but not limited to consideration of the CBC Seismic Parameters. Regulatory Requirement RR GS-3 requires the Developer to undertake the preparation of a Project design-specific geotechnical assessment and to comply with its recommendations. With the implementation of the regulatory requirements, that include specific design, and shoring requirements designed to address building safety during seismic events, Project development at Site 1 would, not cause, exacerbate or accelerate geologic hazards. Therefore, risks from seismic ground shaking at Sites 1 and 3 would be less than significant. <u>Liquefaction/Lateral Spreading and Dynamic Settlement</u> Sites 1 and 3 are not identified as part of a potentially liquefiable area as based on California Geological Survey's Seismic Hazards Map of the Hollywood Quadrangle. Moreover, based on the depth to the historically highest and current groundwater levels, results from the site-specific liquefaction analysis conducted immediately to the north of Site 1 (separate from the Project), the potential for liquefaction or lateral spreading at Sites 1 and 3 is considered to be remote. Nonetheless, Regulatory Requirements RR GS-1 through RR GS-3 require preparation of a design-level geotechnical investigation at Sites 1 and 3. Some seismically-induced dry settlement of the proposed structure could be expected at Sites 1 and 3 as a result of strong ground-shaking. However, based on the typically dense, stiff, and consolidated nature of the alluvial soils and bedrock expected to underlie Site 1 and 3, the potential dynamic settlements would be expected to be negligible. Even so, Project design and construction would be consistent with all applicable provisions of the State and Los Angeles County Code, including Regulatory Requirements RR GS-1 through RR GS-3, which require consideration of seismic loading factors and engineering geology and geotechnical hazards. With the implementation of the regulatory requirements, that include specific design, and shoring requirements designed to address building safety during seismic events, Project development at Site 1	RR GS-2: Slope stability, expansive soils, compressible soils and other similar engineering geology and geotechnical hazard considerations are addressed by the grading standards in the State of California Building Code, Appendix J of Title 26 of the Los Angeles County Code, and by the general requirement for engineering investigation reports, and by many of the implementation programs within other categories. RR GS-3: A Project design-specific geotechnical and engineering geology report is required to be prepared by a California-licensed geotechnical engineer, California-certified engineering geologist, and civil engineer with expertise in geotechnical issues registered in the State of California during Project design and prior to Project construction in compliance with the most current County of Los Angeles Department of Public Works Geotechnical and Materials Engineering Division (GMED) guidelines. The investigation is required to address the proposed Project foundation and structure design to minimize effects from adverse soil conditions including any liquefiable or otherwise unstable/consolidation-prone soils; bedrock characteristics; subsidence; earthquake ground shaking; slope instability; subsurface gas; groundwater; and/or other geotechnical and engineering geologic hazards. The design and construction recommendations will be incorporated into the foundation and structural design of proposed project components, implemented in accordance with the design, and subjected to on-going inspection by the relevant entities/agencies. Prior to Grading Plan approval and issuance of permits, all construction/development plans will be approved by GMED for construction of such improvements. Construction will occur in accordance with the approved plans. City Requirements (Site 2) RR GS-4: In accordance with the Los Angeles Building Code, Los Angeles Municipal Code (LAMC) Chapter IX, Article 1, the Project Developer, or successor in interest, shall have a Geotechnical Study prepared for the Project Site that shall be approved by the Department of Building and Safety prior to issuance of building and grading permits. The Project shall be designed and constructed in accordance with the recommendations provided in the Geotechnical Study, as overseen by the Department of Building and Safety. RR GS-5: Earthwork activities associated with the grading and export of soil shall occur in accordance with City requirements, as specified in the Los Angeles Building Code and CBC and through the	

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
would not cause or exacerbate seismic ground failure. Therefore, risks from seismic ground failure at Sites 1 and 3 would be less than significant. Site 2 <u>Strong Seismic Ground Shaking</u> Site 2 is within the seismically active Southern California region and is, therefore, susceptible to ground shaking during a seismic event. Project design and construction would be consistent with all applicable provisions of the State and City Building Codes, including Regulatory Requirements RR GS-5 and RR GS-6, which require consideration of seismic loading factors and engineering geology and geotechnical hazards. The Project development at Site 2 would also adhere to the recommendations of the geotechnical assessments including but not limited to consideration of the California Building Code Seismic Parameters. Regulatory Requirement RR GS-4 requires the Project to undertake the preparation of a Project design-specific geotechnical assessment and to comply with its recommendations. With the implementation of the regulatory requirements, that include specific design, and shoring requirements designed to address building safety during seismic events, Project development at Site 2 would, thus, not cause, exacerbate or accelerate geologic hazards or expose people to substantial risk of injury. Therefore, risks from seismic ground shaking at Site 2 would be less than significant. <u>Liquefaction/Lateral Spreading and Dynamic Settlement</u> Site 2 is not identified as part of a potentially liquefiable area as based on California Geological Survey's Seismic Hazards Map of the Hollywood Quadrangle. Moreover, based on the depth to the historically highest and current groundwater levels, results from the site-specific liquefaction analysis conducted north of Site 2 (separate from the Project), the potential for liquefaction or lateral spreading at Site 2 is considered to be remote. Nonetheless, Regulatory Requirements RR GS-4 through RR GS-6 require preparation of a design-level geotechnical investigation at Site 2.	grading plan review and approval process, including a haul route approval as specified in the LAMC. RR GS-6: Project building design and construction shall conform to the current building and safety design provisions of the LAMC, which incorporates the CBC, including all provisions related to seismic activity. Metro Requirements (Sites 1, 2 and 3) RR GS-7: The Developer shall comply with the requirements of Metro's most recent "Design Criteria and Standards, Volume III, Adjacent Construction Design Manual." The general requirements include, but are not limited to, the following: 1. Facility or structure drawings and calculations showing the relationship between the proposed Project and Metro facilities shall be submitted for Metro review. 2. Submittals shall be made at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review. 3. If uncertainty exists on the possible impacts before submitting a formal letter requesting a review, the Metro Third Party Administrator (Permits) shall be contacted for an informal evaluation of the amount of detail required for Metro review 4. A period of 30 working days shall be allowed for the initial and each successive review as required. 5. The project proponent shall reimburse Metro for any technical review or support services costs. 6. Each part of the project's design may be reviewed and approved by Metro, and after written acceptance of the design, the project proponent must notify Metro prior to the start of construction as noted therein. Due to the proximity of the tunnel and the uncertainty that exists on the possible impacts, before submitting a formal letter requesting a review, the Developer shall contact the Metro Third Party Administrator	

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Some seismically-induced dry settlement of the proposed structure could be expected at Site 2 as a result of strong ground-shaking. However, based on the typically dense, stiff, and consolidated nature of the alluvial soils and bedrock expected to underlie Site 2, the potential dynamic settlements would be expected to be negligible. Even so, Project design and construction would be consistent with all applicable provisions of the State and City Codes, including Regulatory Requirements RR GS-4 through RR GS-6, which require consideration of seismic loading factors and engineering geology and geotechnical hazards. With the implementation of the regulatory requirements, that include specific design, and shoring requirements designed to address building safety during seismic events, Project development at Site 2 would not cause or exacerbate seismic ground failure. Therefore, risks from seismic ground failure at Site 2 would be less than significant.	(Permits) for an informal evaluation of the amount of detail required for Metro review. In addition, prior to any geotechnical or other site investigation requiring subsurface exploration (e.g., geotechnical drilling, monitoring wells), the Developer shall obtain approval of drilling locations, drilling depths, and downhole activities from Metro. The Developer shall obtain prior written approval to proceed from Metro prior to commencing exploration activities; written approval shall be submitted to County Department of Regional Planning and GMED. Similarly, the Developer shall submit to GMED a written approval from Metro that final project design may be developed.	
Impact (4.5-2): Site 1 and 3 Geologic or soil unit instability resulting from liquefaction/lateral spreading, including dynamic settlement, are discussed above. Subsidence is not considered to be potential hazards at Sites 1 and 3. Moreover, there are no known physical characteristics of surficial geologic units present within Sites 1 or 3 that would result in a significant impact or constraint to development. The probability of seismically-induced landslides affecting Sites 1 and 3 is low due to the lack of significant slopes on the Project Sites and surrounding areas, and there are no known landslides at Sites 1 or 3, nor are they in the path of any known or potential landslides. The potential for impacts to the Metro Red Line tunnel exists from the proximity of Sites 1 and 3 to the subway tunnel. Information regarding the exact location, alignment, and depth of the tunnel and the spatial relationship with Sites 1 and 3 is not known at this time. Therefore, site exploration and planned facilities (e.g., subterranean levels) could impact the tunnel and train operations. Metro has specific requirements with regard to design and construction of any structures within proximity to one of its tunnels (Design Criteria and Standards	Impact (4.5-2): See Impact (4.5-1) above.	Impact (4.5-2): Less than significant.

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Volume III). Each situation (i.e., type of structure, proximity to tunnel, future uses) is evaluated individually as there are no set rules governing minimum setback distances vertically or horizontally. Compliance with Metro’s design manual for adjacent construction is required through Regulatory Requirement RR GS-7. Overall, development at Sites 1 and 3 would not have an adverse effect on the structural integrity of the tunnel or the operation of the trains. In summary, with implementation of the required standard, comprehensive geotechnical and soils engineering investigation and analysis mandated by State and County regulations, specifically the current County Code, California Building Code, and Metro Adjacent Construction Design Manual Design Criteria and Standards, Volume III, including Regulatory Requirements RR GS-1 through RR GS-3, and RR GS-7 geotechnical/geology related impacts associated with Sites 1 and 3 would be less than significant. Site 2 Geologic or soil unit instability resulting from liquefaction/lateral spreading, including dynamic settlement, are discussed above. Subsidence is not considered to be potential hazards at the Site 2, as discussion above. Moreover, there are no known physical characteristics of surficial geologic units present within Site 2 that would result in a significant impact or constraint to development. It is anticipated that the majority of the fill materials in the eastern region of the Site where the mixed-use structure is proposed to be located would be removed during excavation, exposing adequate alluvial soils or bedrock at the subgrade. The proposed subterranean walls extending below the historically highest groundwater level would be designed for an undrained condition with full hydrostatic pressure. Proposed concrete slabs-on-grade bearing below the historically highest groundwater level would be designed to withstand the hydrostatic uplift pressure for an undrained condition. Furthermore, the probability of seismically-induced landslides affecting Site 2 is low due to the lack of significant slopes on the site and surrounding areas, and there are no		

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
known landslides at Site 2 nor is Site 2 in the path of any known or potential landslides. The potential for impacts to the Metro Red Line tunnel exists from the proximity of Site 2 to the subway tunnel. Information regarding the exact location, alignment, and depth of the tunnel and the spatial relationship with Site 2 is not known at this time. Therefore, site exploration and planned facilities (e.g., subterranean levels) could impact the tunnel and train operations. Metro has specific requirements with regard to design and construction of any structures within proximity to one of its tunnels (Design Criteria and Standards Volume III). Each situation (i.e., type of structure, proximity to tunnel, future uses) is evaluated individually as there are no set rules governing minimum setback distances vertically or horizontally. Compliance with Metro’s design manual for adjacent construction is required through Regulatory Requirement RR GS-7. Overall, development at Site 2 would not have an adverse effect on the structural integrity of the tunnel or the operation of the trains. In summary, with implementation of the required standard, comprehensive geotechnical and soils engineering investigation and analysis mandated by State and County regulations, specifically the current County Code, California Building Code, and Metro Adjacent Construction Design Manual Design Criteria and Standards, Volume III, including Regulatory Requirements RR GS-4 through RR GS-7, geotechnical/geology related impacts associated with Site 2 would be less than significant.		
4.6 Greenhouse Gas Emissions		
Impact (4.6-1): <u>Construction-</u> Total construction GHG emissions would be 8,444 metric tons of CO₂ Equivalents (MTCO₂E). Consistent with SCAQMD recommendations and to ensure construction emissions are assessed in a quantitative sense, construction GHG emissions have been amortized over a 30-year period and have been added to the annual operational GHG emissions of the Project.	Impact (4.6-1): Project Design Features The Project would incorporate the water conservation features set forth in PDF USS-2 through USS-4 that would reduce GHGs associated with water consumption. These features would exceed Code requirements for water conservation. Regulatory Requirements	Impact (4.6-1): Less than significant.

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
<u>Operation</u> – The net increase GHG emissions generated by the Project would be approximately 6,400 MTCO₂E per year. The Project would generate GHG emissions due to construction and operational activities; however, the net increase in annual GHG emissions, direct and indirect, would be consistent with the CCAP and other relevant plans. As part of AB 32, the County and State recommend general policies and measures to minimize and reduce GHG emissions from land use development projects. Thus, if the Project is designed in accordance and, not in conflict with these policies and measures, it would result in a less than significant impact since it would be consistent with the with State, County and local strategies on reducing GHG emissions. The Project is consistent with GHG reduction measures from other applicable State, regional, County and City plans and therefore the Project would not have the potential to conflict with applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs and these impacts would be less than significant.	RR GHG-1: The Project shall be built in accordance with all applicable provisions of the Los Angeles County Green Building Standards Code (Sites 1 and 3), and LA Green Building Code (Site 2).	
4.7 Hazards and Hazardous Materials		
Impact (4.7-1): Hazard to the public or the environment through release Site 1 Recognized Environmental Conditions (RECs) are defined as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. Business Environmental Risks (BERs) are defined as “a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate.” <i>De minimis</i> conditions are not recognized environmental conditions. RECs, BERs, and <i>de minimis</i> conditions have been found in connection with Site 1.	Impact (4.7-1): Project Design Features PDF HH-1 At Site 1, the four triple-nested soil gas wells shall be retained for additional sampling, if needed. When no longer needed, because methane concentrations are not detected at or above the Landtec GEM 2000™ instrument detection limit of 0.1 percent or the flame ionization detector (FID) detection limit of 0.1 parts per million by volume (ppmv), they shall be removed/abandoned in accordance with applicable regulations. Regulatory Requirements RR HH-1a For Site 1 and Site 3, Los Angeles County Building Code Sections 110.3 and 110.4 shall be followed regarding methane gas mitigation requirements and standards. Following approval of a methane mitigation plan for the respective site by the County Building Official, redevelopment of each site	Impact (4.7-1): Less than significant.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
The potential RECs are: - Two historical on-site used auto sales facilities - Use of northern office building as a photo lab with industrial wastewater discharge - Use of 523 Shatto Place that resulted in the discharge of industrial wastewater to an oil and sand trap (3-compartment clarifier) - Presence of an abandoned on-place 10,000-gallon, steel, gasoline UST system adjacent to the entry driveway to the east side of the Shatto Place Parking Structure at 523 Shatto Place - Presence of underlying fill material of unknown provenance - Potential for methane gas/presence of oil wells on site (this environmental concern also represents possible vapor encroachment condition indicative of potential vapor intrusion) - Location within Methane Zone and Los Angeles City Oil/Gas Field - Presence of nine oil wells (six beneath existing buildings) with no abandonment documentation (which could serve as a conduit for methane gas) - Adjacent properties at 440 and 444 S. Vermont Avenue (former UST, reported historical drycleaner, and historical automobile dealership), and Site 2 at 550 S. Vermont Avenue (parking structure-related UST listing, two former used auto sales facilities, and two reported possible historical gas/service stations) The BERs are: - Confirmed and untested suspect ACMs - Untested suspect LBP and other LCMs - Potential asbestos- and/or PCB-containing joint compounds within concrete slabs The <i>de minimis</i> conditions are: - Presence of possible PCB-containing equipment and fixtures - Presence of possible mercury-containing fluorescent light bulbs/tubes	shall be performed in accordance with all Los Angeles County Building Code's methane-related requirements. RR HH-1b For Site 2, the City of Los Angeles Methane Ordinance (Ord. No. 175,790) shall be followed, including methane gas sampling and pressure testing, installation, and certification, if required, of a City of Los Angeles-approved methane mitigation system. Following approval by City of Los Angeles Department of Building and Safety (LADBS) and City of Los Angeles Fire Department (LAFD), redevelopment of the site by the Project shall be performed in accordance with all LADBS and LAFD methane-related requirements. RR HH-2 Prior to any demolition, remodeling, and/or renovation activities at the site, untested suspect asbestos-containing materials (ACMs) that may be disturbed, including concrete joint compound, shall be sampled and analyzed in accordance with applicable regulations (including testing concrete joint compound for polychlorinated biphenyls [PCBs]). Abatement of known and suspect ACMs shall be performed prior to any demolition, remodeling, and/or renovation activities (that would disturb the ACMs) in accordance with applicable regulations. In the event that renovation or demolition activities do not take place, known and suspect ACMs at the site shall be managed in accordance with applicable regulations, including the preparation and implementation of an asbestos operation and maintenance (O&M) plan. These activities shall be performed in accordance with applicable regulatory agency guidelines (such as federal Occupational Safety and Health Administration, California OSHA, South Coast Air Quality Management District, and California Environmental Protection Agency, Department of Toxic Substances Control). RR HH-3 Prior to any demolition, remodeling, and/or renovation activities at the site, untested possible lead-based paint (LBP) and other lead-containing materials (LCMs) that may be disturbed shall be sampled and analyzed for total lead content. Abatement of known and possible LBP and other LCMs shall be performed prior to any demolition, remodeling, and/or renovation activities (that would disturb the LBP and other LCMs) in accordance with applicable regulations. These activities shall be performed in accordance with applicable regulatory agency guidelines (such as United States Department of Housing and Urban Development, California Department of Public Health, and Los Angeles County Department of Health Services).	

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
A Phase II Investigation was performed by Tetra Tech following the Phase I ESA of Site 1. This Investigation was performed to evaluate the likelihood that the subsurface at the Site has been impacted by historical on-Site activities and adjacent off-Site activities in areas cited as RECs in the Phase I ESA. To further evaluate the potential oil wells in the western portion of Site 1, an initial review of the oil wells located on or adjacent to the Vermont Corridor Development was conducted by Evans & Walker, Consulting Petroleum Engineers. This evaluation concluded that the anomaly identified in the geophysical survey in the northern parking lot is most likely something other than an oil well, and that it is unlikely that the DOGGR will require abandonment of the oil wells present at the Site. Compliance with existing federal and State laws regarding identified hazardous materials would be required. Mitigation measure MM HH-1 would reduce potentially significant impacts associated with the on-site oil wells to less than significant, and adherence to the Regulatory Requirements RR HH-1 through RR-HH-6 would ensure the Project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Regarding operation, the proposed development at Site 1 would include governmental offices, commercial retail, and on-site parking. These types of uses would be expected to use and store very small amounts of hazardous materials, such as paints, solvents, cleaners, pesticides, etc. As noted in the Regulatory Framework section, the issue of hazardous materials and wastes is highly regulated. Accordingly, all operational hazardous materials on the site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. Based on the above, the Project would not have the potential to exacerbate current environmental	RR HH-4 Prior to proposed redevelopment, possible polychlorinated biphenyls (PCB)-containing equipment and fixtures, as well as mercury-containing fluorescent light bulbs/tubes, shall be disposed of or recycled consistent with applicable regulations and regulatory agency guidelines such as the Integrated Waste Management Act, Beverage Container Recycling and Litter Reduction Act, and California Department of Resources Recycling and Recovery requirements. RR HH-5 A Soil Management Plan (SMP) shall be prepared prior to, and implemented during, site redevelopment activities that would result in the exposure of soils at the site. The SMP shall include, but not be limited to, dust suppression measures in accordance with applicable regulations, methods of monitoring for impacted soil, handling and disposal procedures for impacted soil that is encountered, and procedures for testing of soil imported to or exported from the site. The SMP shall be prepared with local agency oversight, such as the Los Angeles County Fire Department’s Health Hazardous Materials Divisions – Site Mitigation Unit. RR HH-6 Additional regulatory compliance actions are required on Site 1 to address conditions associated with petroleum impacts in soil and groundwater, as identified in the Phase II ESA, prior to construction. As required under existing regulations in conjunction with standard construction practices, these actions would occur at the western portion of Site 1 in the vicinity of on-Site abandoned oil wells, and at the eastern portion of Site 1 (at the parking structure site) in the area of the onsite abandoned UST. Site 1 construction will comply with the requirements of LACFD SMU. Mitigation Measures MM HH-1 The anomaly identified in northwest portion of Site 1 by the geophysical survey should be probed and identified to confirm that it is not an oil well. The information gathered on the Ruhland wells shall then be reviewed with the DOGGR and LADBS to confirm that the Ruhland wells will not require reabandonment. MM HH-2 Prior to the commencement of any construction activity at Site 2, a geophysical survey to locate the on-site oil wells shall be undertaken and shall follow California Occupational Safety and Health Administration guidelines for grading and/or shoring. Second, the Developer shall submit Project plans to the Southern District office of the California Department of Conservation’s Division of Oil, Gas, & Geothermal Resources (DOGGR) that show, at a minimum, the boundary of the development site property with all known wells plotted on the property, final grade of the	

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
conditions that would create a significant hazard. Impacts would be less than significant. Site 2 RECs, BERs, and <i>de minimis</i> conditions have been found in connection with Site 2. The RECs are: • Two historical on-site used auto sales facilities and the two reported possible on-site historical gas/service stations • Presence of underlying fill material of unknown provenance • Potential for methane gas/presence of oil wells on site (this environmental concern also represents possible vapor encroachment condition indicative of potential vapor intrusion) ○ Location in Methane Zone and Los Angeles City Oil/Gas Field ○ Presence of three oil wells beneath existing buildings with no abandonment documentation (which could serve as a conduit for methane gas) • Adjacent properties at Site 1 at 510 and 532 S. Vermont Avenue (two former used auto sales facilities, and use of the northern office building on the property as a photo lab with industrial wastewater discharge) and 523 Shatto Place (historical operations that would result in the discharge of industrial wastewater to an oil and sand trap [3-compartment clarifier]) The BERs are: • Confirmed and untested suspect ACMs • Untested suspect LBP and other LCMs • Potential asbestos- and/or PCB-containing joint compounds within concrete slabs The <i>de minimis</i> conditions are: • Presence of possible PCB-containing equipment and fixtures • Presence of possible mercury-containing fluorescent light bulbs/tubes	development site property, and a visual bar scale for review as a part of its Construction Site Well Review Program. The DOGGR review may include recommendations such as: possible re-abandonment of the on-site oil wells; building/structure redevelopment setbacks and/or other construction-related requirements above or adjacent to the on-site oil wells; the installation of vent cones and related venting-related methane mitigation system above the soil wells and beneath the building slabs. The Project shall incorporate DOGGR's recommendations, to the extent feasible, and/or the Developer may be held responsible by DOGGR for re-abandoning the wells. Any methane mitigation system associated with this measure shall not conflict with Los Angeles County's methane gas mitigation requirements and standards for Site 1, or the City of Los Angeles Methane Ordinance for Site 2.	

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Compliance with existing federal and State laws regarding identified hazardous materials would be required. Mitigation Measure MM HH-2 would reduce potentially significant impacts associated with the on-site oil wells to less than significant, and adherence to the Regulatory Requirements RR HH-1 to RR HH-5 would ensure that Project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Regarding operation, the proposed development at Site 2 would include multi-family residential and amenities, and commercial retail utilizing both existing structure and new construction as well as on-site parking. These types of uses would be expected to use and store very small amounts of hazardous materials, such as paints, solvents, cleaners, pesticides, etc. As noted in the Regulatory Framework section, the issue of hazardous materials and wastes is highly regulated. Accordingly, all operational hazardous materials on the site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. Impacts would be less than significant. Site 3 RECs, BERs, and <i>de minimis</i> conditions have been found in connection with Site 3. The RECs are: • Historical on-site used auto sales facilities • Presence of underlying fill material of unknown provenance • Potential for methane gas on site (this environmental concern also represents possible vapor encroachment condition indicative of potential vapor intrusion)		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
O Location within Methane Zone and Los Angeles City Oil/Gas Field • Historical uses of several adjacent properties to the north, northeast, southeast, and south The BERs are: • Confirmed and untested suspect ACMs • Untested suspect LBP and other LCMs • Potential asbestos- and/or PCB-containing joint compounds within concrete slabs The <i>de minimis</i> conditions are: • Presence of possible PCB-containing equipment and fixtures • Presence of possible mercury-containing fluorescent light bulbs/tubes Compliance with existing federal and State laws regarding identified hazardous materials would be required. Specifically, Regulatory Requirements RR HH-1 through RR HH-5, address methane gas/vapor intrusion; testing and safe handling/removal of ACMs, LBP, LCMs, and PCB-containing materials; and soil management. Moreover, regarding issues related to the underlying fill material, see Section 4.5, Geology and Soils. Adherence to the enumerated Regulatory Requirements would ensure that Project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Regarding operation, the proposed Project at Site 3 would include senior affordable housing, community recreation center, and on-site parking. These types of uses would be expected to use and store very small amounts of hazardous materials, such as paints, solvents, cleaners, pesticides, etc. As noted in the Regulatory Framework section, the issue of hazardous materials and wastes is highly regulated. Accordingly, all operational hazardous materials within the site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. Based on the above, the Project would not have the potential to		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
exacerbate current environmental conditions that would create a significant hazard. Impacts would be less than significant.		
Impact (4.7-2): Hazard near a school Site 1 There are six schools within a quarter-mile of Site 1. Impacts related to construction of the Project would be less than significant through the adherence of to the enumerated Regulatory Requirements and Mitigation Measure MM HH-1, which requires that the anomaly identified in northwest portion of the proposed development by the geophysical survey be probed and identified to confirm that it is not an oil well and the information gathered on the Ruhland wells be reviewed with the DOGGR and LADBS to confirm that the Ruhland wells will not require reabandonment. Therefore, the Project would not emit hazardous substances in a manner that would adversely affect a school. With respect to this threshold, the potential impact during construction would be less than significant. Regarding operation, the proposed development at Site 1 would include governmental offices, commercial retail, and on-site parking. These types of uses would be expected to use and store small amounts of hazardous materials, such as paints, solvents, cleaners, pesticides, etc. As noted in the Regulatory Framework section, the issue of hazardous materials and wastes is highly regulated. Accordingly, all operational hazardous materials on the Site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. Therefore, the Project would not emit hazardous substances in a manner that would adversely affect a school. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. With respect to this threshold, the potential impact during operation would be less than significant.	Impact (4.7-2): See Impact 4.7-1 above.	Impact (4.7-2): Less than significant

Site 2 There are five schools within a quarter-mile of Site 2. Impacts related to construction of the Project would be less than significant through the adherence of to the enumerated Regulatory Requirements and Mitigation Measure MM HH-2, which requires the Developer to submit development plans to DOGGR for review prior to commencement of any construction activity at Site 2, and the Project shall incorporate DOGGR’s recommendations, to the extent feasible, and/or the Developer may be held responsible by DOGGR for re-abandoning the wells as is set forth in Public Resources Code Sections 3208.1 and 3255. Therefore, the Project would not emit hazardous substances in a manner that would adversely affect a school. With respect to this threshold, the potential impact during construction would be less than significant. Regarding operation, the proposed Project at Site 2 would include multi-family residential and amenities, and commercial retail utilizing both existing structure and new construction as well as on-site parking. These types of uses would be expected to use and store very small amounts of hazardous materials, such as paints, solvents, cleaners, pesticides, etc. As noted in the Regulatory Framework section, the issue of hazardous materials and wastes is highly regulated. Accordingly, all operational hazardous materials within the site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. Therefore, the Project would not emit hazardous substances in a manner that would adversely affect a school. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. With respect to this threshold, the potential impact during operation would be less than significant. Site 3 There are four schools within a quarter-mile of Site 3. Impacts related to construction of the Project would be less than significant through the adherence of to the enumerated Regulatory Requirements. Therefore, the Project would not emit hazardous substances in a manner that would adversely affect. With respect to this threshold, the potential impact during construction would be less than significant.		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Regarding operation, the proposed development at Site 3 would include senior affordable housing, community recreation center, and on-site parking. These types of uses would be expected to use and store very small amounts of hazardous materials, such as paints, solvents, cleaners, pesticides, etc. As noted in the Regulatory Framework section, the issue of hazardous materials and wastes is highly regulated. Accordingly, all operational hazardous materials within the site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. Therefore, the Project would not emit hazardous substances in a manner that would adversely affect a school. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. With respect to this threshold, the potential impact during operation would be less than significant.		
Impact (4.7-3): Located on a hazardous materials site Site 1 Site 1 was not reported to be listed in any of the federal and State regulatory or tribal databases. However, Site 1 was reported to be listed in the following local database: Los Angeles County Hazardous Materials Systems. The Site was also listed in the non-ASTM HAZNET database. Regarding the Los Angeles County Hazardous Materials Systems listing, the portion of Site 1 with the seven-level parking structure is listed in this database as an industrial waste or UST facility with a status of open. As discussed above, it appears that the Los Angeles County Hazardous Materials Systems database listing pertains to industrial waste and is not an indication that a UST was present at this address. LABS IWM records for the site included a 1979 application for a permit to discharge industrial wastewater from “air conditioning and photo lab” processes (water and chemical for clean down and photo processing) for 510 S. Vermont Avenue, and a 1965 approved application for a permit to discharge industrial wastewater from a floor sink (from floor washing) to an oil and sand trap (3-compartment clarifier) for 523 Shatto Place (parking structure). The historical use of the northern office building as a photo lab with industrial wastewater discharge, and historical site operations at 523 Shatto Place (parking	Impact (4.7-3): See Impact 4.7-1 above.	Impact (4.7-3): Less than significant.

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
structure) that would result in the discharge of industrial wastewater to an oil and sand trap (3-compartment clarifier), are considered to be a REC. Regarding the non-ASTM HAZNET listing, the site was listed in this database as generating waste in the form of tank bottom waste in 1995. The site representatives were unaware of the reason for this listing or the source of this waste. It is unknown whether the tank bottom waste listing is associated with the 3-compartment clarifier referenced above for the 523 Shatto Place listing. The historical operations at 523 Shatto Place that would result in the discharge of industrial wastewater to an oil and sand trap (3-compartment clarifier) is considered a REC. After preparation of the Phase I ESA additional information was provided by the LAFD UST Division concerning the 10,000-gallon UST on Site 1. On March 17, 1995, a 10,000-gallon steel UST used to store gasoline. The UST was abandoned in-place in accordance with a LAFD-issued permit with oversight by a LAFD inspector. The fuel dispenser(s) and piping between the fuel dispenser(s) and the UST were removed at the time the UST was abandoned in-place. Soil sampling was performed adjacent to the UST consistent with standard practice at the time. No evidence of impacted soil was found in soil samples analyzed for gasoline, BTEX, and lead. No groundwater was encountered to the maximum depth drilled. On May 19, 1995, a no further action letter for the UST was issued by the LAFD. Impacts related to construction of the Project would be less than significant through adherence to the Regulatory Requirements HH-1 through HH-6, and Mitigation Measure MM HH-1. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. As such, the impact during construction and operation would be less than significant.		

Site 2 Site 2 was not reported to be listed in any of the federal regulatory or tribal databases. Site 2 was reported to be listed in the following State and local databases: HIST UST, CA FID, UST, SWEEPS UST, and Los Angeles County Hazardous Materials System. The site was also listed in the non-ASTM HAZNET database. Regarding the non-ASTM HAZNET listings, Site 2 at 3175 W. 6th Street is listed for generating hazardous waste in the form of asbestos-containing waste in 1997, 1999, 2000, 2001, 2009, 2010, and 2014. Site 2 at 550 S. Vermont Avenue is also listed in this database for generating hazardous waste in the form of asbestos-containing waste each year from 1996 to 2000 and in 2014, and for generating hazardous waste in the form of pharmaceutical waste, PCBs, and material containing PCBs. According to the site representative, these listings are likely due to renovations for various County departments at the facility. This facility was not listed in any databases as having had a release. Based on the regulatory status, these site listings are not considered to be of environmental concern to the site. Impacts related to construction of the Project would be less than significant through adherence to the Regulatory Requirements HH-1 through HH-5, and Mitigation Measure MM HH-2. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. As such, the impact during construction and operation would be less than significant. Site 3 Site 3 was not reported to be listed in any of the federal, State, tribal, local regulatory databases. Site is listed in the non-ASTM HAZNET database. Site 3 at 433 S. Vermont Avenue was listed in the non-ASTM HAZNET database for generating hazardous waste in the form of asbestos-containing waste in 1995 and 2008, and PCBs and materials containing PCBs in 2006. According to the site representative, these listings were likely due to renovations at the facility. This facility was not listed in any databases as having had a release. Based on the regulatory status, this site listing is not considered to be of environmental concern to the site.		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Therefore, no hazardous material site pursuant to Government Code Section 65962.5 is located on at Site 3, and the Project would not create a significant hazard to the public or the environment. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. As such, the impact during construction and operation at Site 3 would be less than significant.		
4.8 Hydrology and Water Quality		
Impact (4.8-7), (4.8-8), and (4.8-10): Flood area, seiche, tsunami, or mudflow The significance thresholds not shown in this section have been determined to have no impact or a less-than-significant impact as set forth in Section 6.5, Effects Found Not to be Significant. These include Threshold 4.8-7, addresses the placement of housing in a 100-year flood hazard area; Threshold 4.8-8, addresses placement of structures that would impede or redirect flood flows; and Threshold 4.8-10, addresses the placement of structures in areas subject to inundation by seiche, tsunami, or mudflow. The Project would not place structures in any of the above situations.	Impact (4.8-7), (4.8-8), and (4.8-10): None.	Impact (4.8-7), (4.8-8), and (4.8-10): Less than significant.
Impact (4.8-1) and Impact (4.8-6): Water Quality <u>Construction-Surface Water</u> Construction of the Project would include grading and other earth moving activities that would expose on-site soils to erosion processes. The Storm Water Pollution Prevention Plan (SWPPP) would specify Best Management Practices (BMPs) to be used during construction, which would include but not be limited to: erosion control, sediment control, non-stormwater management, and materials management BMPs. In addition, the Developer would be required to comply with the County grading permit regulations on Sites 1 and 3, and City grading regulations on Site 2. These regulations require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections to reduce sedimentation and erosion.	Impact (4.8-1) and (4.8-6): Regulatory Requirements RR HWQ -1: Compliance with applicable National Pollutant Discharge Elimination System (“NPDES”) permit requirements and the Los Angeles Regional Water Quality Control Board Municipal Storm Water permit (“MS4 permit”) is required. RR HWQ -2: Runoff from parking lots located on Sites 1 and 3 will be treated, as required by County’s LID Ordinance, prior to discharging into existing storm drain systems. Runoff from Site 2 will be treated as required by the City’s LID Ordinance RR HWQ -3: All wastes from construction of the Project will be disposed of as required by federal, State, County (Sites 1 and 3), and City (Site 2) regulations. Appropriately labeled recycling bins will be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non-recyclable materials/wastes will be taken to an appropriate landfill. Toxic wastes will be discarded at a licensed regulated disposal site.	Impact (4.8-1) and (4.8-6): Less than significant.

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
In addition to construction-related earth-moving activities, the Project would require dewatering during construction. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location to proceed with construction, into the drainage system. Discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, could lead to exceedance of the NPDES requirements. Sites 1 and 2 Excavations on Sites 1 and 2 would extend to approximately 20 feet below the ground surface. Due to the presence of the abandoned oil wells on Sites 1 and 2, contaminated groundwater may be encountered when performing basement and foundation excavations. However, the temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. With implementation of site-specific BMPs included as part of the SWPPP and adherence to NPDES discharge requirements, the Project would not significantly increase pollutants in the stormwater runoff. Therefore, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated in Ballona Creek. Conformance with applicable NPDES requirements, as identified in Regulatory Requirements RR-HWQ-1 through RR-HWQ-8, which identify BMPs for the treatment of stormwater runoff and maintenance of water quality, would provide adequate surface water quality protection. Therefore, temporary construction-related impacts on surface water quality would be less than significant. Site 3 Excavation on Site 3 extend to approximately 30 feet below the ground surface. With implementation of site-specific BMPs included as part of the SWPPP and adherence to NPDES discharge requirements, the Project would reduce or eliminate the discharge of potential pollutants from the stormwater runoff.	RR HWQ -4: Leaks, drips, and spills will be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains as required by the NPDES Construction General Permit. RR HWQ -5: As required by the NPDES Construction General Permit, material spills will be prohibited from being hosed down at the pavement. Dry cleanup methods will be required. RR HWQ -6: During construction, where truck traffic is frequent, gravel approaches and dirt tracking devices will be used to reduce soil compaction and limit the tracking of sediment into streets as required by the NPDES Construction General Permit. RR HWQ -7: As required by the NPDES Construction General Permit, all construction vehicle/equipment maintenance, repair, and washing will be conducted away from storm drains. All major repairs will be required to be conducted at an appropriate location. Drip pans or drop cloths will be required to catch drips and spills. RR HWQ -8: Project construction will comply with the County's NPDES and MS4 requirements, and City and County LID requirements for water quality as appropriate to the respective Sites.	

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Therefore, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated in Ballona Creek. Conformance with applicable LID requirements, as identified in Regulatory Requirements RR-HWQ-2, would provide adequate surface water quality protection. Therefore, temporary construction-related impacts on surface water quality would be less than significant. <u>Groundwater</u> During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. Because there are no groundwater production wells or public water supply wells within one mile of the Project Sites, construction activities would not affect existing wells. Additionally, the Project would not result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Water encountered in the vicinity of the oil wells could be petroleum-impacted. However, the Project would not alter these existing conditions beyond removal of groundwater through dewatering activities in compliance with NPDES discharge requirements, and no additional pollutants would be introduced. Temporary pumps and filtration would be utilized in compliance with the NPDES permit. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Provided adherence to the appropriate RR-HWQ-1 through RR-HWQ-8 compliance and containment measures, which identify BMPs for the treatment of stormwater runoff and maintenance of water quality the Project would result in less than significant impacts related to groundwater quality.		

<u>Operation -</u> <u>Surface Water</u> Site 1 The Project would slightly decrease the overall percentage of impervious surfaces. The existing Site 1 has approximately 100 percent impervious surface areas which includes buildings and hardscape surfaces. Existing stormwater discharges from Site 1 without treatment or detention. The Project would develop buildings across Site 1, and it is anticipated that the new overall project site impervious area of Site 1 would be reduced to approximately 95 percent. This reduction is due to the addition of landscaping areas. Site 1 BMPs would control and treat stormwater runoff in compliance with Low Impact Development (LID) requirements and no increase in runoff would result from the Project. Because there are no existing on-site BMPs, the Project at Site 1 would result in improved surface water quality related to stormwater run-off compared to existing conditions. Based on soil conditions, infiltration is deemed infeasible for Site 1. Therefore, capture and use would be the next priority level BMP to consider. In order to satisfy County requirements for capture and use for Site 1, the volume retained would need to be used within 96 hours after the rain event. If the County updates their Low Impact Design policy to allow for longer hold times, then capture and use would still be feasible, and the Project would consider longer holding durations. A cistern would be designed to hold the required volume, and the retained stormwater would be distributed to approved uses on the property such as cooling tower makeup, toilet flushing, or irrigation subject to Los Angeles County Health Department approval. There are multiple options for the system used to hold the collected stormwater. The two most common options include a waterproof cast in place concrete room (similar to a fire tank room), and a large diameter pipe. Due to incorporation of the site specific LID BMPs from the County LID standards manual that are determined to be applicable to Site 1, operation of the Project on Site 1 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. As a result of implementing LID BMPs and RR-HWQ-2, there would be less than significant operational impacts on surface water quality at Site 1.		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Site 2 The Project would slightly decrease the overall percentage of impervious surfaces. The existing Site 2 has approximately 100 percent impervious surface areas which includes buildings and hardscape surfaces. Existing stormwater discharges from Site 2 without treatment or detention. The Project will develop buildings across Site 2, and it is anticipated that the new overall project site impervious area will be reduced to approximately 95 percent. Based on soils conditions, infiltration is deemed infeasible for Site 2. Therefore, capture and use would be the next priority level BMP to consider. In order to satisfy the City requirements for capture and use for Site 2, the volume retained would need to be emptied at least once during the 7-month rain season (October through April). A cistern would be designed to hold the required volume, and the retained stormwater would be distributed to approved uses on the property such as cooling tower makeup, toilet flushing, or irrigation subject to Los Angeles County Health Department approval. There are multiple options for the system used to hold the collected stormwater. The two most common options include a waterproof cast in place concrete room (similar to a fire tank room), and a large diameter pipe. Due to incorporation of site specific LID BMPs from the City LID standards manual that are determined to be applicable to Site 2, operation of the Project on Site 2 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. As a result of implementing LID BMPs and RR-HWQ-2, there would be less than significant operational impacts on surface water quality at Site 2. Site 3 The Project would slightly decrease the overall percentage of impervious surfaces. The existing Site 3 is approximately 100 percent impervious surface areas which includes buildings and hardscape surfaces. Existing stormwater discharges from Site 3 without treatment or detention. The Project will develop buildings across Site 3, and it is anticipated that the new overall project site impervious area will be reduced to approximately 95 percent.		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Based on soils conditions, infiltration is deemed infeasible for Site 3. Therefore, capture and use would be the next priority level BMP to consider. In order to satisfy the County requirements for capture and use for Site 3, the volume retained would need to be used within 96 hours, after the rain event. If the County updates their Low Impact Design policy to allow for longer hold times, then capture and use would still be feasible, and the Project would consider longer holding durations. A cistern would be designed to hold the required volume, and the retained stormwater would be distributed to approved uses on the property such as cooling tower makeup, toilet flushing, or irrigation subject to Los Angeles County Health Department approval. There are multiple options for the system used to hold the collected stormwater. The two most common options include a waterproof cast in place concrete room (similar to a fire tank room), and a large diameter pipe. Due to incorporation of site specific LID BMPs from the County LID standards manual that are determined to be applicable to Site 3, operation of the Project on Site 3 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. As a result of implementing LID BMPs and RR-HWQ-2, there would be less than significant operational impacts on surface water quality. <u>Groundwater</u> Site 1 Development of Site 1 would not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. The Project at Site 1 would not include surface or subsurface application or introduction of potential contaminants or waste materials during operation. Oil wells may be encountered on Site 1. As such, it is expected that the water encountered in the vicinity of the oil wells could be petroleum-impacted.		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
However, operation of the Project would not be expected to alter these existing conditions. Based on the UST Summary Report, a 10,000-gallon steel UST used to store gasoline was abandoned in-place in accordance with a LAFD-issued permit with oversight by a LAFD inspector. On May 19, 1995, a no further action letter for the UST was issued by the LAFD. Provided adherence to the appropriate RR-HWQ-1 through RR-HWQ-8 compliance and containment measures which identify BMPs for the treatment of stormwater runoff and maintenance of water quality, operation of the Project on Site 1 would result in less than significant impacts related to groundwater quality. Site 2 Development of Site 2 would not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. The Project at Site 2 would not include surface or subsurface application or introduction of potential contaminants or waste materials during operation. The Project at Site 2 would not be anticipated to result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation. Oil wells may be encountered on Site 2. As such, it is expected that the water encountered in the vicinity of the oil wells could be petroleum-impacted. However, operation of the Project would not be expected to alter these existing conditions. Provided adherence to the appropriate RR-HWQ-1 through RR-HWQ-8 compliance and containment measures which identify BMPs for the treatment of stormwater runoff and maintenance of water quality, operation of the Project on Site 2 would result in less than significant impacts related to groundwater quality.		

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Site 3 Development of Site 3 would not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. Provided adherence to the appropriate RR-HWQ-1 through RR-HWQ-8 compliance and containment measures which identify BMPs for the treatment of stormwater runoff and maintenance of water quality, operation of the Project on Site 3 would result in less than significant impacts related to groundwater quality.		
Impact (4.8-3), Impact (4.8-4), and Impact (4.8-5): Drainage and runoff Construction- Site 1 Because the construction area on Site 1 would be greater than one acre, the Developer would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. BMPs would be designed to reduce runoff and pollutant levels in runoff during construction. The NPDES and SWPPP measures are designed to contain and treat, as necessary, stormwater or construction watering on the Project Sites to prevent runoff from reaching off-site drainage facilities or receiving waters. In addition, the construction of the Project on Site 1 would be required to comply with all applicable Los Angeles County grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Therefore, with compliance with RR-HWQ-1 through RR-HWQ-8, which identify BMPs for the treatment of stormwater runoff and maintenance of water quality, construction-related impacts to drainage patterns and runoff would be less than significant. Site 2 Because the construction site on Site 2 would be approximately one acre, the Developer would be required to obtain coverage under the NPDES Construction	Impact (4.8-3), Impact (4.8-4), and Impact (4.8-5): See Impact (4.8-1) above.	Impact (4.8-3), (4.8-4), and Impact 4.8-5: Less than significant.

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. BMPs would be designed to reduce runoff and pollutant levels in runoff during construction. The NPDES and SWPPP measures are designed to contain and treat, as necessary, stormwater or construction watering on the Project Sites to prevent runoff from reaching off-site drainage facilities or receiving waters. In addition, the construction of the Project on Site 2 would be required to comply with all applicable City of Los Angeles grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Therefore, with compliance with RR-HWQ-1 through RR-HWQ-8, containment measures which identify BMPs for treatment of stormwater runoff and maintenance of water quality, construction-related impacts to drainage patterns and runoff would be less than significant. Site 3 Because the construction site on Site 3 would be less than one acre, the Developer would not be required to obtain coverage under the NPDES Construction General Permit. However, construction of the Project on Site 3 would be required to comply with all applicable Los Angeles County grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Therefore, with compliance with RR-HWQ-2 which identify BMPs for treatment stormwater runoff and maintenance of water quality, construction-related impacts to drainage patterns and runoff would be less than significant. <u>Operation</u> - During operation of the Project, Sites 1, 2, and 3 would discharge into a City of Los Angeles 18” underground storm drainpipe located along Vermont Avenue. In addition, a portion of Site 1 would discharge toward Shatto Place, which drains north into another 18” underground storm drainpipe located along 4th Street Stormwater that leaves the three Project Sites would surface drain into gutters along Vermont Avenue and Shatto Place where it would flow north toward the nearest catch basins. In general, stormwater runoff would enter		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
offsite catch basins and underground storm drainage pipes which convey stormwater through underground pipe networks eventually draining into Ballona Creek and eventually into the Santa Monica Bay. Implementation of the Project would slightly decrease the percentage of impervious surface area. The existing Sites are approximately 100 percent impervious surface area, including buildings and hardscape. Currently, stormwater is discharged from the Project Sites without treatment or detention. Because each of the Project Sites would include additional new landscaped areas, it is anticipated that the new overall impervious area at the Sites would be reduced to approximately 95 percent. The Project would implement stormwater mitigation strategies in accordance with the applicable regulations (County LID Ordinance for Sites 1 and 3, City LID Ordinance for Site 2) to collect the first flush of runoff from building roofs and hardscape areas. Stormwater flow at the Sites would be managed via roof drains, area drains, and pipes to discharge points and existing catch basins located on the adjacent public streets. A comparison of the pre- and post-peak flow rates indicates that stormwater runoff would not increase after completion of the Project. Consequently, operation-related impacts to drainage patterns and runoff would be less than significant.		
Impact (4.8-2): - <u>Construction</u>-The Project Sites are not located within a designated groundwater recharge basin. The Project would not directly utilize groundwater supplies as all potable and nonpotable water would be supplied through sources available to the City of Los Angeles Department of Water and Power (LADWP). Temporary construction water use would be substantially less than the existing water consumption. As a result, construction of the Project would not deplete groundwater supplies. As discussed above, groundwater has historically existed at relatively shallow depths (20 feet below ground surface) at the Sites. The Project would include	Impact (4.8-2): None.	Impact (4.8-2): Less than significant.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
two levels of subterranean parking below Site 1 (approximately 20 foot excavation), 1.5 levels of subterranean parking below Site 2 (approximately 20 foot excavation), and three levels of subterranean parking below Site 3 (approximately 30 foot excavation). Construction of the subterranean parking levels at the Project Sites would require excavation below the historically high groundwater depths and temporary dewatering would be necessary to achieve a dry and stable excavation. Los Angeles County Regional Water Quality Control Board approval would be required to discharge dewatering water to the street or storm drain. Operation of temporary dewatering systems would incrementally lower local groundwater levels in the immediate vicinity of the Sites. However, groundwater pumping would be limited to the top 10-15 feet of the groundwater table and impacts to regional groundwater flow and level would not occur. Once the temporary construction dewatering is discontinued, the water table would be expected to return to its current elevation Therefore, the Project would result in less than significant impacts related to groundwater levels during construction. <u>Operation</u> - All potable and nonpotable water at the Project Sites would be supplied through existing developed domestic water sources available to LADWP. As such, operation of the Project would not involve groundwater extraction. Water supplied from groundwater extraction has comprised a small percentage (approximately 10 percent) of LADWP’s overall water supply; out of that 10 percent, less than 20 percent is extracted from the Central Groundwater Basin, which is an adjudicated basin. Operation of the Project would not affect the amount of groundwater extracted from the Central Basin by LADWP. The subterranean levels of the Project would be designed to withstand the hydrostatic forces of groundwater and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods. As such, permanent dewatering operations would not be required. Therefore the Project’s potential impact on groundwater levels during operation at each of the Project Sites would be less than significant.		

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Interference with groundwater recharge during operation of a project is largely caused by the creation of impervious surface area (e.g., buildings, road, parking lots, etc.). The Project Sites are not located within a designated groundwater recharge area and are not currently used for groundwater recharge activities. The Sites are currently developed with impervious surfaces and stormwater mostly flows off the Sites and does not result in substantial groundwater recharge. Conditions at the Sites would remain largely the same, as the Project would replace the existing impervious surfaces with new slightly reduced impervious surfaces (from 100 percent to 95 percent). As such, operation of the Project would have a less than significant impact on groundwater recharge. The Project would result in less-than-significant operational impacts and would not substantially directly 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.		
Impact (4.8-9): Levee or dam failure The Project Sites are not located within a 100-year flood plain however, the Sites are located within the potential inundation area of the Hollywood Reservoir. Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. Further, in the event of a dam failure at the Hollywood Reservoir, existing urban development north of the Project Sites, including the US 101 Freeway, would serve as a physical barrier between the upstream portion of the reservoirs/dams and the Project Sites. Therefore, the risk of flooding from inundation by dam failure is considered low and impacts would be less than significant.	Impact (4.8-9): None.	Impact (4.8-9): Less than significant.

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
4.9 Land Use and Planning		
Impact (4.9-1) and Impact (4.9-3): The Project would have a less-than-significant impact with respect to physically dividing an established community (Threshold 4.9-1), because there is no residential community located within the Project Sites, and conflict with any applicable habitat conservation plan or natural community conservation plan (Threshold 4.9-3), because no such plans are applicable to the Project Sites. The analyses for these determinations are provided in Section 6.5, Effects Found Not to be Significant. .	Impact (4.9-1) and impact (4.9-3): None.	Impact (4.9-1) and Impact (4.9-3): Less than significant.
Impact (4.9-2): Conflict with plan, policy or regulation <u>Construction</u> - Project construction activities would follow all applicable County Code requirements for construction on Sites 1 and 3, and City Code requirements for construction on Site 2, which would avoid conflicts with land use plans, policies, and regulations. Therefore, construction of the Project would not conflict with applicable land use plans, policies and regulations, and no impact would occur. <u>Operation - Regional Plans</u> The Project (i.e., Sites 1, 2 and 3) would be consistent with to the goals and policies in the Regional Comprehensive Plan (RCP), Southern California Compass Blueprint Growth Vision, and Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). <u>County General Plan</u> While the land use plan contained in the County General Plan focuses on unincorporated areas of the County and thus does not apply directly to the Project Sites, the General Plan contains a number of elements that address specific issues and establish various goals, policies, and objectives that pertain to the County as a whole and that are relevant to this County sponsored project. These goals, policies, and objectives fall into three basic categories, including (1)	Impact (4.9-2): None.	Impact (4.9-2): Less than significant.

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
supporting infill and pedestrian-friendly development; (2) providing adequate public facilities; and (3) supporting development of affordable housing. The Project would redevelop existing underused sites with new County office facilities, and new residential and complimentary mixed-use commercial development in an urbanized area located within one-third mile of the existing Metro Rail Red/Purple Line Wilshire/Vermont station. The Project would reuse the existing County office building to provide residential units, and would provide new residential units (both at Site 2), including deed-restricted senior affordable housing, and a community recreation center to serve the existing community (at Site 3). The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor commercial uses as well as enhanced pedestrian facilities, through repair of sidewalks and adding landscaping, all of which are designed to promote pedestrian access to the Project Sites and surrounding areas. The Project would include a public plaza on Site 1 to serve employees and visitors to the new County office building, and a new community recreation center at Site 3 to serve the residents of the area. The Project would be consistent with the policies of the County General Plan with respect to infill and pedestrian friendly development. The Project would include new facilities for the Department of Mental Health and WDACS on Site 1 that would allow for more efficient and effective delivery of services to County residents and implement the facilities plans of the County, and a new community recreation center on Site 3 to serve the residents of the area. The new County office building would be designed with sustainable features (LEED Silver equivalent) and located in an identified Transit Priority Area and HQTAs well served by transit in order to reduce energy and water consumption, automobile trips and associated air emissions. The Project would be consistent with the policies of the County General Plan with respect to public facilities. The Project would include deed-restricted senior affordable housing units on Site 3 within one-third mile of the existing Metro Rail Red/Purple Line		

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Wilshire/Vermont station. The County would provide the land for the affordable housing units on Site 3, which will facilitate this development. The Project does not involve the displacement of any housing units, and in fact, creates new housing in the area. The Project would be consistent with the policies of the County General Plan with respect to affordable housing. <u>City of Los Angeles General Plan Framework Element (Sites 1 and 3 for informational purposes; applicable to Site 2)</u> The City Framework promotes the development of a diversity of uses to serve existing and future residents, businesses and visitors in the areas of the City that are most capable of accommodating growth. By concentrating future growth in these areas, the City Framework promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution. The City Framework also promotes the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, and encourages the location of new commercial and multi-family housing development to occur in proximity to transit stations. The Project Sites are included in an area identified as a Regional Center on the City Framework’s Long-Range Land Use Diagram (Metro). Development of County office, residential and commercial land uses would serve the needs of existing and future residents in the area and would expand the diversity of uses in this Regional Center. The Project would increase the vitality in the area through maximizing development of underutilized sites with new land uses that would provide housing and job opportunities. The concentration of development would support the Project area’s existing range of services and activities and would be consistent with the Regional Center designation. The Regional Center is an area targeted for high-density, and a focal point of regional commerce, identity, and activity. The Project would provide pedestrian oriented development in proximity to transit to encourage the development of an activity center in the area of the Project Sites. The Project would provide opportunities for residents, employees, and visitors to use public transit, and walk to other retail businesses and commercial land uses within and near the Project Sites. As		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
such, the Project would support the reduction of vehicle trips, vehicle miles travelled, and air pollution. The Project (i.e., Sites 1, 2 and 3 collectively) would be consistent with the policies of the City of Los Angeles General Plan Framework regarding location and accommodation of growth and development in the City. The Project would include County office, residential and neighborhood serving commercial land uses. The Project design would incorporate design elements, such as ground floor commercial spaces along Vermont Avenue and 6th Street. By developing a mix of land uses on the Project Sites, the Project would generate economic activity in the area and could help attract future investment to the area. The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor commercial uses as well as an enhanced pedestrian facilities, through repair of sidewalks and adding landscaping, all of which are designed to promote pedestrian access to the Project Sites and surrounding areas. The Project (Sites 1, 2 and 3 collectively) would be consistent with the policies of the City Framework regarding urban form and neighborhood design. Therefore, the Project would be consistent with the applicable goals, objectives, and policies in the City General Plan Framework Element. <u>City of Los Angeles General Plan Housing Element (Sites 1 and 3 for informational purposes only; applicable to Site 2)</u> The Project includes the development of new market rate (Site 2) and deed-restricted affordable housing units (Site 3) that will increase the City’s housing supply for all income levels. The County will provide the land for the affordable housing project on Site 3, which will facilitate this development by a non-profit affordable housing provider. Site 2 would provide market rate units with a range of unit types by adaptively reusing an existing office building and through new construction. The new units at Sites 2 and 3 would be located near bus and rail transit lines and would incorporate sustainability features that would reduce energy and water consumption and promote recycling and waste reduction. The Project would not remove any existing residences or displace any residential		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
tenants. The proposed commercial land uses would provide amenities that would serve the Project’s future residents and visitors, as well as the existing neighborhood residents, workers, and visitors. Therefore, the Project (i.e., Sites 1, 2 and 3 collectively) would be consistent with the applicable objectives and policies in the City’s Housing Element. <u>Wilshire Community Plan (Sites 1 and 3 for informational purposes; applicable to Site 2)</u> The Wilshire Community Plan provides objectives and policies designed to promote planned development of the Community Plan area. The Project would redevelop existing underused sites with new County office facilities, and new residential and complementary commercial development in an urbanized area located within one-third mile of the existing Metro Rail Red/Purple Line Wilshire/Vermont station. The Project would reuse the existing County office building to provide residential units and provide new residential units in a commercial zone (Site 2), and deed-restricted senior affordable housing, and a community recreation center to serve the existing community (Site 3). The Project would provide appropriate density in an area that is well-served by rail and bus transit in an identified Transit Priority Area and HQTa. The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor commercial uses on established commercial corridors as well as an enhanced pedestrian facilities, through repair of sidewalks and adding landscaping, all of which are designed to promote pedestrian access to the Project Sites and surrounding areas. The Project would also include bicycle parking spaces on all three Project Sites to encourage the use of alternate transportation modes. The range of commercial and residential Project uses would be consistent with the Community Commercial land use designation of the Project Sites. The Wilshire Community Plan land use map includes a footnote restricting development within the “Community Commercial” land use designation to Height District 1 (i.e., Footnote #5). Height District 1 generally permits a floor		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
area ratio of 1.5 to 1 with unlimited height (i.e., the development envelope is only restricted by the floor area limitation). Thus, the developments at Sites 1 and 2 (new construction/floor area only) would exceed the floor area and intensity contemplated by the Wilshire Community Plan land use map. However, as noted above the Framework Element of the General Plan identifies the Project Sites as within a “Regional Center” designation where the highest intensity developments are encouraged (e.g., high rise construction up to a 6:1 floor area ratio). Moreover, the Project would advance multiple Community Plan goals, policies and objectives, including encouraging a strong and competitive commercial sector along the Vermont Corridor (Site 1) and providing market rate and senior affordable housing in close proximity to transit (Sites 2 and 3). The developments at the Project Sites would also increase the vitality in the area through maximizing development of an underutilized site with new land uses that would provide housing and job opportunities. Notwithstanding that Site 1 and 2 conflict with Wilshire Community Plan Land Use Map Footnote #5, the Project as a whole would reinforce the existing character of the surrounding areas on Vermont Avenue and Wilshire Boulevard. The concentration of development would support the Community Plan area’s existing range of services and activities. The developments at Sites 1, 2 and 3 would be compatible with the existing commercial and multi-family land uses in the area. Project buildout would be of a scale and built form consistent with the surrounding area and would serve the housing needs of existing and possible future residents, and the needs of employees, visitors, and patrons within Wilshire Community Plan Area. Thus, notwithstanding that Site 1 and 2 conflict with Wilshire Community Plan Land Use Map Footnote #5, the Project (i.e., Sites 1, 2 and 3) would on balance be consistent with the land use goals of the Wilshire Community Plan that are applicable to the Project Sites and surrounding area.		

<u>Plan For A Healthy Los Angeles (Sites 1 and 3 for informational purposes only; applicable to Site 2)</u> The Plan for a Healthy Los Angeles provides objectives and policies designed to promote the health of the City’s residents through design. The Project would promote a healthy built environment that could reduce automobile trips and associated air and GHG emissions by providing an enhanced pedestrian-oriented design of the Project Sites. The Project would improve pedestrian facilities in the area to promote walking and would provide bicycle parking and storage spaces on all three Project Sites to promote bicycle use. The Project is located in an area with various bicycle facilities, including on-street bicycle lanes on 1st Street, 7th Street, 11th Street, and Oxford Avenue, and sharrows (shared lanes between bicycles and vehicles on 4th Street and New Hampshire Avenue, further increasing the likelihood of bicycle use. The Project would convert underutilized sites into County office, residential and commercial uses that would enhance the built environment in the surrounding Project vicinity and promote interaction with surrounding uses through walking and bicycling. The Project Sites are located in an area that is well-served by rail and bus transit, which would help to reduce automobile trips and associated air emissions, and improve air quality. In addition to adhering to smart growth principles of locating infill development adjacent to existing employment centers and public transportation options, the Project would incorporate a wide range of building technologies and design features that would protect the environment by saving energy (which would also reduce air pollutant and GHG emissions associated with electricity generation), reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. Further, the Project Sites would achieve the equivalent of LEED Silver status. Therefore, the Project would be consistent with the applicable policies in the Healthy LA Plan. <u>Wilshire Center/Koreatown Redevelopment Plan (Sites 1, 2 and 3)</u> The Project would provide County office, multifamily residential and commercial uses on Project Sites 1 and 2, which would be consistent with the Community Commercial land use designation for these sites set forth in the Redevelopment Plan. The Project would provide deed-restricted affordable housing units and a community recreation center on Site 3, which would be consistent with the Community Commercial land use designation set forth in the Redevelopment Plan for Site 3.		

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<u>Adaptive Reuse Incentive Areas Specific Plan (Site 2 only)</u> Since the existing County office building on Site 2 was constructed in 1964, these provisions would apply to the proposed reuse of this building. Adaptive Reuse Projects must be approved by a Zoning Administrator. With this approval, the proposed reuse of the existing County office building for residential units would be consistent with the Specific Plan. <u>City of Los Angeles Planning and Zoning Code (Site 2 only)</u> Site 2 is zoned C2-1. The proposed land uses that are proposed for the remainder of Site 2 (multifamily residential over a parking structure with ground floor commercial) are permitted in the C2 zone. The zoning classification for Site 2 limits FAR to 1.5 to 1 with unlimited height. The proposed new construction would exceed the permitted floor area allowed under the C2-1 zone/height district. Thus, a discretionary land use entitlement such as a General Plan Amendment to “Regional Center Commercial” and a Height District Change to Height District 2 (i.e., from C2-1 to C2-2) would be required to accommodate an FAR up to 6:1. With a City discretionary land use approval, the proposed new residential construction would be consistent with the Planning and Zoning Code. Site 2 is located in the urbanized mid-Wilshire/Koreatown community of the City, within walking distance of regionally serving transit service. The Project’s bulk and massing is consistent with multiple high-rise commercial and mixed-use developments located along Vermont Avenue. Densification of this area has long been planned for and encouraged given its close proximity to public transit and major employers, and the Project would fit within the existing neighborhood context and pattern of development along Vermont Avenue and 6th Street. In addition, the proposed parking structure and residential building would be located immediately adjacent to the existing County office building, which is approximately 173 feet in height. A discretionary approval to authorize the Site 2 new construction would replace an underutilized property with a new, mixed		

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
use building that would contribute to the revitalization of this area of Vermont Avenue and 6th Street. Thus, the height district change for the Site would further realize the City’s goal and policies for the Wilshire Community Plan area, including encouraging higher density residential uses near major public transportation centers, and encouraging multiple family residential and mixed use development in commercial zones. New development on Site 2 would provide parking meeting the requirements of the Planning and Zoning Code. The new apartment building requires a total of 115 parking spaces. Adding the 53 spaces required to be replaced under the Adaptive Reuse Ordinance, Site 2 requires a total of 168 parking spaces, which is accommodated by the 263 spaces proposed to be provided. <u>City of Los Angeles Walkability Checklist (Site 2 only)</u> While the guidance provided by the Walkability Checklist is not mandatory and is not a part of the LAMC, incorporating the criteria listed to the maximum extent feasible would create a more walkable environment and a higher quality of urban form for the Project. The Site 2 Project generally supports the walkability guidelines discussing sidewalks, which describes that pedestrian corridors should be delineated by creating a consistent rhythm, should be wide enough to accommodate pedestrian flow, and provide pedestrian safety, specifically by creating a clear separation from the roadway and from traffic. Pedestrian access on Site 2 would be provided via sidewalks along 6th Street and Vermont Avenue that would provide direct access to ground floor commercial uses. Therefore, the Project would be consistent with Walkability Checklist guidelines related to sidewalks. The Site 2 Project generally supports the other walkability guidelines regarding: • Utilities, which describe that ideally utilities should be placed underground in order to improve and preserve the character of the		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
street and neighborhood, increase visual appeal, and minimize obstructions in the pedestrian travel path; • Building orientation, which describe that a building’s placement on a site establishes its relationship to the sidewalk and street and could enhance pedestrian activity; • Off-street parking and driveways, which states that the safety of the pedestrian is primary in an environment where pedestrians and automobiles must both be accommodated. • On-site landscaping, which is intended to create a pedestrian friendly environment and a pleasing transition from the street to the building. • Building façade, which describe that a building’s facade could be employed to meet many objectives for a safe, accessible, and comfortable pedestrian environment, specifically by adding visual interest and emphasizing pedestrian movement and comfort. • Building signage and lighting, which describe signage as part of the visual urban language and contributing to neighborhood identity and “place making”. Overall, the Project would have a less-than-significant impact with respect to consistency with applicable land use plans, policies, and regulations.		
4.10.Noise		
Impact (4.10-1) and Impact (4.10-2): Construction noise <u>Construction</u> - Construction of the Project would require the use of heavy equipment for the demolition of existing uses, grading/excavation, renovation of existing uses, and new construction activities. Construction activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of construction, several types of equipment could potentially be operating concurrently and noise levels would vary based on the amount of equipment in operation and the location of the activity.	Impact (4.10-1) and Impact (4.10-2): Regulatory Requirements RR NOI-1: The Project shall comply with applicable provisions of the County and City Codes relating to the regulation of construction noise (i.e., Section 12.08.440 of the County Code (Sites 1 and 3), and Sections 41.40 and 112.05 of the LAMC (Site 2)). RR NOI-2: The Project shall comply with Section 12.08.530 of the County Code (Sites 1 and 3) and Section 112.02 of the LAMC (Site 2) for all new mechanical equipment, which prohibits noise from air conditioning,	Impact (4.10-1) and Impact (4.10-2): significant and unavoidable.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Construction noise levels forecasted for the proposed construction work would result in noise increases at sensitive receptors. It should be noted, however, that any increase in noise levels at off-site receptors during construction would be temporary, and would not generate continuously high noise levels; although, occasional single-event disturbances from construction are possible. In addition, the construction noise during the initial periods of construction would be typically reduced in the later construction periods, as the structures would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors. Typical construction noise levels associated with the Project could exceed 75 dBA at 50 feet from each of the Project Sites. Because construction activities would last for more than 10 days in a three-month period, the Project would cause a significant noise impact during construction if the ambient exterior noise levels at sensitive receptors increase by 5 dBA or more. The ambient exterior noise levels could be exceeded by 5 dBA or more at Sensitive Receptor Nos. 1 through 3, and Sensitive Receptor Nos. 5 through 16. Therefore, construction noise impacts would be potentially significant. MM NOI-1 to MM NOI-5 will reduce the impact but not to less than significant. No additional feasible mitigation is available.	refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dB. RR NOI-3: The project shall comply with Section 12.07.11.2 of the County Code (Sites 1 and 3) and Section 91.1207.11.2 (Allowable Interior Noise Levels) of the LAMC (Site 2), which states interior noise levels attributable to exterior sources shall not exceed 45 dBA CNEL in any habitable room. Mitigation Measures MM NOI-1 Noise and groundborne vibration construction activities whose specific location on the Project Sites may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest off-site land uses. MM NOI-2 Flexible sound control curtains capable of reducing noise generation by at least 10 dBA shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use. MM NOI-3 Noise-generating construction equipment operated at the Project Sites shall be equipped with effective noise control devices (i.e., mufflers, lagging, solar-powered generators, plug-in electrical generators, and/or motor enclosures) consistent with manufacturers' standards. All equipment shall be properly maintained to assure that no additional noise, due to worn or improperly maintained parts, would be generated. Construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications. MM NOI-4 Temporary noise control barriers such as plywood structures shall be erected at the perimeters of the Project Sites as follows: Site 1 – on the northern, eastern and southern edges of the Shatto Place parking structure site on the western edge along Vermont Avenue; and on the southern edge between Site 1 and Site 2; Site 2 - on the eastern edge of the Site and the southern edge of the Site between the existing County Office building and the edge of the Site, and on the southern edge between Site 1 and Site 2; Site 3 – on the northern, western and southern edges of the Site. The noise control barrier shall consist of K-rail with one-inch plywood fencing on top, at least 8 feet in height, which shall reduce construction-related noise levels at the adjacent uses by at least 10 dBA. Alternatively, sound control curtains at least 8 feet in height and capable of reducing construction-related noise levels at the adjacent uses by at least 10 dBA shall be installed on the identified edges of the Project Sites. The supporting structure shall be engineered and erected in order to comply with Los Angeles Municipal Code noise requirements, including those set forth in Chapter XI, Article 2 of the Los Angeles Municipal	

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
	Code. The temporary barrier shall remain in place until all windows have been installed and all grading and excavation activities on the Project Sites are complete. MM NOI-5 All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors (in accordance with the L.A. CEQA Thresholds Guide, noise-sensitive receptors include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks) to the extent feasible. MM NOI-6 Two weeks prior to the commencement of construction at the Project Sites, notification shall be provided to the immediate surrounding off-site properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.	
Impact (4.10-3): Construction hours The Project would not result in construction activities 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. As such, the Project would be consistent with LAMC requirements. Impacts would be less than significant.	Impact (4.10-3): None.	Impact (4.10-3): Less than significant.
Impact (4.10-4): Groundborne vibration <u>Construction</u> - With respect to construction vibration impacts upon existing off-site structures, there are no known structures adjacent to the any of the Project Sites that would be considered structurally fragile or susceptible to vibration damages. The surrounding buildings consist primarily of engineered concrete and masonry buildings, and reinforced-concrete, steel, or timber buildings. As such, the potential for construction-related vibration damage to off-site structures would not exceed the threshold identified by the FTA (vibration levels in PPV) and used by the City. If the Project is approved for subterranean parking and excavation would occur, the Project would be subject to compliance with Section 91.3307 of the LAMC (Protection of Adjoining Property) and California Civil Code Section 832. Specifically, Section 91.3307.1 (Protection Required) states that adjoining	Impact (4.10-4): See Impact (4.10-1) above.	Impact (4.10-4): Less than Significant.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
public and private property shall be protected from damage during construction, remodeling and demolition work. Protection must be provided for footings, foundations, party walls, chimneys, skylights and roofs. Therefore, impacts with respect to potential building damages from construction-related vibration would be less than significant. With respect to human annoyance resulting from vibration generated during construction, the sensitive receptors located in the vicinity of each of the three the Project Sites could be exposed to increased vibration levels. Adjacent residential uses to the west (Sensitive Receptor No. 12) could experience vibration levels greater than the 72 VdB residential annoyance threshold during a worst-case construction activity at Site 3. However, vibration levels experienced in the Site 3 vicinity would be temporary and intermittent, and would be reduced when the construction activities are located toward the center of Project Site 3. Furthermore, consistent with the requirements of LAMC Section 41.40 of the LAMC, construction activity (including demolition) and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, would be prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. All such activities are also prohibited on Sundays and all federal holidays. As such, impacts with respect to construction vibration related to human perception would be less than significant. <u>Operation-</u> Sites 1 and 2 The Project on Sites 1 and 2 would involve urban uses that would not include any stationary equipment that would cause excessive vibration levels. Groundborne vibration at Sites 1 and 2 and in the immediate vicinity currently result from heavy-duty vehicle travel (e.g., refuse trucks and transit buses) on local roadways. While the Project would result in a slight increase in refuse truck activities to serve the proposed land uses at Sites 1 and 2 over existing conditions, these increases would be minor and would not result in perceptible changes to future vibration levels. Furthermore, while refuse trucks would be used for the disposal of solid waste generated at Sites 1 and 2, these truck trips are typical for urban		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
areas, are already occurring within the neighborhood, and only occur a limited number of times per week. Similarly, the number of transit buses that travel along adjacent roadways would also not substantially increase due to the Project because the Project’s peak hour transit ridership of approximately 67 trips during the morning peak hour and 87 trips during the afternoon peak hour that would be accommodated within the available capacity of the system of 14,140 riders during the morning peak hour and 12,300 riders during the afternoon peak hour. Thus, vibration impacts from transit buses associated with operation of the Project would not change and would be less than significant. Site 3 The Project on Site 3 would involve urban uses that would not include any stationary equipment that would cause excessive vibration levels. Groundborne vibration at Site 3 and in the immediate vicinity currently results from heavy-duty vehicle travel (e.g., refuse trucks and transit buses) on local roadways. While the Project would result in a slight increase in refuse truck activities to serve the proposed land uses at Site 3 over existing conditions, these increases would be minor and would not result in perceptible changes to future vibration levels. Furthermore, while refuse trucks would be used for the disposal of solid waste generated at Site 3, these truck trips are typical for urban areas, are already occurring within the neighborhood, and only occur a limited number of times per week. Similarly, the number of transit buses that travel along adjacent roadways would also not substantially increase due to the Project because the Project’s peak hour transit ridership of approximately 67 trips during the morning peak hour and 87 trips during the afternoon peak hour that would be accommodated within the available capacity of the system of 14,140 riders during the morning peak hour and 12,300 riders during the afternoon peak hour. Thus, vibration impacts from transit buses associated with operation of the Project would not change and would be less than significant.		

Impact (4.10-5): Operational noise <u>Traffic Noise</u> The Project would increase local noise levels by a maximum of 0.4 dBA CNEL for the roadway segment of Vermont Avenue between 5th & 6th Streets during the Existing With Project Phase I and II. This increase would not exceed either threshold of significance (i.e. 3 or 5 dBA increase). All other roadway segments during all scenarios would not experience noise level increases above 0.3 dBA CNEL. Because the increase in local noise levels at all of the roadway segments would be less than 3 dBA and 5 dBA CNEL, traffic noise impacts for all scenarios would be less than significant. With respect to the placement of residences in elevated noise conditions, future roadway noise levels fronting Vermont Avenue could reach up to 71.0 dBA CNEL, and up to 71.3 dBA CNEL along 6th Street. These calculations are based on the nearest ground-level location to the roadway centerline, or approximately 50 feet for Vermont Avenue and 40 feet for 6th St. Further, as required in LAMC Section 91.1207.14 (Exterior Sound Transmission Control), the Project would be designed and constructed to ensure interior noise levels attributable to exterior sources shall not exceed 45 dbA CNEL in any habitable room and this impact would be less than significant. <u>Parking Noise</u> Site 1 Site 1 would include two parking structures: (1) an eight-story podium parking structure (seven levels above grade and one level at grade that would be located under the County office building; and (2) a new 11-story building with two below grade levels parking structure on the site of the existing 7-story parking structure on Shatto Place. The podium parking structure would be accessed from Vermont Avenue and the Shatto Place parking structure would be accessed from Shatto Place. The proposed parking areas have the potential to generate noise due to cars entering and exiting, engines accelerating, braking, car alarms, squealing tires, and other general activities associated with people using the parking areas (i.e., talking, opening/closing doors, etc.). Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit. These noise levels would be approximately 66 dBA Leq near driveway locations. Existing roadway noise levels are up to 69.9 dBA	Impact (4.10-5): None.	Impact (4.10.5): Less than significant.

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
CNEL fronting Vermont Avenue. Thus, parking related noise levels would not exceed ambient noise levels on Vermont Avenue. Further, the existing Shatto Place parking garage on Site 1 includes parking noise sources and therefore the Project’s parking uses would not be a new source of noise. Also, the proposed parking uses on Site 1 would be contained within above-ground parking structures which would serve to reduce line-of-sight and block, at least partially, some of the parking related noise sources on-site to off-site sensitive receptors. Therefore, noise impacts associated with the parking structures on Site 1 would be less than significant. Site 2 Site 2 would include a new parking structure consisting of 1.5 underground levels and 3.5 above ground levels that would be accessed from 6th Street. This proposed parking area would have the potential to generate noise due to cars entering and exiting, engines accelerating, braking, car alarms, squealing tires, and other general activities associated with people using the parking areas (i.e., talking, opening/closing doors, etc.). Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit. These noise levels would be approximately 66 dBA Leq near driveway locations. Measured ambient noise levels along 6th Street near Vermont reach up to 69.2 dBA Leq. Thus, parking related noise levels would not exceed ambient noise levels in the urbanized location of Site 2. And, the proposed parking uses would be contained within subterranean and above-ground parking structures which would serve to partially block the line-of-sight to off-site locations from the above ground parking structure to the parking related noise sources on-site, and completely block these site lines in the underground portion of the parking structure. Operational noise generated by motor vehicles within Site 2 would also be regulated under the LAMC. Section 114.02 of the LAMC prohibits the operation of any motor vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise		

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
level by more than five decibels. Therefore, noise impacts associated with the parking structure on Site 2 would be less than significant. Site 3 Vehicle parking for Site 3 would be provided in a three-level subterranean parking structure. The proposed parking areas have the potential to generate noise due to cars entering and exiting, engines accelerating, braking, car alarms, squealing tires, and other general activities associated with people using the parking areas (i.e., talking, opening/closing doors, etc.). Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit. These noise levels would be approximately 66 dBA Leq near driveway locations. Existing roadway noise levels are up to 69.9 dBA CNEL on Vermont Avenue. Thus, parking related noise levels would not exceed ambient noise levels at Site 3. Furthermore, the proposed parking uses would be contained within a subterranean garage, which would serve to block the line-of-sight from off-site locations to the parking related noise sources on-site. Therefore, noise impacts associated with parking facilities on Site 3 would be less than significant. <u>Stationary Noise Sources</u> As part of the Project, new mechanical equipment, pool equipment, HVAC units, and exhaust fans would be installed for the proposed uses. Although the operation of this equipment would generate noise, the design of all mechanical equipment shall comply with Section 12.08.530 of the County Code (Sites 1 and 3) and Section 112.02 of the LAMC (Site 2), which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 decibels. Thus, the on-site equipment would be designed such that it would be shielded, and appropriate noise-muffling devices would be installed on the equipment to reduce noise. In addition, nighttime noise limits would apply to any equipment required to operate between the hours of 10:00		

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
P.M. and 7:00 A.M. As such, with compliance with regulatory requirements, impacts related to stationary noise sources would be less than significant <u>Outdoor Spaces</u> Site 1 Site 1 includes a landscaped terrace that connects the parking structure with the entrance to the County Office Building. This would not be a formal gathering place, rather it would accommodate pedestrians walking between the building and the parking structure, and may also be used as a break location for County employees to gather in small groups. Noise associated with this location would consist primarily of small groups of people talking which would be generally consistent with the existing pedestrian-oriented environment on this portion of Site 1. This activity would result in noise levels of approximately 60-65 dBA at three feet, which would be below measured ambient noise levels and would be imperceptible at off-site locations. Based on these factors, the Site 1 landscaped terrace would not have the potential to cause ambient noise levels to increase by 3 dBA within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase. Impacts from this source would be less than significant. Site 2 Noise associated with the Site 2 roof deck and pool amenity (13th level) would consist primarily of people talking and use of amenities. These amenities would be open to residents only who would generate noise levels of approximately 60-65 dBA at three feet. This activity would not include live entertainment or amplified music, although ambient background music may be used at times (i.e., below the noise levels associated with normal speech). Thus, the outdoor noise levels would be substantially similar to existing ambient noise levels associated with the heavily urbanized project site vicinity. Based on these factors, the Site 2 roof deck and pool amenity would not have the potential to cause ambient noise levels to increase by 3 dBA within the “normally unacceptable” or “clearly		

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
unacceptable” category, or any 5 dBA or greater noise increase. Impacts from this source would be less than significant. Site 3 Noise associated with the Site 3 courtyard would consist primarily of people talking and use of amenities. It should be noted these amenities would be open to residents of the senior affordable housing units only, who would generate noise levels of approximately 60-65 dBA at three feet, would not include live entertainment or amplified music, and would be located in the interior of the proposed residential building. Thus, the outdoor noise levels would be substantially similar to existing ambient noise levels associated with the heavily urbanized area surrounding Site 3. Based on these factors, noise from the Site 3 courtyard would not be perceptible, and would not have the potential to cause ambient noise levels to increase by 3 dBA within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase. Impacts from this source would be less than significant. Furthermore, noise levels from Project operation would be regulated by LAMC Section 116.01 (Loud, Unnecessary and Unusual Noise), LAMC Section 115.02 (Amplified Sound), and LAMC Section 112.01 (Radios, Television Sets, and Similar Devices). Specifically, LAMC Section 116.01 prohibits all future users of a project to willfully make or continue, or cause to be made or continued, any loud, unnecessary, and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. LAMC Section 115.02 regulates amplified sound for commercial purposes in or near residential zones, and prohibits the operation or use of sound amplifying equipment for commercial purposes between the hours of 9:00 p.m. and 8:00 a.m. of the following day in all other zones. LAMC Section 112.01 states, in part, that it shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort		

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of neighbor occupants or any reasonable person residing or working in the area. As such, regulatory compliance would further ensure impacts due to the operation of outdoor spaces would be less than significant.		
4.11 Population, Housing and Employment		
Impact (4.11-1): Sites 1, 2 and 3 <u>Construction</u> - Construction of the Project would result in increased employment opportunities in the construction field. However, the employment patterns of construction workers in Southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with the Project. As such, construction activity associated with Project development would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project occupancy/buildout, and would result in an adverse physical change in the environment; or introduce unplanned infrastructure that was not previously evaluated in the County of Los Angeles General Plan, Wilshire Community Plan, or City of Los Angeles General Plan. Therefore, housing and population impacts associated with construction of the Project would be less than significant. Site 1 <u>Operation- Employment</u> Site 1 would accommodate approximately 2,193 employees at full occupancy (office and retail) by 2023. The majority of these employees would be relocated from existing County offices within the Project area. The increase in employees would be within SCAG's forecasts of 203,100 additional jobs in the City of Los Angeles between 2012 and 2020 and 269,600 additional jobs between 2020 and 2040 as it represents approximately 1.03 percent and 0.78 percent of the total jobs, respectively. The continued concentration of County employment in this area of the City that would occur as a result of the development of Site 1 would be consistent with the regional growth management policies. Therefore,	Impact (4.11-1): None.	Impact (4.11-1): Less than significant.

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
projected employment growth associated with the development of Site 1 would be less than significant. <u>Housing</u> Because no residential units currently exist on-site, development of Site 1 would not remove existing housing, and no housing displacement would occur. As the majority of employees on Site 1 would be relocated from existing facilities in the immediate Project vicinity, it is reasonable to expect that these employees are long-term residents of the City of Los Angeles or other communities in the region, and are unlikely to relocate as a result of the Project. As such, impacts related to housing growth would be less than significant. <u>Population</u> Site 1 would generate approximately 2,166 County office employees and 27 retail employees at full occupancy in 2023, which would result in a net increase of approximately 2,100 employees on the Site. While some new employment opportunities would be created with the Project, most of the expected employees on Site 1 would be drawn from the existing County labor force, and would not need to relocate, or have associated demand for new housing in the area. It is possible that some of the future employees (of which only 103 are anticipated and could be accommodated) would be permanent residents to the area; however, it is unlikely that this indirect population growth would be substantial in the context of the growth forecast for the City of Los Angeles. Thus, any impacts on area population growth would be less than significant. Site 2 <u>Operation- Employment</u> New and reuse development on Site 2 would generate approximately 30 new employees, while the existing approximately 1,223 employees presently located on Site 2 would relocate to Site 1. The increase in 30 employees would be within SCAG’s forecasts of 203,100 additional jobs in the City of Los Angeles between 2012 and 2020 and 269,600 additional jobs between 2020 and 2040 as it		

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
represents approximately 0.01 percent and 0.011 percent of the total jobs, respectively. The continued concentration of County employment in this area of the City that would occur under the Project would be consistent with the regional growth management policies. Therefore, projected employment growth associated with the development of Site 2 would be less than significant. <u>Housing</u> The additional 246 total units proposed to be developed on Site 2 would be within the SCAG’s anticipated growth rate, representing approximately 0.10 percent of the citywide total growth for the period of 2020 to 2040. Therefore, the residential development on Site 2 would be within the projections for housing unit growth. Therefore, impacts related to housing growth would be less than significant. As noted, new and reuse development on Site 2 would create approximately 30 new jobs. It is reasonable to expect that most of the new employees would be drawn from the local labor force readily available in the Community Plan Area and surrounding communities. Coupled with the limited increase in employment associated with the new uses on Site 2, any indirect housing demand associated with the Project on Site 2 would be limited. As such, the Project would not result in an imbalance between the character of jobs created and housing prices in the market serving the Project employees. <u>Population</u> The Project on Site 2 would be expected to accommodate approximately 618 new residents. The addition of these new residents within Site 2 would be within the SCAG population growth projection, representing approximately 0.10 percent of the Citywide total growth for the period of 2020 to 2040. Since the population growth associated with Site 2 would be within the projected growth for the City of Los Angeles, impacts related to population growth would be less than significant.		

Site 3 <u>Operation - Employment</u> Site 3 uses would generate approximately 46 employees, which would result in a net decrease of approximately 66 employees on the Site. Therefore, projected employment growth associated with the development of Site 3 would be less than significant. <u>Housing</u> Proposed development on Site 3 would involve the construction of 72 senior affordable housing units by 2020. The additional 72 total units proposed to be developed on Site 3 would be within the SCAG's anticipated growth rate, representing approximately 0.03 percent of the citywide total growth for the period of 2020 to 2040. Therefore, the residential development on Site 3 would be within the projections for housing unit growth. Therefore, impacts related to housing growth would be less than significant. As shown, Site 3 would create 46 new jobs. It is reasonable to expect that most of the new employees would be drawn from the local labor force readily available in the Community Plan Area and surrounding communities. Coupled with the limited increase in employment associated with the new uses on Site 3, any indirect housing demand associated with the Project on Site 3 would be limited. As such, the Project would not result in an imbalance between the character of jobs created and housing prices in the market serving the Project employees. <u>Population</u> The Project would be expected to accommodate approximately 181 new residents on Site 3. The addition of these new residents within Site 3 would be within the SCAG population growth projection, representing approximately 0.03 percent of the Citywide total growth for the period of 2020 to 2040. Since the population growth associated with Site 3 would be within the projected growth for the City of Los Angeles, impacts related to population growth would be less than significant.		
Impact (4.11-2 and 4.11-3): No Project impacts would occur with respect to displacement of housing or people (Thresholds 4.11-2 and 4.11-3) because the Project Sites currently do not include any housing or residents.	Impact (4.11-2 and 4.11-3): None	Impact (4.11-2 and 4.11-3): No impact

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4.12 Public Services		
Fire Protection and Emergency Service Impact (4.12-1): Site 1, 2, and 3 <u>Construction</u> - Construction on the Project Sites would temporarily create the potential for accidental fires. These impacts are considered to be less than significant for the following reasons: • Emergency access would be maintained to the Project Sites during construction through marked emergency access points approved by the LAFD; • Construction impacts are temporary in nature and do not cause lasting effects to impact LAFD fire protection services; • Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Sites, flagmen would be used to facilitate the traffic flow until construction is complete; and • The Developer would be required to prepare a Construction Staging and Traffic Management Plan that would address traffic and access control during construction. Site 1 <u>Operation-</u> <u>Fire Flows</u> The minimum fire flow requirement for Site 1 would be 6,000 gpm to 9,000 gpm flowing from four to six hydrants at the same time; however, this amount is subject to a field inspection of the general area as well as the Site 1, and could increase. Approval of this plot plan, and implementation of the applicable regulatory requirements would ensure the requisite fire flow for the Project Site.	Impact (4.12-1): Project Design Features PDF PS-1 The Developer shall implement a Construction Staging and Traffic Management Plan (CSTMP) addressing construction activity on each of the three sites that would outline provisions for on-site security during construction, which could include, but are not limited to, temporary security fencing (e.g., chain-link fencing), low-level security lighting, and locked-entry (e.g., padlock gates or guard-restricted access) to limit access by the general public, and providing security personnel to man and patrol the site outside of active construction hours. Additionally, the Construction Staging and Traffic Management Plan shall ensure that routine and emergency access to and around each Site for vehicles and pedestrians is maintained at all times during construction through well-marked entrances. Regulatory Requirements RR- PS-1. The Project shall comply with all State and local building codes relative to fire protection, safety, and suppression. Specifically, the Project design shall incorporate the standards and requirements as set forth by California Code of Regulations (CCR) Title 24 standards, the City of Los Angeles Safety Element, and the County Fire Code (Sites 1 and 3) and LAMC Fire Code (Site 2). RR- PS-2. The Developer shall submit a plot plan for approval of access and hydrants by the County Fire Department for Sites 1 and 3, or LAFD for Site 2, prior to the issuance of building permits. The County Fire Department shall coordinate its findings with respect to Sites 1 and 3 with LAFD. The plot plan shall include fire prevention and access features to the satisfaction of the County or LAFD, including the following standard requirements: - o Access for Fire Department apparatus and personnel to and into all structures shall be required. - o Any required Fire Annunciator panel or Fire Control Room shall be located as required by the Fire Code. - o Any required fire hydrants to be installed shall be fully operational and accepted by the LAFD prior to any building occupation.	Impact (4.12-1): Less than significant.

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
<u>Response Distances and Times</u> A project site should be within the one-mile fire response distance for an engine company and 1.5-mile response distance for a truck company. When response distances exceed these recommendations, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems.). As the turnout time for non-EMS and EMS calls at Fire Station 6 and Fire Station 52 are within the required 6 minutes and the travel time is faster than the citywide average, Site 1 is adequately served by existing fire protection services. Site 1 development would be equipped with a sprinkler system, safety features, and an emergency helistop as required by the County Fire Code. Conformance with applicable Fire Code and County building requirements, as identified in Regulatory Requirements RR-PS-1 through RR-PS-3, would provide adequate on-site fire protection. In addition, as required by County Code, Site 1 would include an Emergency Helicopter Landing Facility (EHLF). The EHLF consists of a clear area on the roof of the building capable of accommodating a helicopter engaged in firefighting and/or emergency evacuation operations. Because the Site 1 development would not have a significant impact on fire protection with regards to response distances and times, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, impacts would be less than significant. <u>Emergency Access</u> Emergency vehicle access to Site 1 would continue to be provided from major roadways adjacent to the Project Site including Vermont Avenue and Shatto Place. In addition, Site 1 would include an emergency helistop on the roof of the proposed office building for emergency access. All circulation improvements, would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Site 1 would be maintained at all times.	RR- PS-3. The Project on Sites 1 and 2 would be built in compliance with the high-rise provisions in the Fire Code and Building Code pertaining to fire-resistant building materials and smoke control. The following safety measures would be implemented. - o All water systems and roadways are to be improved to the satisfaction of the LAFD prior to any building occupation. - o All structures shall be fully sprinklered pursuant to the Fire Code. - o No building or portion of a building shall be constructed more than 150 feet from the edge of a designated fire lane. - o No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel. - o <u>Building Design</u>: Fire resistant doors and materials, as well as walkways, wider stairwells and elevator systems (including emergency and fire control elevators with communication systems inside) that meet code requirements. - o <u>Fire Safety Features</u>: Installation of automatic sprinkler systems, smoke detectors, and appropriate signage and internal exit routes to facilitate a building evacuation; as well as a fire alarm system, building emergency communication system, and a state of the art smoke control system. - o <u>Emergency Safety Provisions</u>: Implementation of an Emergency Plan in accordance with the Fire Code. The Emergency Plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident; establish a drill procedure to prepare for emergency incidents; establish an on-site Emergency Assistance Center; and establish procedures to be followed during an emergency incident. There would also be provision of on-site emergency equipment and emergency training for personnel to reduce the impacts on the need for emergency medical services. - o <u>LAFD Access</u>: Access for LAFD apparatus and personnel to each Project Site would be in accordance with the LAFD requirements.	

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
While development on Site 1 would affect the level of service of roadways in the Site 1 vicinity, the increases in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Site 1 Project’s proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls within the established response time. Because the Project would not have a significant impact on fire protection with regards to fire flow, response times, or emergency access, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, impacts would be less than significant. Site 2 <u>Operation- Fire Flows</u> In accordance with the Fire Code, the Site 2 development would be reviewed as a mixed-use. The minimum fire flow requirement for Site 2 would be 4,000 gpm flowing from four hydrants at the same time; however, this amount is subject to a field inspection of the general area as well as the Site 2 development, and could increase. The impacts related to fire flow for Site 2 would be less than significant for the reasons described under Site 1, above. Therefore, Site 2 impacts related to fire flow would be less than significant. <u>Response Distances and Times</u> A project site should be within the one-mile fire response distance for an engine company and 1.5-mile response distance for a truck company. The turnout time for non-EMS and EMS calls at Fire Station 6 and Fire Station 52 are within the required 6 minutes and the travel time is faster than the citywide average, Site 2 is adequately served by existing fire protection services. The Site 2 Project would be equipped with a sprinkler system and the safety features as required by the Fire Code. Conformance with applicable Fire Code and LAFD building		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
requirements, as identified in Regulatory Requirements RR-PS-1 through RR-PS-3, would provide adequate on-site fire protection. Because the Site 2 development would not have a significant impact on fire protection with regards to response distances and times, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, Site 2 Project impacts related to response times would be less than significant. <u>Emergency Access</u> Emergency vehicle access to Site 2 would continue to be provided from major roadways adjacent to the Project Site including Vermont Avenue and W. 6th Street. Vehicular and pedestrian access to the Site 2 residential building would be provided from W. 6th Street. All circulation improvements that are proposed for Site 2 would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Site 2 would be maintained at all times. While development on Site 2 is anticipated to affect the level of service of roadways in the Project vicinity, the increases in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Project’s proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls within the established response time. Because the Project would not have a significant impact on fire protection with regards to fire flow, response times, or emergency access, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, impacts would be less than significant.		

Site 3 <u>Operation- Fire Flows</u> In accordance with the Fire Code, the Site 3 development would be reviewed as a mixed-use. The minimum fire flow requirement for Site 3 would be 4,000 gpm flowing from four hydrants at the same time; however, this amount is subject to a field inspection of the general area as well as the Project, and could increase. The final fire flow required for the Project would be established by the County during its review of the Project plot plan, prior to the issuance of building permits. The plot plan would be required to identify the minimum fire flow requirements and the location of fire hydrants. Approval of this plot plan, and implementation of the applicable regulatory requirements would ensure the requisite fire flow for this Project Site. <u>Response Distances and Times</u> A project site should be within the one-mile fire response distance for an engine company and 1.5-mile response distance for a truck company. When response distances exceed these recommendations, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief. The turnout time for non-EMS and EMS calls at Fire Station 6 and Fire Station 52 are within the required 6 minutes and the travel time is faster than the citywide average, Site 3 is adequately served by existing fire protection services. The Site 3 development would be equipped with a sprinkler system and the safety features listed under the PDFs, above. Conformance with applicable Fire Code and County building requirements, as identified in Regulatory Requirements RR-PS-1 through RR-PS-3, would provide adequate on-site fire protection. <u>Emergency Access</u> Emergency vehicle access to Site 3 would continue to be provided from major roadways adjacent to the Project Site including Vermont Avenue. The entrance to the proposed community recreation center would be provided on Vermont Avenue. A separate entrance to the proposed residential units, and vehicular access to the below ground parking structure that would serve the residential and community recreation center uses would be also provided from Vermont Avenue. All circulation improvements that are proposed for Site 3 would comply		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
with the Fire Code, including any additional access requirements of the LAFD. Emergency access to Site 3 would be maintained at all times. While development on Site 3 is anticipated to affect the level of service of roadways in the Project vicinity, the increases in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Site 3 proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls within the established response time. Because the Project would not have a significant impact on fire protection with regards to fire flow, response times, or emergency access, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, impacts would be less than significant.		
Police Protection Services Impact (4.12-2): Site 1, 2, and 3 <u>Construction</u> - While there is the potential for the construction of the Project to increase the demand for police protection services, the Project would provide security fencing and personnel to the Project Sites during the construction process. When such precautions are taken, there is generally less need for local law enforcement service at the construction site, thereby reducing the demand for LAPD services. Accordingly, Project construction would not affect police services to the extent that new, expanded, consolidated, or relocated police facilities would be needed in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. Therefore, construction-related impacts on police protection services would be less than significant.	Impact (4.12-2): Project Design Features PDF PS-2 The Project on shall incorporate the design guidelines outlined in the LAPD Design Out Crime Guidelines, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. Specifically, the Project would: - o Provide on-site security personnel whose duties shall include but not be limited to the following: • Monitoring entrances and exits; • Managing and monitoring fire/life/safety systems; and • Controlling and monitoring activities in the parking facilities.	Impact (4.12-2): Less than significant.

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Traffic generated by construction workers and trucks would occur primarily during off-peak hours. Emergency access would be maintained to the Project Sites during construction through marked emergency access points approved by the LAPD, and the Project would implement a Construction Staging and Traffic Management Plan. Therefore, as traffic impacts (as they relate to response times) would not result in the need for expanded, consolidated, or relocated police facilities during construction of the Project Sites, impacts would be less than significant. Site 1 <u>Operation</u> - The design of the Site 1 development would include crime prevention features, such as nighttime security lighting, secured parking facilities, and on-site security cameras incorporated as a project design feature, as described in PDF-PS-2. Further, as a County building, on-site security personnel are provided at all times the building is in operation, and would be responsible for controlling access and responding to on-site incidents as required, with the LAPD serving only as backup. Therefore, with implementation of these design features and the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Site 1 development would result in a less-than-significant operational impact on police protection services. <u>Officer-to-Population Ratio</u> Implementation of the Project would result in an increase of employees and site visitors within Site 1, thereby generating a potential increase in the number of service calls from Site 1. Since the current officer to population ratio within the Olympic Community Station service area is one officer per approximately 851 residents the addition of up to 907 employees could create demand for one additional officer. However, the County would provide on-site security personnel for the County office building on Site 1, which would reduce the need for police services. In sum, any minimal effect which the development Site 1 would have on officer staffing levels would not cause service levels to decline within the Olympic Community	- o Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas; - o Install closed-circuit television at select locations including (but not limited to) entry and exit points and parking areas; - o Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment; - o Provide lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking area and access points; - o Design public spaces to be easily patrolled and accessed by safety personnel; - o Design entrances to, and exits from the building, to be open and in view of surrounding sites; and - o Limit visually obstructed and infrequently accessed “dead zones.” PDF PS-3 Prior to the issuance of a certificate of occupancy for each construction phase and ongoing during operations, the Developer shall develop an Emergency Procedures Plan to address emergency concerns and practices. The Plan will be reviewed by the County for Sites 1 and 3, and by LAPD for Site 2. The County shall share the Plan for Sites 1 and 3 with LAPD.	

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
station area or require the need for provision of new or physically altered police facilities, and impacts would be less than significant. Since the Olympic Community Police Station currently accommodates approximately 250 personnel, it is not anticipated that this level of additional staffing would require the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. As it is highly unlikely that the increase in the officer to population ratio would require the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, impacts would be less than significant. <u>Response Times</u> Police units are most often in a mobile state; therefore, it is unknown precisely which route the LAPD would use to access Site 1 when responding to an emergency call. Response times would not be substantially affected, given that there would be significant traffic impacts at limited locations and given the availability of alternative routes within the street pattern in the area surrounding Site 1. Therefore, with the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Site 1 development impacts related to response times would be less than significant. <u>Emergency Access</u> Emergency access to Site 1 would be provided by the existing street system, as currently occurs. Site 1 would be designed and constructed in accordance with County requirements to ensure proper emergency access. Therefore, as traffic impacts would not result in the need for expanded, consolidated, or relocated police facilities during operation of Site 1, impacts would be less than significant. Site 2 <u>Operation</u> - The design of Site 2 would include crime prevention features, such as nighttime security lighting, secured parking facilities, and on-site security service incorporated as a project design feature. Therefore, with implementation		

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
of these design features and the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Site 2 development would result in a less-than-significant operational impact on police protection services. <u>Officer-to-Population Ratio</u> Implementation of the development on Site 2 would result in an increase of residents and site visitors within the Project Site, thereby potentially generating a potential increase in the number of service calls from Site 2. The current officer to population ratio within the Olympic Community Station service area is one officer per approximately 851 residents, it is assumed that the addition of 618 new residents on Site 2 could create the demand for additional officers. This is only a slight increase and therefore, the development on Site 2 would not represent a significant change in the officer-per-resident ratio of the service area. Since the current officer to population ratio within the Olympic Community Station service area is one officer per approximately 851 residents, it is assumed that the addition of 618 new residents on Site 2 could create the demand for additional officers. The officer-per-resident ratio would increase in the current level of one officer per approximately 851 residents up to one officer per approximately 854 residents. This is only a slight increase and therefore, the development on Site 2 would not represent a significant change in the officer-per-resident ratio of the service area. Any minimal effect which the development of Site 2 would have on officer staffing levels would not cause service levels to decline within the Olympic Community station area or require the need for provision of new or physically altered police facilities, and impacts would be less than significant. <u>Response Times</u> Police units are most often in a mobile state; therefore, it is unknown precisely which route the LAPD would use to access Site 2 when responding to an emergency call. Upon completion of development on Site 2, the Olympic Area Commanding Officer would be provided with a diagram of each portion of the		

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
property, and this diagram would include access routes and any additional information that may facilitate police response to Site 2. Therefore, with the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Project impacts related to response times would be less than significant. In addition, the development on Site 2 would incorporate crime prevention measures into project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety. The measures are incorporated into the Project as Project Design Features. The buildings and layout design of Site 2 would also include crime prevention features, such as nighttime security lighting and a secure parking structure. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In sum, any minimal effect which the development of Site 2 would have on officer staffing levels would not cause service levels to decline within the Olympic Community station area, or require the need for provision of new or physically altered police facilities and impacts would be less than significant. Using the existing officer to population ratio for the Olympic Community Station, the development on Site 2 could warrant the need for one additional officer to maintain the existing officer to population ratio in the Olympic Community Police Station service area, if the LAPD chooses to pursue additional staffing at this station. Since the Olympic Community Police Station currently accommodates approximately 250 personnel, there would be no need for the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. Therefore, impacts would be less than significant. <u>Emergency Access</u> Emergency access to Site 2 would be provided by the existing street system, as currently occurs. Site 2 would be designed and constructed in accordance with LAMC requirements to ensure continued proper emergency access. Therefore,		

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
as traffic impacts would not result in the need for expanded, consolidated, or relocated police facilities during operation of the Site 2 development impacts would be less than significant. Site 3 <u>Operation</u> - The design of Site 3 would also include crime prevention features, such as nighttime security lighting, secured parking facilities, and on-site security service incorporated as a project design feature. Therefore, with implementation of these design features and the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and the Site 3 development would result in a less-than-significant operational impact on police protection services. <u>Officer-to-Population Ratio</u> Implementation of the development on Site 3 would result in an increase of residents, site visitors, and employees within the Project Site, thereby generating a potential increase in the number of service calls from Site 3. The officer-per-resident ratio would increase in the current level of one officer per approximately 851 residents up to one officer per approximately 852 residents. This is only a slight increase and therefore, the development on Site 3 would not represent a significant change in the officer-per-resident ratio of the service area. In addition, the development on Site 3 would incorporate crime prevention measures into project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety. The buildings and layout design of Site 3 would also include crime prevention features, such as nighttime security lighting and a secure parking structure. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In sum, any minimal effect which the development of Site 3 would have on officer staffing levels would not cause service levels to decline within the		

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Olympic Community station area, or require the need for provision of new or physically altered police facilities and impacts would be less than significant. Using the existing officer to population ratio for the Olympic Community Station, the development on Site 3 could warrant the need for one additional officer to maintain the existing officer to population ratio in the Olympic Community Police Station service area, if the LAPD chooses to pursue additional staffing at this station. Since the Olympic Community Police Station currently accommodates approximately 250 personnel, there would be no need for the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. As it is highly unlikely that the negligible increase in the officer to population ratio would require the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the impact would be less than significant. <u>Response Times</u> Police units are most often in a mobile state; therefore, it is unknown precisely which route the LAPD would use to access Site 3 when responding to an emergency call. Response times would not be substantially affected, given that there would be significant traffic impacts at limited locations and given the availability of alternative routes within the street pattern in the area surrounding Site 3. In addition, the police have a variety of options to avoid traffic, such as using sirens to clear a path of travel for driving in the lanes of opposing traffic. Furthermore, upon completion of development on Site 3, the Olympic Area Commanding Officer would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate police response to Site 3. Therefore, with the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Project impacts related to response times would be less than significant.		

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
<u>Emergency Access</u> Emergency access to Site 3 would be provided by the existing street system, as currently occurs. Site 3 would be designed and constructed in accordance with County requirements to ensure continued proper emergency access. Therefore, as traffic impacts would not result in the need for expanded, consolidated, or relocated police facilities during operation of the Site 3 development, impacts would be less than significant.		
Schools Impact (4.12-3): Site 1, 2, and 3 <u>Construction</u> - Construction traffic has the potential to interfere with pedestrian routes for the LAUSD schools that are within the Project area. Construction staging and construction-related parking would primarily be confined to the Project Sites and would not significantly interfere with school traffic. The Developer would be required to develop and implement a construction traffic management plan that would include consideration of safe routes to schools, in accordance with PDF PS-1. The construction traffic management plan would identify potential interim construction impacts and routes as needed to ensure that safe routes to schools are maintained. Site 1 <u>Operation</u>- When complete, the new Site 1 office building would be designed to accommodate a maximum of 2,166 employees in 2023. The Site 1 and Site 2 employment components of the Project are linked, in that the majority of employees that will be located on Site 1 after Project completion would be relocated from existing County facilities on Site 2. The net student generation associated with Sites 1 and 2 office development would be approximately 197 students (472 from Site 1 office uses less, 275 associated with existing County employees on Site 2), as calculated using the LAUSD School Fee Justification Study. The County is not subject to school fees. The projected level of student generation on Site 1 would exceed the available capacity of area schools.	Impact (4.12-3): Regulatory Requirements RR PS-4 Development on Site 2 will be required to pay to the LAUSD the prevailing LAUSD fee. School fees exacted from residential and commercial uses would help fund necessary school service and facilities improvements to accommodate anticipated population and school enrollment within the LAUSD service area.	Impact (4.12-3): Less than significant.

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
However, the low levels of student generation associated with the Project uses on Site 1, coupled with the fact that most of the employees on Site 1 would be County employees already working in the area, would represent a minimal potential increase in enrollment in LAUSD schools, and the impact on school services generated by Site 1 would be less than significant. Site 2 <u>Operation</u> - Residential and retail uses on Site 2 would generate an increase of approximately 184 students. Payment of the applicable school fees to LAUSD would offset the impact of additional student enrollment at schools serving the Project area. With payment of the applicable school fees, impacts on the schools identified to serve Site 2 would be less than significant. Site 3 <u>Operation</u> - Site 3 would be developed with senior affordable housing units, and a community recreation center. No student generation would be associated with this use. No impact on school services would result from the development of Site 3. The County is not subject to school fees for new development.		
Libraries Impact (4.12-4): Site 1, 2, and 3 <u>Construction</u> - The Project would result in a temporary increase of construction workers on the Project Sites. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, though, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, Project-related construction workers would not result in a notable increase in resident population or a corresponding demand for library services in the vicinity of the Project Sites. As such, impacts to library facilities during the construction of the Project Sites would be less than significant.	Impact (4.12-4): None.	Impact (4.12-4): Less than significant.

Site 1 <u>Operation</u> - The Project would be served by the Felipe de Neve Branch Library located at 2820 W. 6th Street. Measuring 9,273 square feet in size, the Felipe de Neve Branch Library does not meet the proposed community branch building size criteria defining a regional branch as up to 14,500 square feet in size. The current labor force would already be users of the LAPL system to the extent that local libraries are patronized during the work day, and not new to the entire system. In addition, during non-work hours, employees would use their local libraries. As a result, the increase in employees from the development on Site 1 would not generate the need for new or expanded facilities and would have a less than significant impact on library services. Site 2 <u>Operation</u> - The Project would be served by the Felipe de Neve Branch Library located at 2820 W. 6th Street. Development on Site 2 would be expected to generate 618 new residents. According to correspondence from LAPL, the Felipe de Neve Branch Library is not adequately meeting the current demand and completion of the Project could create an impact on library services. Under Measure L, library funding is now mandated under the City Charter to be funded from property taxes, including those assessed against the residential and retail components of the Project on Site 2, which would increase with the new development and would be used for additional staff, books, computers, and other library materials. Libraries are required to pay for their own direct and indirect costs as of July 2014 with this source of revenue. To the extent any new or expanded facilities are determined to be required, LAPL would develop these facilities contingent upon the availability of land and resources to provide library facilities. In addition, any new library facilities would typically generate less than significant impacts because they would be expansions of existing facilities or new buildings in already urban areas that are not environmentally sensitive. However, in the unlikely event a new library facility may have significant effects, any such action on the part of LAPL would be a discretionary action that would be subject to project level CEQA review. As a result, the increase in residential population associated with the Project would represent a less than significant impact on libraries. Site 3		

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
<u>Operation</u> - The Project would be served by the Felipe de Neve Branch Library located at 2820 W. 6th Street. Development on Site 3 would be expected to generate 181 new residents. According to correspondence from LAPL, the Felipe de Neve Branch Library is not adequately meeting the current demand and completion of the Project would create an impact on library services. Under Measure L, library funding is now mandated under the City Charter to be funded from property taxes, including those assessed against the residential component of the Project on Site 3, which would increase with the new development and would be used for additional staff, books, computers, and other library materials. Libraries are required to pay for their own direct and indirect costs as of July 2014 with this source of revenue. To the extent any new or expanded facilities are determined to be required, LAPL would develop these facilities contingent upon the availability of land and resources to provide library facilities. In addition, any new library facilities would typically generate less than significant impacts because they would be expansions of existing facilities or new buildings in already urban areas that are not environmentally sensitive. However, in the unlikely event a new library facility may have significant effects, any such action on the part of LAPL would be a discretionary action that would be subject to project level CEQA review. As a result, the increase in residential population associated with the Project would represent a less than significant impact on libraries.		
4.13 Recreation		
Impact (4.13-1): Impacts to park facilities Site 1 In general, employees of office development are less likely to patronize parks during working hours as they are more likely to use parks and recreational facilities near their homes during non-work hours. Furthermore, the development on Site 1 would not introduce permanent residents to the Project area. Therefore, development on Site 1 would not substantially increase the use or deterioration of parks and recreational facilities in the vicinity, and impacts would be less than significant with respect to the deterioration of park or recreational facilities.	Impact (4.13-1): Regulatory Requirements RR-REC-1 Open space shall be provided on Site 2 in accordance with LAMC Section 12.21-G.2 RR-REC-2 The Developer of Site 2 shall pay Park Fees to the City of Los Angeles in accordance with the requirements of LAMC Section 12.33.	Impact (4.13-1): Less than significant.

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Site 1 would include an approximately 18,600 square foot landscaped terrace on the second floor that creates an inviting open space for employees to utilize. The Project would include an additional 9,221 square feet of open space throughout floors three through nine for employees to utilize. Site 2 The standard minimum parkland-to-resident ratio provided in the City’s <i>Public Recreation Plan</i> is two acres per 1,000 residents. Within the Wilshire Community Plan area, in which the Project Site is located, the average household size is 2.51 persons per household. At this average household size, Site 2 would be expected to accommodate approximately 618 new residents within the Wilshire Community Plan area. Based on the parkland-to-resident ratio, the Project would generate a need for approximately 1.24 additional acres of public parkland. The Project would include open space and recreational facilities to serve Project residents that would reduce demand for public parks. As development on Site 2 would be subject to City of Los Angeles land use regulations, to alleviate the demand on City parks and recreational facilities, the Developer on Site 2 would be required to pay Park Fees in accordance with Regulatory Requirement RR-REC-2. With the payment of Park Fees to the City, impacts to parks and recreational facilities would be less than significant. Site 3 The residential component of the development on Site 3 includes 72 residential units and would have amenities, including an open courtyard and community rooms. The Project would provide approximately 4,990 square feet of open space on Site 3. In addition, the Project on Site 3 would include a 13,200 square foot community recreation center that would serve the Project and the surrounding community. Inclusion of open space and the community recreation center would offset any increased demand associated with the residential units that would be developed on Site 3. Therefore, impacts to parks and recreational facilities would be less than significant.		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Impact (4.13-2): Construction of new park facilities Site 1 The development on Site 1 does not include nor would it necessitate a park or recreational facility component. Therefore, no impact would occur with respect to the construction or expansion of recreational facilities. Site 2 The development on Site 2 does not directly include a park or public recreational facility component. Rather, LADRP would develop these facilities contingent upon the availability of land and resources to provide park facilities, and any such action on the part of LADRP would be a discretionary action that would be subject to CEQA review. Therefore, impacts of Site 2 in this regard would be less than significant. Site 3 Proposed development on Site 3 would include permanent residents that would increase demand for park facilities in the Wilshire Community Plan Area. The development on Site 3 includes an approximately 13,000 square foot community recreation center and approximately 5,000 square feet of private open space, the environmental effects of which are addressed in this Draft EIR as part of the overall Project (development on all three Project Sites). The inclusion of the community recreation center on Site 3 would not result in significant environmental effects in and of itself. Therefore, impacts of the Project on Site 3 in this regard would be less than significant.	Impact (4.13-2): None.	Impact (4.13-2): Less than significant.
4.14. TRANSPORTATION and TRAFFIC		
Impact (4.14-1): Conflict with plan or policy <u>Construction</u> - Construction of the Project is anticipated to occur over an approximately five-year period between years 2018 and 2023. Typical construction activity would occur between 7:00 AM and 3:30 PM on weekdays, along with occasional Saturday activity during the same hours. Some staging	Impact (4.14-1): Project Design Features PDF TR-1 Transportation Initiative Funding. The Developer would make financial contributions to various City transportation initiatives, including the 2010 Bicycle Plan and Vision Zero. These contributions may be used at the City’s discretion to fund infrastructure and safety improvements in and around	Impact (4.14-1): Significant and unavoidable.

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
activities would occur outside of these hours, including from 5:00 AM to 7:00 AM or in the evening. Construction haul truck and delivery truck trips would typically arrive and depart throughout the workday, including during the morning peak hours. Based on construction plans prepared for the Project, there could be a maximum of 225 construction workers at Site 1 at the peak when finishing of the Site 1 Tower overlaps with the construction of the Replacement Shatto Structure. There could also be a maximum of 75 daily truck trips on major concrete pour days. These trips would occur regularly throughout the workday, for an average of approximately 10 per hour. Increases in hauling and delivery truck traffic and worker automobile commute traffic could lessen the capacities of access streets and haul routes while hauling trucks could impede traffic due to slower movements and larger turning radii of trucks. However, as noted above, construction worker trips would occur almost exclusively outside of the morning and afternoon peak hours, and therefore would not cause peak hour traffic impacts. Additionally, the numbers of hourly truck trips would be substantially lower than the peak hour trip generation estimates for the Project and their effects would be temporary. Therefore, the temporary increase in truck and worker traffic during construction would not result in a significant traffic impact on nearby intersections. Furthermore, a Construction Management Plan (RR TR-1) would contain measures to further reduce the effects of construction traffic on nearby intersections. Most construction activities will be primarily contained within the Project Site boundaries. However, it is possible that construction fences could temporarily encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Sites on Vermont Avenue, Shatto Place, and 6th Street. Construction worker parking would be provided in nearby surface lots or parking structures, or in remote lots with shuttle transportation provide to the construction site, until parking facilities constructed as part of the Project are available for use on-site. Temporary traffic controls, including signage and flag men as necessary, would be provided to direct traffic around any closures as	the Study Area. While the funding of these improvements do not reduce the significance of transportation impacts on intersections based on City analysis methodology and impact criteria, they do help to advance the City's policies and goals relating to overall mobility for all travel modes. Regulatory Requirements RR TR-1: Construction Management Plan. A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan shall be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate: • Prohibition of construction worker parking on nearby residential streets. • Construction-related vehicles shall not park on surrounding public streets. • Temporary traffic control (e.g., flag men) shall be used during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways. • Construction activities shall be scheduled to reduce the effect on traffic flow on surrounding arterial streets. • Construction-related deliveries, haul trips, etc. shall be scheduled so as to occur outside the commuter peak hours to the extent feasible. • Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be utilized as appropriate. • Workers shall be required to participate in a carpool registry with the goal of reducing single-occupant automobile trips by construction workers. Mitigation Measures Significant impacts were identified based on LADOT thresholds for up to 10 intersections, depending on analysis year and Project Phase. Mitigation measures were identified in consultation with LADOT and were prioritized based on LADOT's mitigation guidelines. The mitigation program for the Project includes the following major components:	

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
required in the Construction Management Plan. Therefore, Project construction would not be expected to create hazards for roadway travelers, bus riders, or pedestrians, so long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) have been incorporated into the Construction Management Plan. The construction-related impacts associated with access and transit would be less than significant, and the implementation of the Construction Management Plan described below in RR TR-1 would further reduce those impacts. <u>Operation</u> - Phase I would generate a net total of 1,553 daily trips, including 186 during the morning peak hour (168 inbound and 18 outbound) and 243 during the afternoon peak hour (31 inbound and 212 outbound). Phase I would result in significant impacts at six intersections: 6. Vermont Avenue & Beverly Boulevard (afternoon peak hour) 10. Vermont Avenue & 3rd Street (afternoon peak hour) 18. Vermont Avenue & 6th Street (afternoon peak hour) 24. Vermont Avenue & Wilshire Boulevard (afternoon peak hour) 30. Vermont Avenue & Olympic Boulevard (morning peak hour) 33. Vermont Avenue & Washington Boulevard (afternoon peak hour) Phase II would generate a net total of 1,662 daily trips, including 134 trips during the morning peak hour (48 inbound and 86 outbound) and 171 trips during the afternoon peak hour (90 inbound and 81 outbound). In total, between Phases I and II, the Project would generate a net total of 3,215 daily trips, including 320 during the morning peak hour (216 inbound and 104 outbound) and 414 trips during the afternoon peak hour (121 inbound and 293 outbound). Phases I and II would result in significant impacts at 10 intersections: 6. Vermont Avenue & Beverly Boulevard (afternoon peak hour) 10. Vermont Avenue & 3rd Street (morning and afternoon peak hours)	1. Implementation of a transportation demand management (TDM) program for the Project Site to promote peak period trip reduction; and, 2. Transportation Systems Management (TSM) improvements, specifically consisting of the installation of a traffic monitoring camera and fiber optic data transmission line to allow additional video monitoring of the traffic signal system. These mitigation measures would be consistent with the City's policies that support improvements that reduce greenhouse gas emissions by reducing the use of single-occupant vehicle trips, encourage developers to construct transit and pedestrian-friendly projects with safe and walkable sidewalks, and provide efficient and effective traffic control and management. The combined effect of the various strategies implemented as part of the TDM program would result in a reduction in peak hour trip generation by offering services, actions, specific facilities, etc., aimed at encouraging use of alternative transportation modes. For the Project, a TDM trip reduction credit of 10 percent for Site 1 office workers was assumed as an achievable but conservative estimate, as stated in Appendix 4.14-2 to the Draft EIR and approved by LADOT. Accordingly, the TDM program would be expected to result in a reduction of 301 daily trips under Phase I, including 50 during the morning peak hour and 61 during the afternoon peak hour. The TDM program would be expected to result in a reduction of 316 daily trips upon completion of Phase 2, including 52 during the morning peak hour and 65 during the afternoon peak hour. The TSM improvement would enhance the ability to monitor traffic and adapt the signal system to real-time conditions along Vermont Avenue between 3rd Street and 6th Street. LADOT's ATSAC department has identified this improvement as a high priority for the area to allow for more immediate response to traffic conditions. For the improvement to the ability to manage the traffic systems, LADOT would allow a 1percent increase in intersection capacity (reflected as a 0.01 improvement in intersection V/C ratio) at four study intersections on Vermont Avenue between 3rd Street and 6th Street: 10. Vermont Avenue & 3rd Street 13. Vermont Avenue & 4th Street 15. Vermont Avenue & 5th Street 18. Vermont Avenue & 6th Street	

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
13. Vermont Avenue & 4th Street (afternoon peak hour) 18. Vermont Avenue & 6th Street (morning and afternoon peak hours) 24. Vermont Avenue & Wilshire Boulevard (morning and afternoon peak hours) 28. Vermont Avenue & 8th Street (afternoon peak hour) 30. Vermont Avenue & Olympic Boulevard (morning and afternoon peak hours) 32. Vermont Avenue & Venice Boulevard (morning peak hour) 33. Vermont Avenue & Washington Boulevard (afternoon peak hour) 35. Vermont Avenue & I-10 Eastbound Ramps (afternoon peak hour) MM TR-a1 and TR-a2 will reduce the impact but not to less than significant. No additional feasible mitigation is available. Project traffic (cut-through or directly distributed) would not significantly impact analyzed street segments. No mitigation is required.	MM TR-a1 Transportation Demand Management Program. The Project shall develop and implement a TDM program in accordance with the June 29, 2017 LADOT Transportation Study Assessment letter to promote non-auto travel and reduce the use of single-occupant vehicle trips among the office workers on Site 1. The TDM program would be prepared by the County, and approved by the County Department of Public Works. The TDM program would be submitted to the City (LADOT) for verification that the provisions of the TDM program sufficiently justify the 10 percent trip reduction used in the Project's Traffic Study. The County approval and City verification shall be received prior to issuance of certificate of occupancy for the Site 1 County office building. Examples of strategies that may be, but are not required to be included in the TDM program would be the following: • TDM-related information available in common area • Bicycle amenities such as racks and showers • Incentives for using alternative travel modes • Parking incentives • Contribution to the City's Bicycle Plan Trust Fund for implementation of bicycle improvements in the Project area The following provides further information and description of the various TDM program strategies that may be, but are not required to be, incorporated into the Project's TDM program: <u>Educational Programs.</u> A transportation management coordinator (TMC) on the building management staff would reach out to employees directly to promote the benefits of TDM. <u>Project Design Features to Promote Bicycling and Walking.</u> The Project would incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities, or a bicycle valet system. Additionally, the Project Site would be designed to be a friendly and convenient environment for pedestrians. The Project would also contribute a one-time payment	

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
	of \$50,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the Study Area. <u>Incentives for Using Alternative Travel Modes.</u> The Project TMC could incorporate various incentives for use of its programs, including discounted transit passes for employees and/or "parking cash-out" subsidies, which act as a rebate for employees who choose not to park a car at the Project Site. An additional option could include unbundled parking, which allows for a separate charge for parking from office space and the flexibility to vary the number of spaces rented. MM TR-a2 Transportation Systems Management Improvements. The Developer shall fund and coordinate the installation of a traffic monitoring camera at the intersection of Vermont Avenue & 5th Street and install fiber optic line to connect the camera to LADOT's ATSAC system. The improvement includes installation of high-capacity fiber optic data cables on Vermont Avenue between 5th Street and Beverly Boulevard, a distance of approximately 4,000 feet. The Developer shall implement this improvement through the City's B-Permit process.	
Impact (4.14-2):Conflict with CMP Based on the trip distribution patterns and Project trip generation, Phases I and II combined would generate 17 AM peak hour trips and 22 PM peak hour trips at Intersection 22, Western Avenue & Wilshire Boulevard, and 24 AM peak hour trips and 32 PM peak hour trips at Intersection 26, Alvarado Street & Wilshire Boulevard. Because the Project would not generate 50 peak hour trips at any of the arterial monitoring intersections during either the morning or afternoon peak hour, no further analysis is required. Impacts to CMP arterial monitoring intersections would be less than significant. Based on the Project-only traffic volumes, the Project would not add 150 trips in a single direction to any freeway segment during either peak hour. Therefore, no further analysis is required. The CMP requires that a transit system analysis be performed to determine whether a project would increase transit ridership beyond the current capacity of the transit system. The Project would generate approximately 67 transit person-trips during the morning peak hour and 87 transit person-trips during the	Impact (4.14-2): None.	Impact (4.14-2): Less than significant.

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
afternoon peak hour. The Project Sites are well-served by numerous established transit routes. Therefore, impacts to transit system capacity resulting from the Project would be less-than-significant.		
Impact (4.14-3): Design feature hazard The Project would not include hazardous design features such as sharp curves or incompatible uses. Proposed Project intersections are discussed below. Site 1 Vehicular access to Site 1 would be provided at two driveways on Vermont Avenue to the Site 1 Podium Structure and two driveways on Shatto Place to the Replacement Shatto Structure. On Vermont Avenue, a driveway at the northern edge of Site 1 would provide right-turn-out egress only (left-turn egress would be restricted because it would require crossing the northbound left-turn pocket from Vermont Avenue to 5th Street). A driveway at the southern edge of Site 1 would allow left-turns and right-turns into the Site. Once in Site 1, vehicles could circulate up to the various parking levels using internal ramps. Access to the Replacement Shatto Structure would be essentially unchanged from current access to the Existing Shatto Structure. Two one-way driveways (one ingress and one egress) would be provided to Shatto Place. Each would allow both left-turns and right-turns in or out. There would also be an internal vehicular connection between the Site 1 Podium Structure on the west side of Site 1 and the Replacement Shatto Structure on the east side of Site 1. Therefore, drivers could enter on Shatto Place and exit on Vermont Avenue or vice versa, and in the event that parking is at capacity in one or the other structure, drivers could travel to the other structure without driving on public roads. Access to Site 1 was designed to help accommodate the goals of the City’s Vision Zero program. Vermont Avenue is part of the High Injury Network (HIN), and it is preferable to limit access on HIN streets. Therefore, the egress driveway onto Vermont Avenue is limited to right-turns only rather than allowing unsafe left turns across a turn pocket. Additionally, the design emphasizes the use of Shatto	Impact (4.14-3): None.	Impact (4.14-3):Less than significant.

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Place (which is not a HIN street) as the primary access point in three ways. First, the Replacement Shatto Structure provides a substantial slightly higher percentage of the overall Site 1 parking supply (768 spaces out of 1,733 total spaces). Second, an internal connection allows vehicles to pass between the Replacement Shatto Structure and the Site 1 Podium Structure. Third, the driveways on Shatto Place allow left-turns and right-turns, whereas egress onto Vermont Avenue is only allowed toward the north. As such, Site 1 driveways have been designed to avoid potential injuries related to unsafe intersections. Accordingly, impacts at Site 1 would be less than significant. Site 2 Vehicular access to Site 2 would be provided at a single right-turn-in / right-turn-out driveway on 6th Street at the eastern edge of the Site. As with Site 1, access to Site 2 was designed to help accommodate the goals of the City’s Vision Zero program. No access to Site 2 would be provided on Vermont Avenue, for two reasons. First, though both Vermont Avenue and 6th Street are part of the HIN, Vermont Avenue has more lanes, higher traffic volumes, and travel speeds than 6th Street and therefore access was provided on 6th Street. Second, a driveway on Vermont Avenue would be too close to the proposed Site 1 ingress driveway (to be located at the southern edge of Site 1) to allow for safe operation of both driveways. Accordingly, the Site 2 driveway has been designed to avoid potential injuries related to unsafe intersections. Accordingly, impacts at Site 2 would be less than significant. Site 3 Vehicular access to Site 3 would be provided via a single full-access driveway on Vermont Avenue providing access to subterranean parking. The driveway would be located in the northern end of the Site, similar to existing conditions. No additional or new access locations would be created compared to over what currently exists. As such, impacts at Site 3 would be less than significant.		

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Impact (4.14-4): Inadequate emergency access <u>Construction</u> - Project construction would not affect emergency access. Therefore, construction-related impacts would be less than significant. <u>Operation</u> - Emergency vehicle access to the Project Site would continue to be provided from major roadways adjacent to the Project Site, including Vermont Avenue, 6th Street, and Shatto Place. All circulation improvements that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Project Site would be maintained at all times. Therefore, impacts related to emergency access would be less than significant.	Impact (4.14-4): None.	Impact (4.14-4): Less than significant
Impact (4.14-5): Conflict with adopted policies and plans The Project would use up to 0.47 percent of the additional morning peak hour transit capacity available and 0.71 percent of the additional evening peak hour transit capacity available. However, the Project Site and the greater Wilshire area are served by a considerable amount of transit options, and such an increase in ridership would be easily accommodated. The Project would not require the disruption of public transportation services or the alteration of public transportation routes. Because the Project would not modify or conflict with any alternative transportation policies, plans, or programs, impacts to transit, bicycle, and pedestrian facilities policies, plans, and plans would be less than significant.	Impact (4.14-5): None.	Impact (4.14-5): Less than significant.
Impact (4.14-6): Increase in V/C ratio The impact during operation for this threshold would be identical to that which is described under Impact 4.14-1 above.	Impact (4.14-6): See Impact 4.14-1 above.	Impact (4.14-6): Significant and unavoidable.
Impact (4.14-7): Addition of 50 more trips The impact during operation for this threshold would be identical to that which is described under Impact 4.14-2 above.	Impact (4.14-7): None.	Impact (4.14-7): Less than significant.

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Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
Impact (4.14-8): Increased demand to capacity ratio The impact during operation for this threshold would be identical to that which is described under Impact 4.14-2 above.	Impact (4.14-8): None.	Impact (4.14-8): Less than significant
Impact (4.14-9): Increase ADT volumes The impact during operation for this threshold would be identical to that which is described under Impact 4.14-1 above.	Impact (4.14-9): See Impact (4.14-1) above.	Impact (4.14-9): Significant and unavoidable.
Impact (4.14-10): Exceed capacity of transit system The impact during operation for this threshold would be identical to that which is described under Impact 4.14-2 above.	Impact (4.14-10): None.	Impact (4.14-10): Less than significant.
Impact (4.14-11): Design features that affect visibility The impact during operation for this threshold would be identical to that which is described under Impacts 4.14-3 and 4.14-5 above.	Impact (4.14-11): None.	Impact (4.14-11): Less than significant.
4.15 Tribal Cultural Resources		
Impact (4.15-1): The County commenced tribal notification for this Project in accordance with AB 52 on May 8, 2017, via a mailing to tribal representatives that had requested notification of projects within the area including the Project Sites. A request for consultation was received from the Gabrieleño Band of Mission Indians – Kizh Nation on June 1, 2017. No communication or request was received from any other notified tribes was received within the 30-day response period. Pursuant to the requirements of AB 52, the County initiated the consultation process on June 14, 2017 in a letter to the Gabrieleño Band of Mission Indians—Kizh Nation, sent via email and U.S. mail. On August 23, 2017, County staff held a phone consultation with representatives of the Gabrieleño Band of Mission Indians—Kizh Nation to discuss potential resources in the area, impacts of the Project, and mitigation measures. Based on the records search conducted for the Project and documentation/information provided by Mr. Andrew Salas, on behalf of the Gabrieleño Band of Mission Indians—Kizh Nation, the Project Sites are considered sensitive for potential tribal cultural resources. Project grading activities may encounter these resources and impacts may be potentially	Impact (4.15-1): None. Mitigation Measure MM TCR-1: Prior to issuance of a grading permit, the Applicant shall retain a qualified Native American Monitor (Monitor) from the Gabrieleno Band of Mission Indians-Kizh Nation to monitor all grading activities within the project site. The Monitor shall photo-document the grading activities and maintain a daily monitoring log that contains descriptions of the daily construction activities, locations and mappings of the graded areas, soils, and documentation of any identified tribal cultural resources. If tribal cultural resources are encountered during monitoring, all ground-disturbing activities within 50 feet of the find shall cease and the Monitor shall evaluate the significance of the find, and if significant, recommend appropriate measure(s) to mitigate impacts. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Developer shall implement all measure(s) that the County determined necessary, appropriate and feasible. Within 60 days after grading activities are completed, the Monitor shall prepare and submit a final report to the County and the California Native American Heritage Commission. The report shall include documentation of any recovered tribal cultural resources, the significance of the resources, and the	Impact (4.15-1): Less than significant.

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significant. With the implementation of Mitigation Measure MM-TCR-1, which would provide for an archaeological monitor during grading and excavation activities of the Project, impacts on tribal resources would be reduced to less than significant.	treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log and photo documentation, accompanied by a photo key, to the County.	
4.16 Utilities & Service Systems		
Wastewater Impact (4.16-1) and Impact (4.16-2) <u>Construction</u> Construction activities for the Project would result in a temporary increase in wastewater generation as a result of construction workers on-site. In the event there is an increase in wastewater flow during construction, this increase would be limited and would be within the capacity of the wastewater facilities that currently serve the Project. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable increase in wastewater flows. Therefore, the Project construction impacts to the wastewater system would be less than significant. The Project would require construction of new on-site infrastructure to serve new buildings, and potential upgrade and/or relocation of existing infrastructure. Although no upgrades to the public main are anticipated, minor off-site work is required in order to connect to the public main. A Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, Project impacts on wastewater associated with construction activities would be less than significant. <u>Operation-</u> <u>Wastewater Conveyance Infrastructure</u> The Bureau of Sanitation analyzed the Project demands in conjunction with existing conditions and forecasted growth, and approved the Project to discharge	Impact (4.16-1) and Impact (4-16-2): Project Design Features PDF-USS-1. The Project would not generate wastewater that would require additional treatment beyond that provided to domestic wastewater and sewage lines from bathrooms, restrooms, and kitchens. Kitchen drains would be provided with oil separators, in accordance with and City requirements, to treat wastewater prior to discharge to the on-site sewer system. In addition, the Project would implement water conservation measures PDF USS-2, USS-3 and USS-4 on Project Sites 1, 2 and 3, respectively, which would also reduce wastewater generation. Regulatory Requirements The following standards would be imposed by existing laws and regulations and would work to address Project impacts related to wastewater. This is not required mitigation but is an inherent Project component. RR USS-1 All wastewater from the Project would be treated according to requirements of the NPDES permit authorized by the LARWQCB. RR-USS-2 Project construction shall comply with the County of Los Angeles Green Building Standards Code (Sites 1 and 3) and City of Los Angeles Green Building Code (Site 2).	Impact (4.16-1) and Impact (4-16-2): Less than significant.

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up to 124,464 gpd of wastewater in addition to the flows from the existing uses at the Project Sites. The estimated net increase in wastewater generation of 90,154 gpd to the sewer collection system is significantly less than the net increase in wastewater generation of 124,464 gpd to the sewer collection system allotted to the Project by the approved SCAR. Therefore, impacts on wastewater collection and conveyance infrastructure would be less than significant. <u>Wastewater Treatment</u> The existing design capacity of the Hyperion Service Area is approximately 450 mgd. Currently, up to approximately 300 mgd is treated at the Hyperion Treatment Plant resulting in residual treatment capacity of approximately 150 mgd. The Project's proposed net wastewater generation is approximately 0.124 mgd, per the SCAR which is equal to 0.082 percent of the Hyperion Treatment Plant's capacity. Since all Project wastewater would be treated at the Hyperion Treatment Plant, Project wastewater discharges would not cause exceedance of the standards of the RWQCB. Impacts of the Project with respect to wastewater treatment would be less than significant.		
Water Impact (4.16-3) and Impact (4.16-4): <u>Construction</u>-Water demand for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal and re-compaction. Considering temporary construction water use would be substantially less than the existing water consumption, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project. Impacts on the water infrastructure due to construction activity would be less than significant. The Project would require construction of new, on-site water distribution lines to serve new buildings and potential relocation of existing lines. Installation of new water infrastructure would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. No upgrades to	Impact (4.16-3), and Impact (4.16-4): Project Design Features PDF USS-2 The County and Developer commit to the following conservation measures to promote water conservation at Site 1: ○ High Efficiency Toilets with a flush volume of 1.1 gallons per flush ○ Domestic Water Heating System located in close proximity to point(s) of use: For typical Office Levels, Electric Water Heaters are provided at floors 2, 5, 8 & 11 to supply hot water to lavatories for the floor below, floor above, and the floor on which the heater is located; for Terrace Level a dedicated electric heater(s) is provided for Showers & Restroom Lavatories; for Ground Floor, a dedicated electric heater is provided for Restroom Lavatories. ○ Individual Metering and billing for water use for commercial unit: Individual metering is provided for each retail space at Ground Level and separate metering is provided for the Office use (single use tenant)	Impact (4.16-3) and Impact (4.16-4), Less than significant.

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public water mains are anticipated. Therefore, Project impacts on water associated with construction activities would be less than significant. <u>Operation</u>-When analyzing the Project for infrastructure capacity, the projected demands for both fire suppression and domestic water are considered. The results of the Service Advisory Request (SAR) demonstrates that adequate infrastructure capacity exists. <u>Fire Water Demand</u> Based on fire flow standards set forth in Section 57.507.3 of the LAMC, the Project Sites fall within the industrial and commercial category, which has a required fire flow of 6,000-9,000 gallons per minute (gpm) from 4 to 6 fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch. According to the IFFAR, the Project has adequate fire flow available to comply with Section 57.507 of the LAMC. The Project would also incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which would be subject to fire department review and approval during the design and permitting of the Project. Thus, the estimated fire service flows are compliant with the Fire Code. Through compliance with City of Los Angeles Fire Department (LAFD) and LADWP requirements, the Project's fire flow impacts to water infrastructure would be less than significant. <u>Domestic Water Demand</u> The Project would either protect existing or install new fire and domestic infrastructure to meet the proposed plumbing and fire suppression demands in compliance with Los Angeles Department of Building and Safety (LADBS) and LADWP requirements. The approved SARs confirm that sufficient capacity is available for the Project. The Project proposes to connect to the existing mains within all of the surrounding streets: Vermont Avenue, 6th Street, and Shatto Place with laterals that would be adequately sized to simultaneously	- o Tankless and on-demand Water Heaters: Tankless water heaters (InstaHot) are provided for all pantry sink locations. - o Drip/Subsurface Irrigation (Micro-Irrigation) is provided for 100 percent of the irrigation system - o Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together) - o Drought Tolerant Plants: 50 percent of total landscaping - o Cistern - captures stormwater runoff as it comes down through the roof gutter system: Capture and reuse cistern water for irrigation. PDF USS-3 The Developer commits to the following conservation measures to promote water conservation at Site 2: - o Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together) - o Drought Tolerant Plants: 50 percent of total landscaping - o CEE Tier 1 High Efficiency Clothes Washers PDF USS-4 The Developer commits to the following conservation measures to promote water conservation at Site 3: - o Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together) - o Drought Tolerant Plants: 50percent of total landscaping - o CEE Tier 1 High Efficiency Clothes Washers Regulatory Requirements RR-USS-2 would be imposed by existing laws and regulations and would reduce Project impacts related to water.	

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Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
accommodate fire demand and domestic demand. Therefore, impacts on water supply infrastructure would be less than significant. <u>Water Supplies</u> With respect to water supplies available to serve the Project, LADWP prepared the Water Supply Assessment (WSA) in accordance with California Water Code Sections 10910-10915. WSAs are prepared to ensure that proposed projects that utilize water resources are consistent with the City's conservation goals and long-term water supply availability, as detailed in LADWP's 2015 Urban Water Management Plan (UWMP). The WSA concludes that the 102 AFY increase in the total water demand for the Project falls within the available and projected water supplies for normal, single-dry, and multiple dry years through the year 2040, as described in LADWP's 2015 UWMP. LADWP will be able to meet the proposed water demand of the Project, as well as existing and planned future water demands of its service area. Impacts of the Project with respect to water supply would be less than significant.		
Solid Waste Impact (4.16-5) and Impact (4.16-6): <u>Construction</u>-Implementation of the Project would generate construction and demolition waste. Construction of the Project is estimated to generate a total of approximately 3,622 tons (7,244,069 pounds) of solid waste, and approximately 35,774 tons (71,547,956 pounds) of demolition debris for a total of approximately 39,396 tons (78,792,025 pounds) of total construction solid waste. The County of Los Angeles Countywide Integrated Management Plan 2015 Annual Report (the "2015 Annual Report") concludes that there is current capacity of 57.56 million tons available in the County for the disposal of inert waste. This would be a less-than-significant impact, as the Project would not create a need for additional solid waste disposal facilities to adequately handle project construction-generated inert waste. <u>Operation</u>-Operation of the Project would result in ongoing generation of solid waste. Over the long-term, the Project would be expected to generate	Impact (4.16-5) and Impact (4.16-6): PDF USS-5 The Project will establish a Solid Waste Diversion Program of 50 percent for project operations. PDF USS-6 The Project will establish a Solid Waste Diversion Program of 75 percent for project construction. PDF USS-7 Construction contractors shall only contract for solid waste disposal services with a company that recycles demolition and construction-related wastes, as demonstrated to the County of Los Angeles Department of Public Works (Sites 1 and 3), or City Department of Building and Safety (Site 2) prior to issuance of demolition or construction permits. PDF USS-8 The Project will provide readily accessible areas around the Project Sites for the deposit, storage, and collection of non-hazardous materials for recycling. RR USS-3 In compliance with AB 939, the Developer would be required to implement a Solid Waste Diversion Program and divert at least 50 percent of the solid waste generated by the Project.	Impact (4.16-5) and Impact (4.16-6): Less than significant.

Table 2-2
Summary of Project Impacts, Project Design Features, Regulatory Requirements, and Mitigation Measures

Environmental Impacts Before Mitigation	Project Design Features, Regulatory Requirements, and Mitigation Measures	Level of Impact After Mitigation
approximately 2,706 net pounds per day (ppd) of solid waste. All solid waste generating activities, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, the Project would divert 50 percent of its solid waste generated as required by PDF USS-4 and RR USS-6. The Project would also comply with all federal, State, and local regulations related to solid waste. Therefore, a less-than-significant impact associated with operational solid waste would occur.		
Source: EcoTierra Consulting, 2017.		

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3.0 PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

3.1 INTRODUCTION

The proposed Vermont Corridor Project is being undertaken by the County of Los Angeles (the “County”), through its Community Development Commission (“CDC”), to generate substantial economic benefit to the area by eliminating blight, creating construction jobs for local residents, as well as providing growth and expansion opportunities for local and small businesses. The Project would include the updated re-development and occupancy of three County-owned properties located in the “Vermont Corridor”, which is identified as the area located on South Vermont Avenue between 4th Street and 6th Street, in the City of Los Angeles (the “City”). In this context, the term Project refers to the whole of the actions that are evaluated in this Draft EIR, including the redevelopment of three Project Sites (as defined below) and all associated activities. The three County-owned sites are collectively referred to as the “Project Sites”, and are generally located at the following addresses: Site 1, located at 510, 526, and 532 South Vermont Avenue and 523 Shatto Place; Site 2, located at 550 South Vermont Avenue and 3175 West 6th Street; and Site 3, located at 433 South Vermont Avenue (see Table 3-1 for complete addresses). References to individual Sites refer only to the respective Site.

The Vermont Corridor is home to over a half million square feet of County-owned office space, and over a half million square feet of County-leased office space. County departments occupying these spaces are the Department of Mental Health (“DMH”), Department of Parks and Recreation (“DPR”), and Workforce Development, Aging and Community Services (“WDACS”) (collectively “Departments”). County-owned facilities, built between 1938 and 1963, have contributed to blight in the surrounding community due to the age of the buildings. These outdated facilities offer few operating efficiencies or amenities for the County employees who occupy the buildings. To promote improved efficiency, reverse blight in the area, and promote redevelopment of the County-owned properties and surrounding areas, the County intends to consolidate these Departments’ locations within new office facilities, and relocate employees accordingly. Further, the aged facilities occupy prominent parcels that offer potential opportunities for economic revitalization through their redevelopment that would also provide additional public benefits and aesthetic enhancement for the surrounding community.

On February 10, 2015, the County Board of Supervisors (“Board”) authorized the CDC, in consultation with the County Chief Executive Officer (“CEO”), to prepare a Request for Proposals (“RFP”) for the design and proposed construction of a new DMH headquarters facility, and the proposed future development of near-by County-owned properties in the Vermont Corridor.

On August 18, 2015, the Board authorized the release of the RFP. The Board also authorized the Executive Director of the CDC, in consultation with the CEO and County Counsel, to enter into exclusive negotiations with the highest ranked proposer, on behalf of the County.

Following a competitive selection process involving a range of subject matter experts, a development team partnership led by TC LA Development, Inc. (“TCLA”) that included Public Facilities Group, Meta Housing Corporation, and several architectural and engineering firms was selected as the developer for the Project. A not-for-profit Special Purpose Entity (“SPE”) was created to develop the proposed new DMH headquarters building under the authority of the County. Los Angeles Community Facilities, Inc. (“LACF”) is the SPE created for this purpose, whose sole member is Public Facilities Group. Under this structure, the County contracts with LACF, and concurrently, LACF contracts with TCLA as the developer. The CDC acts as the agent for the County in the management and administration of the contract with

LACF, and is responsible for negotiation of ground lease terms for the County properties located at 550 and 433 South Vermont Avenue and 3175 West 6th Street in the City of Los Angeles.

In June, 2016, following coordination between the Korean community and the office of Supervisorial District 2, developers responding to the RFP were encouraged to work with the Korean community to include a community recreation center in the Project. The selected developer incorporated a community recreation center, which was not part of the original RFP, into the Project on Site 3.

On August 9, 2016, the Board approved joint recommendations of the CEO and CDC for pre-development services for proposed pre-development review and negotiations, and directed the respective staffs to complete documentation required under the California Environmental Quality Act, negotiate development documentation including proposed ground leases, and return with recommendations for the Board's consideration.

Site 1 is currently occupied by a two-story abandoned structure with roof parking that has been identified as structurally deficient, a two-story office building occupied by DPR staff, open parking areas, and carport in the north parking area, and an existing parking structure at 523 Shatto Place that is connected to the site. Site 2 is currently occupied by two office buildings, which house DMH and WDACS staff, respectively. Site 3 is currently occupied by an office building housing DPR staff.

On Site 1, a new Class A office building for the new DMH headquarters, as well as ancillary ground floor retail, and structured parking spaces, is proposed. The proposed office building would be designed to fit aesthetically with the surrounding neighborhood, with a prominent design. To ensure cost effectiveness, the building design would be structured around a solid core and shell to ensure a functional and easily maintainable building foundation. Site 1 development would be constructed by TCLA on County land for County offices with ancillary retail and parking.

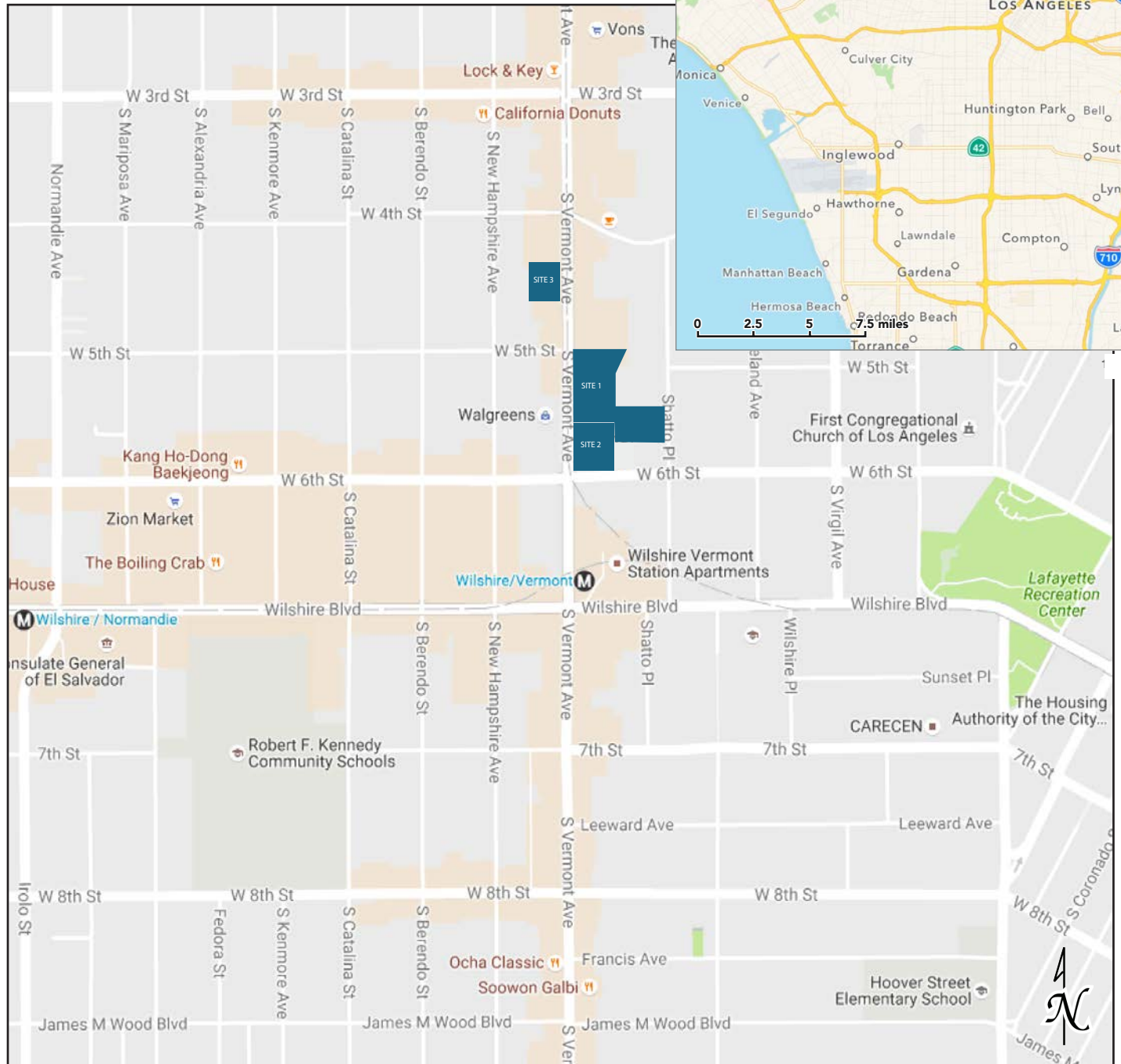
On Site 2, adaptive reuse of the existing DMH headquarters building at 550 South Vermont Avenue, into multifamily units and commercial space, is proposed. In addition, a new parking structure is proposed on the site of the existing office building at 3175 West 6th Street. As an option, new residential units and commercial space are proposed to be located above this structure, and at ground level, respectively. Site 2 development would be constructed by TCLA on County land for mixed use residential and commercial development under a ground lease.

On Site 3, construction of new senior affordable housing, a new community recreation center, and underground parking is proposed. Site 3 development would be constructed by Meta Housing, the non-profit member of the TCLA team, on County land, for a public benefit (affordable housing and community recreation center) project.

3.2 ENVIRONMENTAL SETTING

Project Location

The Project's Site 1, Site 2, and Site 3 are shown in Figure 3-1, Regional and Project Vicinity Map, and Figure 3-2, Aerial View of the Project Sites. Site 1 is an irregularly shaped, approximately 110,400 square foot (approximately 2.5 acre) site, located on the east side of Vermont Avenue, north of 6th Street. Site 2 is a rectangular, approximately 43,300 square foot (approximately 1 acre) site located at the northeast corner of the intersection of Vermont Avenue and 6th Street. Site 3 is a rectangular, approximately 21,700



■ Project Site

Source: Google Earth, December 2016.

0 656
Scale (Feet)



 Project Site
 Source: Google Earth, December 2016.

0 384
 Scale (Feet)



Figure 3-2
Aerial Map

square foot (approximately 0.5 acre) site, located on the west side of Vermont Avenue, north of 5th Street. All three sites are located in the City. The Project Sites are comprised of the addresses and assessor parcel numbers (“APNs”), and the existing uses listed in Table 3-1, Project Site Addresses and Assessor Parcel Numbers.

Table 3-1
Project Site Addresses and Assessor Parcel Numbers

Site No.	Address	APN	Existing Use
1	500, 510, 526, 532 S. Vermont Avenue 523, 531 S. Shatto Place	5077-003-905 5077-003-904 5077-003-903 5077-003-901	County Office, Surface Parking, Parking Structure
2	540, 542, 550 S. Vermont Avenue 3175 W. 6 th Street	5077-003-902	County Office Parking Structure
3	427, 433 S. Vermont Avenue	5502-009-900 5502-009-901	County Office Parking Lot
<i>Source: Los Angeles County Facilities, Inc., 2016.</i>			

Regional access to the Project Sites is provided by the Santa Monica Freeway (“I-10”), approximately 1.75 miles to the south, and the Hollywood Freeway (“US-101”) approximately 1.1 miles north of the Project Sites. Local access to the Project Sites is provided by, but is not limited to, Vermont Avenue, 6th Street, and Wilshire Boulevard. The Project Sites are served by the Metro Rail Red and Purple Lines from the Metro Rail Wilshire/Vermont Station located at the northeast corner of Wilshire Boulevard and Vermont Avenue. The entrance to the Wilshire/Vermont Station is located approximately 700 feet south of Site 2, 1,000 feet south of Site 1, and 1,700 feet south of Site 3. The Metro Red and Purple Lines provide access to the regional rail transit system, including the Metro Blue, Gold, Orange and Exposition Lines, and to regional and commuter rail lines, including Metrolink and Amtrak, through Union Station. The Project Sites are also served by Metro, DASH, and Foothill Transit bus lines, including Metro Local 20 and Metro Rapid 720, which run on Wilshire Boulevard, and Metro Local 204 and Metro Rapid 754, which run on Vermont Avenue.

Description of Surrounding Area

The Project Sites are located in an urbanized area containing commercial, office, retail, institutional, and multi-family residential uses. Site 1 is bounded by a retail center and parking structure on the north, a Walgreens pharmacy and a car wash across Vermont Avenue to the west, Site 2 to the south, and an office building to the east, north of the existing Shatto Place parking structure. Site 2 is bounded by Site 1 to the north, the Walgreens and a City parking lot across Vermont Avenue to the west and southwest, respectively, Central Middle School and a multi-family residential complex across 6th Street to the south, and a restaurant with a surface parking lot and an auto repair shop to the east. Site 3 is bounded by a retail center with surface parking lot to the north, an apartment building to the west, a vacant auto service center to the south, and a religious institution (the Islamic Center) to the east across Vermont Avenue.

Photographs of the Project Sites and immediate surroundings are included in Figures 3-3 through 3-12.



View 1: County DPR Building.



View 2: Surface Parking Lot Serving County DPR Building.



View 3: Entrance to County DPR Building.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2017.



View 4: Surface Parking Lot Serving County DMH Building.



View 5: Unoccupied County Office Building.



View 6: Parking Structure Serving County Office Buildings.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2017.



View 1: DMH Building.



View 2: CSS Building.



View 3: Entry to DMH Building.



PROJECT SITE
PHOTO LOCATION MAP

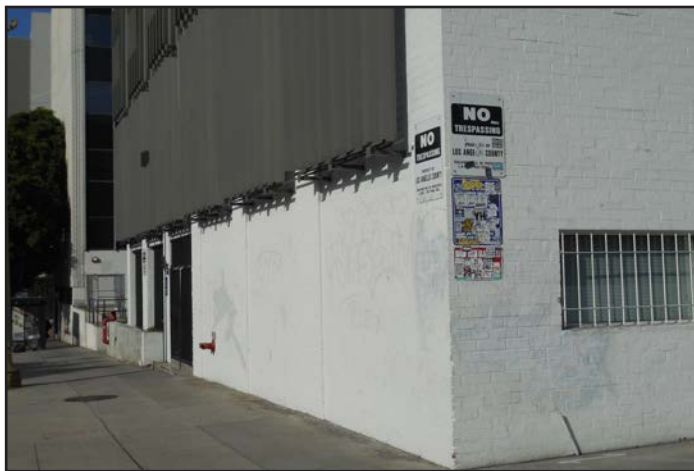
Source: EcoTierra Consulting, January 2017.



View 4: Ground Floor of DMH Building at Vermont Avenue & 6th Street.



View 5: Surface Parking Lot between DMH Building and CSS Building.



View 6: Entry to CSS Building.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2017.



View 1: DPR Building Viewed from North.



View 2: DPR Building Viewed from South.



View 3: DPR Building Viewed from Southeast.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2017.



View 1: Galleria Market Located North of Site 1.



View 2: Car Wash Located West of Site 1 Across Vermont Avenue.



View 3: Walgreens Located West of Sites 1 and 2 Across Vermont Avenue.

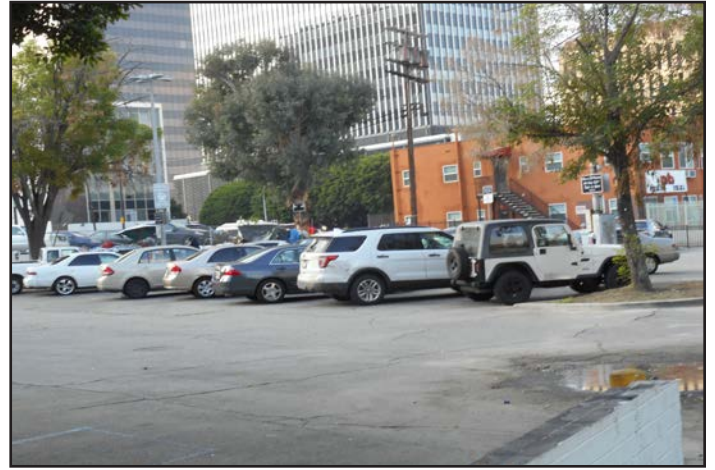


PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2017.



View 4: Multifamily Residential Located South of Site 2 Across 6th Street.



View 5: City Parking Lot and Denny's Restaurant Located Southwest of Site 2 Across Vermont Avenue.

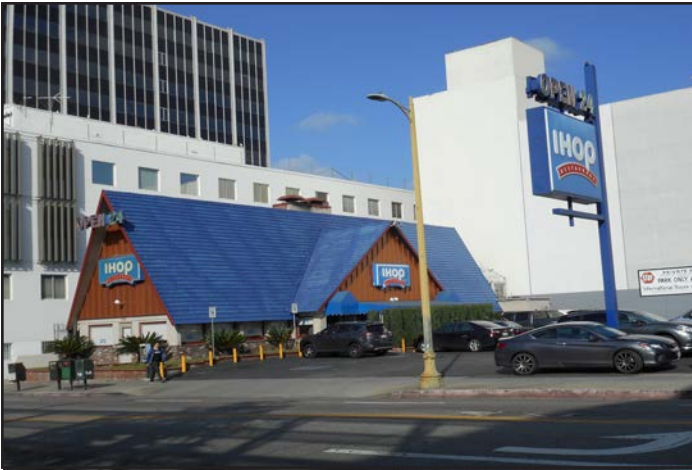


View 6: Young Oak Kim Academy Located South of Site 2 Across 6th Street.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2017.



View 7: Restaurant Located Adjacent to CSS Building on 6th Street.



View 8: Auto Repair Facility Located East of Site 2 on 6th Street.



View 9: Young Oak Kim Academy Located South of Site 2 Across 6th Street.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2017.



View 10: New Office Building Under Construction North of Site 1 Parking Structure on Shatto Place.



View 11: Office Building Located East of Site 1 Parking Structure Across Shatto Place.



View 12: New Covenant Academy and Church Located Southeast of Site 1 Parking Structure Across Shatto Place.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2017.



View 13: Commercial Center Located North of Site 3 on Vermont Avenue.



View 14: Islamic Center Located East of Site 3 Across Vermont Avenue.



View 15: Former Auto Repair Facility Being Redeveloped as Laundromat Located South of Site 3 on Vermont Avenue.



PROJECT SITE
PHOTO LOCATION MAP

Source: EcoTierra Consulting, January 2017.

Existing Land Uses

Site 1

Site 1 is currently developed with a 30,788 square foot, two story office building built in 1959 that is occupied by 93 employees from DPR and a surface parking lot to the north of this building with 20 spaces, an unoccupied 13,325 square foot one-story office building constructed in 1938, which contains 41 rooftop parking spaces accessed from 6th Street, a surface parking lot containing 79 spaces located between the two office buildings, and a seven-story, 235,248 square foot parking structure (six stories above grade and one story below grade) containing 864 spaces, built in 1958, that connects to the existing County office building and serves all County facilities in the area. Current DPR employees on Site 1 will be relocated to offsite facilities prior to the commencement of construction on Site 1.

Site 2

Site 2 is currently developed with a 154,793-square foot, 12-story County office building built in 1960 that is occupied by 973 employees from DMH, an approximately 52,000 square foot, four-story office building built in 1958 that is occupied by 250 employees from WDACS, and a 14,010-square foot parking structure with one level below grade and one level at-grade and containing 53 spaces, built in 1959.

Site 3

Site 3 is currently developed with a 29,292-square foot, four-story office building built in 1963 and occupied by 112 employees from DPR, and an at-grade parking lot at the rear and north of the existing building containing 65 spaces. Current DPR employees on Site 3 will be relocated to offsite facilities prior to the commencement of construction on Site 3.

Land Use Regulation

Sites 1, 2, and 3 are located in the City of Los Angeles Wilshire Community Plan area, with a “Community Commercial” land use designation. The Site 1 City zoning classification is C2-1 (Commercial, Height District 1) for the office buildings and surface parking lot areas, and the zoning classification for the existing 523 Shatto Place parking structure is PB-1 (Parking Building, Height District 1). Sites 2 and 3 are zoned C2-1.

The Project Sites are all located in a “Transit Priority Area” as defined by California Public Resources Code (“PRC”) Section 21099 because they are located within one-half mile of an existing rail transit station (Wilshire/Vermont Metro Rail Red/Purple Line Station). The Project Sites are located in an area that is developed with urban uses, and have each been previously developed with urban uses. Accordingly, the Project Sites are infill sites as defined in PRC Section 21099. The Project is an infill development comprised of a new County office building and parking structure on Site 1, redevelopment of the existing County office building on Site 2 into residential units, along with a new mixed-use building and parking structure on Site 2, and a new senior affordable housing project and community recreation center on Site 3. The Site 1 office building and associated parking structure is proposed on a property zoned for commercial uses with a floor area ratio (“FAR”) that exceeds 0.75 to 1 and, therefore, qualifies as an “Employment Center Project” as defined by PRC Section 21099(a)(1).

The Project will be developed for public and private uses and benefits pursuant to state law including but not limited to Government Code Sections 26227, 25549.1 *et seq.*, and 53090 *et seq.* Government Code Section 26227 authorizes the Board of Supervisors to make County real property available to a non-profit corporation or association to operate programs that serve the social needs of County residents, and to finance improvements and enter into leases or other transactions to carry out such public benefit

programs. In light of the current shortage of deed-restricted senior affordable housing, and the need for community recreational facilities in the area, the proposed development on Site 3 would result in substantial public benefits to County residents. The County therefore intends to exercise its sovereignty under California Government Code Sections 53090 *et. seq.* and 26227 and exempt Site 3 from City of Los Angeles zoning regulations.

Site 1

Site 1 is located in the City of Los Angeles, but the property is owned by the County and would be developed for County use, and thus, is not subject to City of Los Angeles' land use regulations, pursuant to California Government Code Section 53090 *et. seq.* At the same time, Site 1 is not specifically addressed by the County General Plan, because it is located the City of Los Angeles limits, and not within the unincorporated County. Therefore, no adopted land use plans govern development at Site 1. Nevertheless, this Draft EIR evaluates the Project's consistency with applicable County General Plan policies and also as part of the inter-jurisdictional consultation process required in California Government Code Section 65402, addresses the Project's consistency with City of Los Angeles General Plan and policies. Government Code Section 65402 states that, if a city general plan has been adopted, a County cannot authorize or construct a building within the corporate limits of the city until the city's planning agency has received and reported upon the project's conformity with the city's general plan. The planning agency has 40 days to report on the conformity with the general plan and failure to timely respond becomes a conclusive determination that the project conforms to the city general plan. Although exempt from City of Los Angeles building and zoning requirements, Site 1 development would be required to comply with County Building Code requirements, and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. Furthermore, the Los Angeles County Department of Regional Planning will review the proposed development on Site 1 for consistency with the County General Plan.

Site 2

Site 2 is located in the City of Los Angeles, on land owned by the County. Development on Site 2 would be constructed on County land for mixed use residential and commercial development use under a ground lease. Development of Site 2 would be subject to the City of Los Angeles General Plan, Zoning Ordinance and building regulations.

Site 3

Site 3 is located in the City of Los Angeles, on land owned by the County. Development on Site 3 would consist of (i) a senior affordable housing project to be developed and operated in partnership with a non-profit housing corporation, and (ii) a community recreation center to be operated by the YMCA of Metropolitan Los Angeles (a non-profit organization), under a ground lease as a public benefit.

Site 3 is not specifically addressed by the County General Plan because it is located win the City of Los Angeles and not in the unincorporated County. Therefore, there are no adopted land use plans that govern development at Site 3. Nevertheless, this Draft EIR evaluates the Project's consistency with applicable County General Plan policies, and also, as part of the inter-jurisdictional consultation process required in Section 65402 of the California Government Code, addresses the Project's consistency with City of Los Angeles land use plans and policies. Although exempt from City of Los Angeles building and zoning requirements, Site 3 development would be required to comply with County Building Code requirements, and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. Furthermore, the Los Angeles County

Department of Regional Planning will review proposed development on Site 3 for consistency with the County General Plan.

3.3 PROJECT CHARACTERISTICS

The Project would involve the redevelopment of each of the Project Sites. Specific development that is proposed for each Project Site is described in the following sections. A summary of existing and proposed development for each Project Site is provided in Table 3-2 (Project Development Summary).

Proposed Development

Site 1

Proposed development on Site 1 would involve removal of the existing DPR office building, vacant office building, surface parking lots, and parking structure, and construction of a new County office building containing 471,000 square feet of office use over a 390,000-square foot parking structure containing 965 spaces, and 10,000 square feet of ground floor retail and restaurant uses. Current DPR employees located on Site 1 will be relocated to offsite facilities with existing capacity prior to the commencement of construction on Site 1. The proposed office building would be up to 280 feet in height to the top of the parapet (286 feet to top of elevator machine room, 296 feet to top of emergency helicopter landing facility ("EHLF")), and would consist of 21 total stories (13 office floors over an eight-story parking structure (seven levels above grade and one level at grade)). County Code Section 2007.9 requires an EHLF to be included in buildings over 12 stories or 120 feet above the lowest level of Fire Department access. The EHLF consists of a clear area on the roof of the building capable of accommodating a helicopter engaged in firefighting and/or emergency evacuation operations. In addition, a new parking structure would be constructed on the site of the existing 7-story parking structure on Shatto Place. This new structure would contain 768 spaces within a 380,000-square foot, 11-story building with two below grade levels that would serve the new office building. The new parking structure would be up to 110 feet in height to the top of the parapet (130 feet to top of elevator machine room). A total of 135 bicycle storage spaces (7 short-term and 128 long-term) would be provided on Site 1.

When complete, the new 21-story office building would accommodate the relocation of the 973 DMH employees currently located in the existing 12-story building on Site 2, the 250 WDACS employees currently located in the existing four-story building on Site 2, and an additional 840 DMH and/or WDACS employees currently located in leased facilities within four miles of the new office building.¹ Accordingly, a total of up to 2,063 County employees would be located on Site 1 when the building opens in 2021.

In order to provide the capability of meeting the County's future needs, the new Site 1 office building would be designed to accommodate future growth, to a maximum of 2,166 employees, between 2021 and 2023. In addition, an estimated 27 new employees associated with the new retail uses would be located on Site 1.

Site 1 would accommodate approximately 2,193 employees at full occupancy (office and retail) by 2023, which would represent a net increase of approximately 2,100 employees on the Site. The majority of these employees would be relocated from existing County offices within the Project area.

¹ Existing employees on Site 3 would not be relocated to Site 1's office building.

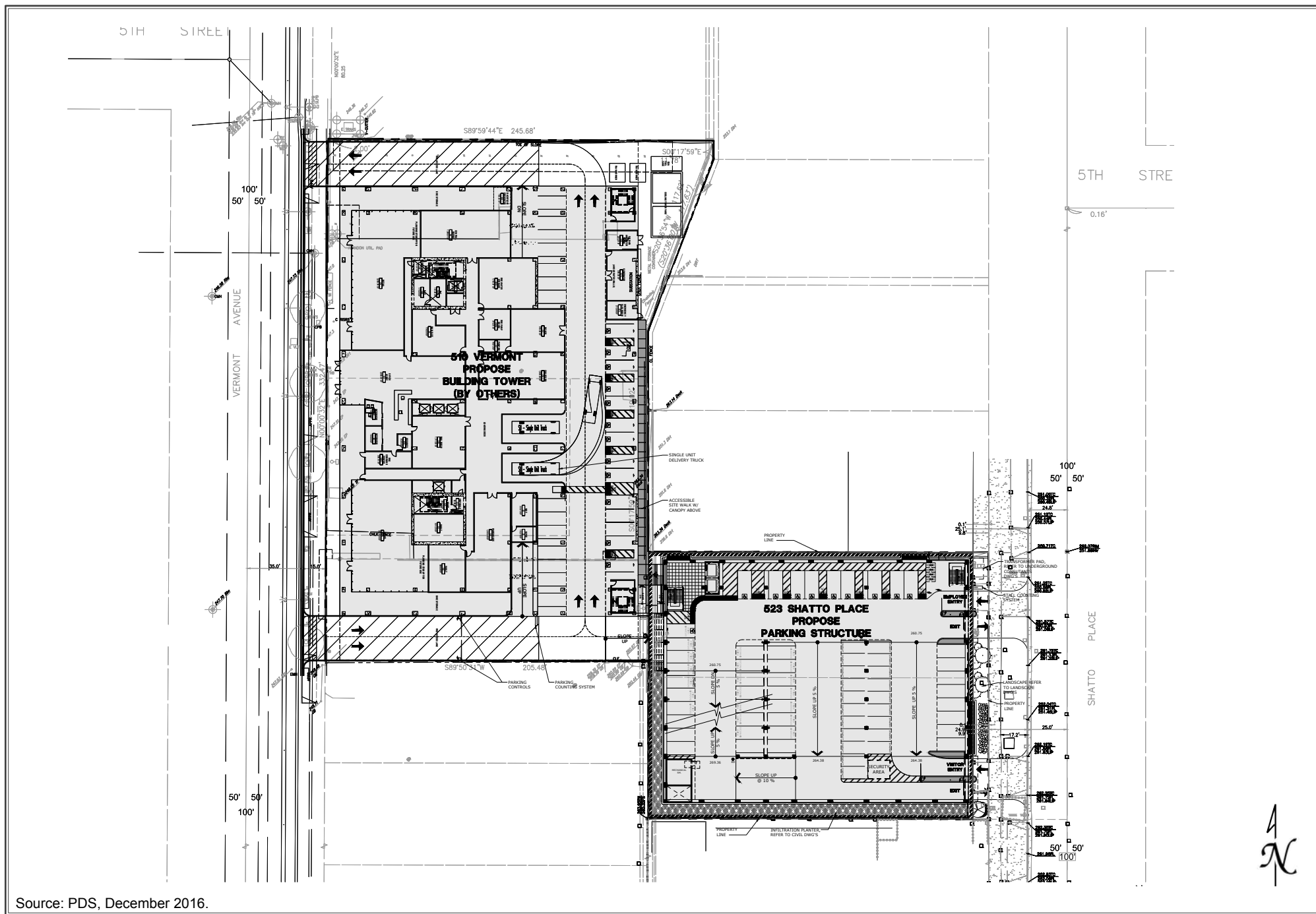
Table 3-2
Project Development Summary

Use	Size
Development	
Site 1	
<i>Existing</i>	
County Office (Occupied)	30,788 sf
County Office (Vacant)	13,325 sf
Employees	93 employees
<i>Proposed</i>	
County Office	471,000 sf
Retail	6,350 sf
Restaurant	3,650 sf
Employees	2,193 employees
Site 2	
<i>Existing</i>	
County Office (Occupied)	154,793 sf
County Office (Occupied)	52,000 sf
Employees	1,223 employees
<i>Proposed</i>	
Residential (Reuse)	172 units
Retail (Reuse)	4,100 sf
Amenity (Reuse)	8,875 sf
Residential (New Construction)	74 units
Retail (New Construction)	3,400 sf
Amenity (New Construction)	2,250 sf
Employees	30 employees
Residents	618 residents
Site 3	
<i>Existing</i>	
County Office (Occupied)	29,292 sf
Employees	112 employees
<i>Proposed</i>	
Senior Affordable Housing	72 units
Community Recreation Center	13,200 sf
Employees	46 employees
Residents	181 residents
Parking Spaces	
Site 1	
<i>Existing</i>	
Parking Structure	864
Surface Parking Lots	99
Vacant Office Building	41
Total Existing	1,004
<i>Proposed</i>	
New Office Building	965
New Shatto Place Parking Structure	768
Total Proposed	1,733

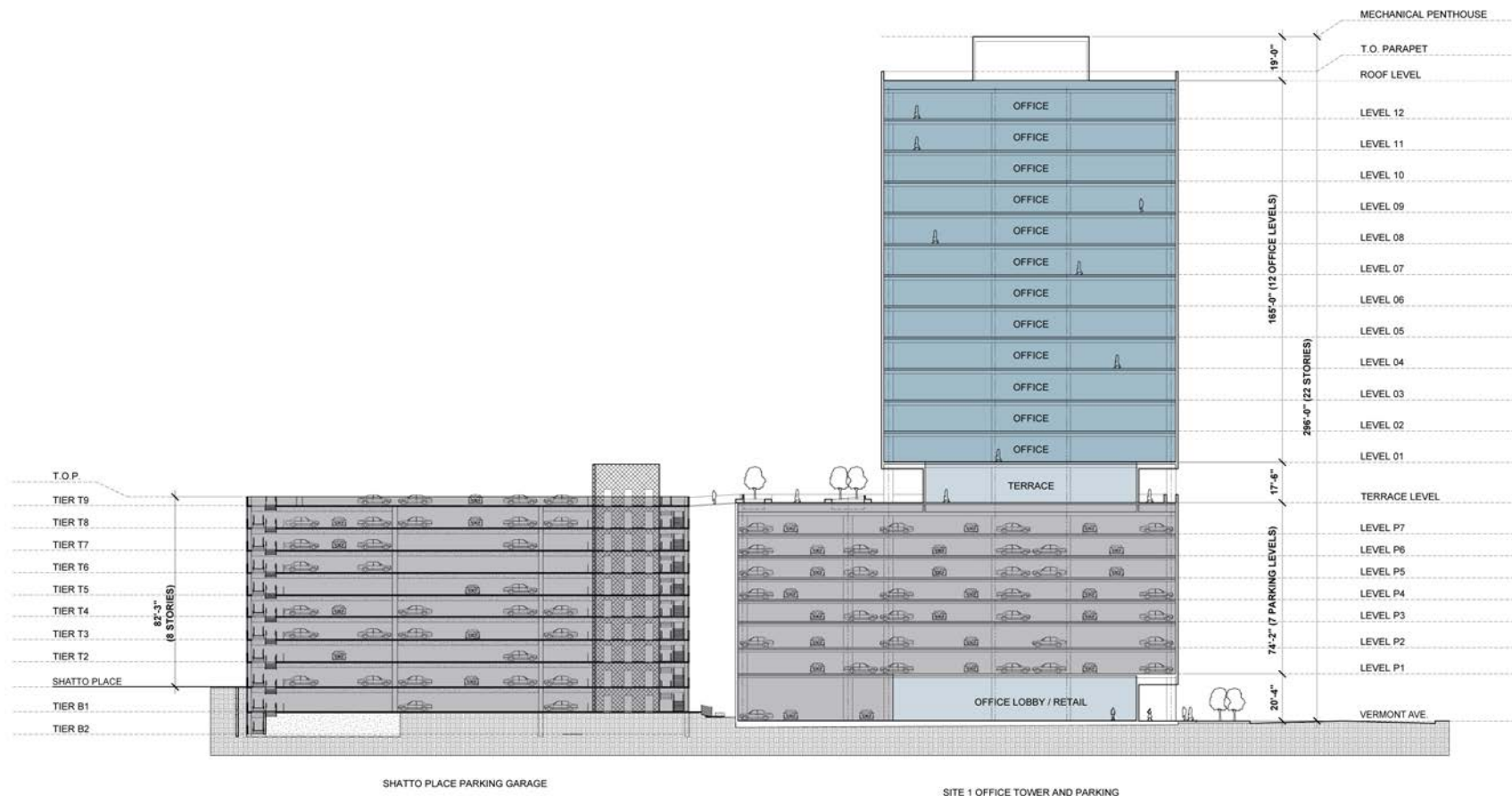
Table 3-2
Project Development Summary

Use	Size
Site 2	
<i>Existing</i>	
<i>Parking Structure</i>	53
<i>Proposed</i>	
<i>Parking Structure</i>	263
Sites 1 & 2 Total Parking Spaces	
<i>Existing</i>	1,057
<i>Proposed</i>	1,996
Site 3	
<i>Existing</i>	65
<i>Proposed</i>	116
Bicycle Storage	
Site 1	
<i>Existing</i>	
<i>Short-Term</i>	0
<i>Long-Term</i>	0
<i>Proposed</i>	
<i>Short-Term</i>	7
<i>Long-Term</i>	128
Site 2	
<i>Existing</i>	
<i>Short-Term</i>	5
<i>Long-Term</i>	0
<i>Proposed</i>	
<i>Short-Term</i>	30
<i>Long-Term</i>	260
Site 3	
<i>Existing</i>	
<i>Short-Term</i>	0
<i>Long-Term</i>	0
<i>Proposed</i>	
<i>Short-Term</i>	21
<i>Long-Term</i>	81
Total Existing Bicycle Storage	5
Total Proposed Bicycle Storage	527
<i>Source: Los Angeles County Facilities, Inc., 2016.</i>	

As shown in Figure 3-13, Site 1 Proposed Site Plan, vehicular and pedestrian access to the new Site 1 office building would be provided from Vermont Avenue. Two driveways, located immediately north and south of the proposed new building, would lead to the parking levels. Ingress would be provided from the south driveway, and egress would be provided from the north driveway. Retail uses and a lobby to access the office levels would be provided on Vermont Avenue. The principal entrance to the new office building would be provided on the east side of the building via a terraced connection to the top level of the proposed new Shatto Place parking structure Figure 3-14, Site 1 Proposed Project Cross Section.



Source: PDS, December 2016.



Source: Gensler, 2017.

The terrace entrance would connect to an atrium that would provide security and access to the office floors above. Access to the new Shatto Place parking structure would be from two driveways on Shatto Place. Ingress and egress would be provided from both the north driveway and south driveways.

Site 2

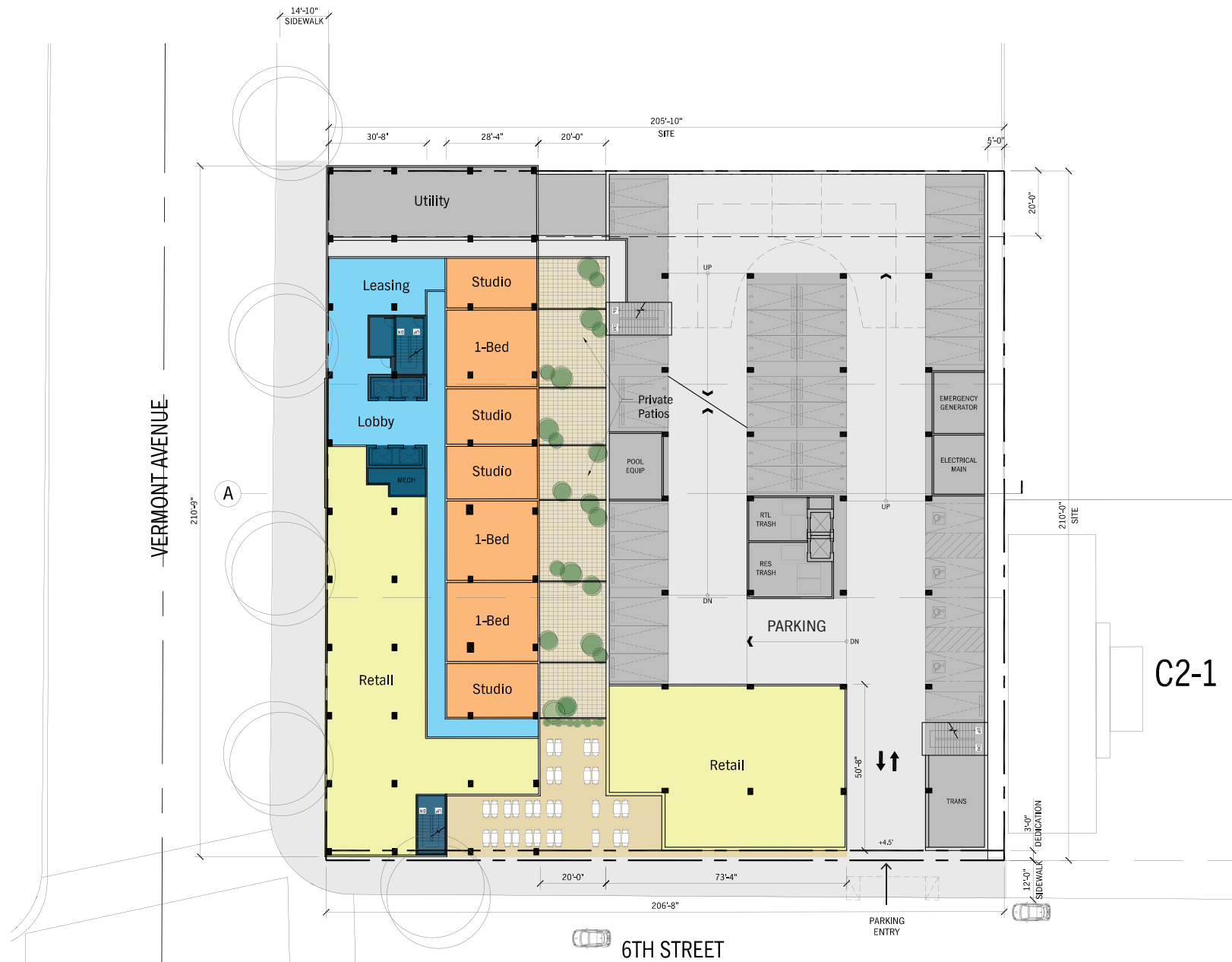
Proposed development on Site 2 would involve reuse and conversion of the existing 154,793 square foot, 12-story DMH building into a maximum of 172 residential units (82 studio, 46 one-bedroom, 44 two-bedroom), 4,100 square feet of ground floor retail, 1,375 square feet of ancillary space (office, common area, etc.), and an approximately 7,500 square foot roof deck amenity. Upgrade to existing steel framing and installation of new HVAC, and life/safety systems would be included in the reuse of the existing DMH building, as well as new exterior building facades. The existing building height of 173.5 feet (including the elevator machine room) would not change under the Project. The development of Site 2 would involve removal of the existing four-story, approximately 52,000 square foot, WDACS office building and two-story parking structure, and construction of a new 116,324 square foot, five-level parking structure (3.5 levels above grade and 1.5 levels below grade). A future option for the development of Site 2 would include construction of a new 66,935 square foot, mixed-use building above the parking structure, containing five residential levels and 74 units (28 studio, 38 one-bedroom, and 8 two-bedroom), and 2,250 square feet of ancillary space. In addition, 3,400 square feet of retail uses would be provided at the ground level of the new mixed-use building on 6th Street. The parking structure would provide 263 auto parking spaces and 290 bicycle storage spaces (30 short-term and 260 long-term) to serve the residential units (new and reused/converted), and the retail uses on Site 2. The new mixed-use building would be approximately 95 feet from the highest adjacent grade to the top of the parapet (105 feet to top of elevator machine room).

As shown in Figure 3-15, Site 2 Proposed Site Plan, retail uses on Site 2 would be located along Vermont Avenue and 6th Street. The residential units on Site 2 would be accessed from a lobby facing Vermont Avenue, with secondary access from a new plaza area that would front on 6th Street. The existing repurposed building would be connected to the new mixed-use building via a sky bridge on the 4th floor Figure 3-16, Site 2 Proposed Cross Section. Ingress and egress to the new parking structure would be provided from 6th Street. The new residential units would be accessed directly from the parking garage, while the converted units in the existing building would connect to the new parking garage via the 4th floor sky bridge.

Development on Site 2 would generate approximately 30 new employees, while the existing approximately 1,223 employees presently located on Site 2 would relocate to Site 1. Construction on Site 2 would not commence until the completion of the Site 1 development, and following the relocation of the 973 DMH employees currently located in the existing DMH building on Site 2, and the 250 WDACS employees currently located on Site 2 into the new Site 1 building.

As previously discussed, proposed development on Site 2 would involve the construction of 74 residential units (new construction), and the conversion of 154,793 square feet within the existing DMH building for the construction of 172 residential units. The City of Los Angeles estimates that there are approximately 2.51 persons per dwelling unit in the Wilshire Community Plan Area.² At this average household size, the Project would be expected to accommodate approximately 618 new residents. Buildout of Site 2 is expected by 2023.

² City of Los Angeles, Department of City Planning, Wilshire Community Plan, September 19, 2001.



Source: Steinberg, 2016.



Source: Steinberg, 2016.

Site 3

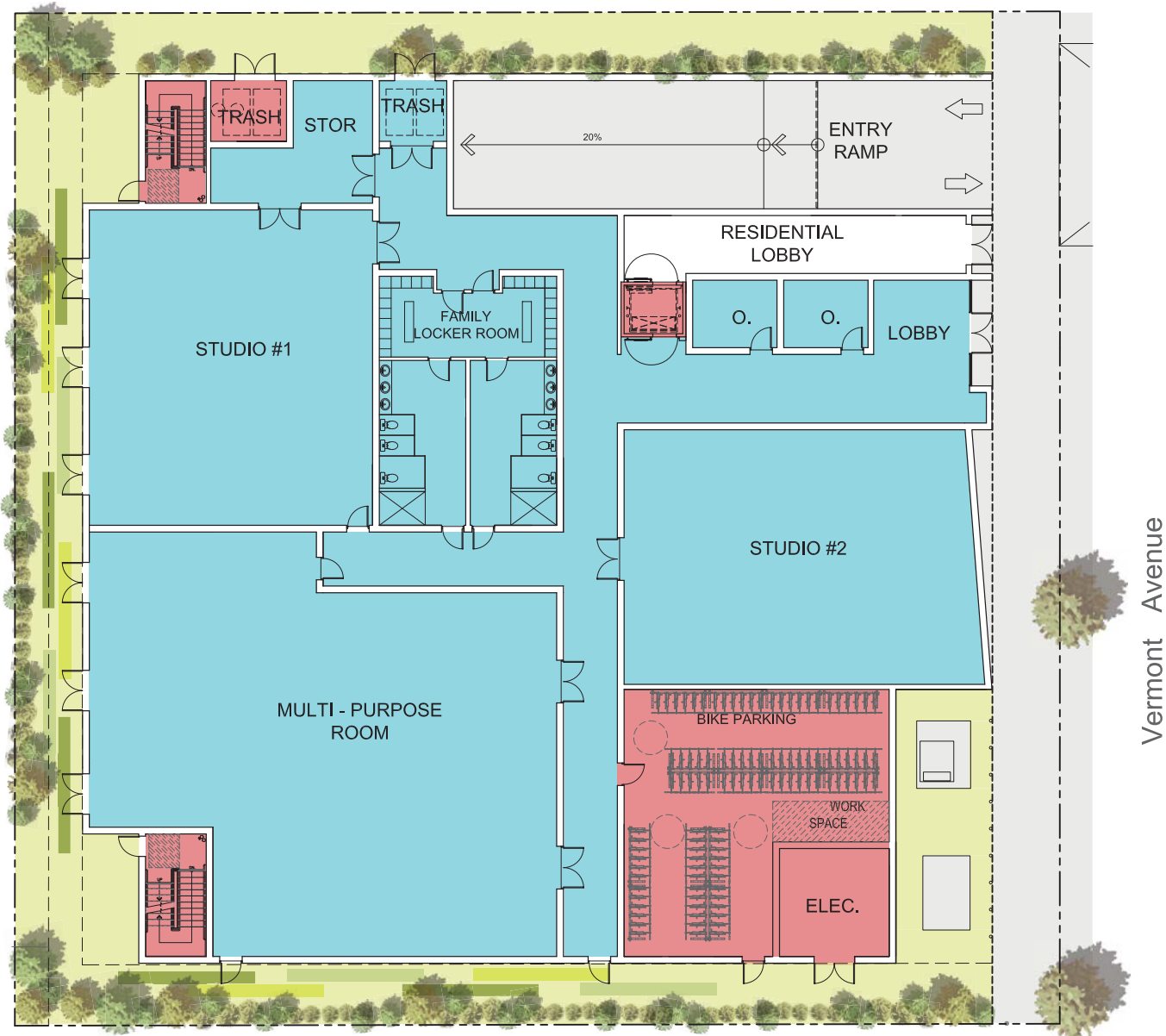
Proposed development on Site 3 would involve removal of the existing DPR building and construction of a new 80,837 square foot, six-story, 100 percent senior affordable housing project containing 72 units, and an approximately 13,200 square foot community recreation center, over a three-story, 51,591 square foot underground parking structure containing 116 spaces. Current DPR employees located on Site 3 will be relocated to offsite facilities with existing capacity prior to the commencement of construction on Site 3. As shown in Figure 3-17, Site 3 Proposed Site Plan, the entrance to the proposed community recreation center would be provided on Vermont Avenue. A separate entrance to the proposed residential units, and vehicular access to the below ground parking structure that would serve the residential and community recreation center uses would be also provided from Vermont Avenue. In addition, 81 long term and 21 short-term bicycle parking spaces would be provided on the ground floor. As shown in Figure 3-18, Site 3 Podium Plan, a landscaped courtyard, open to the sky, would be provided on the second level of the Project to serve the Project residents, and would be surrounded by the upper floor units Figure 3-19, Site 3 Upper Levels Plan. The new building would be 65 feet in height to the top of the parapet (75 feet to top of elevator machine room) Figure 3-20, Site 3 Proposed Cross Section. Elevations for the proposed Site 3 Project are shown in Figure 3-21, Site 3 Elevations.

Site 3 uses would generate approximately 46 employees, which would result in a net decrease of approximately 66 employees on the Site. As discussed previously, development of Site 3 involves the demolition of all on-site uses and the construction of a variety of uses including up to 72 residential dwelling units on the Project Site. The City of Los Angeles estimates that there are approximately 2.51 persons per dwelling unit in the Wilshire Community Plan Area.³ Based on this average household size, the Project would be expected to accommodate approximately 181 new residents on Site 3.

Parking

Site 1 development would consist primarily of an office tower for County employees, along with associated parking. The LAMC requires office uses to provide 1 parking space for every 500 square feet of floor area. However, the County Code requires 1 parking space for every 400 square feet of office floor area, which is more stringent, and was therefore used to assess Site 1 office parking code requirements. The Project Sites are also located in a designated State Enterprise Zone, which has a general commercial (e.g., retail and restaurant) parking standard of 1 space per 500 square feet of floor area. The County Code, however, requires one parking space per 250 square feet of retail use and 1 space for every three persons for restaurants (based on occupancy load). Accordingly, Site 1 would be required to provide 1,191 spaces per the County Code for the office and retail uses, plus an additional parking space for every three persons expected to occupy the 3,650 square foot Site 1 restaurant use. Notwithstanding these generally applicable County Code requirements, the County has established a separate standard for County office buildings of 0.8 spaces per employee in a separate memorandum entitled "Department Office Space Standards." (See Appendix 3-1 to this Draft EIR). County experience has shown that this ratio provides sufficient parking to meet County office needs. Using the standard established for County office buildings, a total of 1,733 parking spaces would be required on Site 1. The Project would supply 1,733 spaces, which would satisfy County employee and visitor parking needs.

³ *Ibid.*



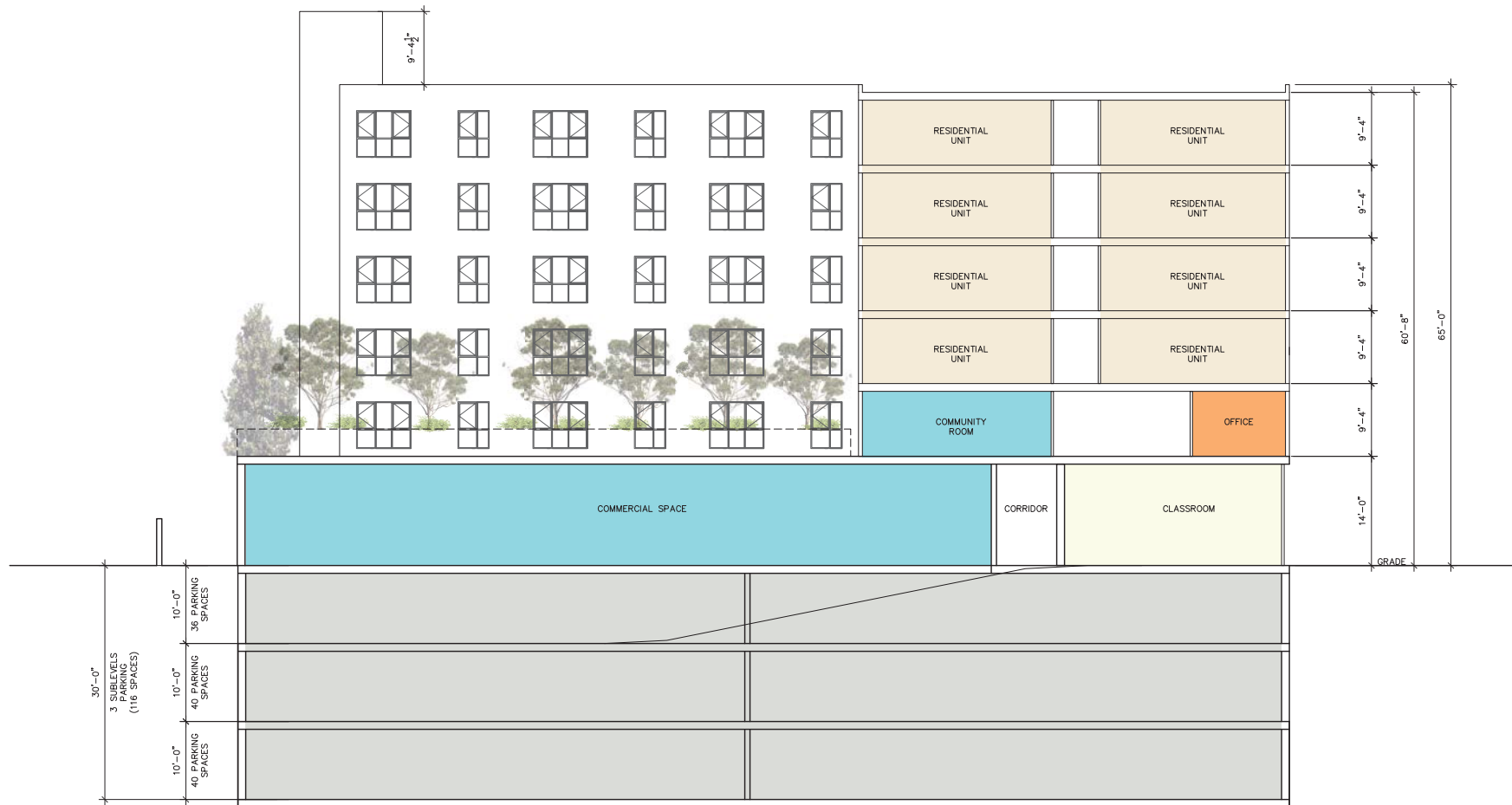
Source: Y & M Architects, August 2017.



Source: Y & M Architects, October 2016.



Source: Y & M Architects, October 2016.



Source: Y & M Architects, October 2016.



SOUTH
SIDE ELEVATION
SCALE: 1/8" = 1'-0"

②



NORTH
SIDE ELEVATION
SCALE: 1/8" = 1'-0"

①

Source: Y & M Architects, August 2017.

Site 2 development would consist of the adaptive reuse of the Site 2 Tower and the construction of an additional apartment building over a podium parking structure. Under the City's Adaptive Reuse Ordinance ("ARO"), the conversion of the Site 2 Tower from office to residential use (along with 4,100 square feet of ground-floor commercial space) alone would only be required to provide the amount of parking that was previously provided at the Site. Because the Site 2 Tower currently provides approximately 53 spaces in an adjacent 2-level parking structure, the Project would be required to provide 53 spaces associated with the proposed Tower. If the ARO did not apply to the Site 2 Tower, it would be required to supply 247 spaces per the general LAMC parking standards (239 residential and 8 commercial spaces). Additionally, the new mixed-use building, located at 3175 W. 6th Street, would be required to provide parking in accordance with new development requirements. The LAMC requires 1 parking space per studio unit, 1.5 spaces per 1-bedroom unit, and 2 parking spaces per 2-bedroom unit. The 3,400 square feet of ground-floor commercial space must provide 1 space per 500 square feet under the City's Enterprise Zone parking requirements. Accordingly, the new mixed-use building would require a total of 108 parking spaces (101 residential plus 7 commercial parking spaces). In total, Site 2 would be required to provide a total of 161 parking spaces under the combination of ARO and LAMC requirements (53 ARO spaces plus 108 spaces for new mixed use construction). Because the Project proposes 263 spaces at Site 2, the Project would satisfy resident and visitor parking needs. However, if only LAMC/Enterprise Zone parking requirements were to be applied, the requirement for Site 2 would be 355 spaces. By this standard, the proposed 263 spaces would be below the straight LAMC requirement. As such, Site 2 as proposed would not be considered "overparked".

California Assembly Bill 744 ("AB 744") states that housing projects with exclusively affordable units (as is the case with the Site 3 senior affordable housing units) cannot be required to provide more than 0.5 parking spaces per unit. For the community recreation center included at Site 3, the County Code requires one parking space for every three occupants based on maximum allowable occupancy. Accordingly, the residential uses would require 36 parking spaces and the community recreation center would require 80 spaces based on a 240-person maximum occupancy for a total requirement of 116 spaces. This would be accommodated by the 116 spaces proposed at Site 3, which would satisfy resident and visitor parking needs.

Bicycle Parking

The County Code and LAMC also require bicycle parking to be provided. Specific requirements are shown in Table 3-3. According to County requirements, Site 1 would be required to provide a total of 26 short-term and 49 long-term bicycle parking spaces. While Site 1 would only provide seven short-term bicycle parking spaces, it would provide 128 long-term spaces for a total of 135 spaces, well over the total requirement of 75 spaces. Site 2 would provide 30 short-term and 260 long-term bicycle parking spaces, exceeding the LAMC requirement of 29 short-term and 250 long-term spaces. Site 3 would provide 21 short-term and 81 long-term bicycle parking spaces, exceeding the County Code requirement of 13 short-term and 39 long-term spaces.

Project Construction

As noted above, construction on Site 1 and relocation of existing County employees to the new office building on Site 1 is required before the conversion of the existing building and construction of the new mixed-use building on Site 2 may commence. Site 3 construction would be independent of the Site 1 and Site 2 construction activities, but will occur during the construction on Site 1. Accordingly, the Project is evaluated in this Draft EIR as a two-phased project.

Phase I

Phase I of the Project would include construction of the new County office building, retail uses, and parking structure on Site 1, and construction of new senior affordable housing and community recreation center on Site 3. Site 1 construction is anticipated to begin in the summer of 2018, and would take place over a period of approximately 36 months, with occupancy anticipated to be complete in the summer of 2021. Construction on Site 3 is anticipated to commence in the summer of 2019, and be completed and occupied in 2020.

**Table 3-3
Bicycle Parking Requirement**

Land Use	Units or Size	Long-Term Spaces	Short-Term Spaces
<i>Los Angeles County Code Requirement (Sites 1 and 3)</i>			
Office		1 space per 20,000 sf	1 space per 10,000 sf
Residential		1 space per 10 units	1 space per 2 units
Retail		1 space per 5,000 sf	1 space per 12,000 sf
Community Center		1 space per 50 occupants	1 space per 100 occupants
<i>City of Los Angeles Municipal Code Requirement (Site 2)</i>			
Residential		1 space per unit	1 space per 10 units
Retail		1 space per 2,000 sf	1 space per 2,000 sf
<i>Site 1 Bicycle Parking Requirement</i>			
Office	471,000 sf	24	48
Retail	10,000 sf	2	1
<i>Site 1 Total</i>		26	49
<i>Site 2 Bicycle Parking Requirement</i>			
Residential	246 units	246	25
Retail	7,500 sf	4	4
<i>Site 2 Total</i>		250	29
<i>Site 3 Bicycle Parking Requirement</i>			
Residential	72 units	8	36
Community Center	240 occupants	5	3
<i>Site 3 Total</i>		13	39
<i>sf square-feet</i>			
<i>Source: Gibson Transportation Consulting, Inc., 2017.</i>			

Phase I construction activities on Sites 1 and 3 would include demolition of existing buildings, parking structures and surface parking lots, excavation to accommodate the underground parking structures, construction of underground and aboveground parking structures, and framing and finishing of the new County office building and residential/community recreation center building. Current County employees on Sites 1 and 3 would be relocated to offsite facilities prior to the commencement of construction. In order to provide parking for existing County employees on Site 2, the Shatto Place parking structure would remain in place until the parking facilities in the new Site 1 tower are complete, and available to provide

parking to the Site 2 employees. Access to Site 1 during construction would be provided from Vermont Avenue and Shatto Place. Construction of Phase I would include temporary lane and sidewalk closures on the east side of Vermont Avenue and the west side of Shatto Place, which would occur within the parking lanes of these streets. Removal of demolition debris and excavated materials would be via a haul route on Shatto Place, 6th Street, and Vermont Avenue either northbound to the Hollywood Freeway (US-101), or southbound to the Santa Monica (I-10) freeway. Temporary lane and sidewalk closures on Vermont Avenue and Shatto Place would be identified in a Construction Traffic Control Plan approved by the City of Los Angeles Department of Transportation (“LADOT”). Through sidewalk access would be maintained on Vermont Avenue and Shatto Place throughout Phase I construction. Normally, two through northbound lanes would be maintained on Vermont Avenue throughout Phase I construction. However, on infrequent occasions, closure of one additional lane may be required for short-term activities such as concrete pours. At least one northbound lane would be maintained on Vermont Avenue at all times during Phase I construction. During concrete pours for the new parking structure on Shatto Place, complete closure of Shatto Place may be temporarily required, if approved by LADOT. On these infrequent occasions, alternate north-south access would be available on Vermont Avenue and Westmoreland Avenue. Construction worker parking would be arranged with surface lots/structures in the area, or in remote lots with shuttle transportation provided to the construction site, until parking facilities for construction workers are available on-site. Construction employment would be limited during the initial phases of construction (demolition, excavation), and would increase as the Project structures are constructed.

Access to Site 3 during Phase I construction would be provided from Vermont Avenue. Construction of the Project on Site 3 would include temporary lane and sidewalk closures on the west side of Vermont Avenue that would be regulated through a Construction Traffic Control Plan approved by LADOT. These closures would occur in the parking lane. Sidewalk access would be maintained on Vermont Avenue throughout Phase I construction. Removal of demolition debris and excavated materials would be via a haul route on Vermont Avenue either northbound to the Hollywood Freeway (US-101), or southbound to the Santa Monica (I-10) freeway. Normally, two through southbound lanes would be maintained on Vermont Avenue throughout Phase I construction. However, on infrequent occasions, closure of one additional lane may be required for short term activities such as concrete pours. At least one southbound lane would be maintained on Vermont Avenue at all times during Phase I construction. Construction worker parking would be arranged with surface lots/structures in the area, or in remote lots with shuttle transportation provided to the construction site, until parking facilities are available on-site. Construction employment would be limited during the initial phases of construction (demolition, excavation), and would increase as the Project structures are constructed.

Phase II

Phase II of the Project would include the reuse and conversion of the existing twelve-story building for residential and retail use, and construction of new residential and retail uses and parking structure on Site 2. Construction on Site 2 is anticipated to commence in the fall of 2021 and be completed and occupied in late 2023.

Site 2 employees will be relocated to the completed Site 1 prior to the commencement of construction activities on Site 2. Phase II construction activities on Site 2 would include demolition of the existing four-story WDACS office building and two-story parking structure, excavation to accommodate the new underground parking structure, construction of a new underground and aboveground parking structure, framing and finishing of the new residential building, and demolition and reuse/conversion of the interior spaces of the existing DMH building. Access to Site 2 during Phase II construction would be provided from

Vermont Avenue and 6th Street. Construction of Phase II would include temporary lane and sidewalk closures on the east side of Vermont Avenue and the north side of 6th Street, which would occur within the parking lanes of these streets. Removal of demolition debris and excavated materials would be via a haul route on 6th Street, and Vermont Avenue either northbound to the Hollywood Freeway (US-101), or southbound to the Santa Monica (I-10) freeway. Temporary lane and sidewalk closures on Vermont Avenue and 6th Street would be identified in a Construction Traffic Control Plan approved by LADOT. Sidewalk access would be maintained on Vermont Avenue and 6th Street throughout Phase II construction. Normally, two through westbound lanes would be maintained on 6th Street throughout Phase II construction. However, on infrequent occasions, closure of one additional lane may be required for short term activities such as concrete pours. At least one westbound lane would be maintained on 6th Street at all times during Phase II construction. Construction worker parking during Phase II would be provided in the new parking structures on Site 1.

3.4 ENVIRONMENTAL DESIGN FEATURES

The Project would comply with the requirements in the County's Green Building Code and Title 24, which requires buildings to be designed to include green building measures for energy efficiency, water conservation, recycling, light pollution reduction, electric vehicle charging stations, Energy Star-rated appliances, eco-friendly building materials, non-volatile organic compound paints/adhesives, drought-tolerant planting, and high performance building envelopment. The Project would comply with all LEED Silver requirements.

3.5 PROJECT OBJECTIVES

The objectives and underlying purposes of the Project are as follows:

1. **Provide a mix of uses that maximizes building density at locations served by public transit and locates residential uses in areas that reduce automobile dependency, by replacing obsolete County facilities with new state-of-the art office facilities and infrastructure that will meet the current and future needs of County Departments located within or near the Vermont Corridor, and by providing residential and retail uses to serve the local community, in a transit priority area.**
2. **Promote revitalization of the currently underutilized project sites by expediting the elimination of blight and improving the visual character of the Project area through the redevelopment of underutilized sites.**
3. **Provide needed housing near public transit by constructing high density residential dwelling units to serve a range of potential tenants, and developing new housing stock at infill locations close to commercial and office uses.**
4. **Provide needed deed restricted senior affordable housing units in the Vermont Corridor.**
5. **Promote fiscal and community benefits, economic development, and job creation by creating construction jobs, consolidating DMH and WDACS employees in the Vermont Corridor, providing economic benefit to the County, and providing community benefits through construction of a community recreation center and deed restricted senior affordable housing.**
6. **Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and**

conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

3.6 ACTIONS REQUIRED

County of Los Angeles

The Project Sites are located entirely in the City of Los Angeles, but are owned by the County. The County, through its CDC, is the Lead Agency for the Project. Discretionary approvals from the County would be necessary to implement the Project on all Project Sites. Discretionary actions to be considered by the County include, but may not be limited to, the following:

- Certification of the EIR;
- Adoption of required findings and approval of the Project as described in the EIR;
- Approval of Project financing, including bond issuance;
- Approval of ground leases and option to ground leases, or comparable agreements for financing; and
- Other approvals as needed and may be required.

The County would provide ministerial approvals for grading and building permits, and other on-site ministerial actions that may be necessary to construct the Project on Site 1 and Site 3. Although exempt from City of Los Angeles building and zoning requirements, Site 1 and Site 3 development would be required to comply with County Building Code and State Fire Marshal requirements, and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. In addition, development on Sites 1 and 3 will be reviewed by the County Department of Regional Planning for consistency with the County General Plan.

City of Los Angeles

Proposed development on Site 2 would be subject to the zoning and building regulations of the City of Los Angeles. As an agency with discretionary approval authority over the Project on Site 2, the City is a Responsible Agency under CEQA Guidelines Sections 15381 and 15096. Discretionary actions to be considered by the City include, but may not be limited to, the following:

- Consider the environmental effects of the Site 2 Project as shown in the EIR; and
- Approvals and permits for the Site 2 Project under the Adaptive Reuse Incentive Areas Specific Plan, and other City entitlements that may be required to authorize new Site 2 construction.

The City would provide ministerial approvals for grading and building permits, and other on-site ministerial actions that may be necessary to construct the Project on Site 2. Off-site ministerial permits, including but not necessarily limited to, connection to off-site utilities, any necessary work/improvements within the public right-of-way, and any off-site mitigation would be within the City's jurisdiction.

3.7 RELATED PROJECTS

Section 15130 of the State CEQA Guidelines provides that EIRs consider the environmental effects of a proposed project individually as well as cumulatively. Cumulative impacts are two or more individual

effects which, when considered together, are considerable or which compound or increase other environmental impacts (State CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts.

Projects recently approved, under construction, or to be developed in the reasonably foreseeable future (i.e., those projects with pending applications) that could potentially produce a related cumulative environmental impact, when considered in combination with the proposed Project are evaluated throughout Section 4.0, Environmental Impact Analysis. In addition to the use of the ambient growth rate, listings of potential related projects in the study area that might be developed within the study time frame were obtained from LADOT. A review of this information identified a total of 115 related projects within an approximate two-mile radius of the Project Sites, as identified by LADOT, that are considered as appropriate in each of the cumulative impact analyses provided in this EIR. Table 3-4 (List of Related Projects) lists the related projects. The locations of these related projects are shown in Figure 3-22, Related Projects Location Map.

**Table 3-4
Related Projects**

No.	Project Name	Address	Uses
1.	Office & Apartments	3323 W. Olympic Blvd.	40 apartment units and 277,720 sf office
2.	Gaju Marketplace (The "G")	450 S. Western Ave.	130,500 sf retail market
3.	Mixed-Use	3670 W. Wilshire Blvd.	378 condominium units and 8,000 sf commercial
4.	Wilshire Coronado	2525 Wilshire Blvd.	160 condominium units and 7,500 sf retail
5.	Mixed-Use	3033 W. Wilshire Blvd.	189 condominium units and 5,500 sf retail
6.	Tenten Wilshire Expansion	1027 W. Wilshire Blvd.	402 condominium units and 7,428 sf retail
7.	Shopping Center / Mixed-Use	3060 W. Olympic Blvd.	109,006 sf retail
8.	Mixed-Use	805 S. Catalina St.	224 condominium units and 7,000 sf retail
9.	Mixed-Use	3200 W. Beverly Blvd.	32 condominium units and 5,870 sf retail
10.	Bixel & Lucas	1102 W. 6th St.	649 apartment units and 39,996 sf retail
11.	Mixed-Use	820 S. Hoover St.	32 condominium units and 4,500 sf retail
12.	3-story Retail and Office Building	2789 W. Olympic Blvd.	20,607 sf retail and 2,781 sf office
13.	Condominiums	742 S. Hartford Ave.	58 condominium units
14.	Office Building	1130 W. Wilshire Blvd.	95,847 sf office building
15.	Oak Village Residences	902 W. Washington Blvd.	142 townhome / condominium units
16.	Affordable Housing and Assisted Living	2924 W. 8th St.	42 affordable apartment units and 43 assisted living units
17.	Laborers Local 300 Headquarters	2005 W. Pico Blvd.	30,300 sf office space
18.	Pacific Charter Middle School	1371 W. 35th St.	300 students, 6th-8th grade
19.	USC University Park Master Plan	3301 S. Hoover St.	University expansion master plan
20.	Western Galleria Market	100 N. Western Ave.	98 apartment units and 30,000 sf retail
21.	Southwestern Law School Expansion	30350 W. Wilshire Blvd.	133 student units, 450-seat lecture hall, and 43,400 sf administrative space
22.	Wilshire Temple Master	3663 W. Wilshire Blvd.	School and office improvements

**Table 3-4
Related Projects**

No.	Project Name	Address	Uses
	Plan		
23.	South LA Redevelopment 3A	3671 S. Vermont Ave.	80 apartment units and 50,000 sf retail
24.	Westlake Theater Apartments	619 S. Westlake Ave.	52 apartment units and public parking
25.	Pacific Charter Elementary School	1700 W. Pico Blvd.	Relocation of 450 student K-5 charter school
26.	Camino Nuevo Charter School Relocation	3400 W. 3rd St.	656-student K-8 charter school
27.	15th St Charter School	2755 W. 15th St.	300 student middle school
28.	Health Club	3470 W. Wilshire Blvd.	20,178 sf health club
29.	Berendo Apartments (688)	688 S. Berendo St.	136 apartment units
30.	Mixed-Use	1435 W. 3rd St.	122 apartment units and 5,000 sf retail
31.	Berendo Apartments (680)	680 S. Berendo St.	174 apartment units
32.	Valencia Project	1501 W. Wilshire Blvd.	217 apartment units, 2,400 sf retail, 4,450 sf restaurant
33.	Apartment Project	685 S. New Hampshire Ave.	177 apartment units
34.	Church	968 S. Berendo St.	85,308 sf church
35.	1020 Fedora Street Hotel	1020 S. Fedora St.	86-room hotel
36.	Mixed-Use	1329 W. 7th St.	94 apartment units and 2,000 sf retail
37.	Residential	3640 W. Wilshire Blvd.	209 apartment units
38.	Restaurants	135 N. Western Ave.	11,904 sf restaurants
39.	1700 W. Olympic Hotel	1700 W. Olympic Blvd.	160-room hotel
40.	Apartment Project	535 S. Kingsley Dr.	85 apartment units
41.	Mixed-Use	2850 W. 7th St.	206 apartment units and 7,500 sf retail
42.	Mixed-Use	940 S. Western Ave.	81 apartment units and 8,000 sf retail
43.	Apartment Project	800 S. Harvard Blvd.	113 apartment units and 7,000 sf retail
44.	Equitas Charter School	2723 W. 8th St.	450 K-8 students
45.	Residential project	2929 W. Leeward Ave.	80 condominium units
46.	6th & Virgil	2968 W. 6th St.	399 apartment units and 20,000 sf commercial space
47.	Legal Aid Foundation of LA	1550 W. 8th St.	Replace existing 12,000 sf office building with 34,000 sf office building
48.	AMCAL - Meridian Apartments	241 N. Vermont Ave.	100 apartment units and 5,000 sf retail
49.	Hotel and Restaurant	2965 W. 6th St.	99-room hotel and 545 sf restaurant addition
50.	Hotel and Retail	4110 W. 3rd St.	173-room hotel and 2,780 sf retail
51.	Residential project	459 S. Hartford Ave.	94 apartment units
52.	Mixed-Use	700 S. Manhattan Pl.	161 apartment units and 10,000 sf restaurant
53.	Hotel and Apartments	675 S. Bixel St.	126-room hotel, 425 apartment units, and 4,874 sf retail
54.	Apartment Project	1011 S. Serrano Ave.	91 apartment units
55.	Mixed-Use	1145 W. 7th St.	126 condominium units, 100 apartment units, and 7,200 sf retail
56.	Mixed-Use	3076 W. Olympic Blvd.	226 apartment units and 16,000 sf retail
57.	Mixed-Use	1150 W. Wilshire Blvd.	80 apartment units and 4,589 sf restaurant
58.	Mixed-Use	609 N. Dillon Ave.	Replace existing truck storage area with 137

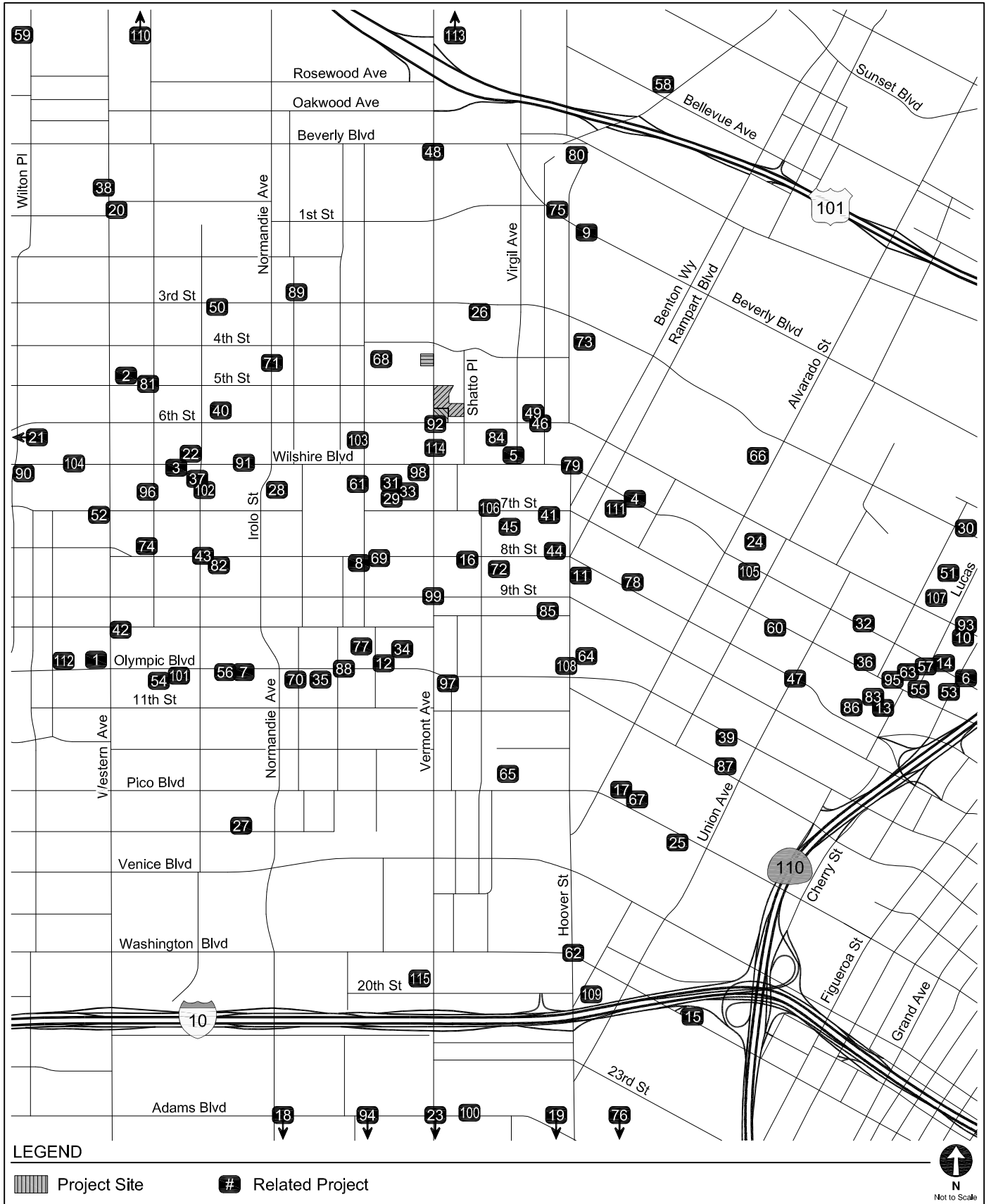
**Table 3-4
Related Projects**

No.	Project Name	Address	Uses
			apartment units and 18,000 sf retail
59.	Apartment Project	525 N. Wilton Pl.	88 apartment units
60.	Restaurants and Bar	1728 W. 7th St.	9,600 sf restaurants and 3,500 sf bar
61.	Apartment Project	3350 W. Wilshire Blvd.	120 apartment units
62.	Pharmacy / Drug Store (CVS)	1302 W. Washington Blvd.	16,572 sf CVS pharmacy / drug store
63.	Apartment Project	1218 W. Ingraham St.	90 apartment units
64.	Residential Project	1011 S. Park View St.	108 apartment units
65.	Apartment Project	1255 E. Elden Ave.	103 apartment units
66.	Apartment Project	422 S. Lake St.	80 apartment units
67.	Charter High School	1929 W. Pico Blvd.	480-student high school
68.	Apartment Project	427 S. Berendo St.	85 apartment units
69.	Mixed-Use	3100 W. 8th St.	100 apartment units and 9,496 sf retail
70.	Apartment Project	1017 S. Mariposa Ave.	79 apartment units
71.	Apartment Project	411 S. Normandie Ave.	224 apartment units
72.	Apartment Project	2859 W. Francis Ave.	81 apartment units
73.	Apartment Project	326 S. Reno St.	65 apartment units
74.	Mixed-Use	3525 W. 8th St.	367 apartment units, 23,000 sf supermarket, and 16,500 sf retail
75.	Apartments and Child Care	3330 W. Beverly Blvd.	40 apartment units and 4,237 sf child care center
76.	USC Children's Creative Learning Center	2716 S. Severance St.	9,955 sf child-care center expansion
77.	Apartment Project	966 S. Dewey Ave.	65 apartment units
78.	Mixed-Use	2405 W. 8th St.	144 apartment units and 4,406 sf retail
79.	Mixed-Use	2900 W. Wilshire Blvd.	644 apartment units and 15,500 sf commercial space
80.	Apartment Project	235 N. Hoover St.	212 apartment units
81.	Mixed-Use	4074 W. 5th St.	119 apartment units and 13,000 sf retail
82.	Apartment Project	815 S. Kingsley Dr.	90 apartment units
83.	Apartment Project	740 S. Hartford Ave.	80 apartment units
84.	Mixed-Use	616 S. Westmoreland Ave.	77 apartment units, 2,360 sf restaurant, and 745 sf retail
85.	2649 San Marino Apartments	2649 W. San Marino Ave.	45 apartment units
86.	1322 Linwood Apartments	1322 W. Linwood Ave.	84 apartment units
87.	1633 W. 11th Charter School	1633 W. 11th St.	460 K-5 students
88.	Mixed-Use	2870 W. Olympic Blvd.	78-room hotel and 16,384 sf retail/restaurant
89.	Postpartum Extended Care and Retail	257 S. Mariposa Ave.	140 apartment units for postpartum care and 3,490 sf retail
90.	Mixed-Use	3986 W. Wilshire Blvd.	228 apartment units, 5,000 sf coffee shop, 5,000 sf restaurant, and 12,000 sf retail
91.	Mixed-Use	3545 W. Wilshire Blvd.	433 apartment units and 49,849 sf retail
92.	Mixed-Use	605 S. Vermont Ave.	103 apartment units and 30,937 sf museum
93.	Sapphire Mixed-Use	1111 W. 6th St.	369 apartment units, 18,600 sf shopping center, 2,200 sf restaurant, and 1,200 sf coffee

**Table 3-4
Related Projects**

No.	Project Name	Address	Uses
			shop
94.	Apartment Project	1322 W. Jefferson Blvd.	80 residential units and 1,400 sf commercial space
95.	Lifan Tower Mixed-Use	1235 W. 7th St.	303 condominium units and 5,959 sf retail
96.	Mixed-Use	3700 W. Wilshire Blvd.	506 condominium units, 40,323 sf retail, and 21,712 sf restaurant
97.	Mixed-Use	1000 S. Vermont Ave.	236 apartment units and 60,300 sf commercial space
98.	Mixed-Use	3240 W. Wilshire Blvd.	162-room hotel and 545 apartment units
99.	Zion Market	888 S. Vermont Ave.	4,400 sf office and 47,208 sf market
100.	K-8 Charter School	1342 W. Adams Blvd.	500 K-8 students
101.	Mixed-Use	3170 W. Olympic Blvd.	252 apartment units and 32,300 sf retail
102.	Harvard Boulevard Hotel	679 S. Harvard Blvd.	110-room hotel and 1,000 sf commercial space
103.	The Nest on Catalina	621 S. Catalina St.	165 apartment units, 8,000 sf retail, 15,000 sf nightclub, and 15,000 sf hall
104.	Apartment Project	3875 W. Wilshire Blvd.	196 apartment units
105.	Mixed-Use	1930 W. Wilshire Blvd.	478 apartment units, 850-seat theater, 50-student classroom, and 220-room hotel
106.	Mixed-Use	2972 W. 7th St.	304 apartment units and 9,735 sf retail
107.	Urban View Lofts Project	495 S. Hartford Ave.	218 apartment units
108.	Olympic & Hoover Mixed-Use	2501 W. Olympic Blvd.	173 apartment units and 36,180 sf commercial space
109.	Medical Office Building	1122 W. Washington Blvd.	60,000 sf medical office building
110.	Mixed-Use	4914 W. Melrose Ave.	45 live/work units and 3,760 sf retail
111.	Mixed-Use	668 S. Coronado St.	122 apartment units and 1,182 sf retail
112.	Urban Commons Gramercy	3377 W. Olympic Blvd.	142 assisted living units, 9,246 sf medical office, and 3,179 sf retail
113.	Hollywood Presbyterian Hospital Seismic Retrofit	1300 N. Vermont Ave.	Replace existing hospital and ancillary uses and build 30,933 sf office
114.	Wilshire Gate Project	631 S. Vermont Ave.	200-room hotel, 250 condominium units, 49,227 sf office, and 21,320 sf retail
115.	1620 Cordova St Charter School	1620 W. Cordova St.	400 students

Source: Gibson Transportation Consulting, 2017.



Source: Gibson Transportation Consulting, Inc., April 2017.

4.1 AESTHETICS

4.1.1. AESTHETICS/VIEWS

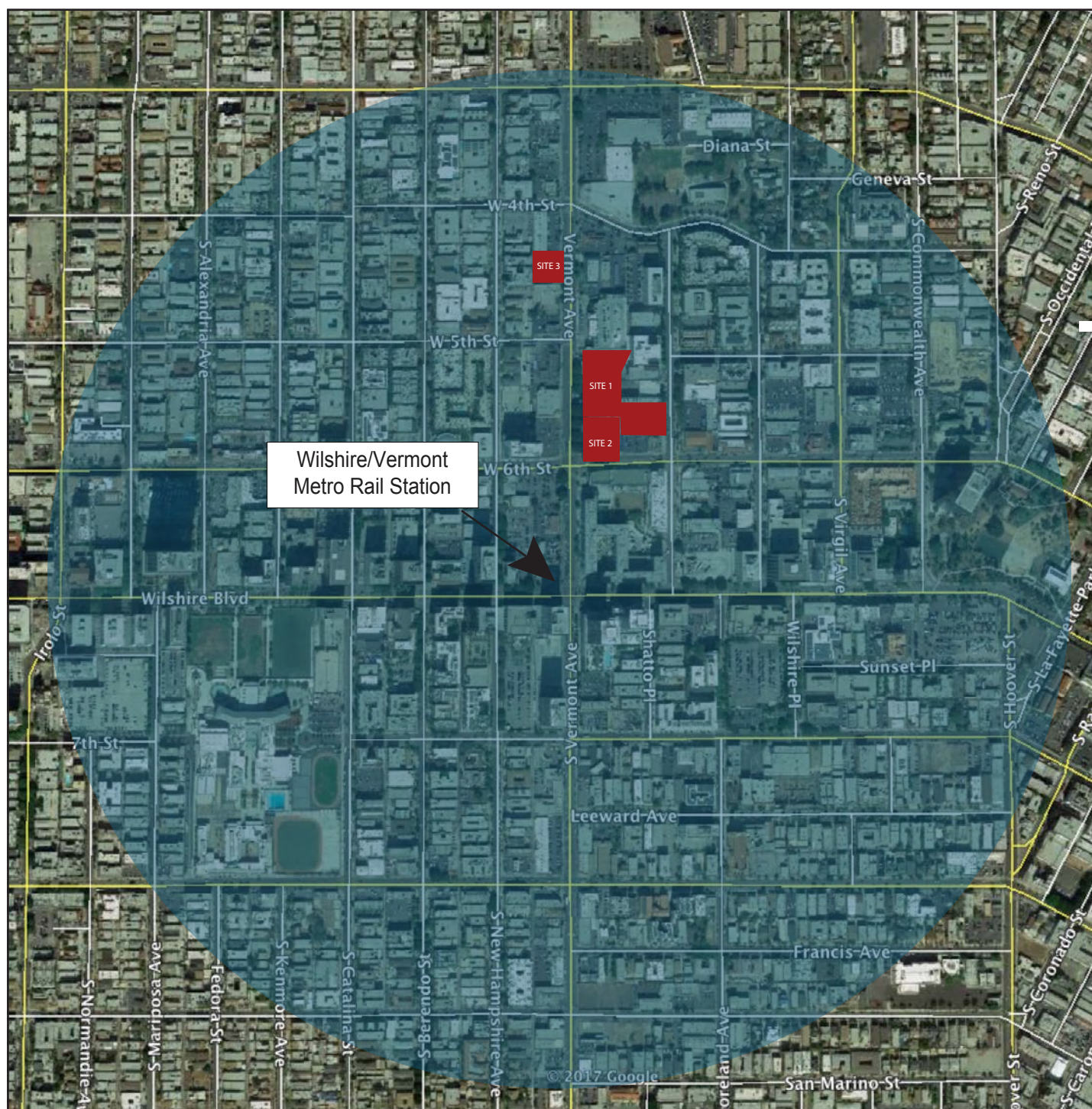
For purposes of this Draft EIR, the area of aesthetics encompasses aesthetics and views, shade/shadow, and light and glare. These topics are discussed under separate subheadings in this section of the Draft EIR.

TRANSIT PRIORITY AREAS

In 2013, the State of California enacted Senate Bill 743 (SB 743), which took effect January 2014. Among other things, SB 743 added Public Resources Code (PRC) Section 21099, which provides that “aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment.” PRC Section 21099(a)(7) defines a “transit priority area” as an area within 0.5 mile of a major transit stop that is “existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” PRC Section 21064.3 defines “major transit stop” as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.” PRC Section 21099 (a)(4) defines an infill site as “a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses.” PRC Section 21099(a)(1) defines an employment center project as “a project located on property zoned for commercial uses with a floor area ratio (FAR) of no less than 0.75 and that is located within a transit priority area.”

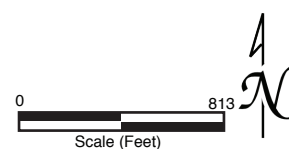
The Project is an infill development. Site 1 development is comprised of a new County 21-story office building over a parking structure and ground floor retail, and a new 11-story parking structure on Shatto Place. Site 2 is comprised of the redevelopment of the existing 12-story County office building into residential units and a new 8-story mixed use residential building with a parking structure and ground floor retail. Site 3 is comprised of the removal of the existing DPR building and the construction of a new six-story, senior affordable housing project with a community recreation center and underground parking. As shown in Figure 4.1.1-1, Site 1 is located approximately 1,025 feet (0.19 miles) from the existing Wilshire/Vermont Metro Rail Red/Purple Line station (an existing major transit stop per PRC 21064.3), located at the northeast corner of the intersection of Wilshire Boulevard and Vermont Avenue. Site 2 is located approximately 700 feet (0.13 miles) from the Wilshire/Vermont Station, and Site 3 is located approximately 1,600 feet (0.3 miles) from the Wilshire/Vermont Station. Accordingly, the Project Sites are located within a Transit Priority Area as defined by PRC 21099.

The Project Sites are located in an area that is developed with urban uses, and have each been previously developed with urban uses. Accordingly, the Project Sites are infill sites as defined in PRC Section 21099. In addition, Site 1 is zoned for commercial uses, and is proposed to be developed with a County office building at an FAR greater than 0.75. As such, Site 1 would represent an employment center project as defined in PRC Section 21099. On Site 2, the existing 12-story County office building would be redeveloped with residential units and a new mixed use residential building with a parking structure and ground floor



- Project Sites
- One-half Mile Radius From The Wilshire/Vermont Metro Rail Station

Source: EcoTierra Consulting and GoogleEarth, 2017.



retail would be constructed. Site 3 would be developed with a senior affordable housing project and community recreation center with underground parking.

Accordingly, proposed development of Sites 1, 2 and 3 would represent residential, mixed-use residential, and/or employment center projects on infill sites in a transit priority area. As such, CEQA provides that aesthetic and parking impacts of the Project shall not be considered significant impacts on the environment. Nonetheless, analyses regarding aesthetics/ views, shade/shadow, and light/glare are provided in this Chapter of the Draft EIR for informational purposes.

INTRODUCTION

This subsection evaluates the potential impacts of the Project on aesthetics and views in the Project area. Aesthetics refers to the overall visual quality of an area or given field of view. Visual character includes aspects such as design, size, shape, color, texture, and the general composition of aesthetic features, as well as the relationships between these elements. Aesthetic features often consist of unique or prominent natural or man-made attributes or several small features that, when viewed together, create a whole that is visually interesting or appealing. Adverse visual quality effects can include the loss of existing aesthetic features of value or the introduction of contrasting features that could contribute to a decline in overall visual character. The analysis of aesthetics presented below focuses on the Project's visual relationship with existing and planned land uses in the Project area.

The analysis of views assesses the Project's potential impacts on visual access to visual resources. In this regard, the analysis considers focal views (i.e., views of a particular object, scene, or feature of visual interest) and panoramic views or vistas (i.e., views of a large geographic area that may be wide and extend into the distance). Building height, mass, and other elements are also considered as they directly relate to view obstruction.

ENVIRONMENTAL SETTING

Existing Conditions

Aesthetics/Visual Quality

Surrounding Locale

The Project Sites are located in an urbanized area. Land uses in the general vicinity of the Project Sites are characterized by a mix of varying levels of intensity residential, commercial, and institutional uses, which vary widely in building style and period of construction. Views of the existing uses in the area of the Project Sites are provided in Figures 3-3 through 3-12 in Section 3.0, Project Description and Environmental Setting, of this Draft EIR. The Hollywood Freeway (US-101), the freeway nearest to the Project Sites, runs southeast-northwest in the Project area, and is approximately one mile to the northeast of the Project Sites. The nearest Metro Rail station (Wilshire/Vermont Station) is located at Vermont Avenue and Wilshire Boulevard, approximately 0.3 miles south of the Project Sites at its furthest point, and is also located at an intersection of two major arterial streets. The confluence of transportation modes has resulted in this area developing as a major activity center in the City.

The physical setting of the Project area consists of the flat portion of the Los Angeles basin, where development in the area has occurred continuously over the last century. Thus, the Project area consists of buildings varying in age that are both historic and modern, occupied primarily by commercial and

institutional uses and multi-family residential development. Overall, there is a lack of uniformity in design among nearby development.

The visual character of the areas immediately surrounding the Project Sites is defined by a number of mid- to high-rise buildings located in the vicinity of the Wilshire/Vermont Metro Rail station, and on 6th Street, which include the existing Project building on Site 2. These buildings dominate the visual environment in this area of the City and include the following (see Figure 4.1.1-2, Locations of High Rise Buildings in the Project Area):

- The Vermont (3150 Wilshire Boulevard) – two towers (22 stories over 6 levels of retail and parking, and 17 stories over 6 levels of retail and parking);
- The Towers on Wilshire (3200 Wilshire Boulevard and 695 Vermont Avenue) – two towers of 13 stories over 5 levels of retail and parking;
- One Park Plaza (3250 Wilshire Boulevard) – 22 story tower;
- Mirae Bank Building (3255 Wilshire Boulevard) – 12 story tower over three retail/parking levels;
- The Summit on 6th (3223 6th Street) – 12 story tower;
- Existing County DMH building (Site 2 - 550 Vermont Avenue) – 12 story tower.

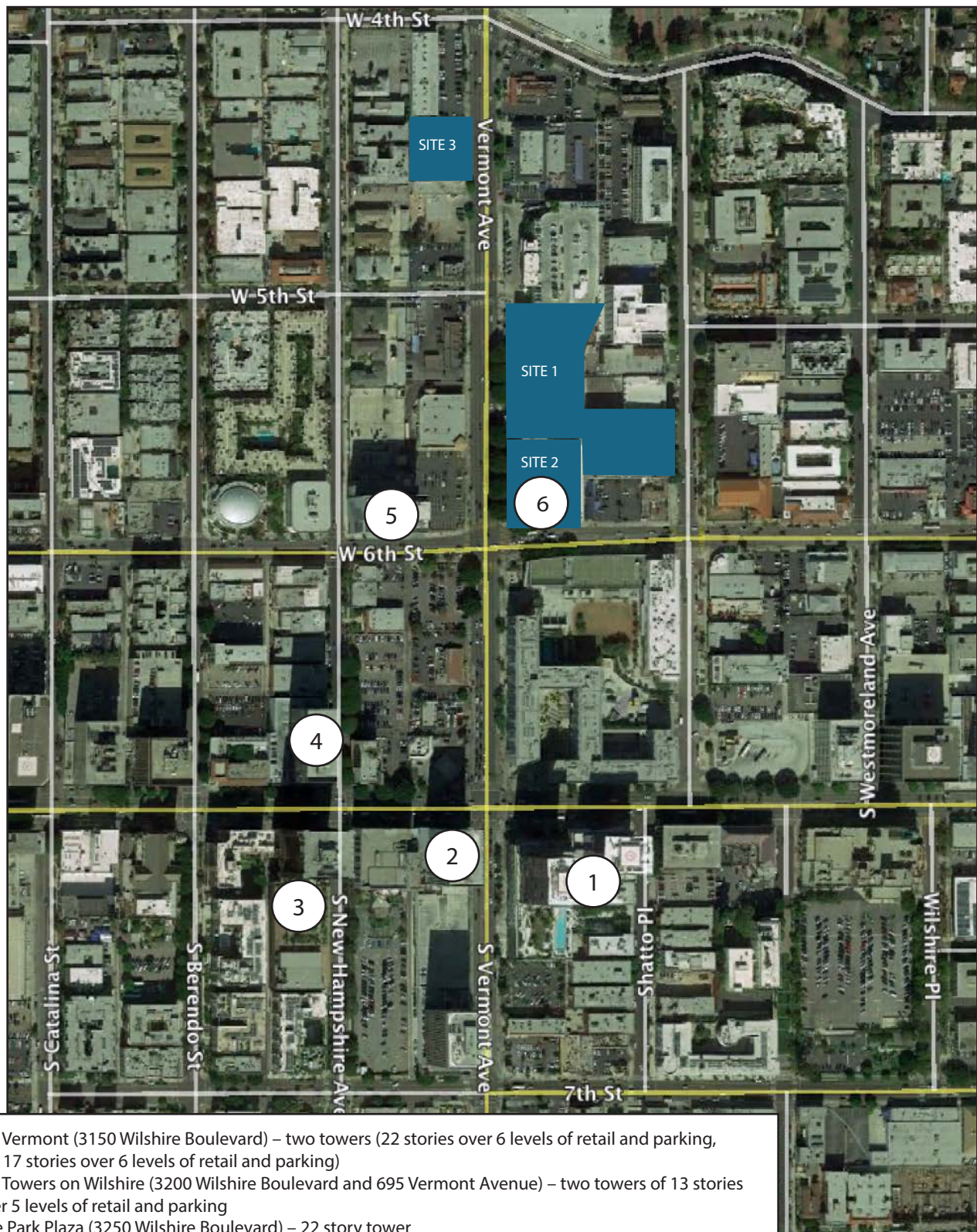
The remainder of the area surrounding the Project Sites is characterized by mid- to low-rise buildings located along Vermont Avenue and 6th Street, including the Wilshire Vermont Towers (seven stories) located atop the Metro Rail Station, the Young Oak Kim Academy (three stories) located to the north of the Project Sites, the Galleria Market (three stories) located north of Site 1, and a two-story commercial center located north of Site 3. These buildings are scattered among one-story commercial and institutional (Islamic Center) buildings and surface parking lots located throughout the area.

Low- to mid-rise office buildings and institutional (New Covenant Academy and Church) uses are located along Shatto Place, providing a visual environment that can be characterized as low to medium density urban development.

Land uses located directly adjacent to the Project Sites include commercial, office, retail, institutional, and multi-family residential uses. Site 1 is bounded by a retail center and parking structure on the north, a Walgreens pharmacy and a car wash across Vermont Avenue to the west, Site 2 to the south, and an office building to the east, north of the existing Shatto Place parking structure. Site 2 is bounded by Site 1 to the north, the Walgreens and a City parking lot across Vermont Avenue to the west and southwest, respectively, Central Middle School and a multi-family residential complex across 6th Street to the south, and a restaurant with a surface parking lot and an auto repair shop to the east. Site 3 is bounded by a retail center with surface parking lot to the north, an apartment building to the west, a vacant auto service center to the south, and a religious institution (the Islamic Center) to the east across Vermont Avenue. Photographs of the Project Sites and immediate surroundings are included in Section 3.0 Project Description and Environmental Setting, Figures 3-3 through 3-12.

Project Sites

The Project Sites are located in the Koreatown/Mid-Wilshire community of the City of Los Angeles. Site 1 is irregularly shaped and approximately 2.5 acres in size, located on the east side of Vermont Avenue, north of 6th Street. Existing development within Site 1 includes a two-story, 30,788 square foot office building that is occupied by DPR along with a 20-space surface parking lot to the north of this building; an unoccupied one-story, 13,325 square foot office building with rooftop parking spaces; a surface parking lot containing 79 spaces located between the two office buildings, and a seven-story, 235,248 square foot



- 1: The Vermont (3150 Wilshire Boulevard) – two towers (22 stories over 6 levels of retail and parking, and 17 stories over 6 levels of retail and parking)
- 2: The Towers on Wilshire (3200 Wilshire Boulevard and 695 Vermont Avenue) – two towers of 13 stories over 5 levels of retail and parking
- 3: One Park Plaza (3250 Wilshire Boulevard) – 22 story tower
- 4: Mirae Bank Building (3255 Wilshire Boulevard) – 12 story tower over three retail/parking levels
- 5: The Summit on 6th (3223 6th Street) – 12 story tower
- 6: Existing County DMH building (Site 2 - 550 Vermont Avenue) – 12 story tower

Project Site

Source: Google Earth, July 2017.

0 520
Scale (Feet)



Shatto Place parking structure (six stories above grade and one story below grade) that connects to the existing occupied County office building and serves all County facilities in the area.

Site 2 is a rectangular, approximately 1 acre site located at the northeast corner of the intersection of Vermont Avenue and 6th Street. Existing development within Site 2 includes a twelve-story, 154,793 square foot office building occupied by DMH; a four-story, approximately 52,000 square foot office building occupied by WDACS; and a 14,010-square foot parking structure with one level below grade and one level at-grade. Site 3 is a rectangular, approximately .5 acre site located on the west side of Vermont Avenue, north of 5th Street. Existing development within Site 3 includes a four-story, 29,292 square foot office building occupied by DPR as well as a 65-space surface parking lot at the rear and north of the existing building. All existing buildings and structures within the Project Sites were built between 1938 and 1963. These buildings are non-descript, with no notable architectural characteristics, and do not contribute to the pedestrian environment along Vermont Avenue and 6th Street adjacent to the existing Project buildings. Site 1 includes limited landscaping with seven City of Los Angeles street trees, and an approximately ten-foot cement block wall with wrought iron bars. Four of these trees are Indian laurel fig trees (*Ficusmircocarpa nitida*) located on Vermont Avenue. The three other trees are carrotwood trees (*Cupaniopsis anacardioides*) located on Shatto Place. Site 2 includes limited landscaping with four City of Los Angeles street trees, and chain link fencing at the door entryway. These trees are Indian laurel fig trees (*Ficusmircocarpa nitida*) located on Vermont Avenue and 6th Street. Site 3 includes limited landscaping, and a ten-foot wrought iron fence near the building at the ground level.

Visual Resources

The Project Sites are located in an urbanized setting and are surrounded by commercial, institutional, parking, and multi-family residential uses. There are no scenic vistas or prominent topographical features that would provide scenic vistas nor are there scenic corridors or expansive views available at or in the vicinity of the Project Sites.

The nearest designated scenic highway to the Project Sites is Highland Avenue, north of Wilshire Boulevard; Highland Avenue is approximately three miles west of the Project Sites.¹ The Project Sites are not located along or within the scenic vistas or viewsheds of this scenic highway.

There are no tall or topographic features on the Project Sites from which scenic vistas may be viewed, or that make up part of the scenic landscape of the surrounding community. The Project Sites are located approximately three miles south of the Hollywood Hills. Because of this distance, and the blockage of the views by the surrounding mid-rise uses, the Hollywood Hills do not provide a substantial scenic resource in this area. No other visually prominent scenic resources are located in the vicinity of the Project Sites. As noted above, the visual environment on and in the vicinity of the Project Sites is characterized by the existing urban development with no iconic or historic buildings in the vicinity of the Project Sites and no views of the downtown skyline available. The only historical resource in the vicinity of the Project is located at 432-436 South New Hampshire Avenue, which is immediately west of Site 3. The historical resource is the Brynmoor Apartments Neon Roof Sign, which is designated Los Angeles Historic-Cultural Monument #641. At the time of its construction, the Brynmoor Apartments Neon Roof Sign was oriented towards Wilshire Boulevard and visible from this major automobile thoroughfare. However, while the roof sign is visible from Vermont Avenue, it is primarily oriented towards Wilshire Boulevard, the major

¹ California Scenic Highway Mapping System, State of California Department of Transportation, website: <http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm>, and City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, Scenic Highways, September 1, 1996.

thoroughfare when the building was constructed, and only minimally visible from Vermont Avenue. This secondary view of the sign would be obscured. Furthermore, the intersection of Vermont Avenue and Wilshire Boulevard is not identified by the City or the County as an important view location, and it is not a defined scenic resource. The new building would introduce a new visual element to the setting of the Brynmoor Apartments Neon Roof Sign; however, the setting in Wilshire Center is already characterized by a variety of mid and high-rise buildings that obscure views of the roof sign from the primary view from Wilshire Boulevard and secondary view from Vermont Avenue.

Existing Views

Public views are those which can be seen from vantage points that are publicly accessible, such as streets, freeways, parks, and vista points. These views are generally available to a greater number of persons than are private views. Private views are those that can be seen from vantage points located on private properties. The views associated with the Project Sites are discussed in detail in the following paragraphs.

A range of low- to high-intensity commercial and residential land uses define the viewsheds in the Project area, with multiple high-rise structures located along Wilshire Boulevard (south of the Project Sites) and a smaller number of taller buildings (including the existing County DMH building) along 6th Street (west of Site 2). The remainder of the area is characterized by mid- to low-rise residential, commercial, and institutional buildings.

At the street level, views are limited predominantly to those available from Vermont Avenue, Wilshire Boulevard and 6th Street. No visually prominent scenic resources are located in the area of the Project Sites. The existing viewsheds are defined primarily by existing urban development and the existing urban development prevents the availability of expansive scenic views from around the Project Sites.

Views From the Project Sites

The Project Sites are located in an urbanized setting. As a result, the Project Sites provide direct public views of surrounding low- to mid-rise commercial and residential development to the north, west, and east. Direct views of high rise development to the south are available from Site 2 and Site 3 (most view lines to the south from Site 1 are blocked by the existing Site 2 building).

Views Of and Toward the Project Sites

The area of the Project Sites is relatively flat. The Project Sites contain existing urban development, characterized by non-descript buildings, with no discernible architectural characteristics, with walls and fencing and limited landscaping at the ground level. Only the existing 12-story DMH building is at all prominent. The other two- to four-story buildings are not visually discernible from the surrounding development. Public vantage points are primarily available from area roadways, most notably Vermont Avenue and 6th Street. Due to the surrounding development, distant public views of the Project Sites are not available.

Several public parks and recreation facilities are located in the Project area. The closest recreation facility to the Project Sites is Shatto Recreation Center, located approximately 0.15 miles northeast of Site 3. However, due to the existing development, views of the Project Sites and the mid-rise buildings in the immediate area are not available from this facility.

Views Through the Project Sites

Due to the location of the Project Sites and existing surrounding development, there are no expansive views through the Project Sites. Moreover, no scenic or visual resources are located in the vicinity of the Project Sites.

Regulatory Framework

Federal

No federal aesthetic regulations apply to the Project.

State

California's Scenic Highway Program was created by the Legislature in 1963. Its purpose is to protect and enhance the natural scenic beauty of California highways and adjacent corridors through special conservation treatment. State laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263. A highway may be designated scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes upon the traveler's enjoyment of the view. The California Department of Transportation (Caltrans) defines a State Scenic Highway as any freeway, highway, road, or other public right-of-way that traverses an area of exceptional scenic quality. Eligibility for designation as a State Scenic Highway is based on vividness, intactness, and unity of the roadway. No State-designated scenic highways are located in the area of the Project Sites.

County of Los Angeles

County of Los Angeles General Plan, Conservation and Natural Resources Element

The Conservation and Natural Resources Element includes policies intended to protect open space-related resources, including land and water areas devoted to recreation, scenic beauty, and the conservation and use of natural resources. As noted above, no scenic resources are located in the area of the Project Sites.

County of Los Angeles General Plan, Land Use Element

The Land Use Element provides strategies and planning tools to facilitate development and revitalization efforts. It includes goals and policies aimed at encouraging a more concentrated urban development pattern through the revitalization of deteriorating urban areas, infilling of bypassed lands and focusing new urban development in the most suitable locations. The Land Use Element also includes policies intended to conserve natural resources and ensure compatibility between new development and the natural and manmade environment.

City of Los Angeles

General Plan Framework

As discussed in further detail in Section 4.9 (Land Use and Planning) of this Draft EIR, the *City of Los Angeles General Plan Framework Element* (the "Framework") includes a Long Range Land Use Diagram for the Metro region, which identifies all three Project Sites as being located in a Regional Center. According to the Framework's Long-Range Land Use Diagram for the Metro region, a Regional Center is an area

targeted for high-density land uses, and a focal point of regional commerce, identity, and activity.² Regional Centers generally have a range of floor area ratios from 1.5:1 to 6.0:1 and are characterized by buildings ranging from 6 to 20 stories high (or higher).

The Urban Form and Neighborhood Design chapter of the Framework establishes the goal of creating a livable city for existing and future residents; a city that is attractive to future investment; and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and citywide scales.

Wilshire Community Plan

As discussed in further detail in Section 4.9 (Land Use and Planning) of this Draft EIR, the Wilshire Community Plan (the “Community Plan”) guides land uses on the Project Sites and in the surrounding areas (the “Community Plan Area”, or “CPA”). Although the land use designations in the Community Plan are not directly applicable to Sites 1 and 3, the Plan establishes the vision for the long-term development of the CPA, which would also work to establish the visual environment of the area. The Community Plan designates the Project Sites for Community Commercial land uses. The Site 1 City zoning classification is C2-1 (Commercial, Height District 1) for the office buildings and surface parking lot areas, and the zoning classification for the existing Shatto Place parking structure is PB-1 (Parking Building, Height District 1). Sites 2 and 3 are zoned C2-1. An assessment of the Project’s compliance with the purpose of the Community Plan is analyzed in greater detail in Section 4.9 (Land Use and Planning) of this Draft EIR.

Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the General Plan Framework’s urban design principles and are intended to be used by City Planning Department staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the General Plan Framework and Community Plans. By offering more direction for proceeding with the design of a project, the Citywide Design Guidelines illustrate options, solutions, and techniques to achieve the goal of excellence in new design. The Citywide Design Guidelines, which were adopted by the City Planning Commission in July 2013, are intended as performance goals and not zoning regulations or development standards, and therefore do not supersede regulations in the LAMC. As stated in the Citywide Design Guidelines, although each of the Citywide Design Guidelines should be considered in a project, not all of them will be appropriate in every case, as each project will require a unique approach, and “flexibility is necessary and encouraged to achieve excellent design.”³ The City’s Urban Design Studio, which is part of the City of Los Angeles Department of City Planning, considers the Citywide Design Guidelines and other applicable planning documents when reviewing development proposals.⁴ Accordingly, the elements of the Citywide Design Guidelines are considered in the aesthetic impact analysis for Site 2 along with project-specific input received during the City’s urban design review processes, which has been applied to the Project.

² City of Los Angeles Department of City Planning, *City of Los Angeles General Plan Framework, Long Range Land Use Diagram*, Metro.

³ Los Angeles Department of City Planning, *Commercial Citywide Design Guidelines, Pedestrian-Oriented/Commercial and Mixed-Use Projects*, May 2011, p. 5.

⁴ Los Angeles Department of City Planning, *Urban Design Studio*, <http://urbandesignla.com/about.php>, accessed December 8, 2016.

Walkability Checklist

In January of 2007, the Department of City Planning created the *Walkability Checklist: Guidance for Entitlement Review* (Walkability Checklist). The purpose of the Walkability Checklist is to guide the Department of City Planning, as well as developers, architects, engineers, and all community members, in creating enhanced pedestrian movements, access, comfort, and safety contributing to overall walkability throughout the City. Each of the implementation strategies in the Walkability Checklist should be considered in a project, although not all strategies would be appropriate in every project. In this case the Walkability Checklist would only be applicable to Site 2. While the Walkability Checklist is neither a requirement nor part of the Planning and Zoning Code, it provides guidance for consistency relating to the policies contained in the City Framework. Incorporating these guidelines into a project's design encourages pedestrian activity, more adequate forms, and place making.

City of Los Angeles Planning and Zoning Code

All on-site development activity on Site 2 is subject to the Planning and Zoning Code. The Planning and Zoning Code includes development standards for the various districts in the City of Los Angeles. Sites 2 is zoned C2-1.⁵

C2 is a commercial zone, which allows for the construction of a variety of commercial uses, including retail stores, offices, restaurants, parking structures, as well as hotel and multi-family residential uses. The Project would include uses that are within these categories and would therefore be consistent with the C2 zoning designation.

Site 2 is located within Height District 1. Height District 1 permits development at a Floor Area Ratio (FAR) of 1.5:1 with no height limit (i.e., height is only limited by the allowable floor area). Although the existing Site 2 office building exceeds the C2-1 1.5:1 floor area, the Adaptive Reuse Specific Plan nevertheless permits adaptive reuse of the existing commercial square footage for residential and ground floor commercial uses. However, the new construction proposed at Site 2 would require entitlements from the City of Los Angeles to exceed the 1.5 to 1 floor area limitation otherwise allowed by the C2-1 zone/height district.

ENVIRONMENTAL IMPACTS

Methodology

Aesthetics

The analysis of aesthetics considers the visual quality of the area immediately surrounding the Project Sites and the impacts of the Project with respect to the existing aesthetic environment. The analysis evaluates the visual impacts that the Project would have on the overall visual environment of the Project area and whether the Project development would be compatible with and would respect surrounding development. Specifically, the analysis considers the physical aspects of the Project and its associated

⁵ For disclosure purposes, the Site 1 City zoning classification is C2-1 (Commercial, Height District 1) for the office buildings and surface parking lot areas, and the zoning classification for the existing Shatto Place parking structure is PB-1 (Parking Building, Height District 1). Sites 3 is zoned C2-1.⁵ However, as discussed above, City zoning and building requirements do not apply to Sites 1 and 3.

design features, and includes renderings showing future conditions at representative locations where the Project is visible from the public right-of-way.

Views

The analysis of views evaluates the changes to existing public views that may result from Project development. The intent of the analysis is to determine if valued view resources are visible in the Project area and whether visual access to such resources would be blocked or diminished as a result of the Project. The analysis further considers whether the Project would enhance viewing conditions through the creation of new resources and whether the Project includes design features that would offset or mitigate specific impacts.

To determine whether a potential view impact would occur, a three-step process is used to weigh several considerations, as follows:

- Step 1:** Define the view resources that could be affected by proposed development.
- Step 2:** Identify the potential obstruction of view resources as a result of development of the particular Project Site.
- Step 3:** Evaluate whether a potential obstruction would substantially alter the view. The “substantiality” of an alteration in viewing is somewhat subjective and dependent on many factors. In this case, an obstruction in the view of a particular view resource is considered to be substantial if it exhibits the following traits:
 - (1) the area viewed contains a valued view resource;
 - (2) the obstruction of the resource covers more than an incidental/small portion of the resource; and
 - (3) the obstruction would occur along a public view area.

Thresholds of Significance

The following threshold questions have been included in accordance with guidance provided in Appendix G to the State CEQA Guidelines:

- Threshold 4.1.1-1:** Would the Project have a substantial adverse effect on a scenic vista?
- Threshold 4.1.1-2:** Would the Project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?
- Threshold 4.1.1-3:** Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?

An affirmative answer to any of these questions would represent a significant impact. The Project Sites are located in an urbanized setting and are surrounded by commercial, institutional, parking, and multi-family residential uses. There are no scenic vistas or prominent topographical features that would provide scenic vistas nor are there scenic corridors or expansive views available at or in the vicinity of the Project Sites. Furthermore, the nearest designated scenic highway to the Project Sites is Highland Avenue, which

is approximately three miles west of the Project Sites. Accordingly, the Project Sites are not located along or within the scenic vistas or viewsheds of this scenic highway. As such, no further analysis of Thresholds 4.1.1-1 and 4.1.1-2 is necessary. These topics are addressed in Section 6.5, Effects Found Not to be Significant, of this Draft EIR.

Project Design Elements

The Project would include one structure up to 280 feet in height that would accommodate governmental offices and commercial retail, three structures that would be 173, 105 and 95 feet in height, respectively, that would accommodate multi-family residential, and community recreation center, and a structure up to 130 feet in height that would accommodate parking uses. The design characteristics of the Project as set forth in Section 3.0, Project Description and Environmental Setting, of this Draft EIR provide characteristics of the proposed Project buildings that would define their contribution to the visual environment on and in the vicinity of the Project Sites.

Impact Analysis

Threshold 4.1.1-3: Would the Project substantially degrade the existing visual character or quality of the site and its surroundings?

Construction

Construction activities typically contrast with, and disrupt the general order and existing aesthetic character of a given location or area. As proposed, the Project would be constructed in two phases. Site 1 and Site 3 would be developed in Phase I, which is anticipated to begin in summer 2018 and summer 2019, respectively. Construction activities on Site 1 and Site 3 are expected to be completed by summer of 2019 and 2020, respectively. Site 2 would be developed in Phase II, which is anticipated to begin in fall 2021 and completed by late 2023.

Project construction activities would include the demolition and removal of certain existing uses; site preparation, grading, and excavation; staging of construction equipment and materials; construction of structures; and the installation of landscaping and hardscaping. The construction activity would vary on a weekly basis, depending largely on the number of workers and construction trucks needed for the activities occurring during each time period. Although temporary in nature, these construction activities would alter the visual appearance of the Project Sites and would be visible to pedestrians and motorists on adjacent streets, as well as to viewers within nearby buildings. However, the Project Sites' appearance during construction would be typical of construction sites in urban areas. Temporary barriers, which would likely be K-rail and plywood extending to eight feet in height, would be installed around each of the Project Sites during construction to screen the construction activities and equipment from street level views.

Construction activities typically include both a disturbance in existing natural and man-made features and the development of structures, which, at least temporarily, are devoid of external treatments designed to improve visual character. These could cause substantial changes in visual character if they occur within close proximity to surrounding viewsheds, and are uncharacteristic of the existing setting. However, no visually prominent scenic resources are located in the area of the Project Sites. The existing viewsheds are defined primarily by existing urban development, and the existing urban development prevents the availability of expansive scenic views from around the Project Sites. Construction of structures that include the use of temporary towers and cranes could also interfere with existing views. Some Project

construction activities would likely be visible above the ground level barriers from surrounding properties that currently have views of the Project Sites.

In terms of visual character, Project construction activities would result in temporary changes as viewed from the street and from the adjacent buildings. Thus, while Project construction would alter the visual character of the Project Sites, such activities would be partially screened, temporary in nature, and visual impacts associated with construction would cease after completion. Based on the above, Project construction activities would not substantially alter or degrade the existing visual character of the Project Sites or surrounding area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

Operation

Height and Massing

The Project would involve development of the Project Sites as described below.

Site 1

Proposed development on Site 1 would involve removal of the existing DPR office building, vacant office building, surface parking lots, and parking structure, and construction of a new County office building containing 471,000 square feet of office use over a 390,000-square foot parking structure containing 965 spaces, and 10,000 square feet of ground floor retail. The proposed office building would be up to 280 feet in height to the top of the parapet (286 feet to top of elevator machine room, 296 feet to top of emergency helistop), and would consist of 21 total stories (13 office floors over an eight-story parking structure (seven levels above grade and one level at grade)). In addition, a new parking structure would be constructed on the site of the existing seven-story parking structure on Shatto Place. This new structure would contain 768 spaces within a 380,000-square foot, 11-story building with two below grade levels that would serve the new office building. The new parking structure would be up to 110 feet in height to the top of the parapet (130 feet to top of elevator machine room).

Site 2

Proposed development on Site 2 would involve reuse and conversion of the existing 154,793 square foot, 12-story DMH building into a maximum of 172 residential units, 4,100 square feet of ground floor retail, 1,375 square feet of ancillary space, and an approximately 7,500 square foot roof deck amenity. The existing building height of 173.5 feet (including the elevator machine room) would not change under the Project. In addition, the development of Site 2 would involve removal of the existing four-story, approximately 52,000 square foot, WDACS office building and two-story parking structure, and construction of a new 116,324 square foot, five-level parking structure (3.5 levels above grade and 1.5 levels below grade). A future option for the development of Site 2 would include construction of a new 66,935 square foot, mixed-use building above the parking structure, containing five residential levels and 74 units, and 2,250 square feet of ancillary space. In addition, 3,400 square feet of retail uses would be provided at the ground level of the new mixed-use building on 6th Street. The new mixed-use building would be approximately 95 feet from the highest adjacent grade to the top of the parapet (105 feet to top of elevator machine room).

Site 3

Proposed development on Site 3 would involve removal of the existing DPR building, and construction of a new 80,837 square foot, six-story, one hundred percent senior affordable housing project containing 72 units, and an approximately 13,200 square foot community recreation center, over a three-story, 51,591 square foot underground parking structure containing 116 spaces. The new building would be 65 feet in height to the top of the parapet (75 feet to top of elevator machine room).

The size and nature of the Project development would result in greater building mass and density at each of the Project Sites compared to existing conditions. The new County office building on Site 1, with a 13-story office tower over one at grade and seven above-ground parking levels, would represent a substantial change from the existing one- and two-story structures on this Site. Furthermore, this new structure would be visually prominent in this area as a result of both its height and mass. The new Shatto Place parking structure on Site 1 would occupy the same footprint as the existing parking structure, but would be 11 stories, approximately four stories taller than the existing structure.

The redevelopment of the existing Site 2 DMH building would result in similar height and mass as the existing building, approximately 12 stories. However, the new mixed use building would be eight stories, approximately four stories taller than the existing four-story building.

Existing development within Site 3 includes a four-story, office building occupied by DPR as well as a 65-space surface parking lot at the rear and north of the existing building. The height of the building on Site 3 would increase from a four-story structure to a six-story structure.

Furthermore, the changes in height and mass of buildings on the Project Sites would be consistent with height and mass of other buildings located in the area. Specifically, the Project Sites height and massing would be similar to The Vermont's 23-story and 28-story high-rise buildings on Wilshire Boulevard and the 12-story residential building to the west of Site 2 on 6th Street. In addition, the Project Sites would be in keeping with the character of the project area which is centered on the Wilshire/Vermont Metro Rail station. Even with the increased height and mass, the proposed new and redeveloped buildings on the Project Sites would represent a notable improvement in the appearance of the Project Sites. With the exception of the Site 1 County office building, the other new development would only be an incremental increase from existing buildings (i.e., four stories to eight stories, and lower than the 12-story County office building that would be redeveloped, on Site 2, and four stories to six stories on Site 3).

Visibility of the Project Sites

The Project would substantially increase the visibility of the Project Sites, particularly Site 1, from a distance, as compared to existing conditions. Due to the height of the new County office building on Site 1, the County office building would likely be visually prominent from the surrounding area. This increased visibility would occur on nearby roadways and adjoining sidewalks, including Vermont Avenue, Wilshire Boulevard and 6th Street. The intersection of Vermont Avenue and Wilshire Boulevard is approximately 0.18 miles southwest of Site 1. Additionally, the greater height and mass would increase the visibility of Site 1 from nearby residential and commercial properties. Although there is a public park in the Project area (Shatto Recreation Center), the new County office building likely would not be visible from this park due to distance and intervening development. Even with increased prominence, however, the Project at Site 1 would be visually integrated with the existing character of the area south of Site 1, because the area is characterized by high-rise development in an urbanized setting. In addition, most view lines of Site 1 from the south are blocked by the existing Site 2 building.

As discussed previously, the visual character of the areas immediately surrounding the Project Sites is defined by a number of mid- to high-rise buildings located in the vicinity of the Wilshire/Vermont Metro Rail station, and on 6th Street, which include the existing Project building on Site 2. These buildings dominate the visual environment in this area of the City and include the following (see Figure 4.1.1-2, Locations of High Rise Buildings in the Project Area):

- The Vermont (3150 Wilshire Boulevard) – two towers (22 stories over 6 levels of retail and parking, and 17 stories over 6 levels of retail and parking);
- The Towers on Wilshire (3200 Wilshire Boulevard and 695 Vermont Avenue) – two towers of 13 stories over 5 levels of retail and parking;
- One Park Plaza (3250 Wilshire Boulevard) – 22 story tower;
- Mirae Bank Building (3255 Wilshire Boulevard) – 12 story tower over three retail/parking levels;
- The Summit on 6th (3223 6th Street) – 12 story tower;
- Existing County DMH building (Site 2 - 550 Vermont Avenue) – 12 story tower.

The remainder of the area surrounding the Project Sites is characterized by mid- to low-rise buildings located along Vermont Avenue and 6th Street, including the Wilshire Vermont Towers (seven stories) located atop the Metro Rail Station, the Young Oak Kim Academy (three stories) located to the north of the Project Sites, the Galleria Market (three stories) located north of Site 1, and a two-story commercial center located north of Site 3. These buildings are scattered among one-story commercial and institutional (Islamic Center) buildings and surface parking lots located throughout the area. There is no consistent architectural style that presently characterizes the area of the Project Sites.

Moreover, new Project development on all Project Sites would provide urban-scale development that would be reflective of the expected visual character of the area as it develops in accordance with adopted City of Los Angeles land use plans, including the Wilshire Community Plan, which envision the concentration of development in transit station areas in the future.

Architectural Design

The overall effect of the Project with respect to design would be to improve the current appearance of the Project Sites and to provide an aesthetically pleasing and pedestrian-friendly scale and atmosphere along Vermont Avenue and 6th Street. The existing buildings on the Project Sites were built in the 1950s and 1960s and do not include any noteworthy architectural design features. The Project would upgrade the architectural quality of all three Project Sites through the construction of new buildings and upgrading of the existing County office building on Site 2. At each Site, the Project would integrate a pedestrian scale design, including locating building entrances at grade, the use of a variety of textures, materials, signage, and architectural features appropriate to each Project Site, including eco-friendly building materials, non-volatile organic compound paints/adhesives, drought-tolerant planting, and high performance exterior sheathing on the buildings, thereby minimizing the effects of building mass and blank street walls. The Project's ground floor commercial spaces on Vermont Avenue (Sites 1 and 2) and 6th Street (Site 2) would serve to activate the street level along Vermont Avenue and improve the pedestrian experience. The buildings would be modern in style. In addition, Section 3.0 Project Description and Environmental Setting of the Draft EIR, provides an illustration of the access entry points to the Project Sites in Figures 3-13, 15, and 17.

The Site 1 building has been designed in 360 degrees with no one side containing less architectural detail in building textures and materials. Entrances would be provided both from Vermont Avenue and from the new Shatto Place parking structure. The Vermont Avenue entrance would be designed to

accommodate employees and visitors arriving at Site 1 by transit. The proposed building features ground level retail and lobby areas along Vermont Avenue that consist of high storefront glazing which fronts a concrete parking structure podium clad above ground level with horizontal and diagonal aluminum fins in combination with metal mesh screen. This transitions up to a steel structure office tower consisting of a high-performance aluminum curtainwall glazing system with extruded aluminum fins to maximize energy performance and to carry the building aesthetic up from the ground floor level. The building also includes a spacious outdoor terrace level that serves as primary building entry for the Department of Mental Health. The terrace level consists of architectural concrete, a large operable glass folding wall and substantial landscaping to support an indoor/outdoor working environment.

The Shatto Parking would be a concrete structure with an architectural metal mesh screen along Shatto Place to create an architecturally unifying design.

The redevelopment of the existing DMH building on Site 2 would involve removal of the existing exterior materials and construction of a new exterior façade using energy efficient thermal glass and new structural reinforcement members acting as an exoskeleton structural rehabilitation. The design is meant to create a one of a kind architectural expression that is differentiated from the new office building, but that still compliments the area and the new County office tower.

A new three-story concrete parking structure with five levels of residential units above would be constructed to the East of the existing building. Figure 4.1.1-3 illustrates the proposed views of Project Sites 1 and 2 as seen from Vermont Avenue.

Construction of the new senior affordable housing and community recreation center project on Site 3 would provide a contemporary architectural design utilizing building textures, neutral color tones, and materials such as board formed concrete, cementitious siding, reveal panel system, and Portland cement that would also create visual interest on the segment of Vermont Avenue between 4th and 5th Street. Figure 4.1.1-4 shows the view of the affordable housing and community recreation center project on Site 3 from Vermont Avenue.

Landscaping

The Project's ground floor plan contains enhanced landscaping designed to improve the pedestrian experience on the Project's Vermont Avenue frontage on all three Project Sites. Figure 4.1.1-5 illustrates the street level view of Sites 1 and 2 as seen from Vermont Avenue. On Site 1, the Project includes sidewalk improvements and construction that would significantly impact seven City of Los Angeles Street Trees, and ten non-protected significant trees located within Site 1. The seven street trees would be replaced at a 2:1 ratio to the satisfaction of the City of Los Angeles Urban Forestry Division, for a total of fourteen (14) new street trees. The ten non-protected significant trees would be removed and replaced at a ratio of 1:1 upon the completion of construction, for a total of 24 new trees on Site 1.



Source: Gensler/Steinberg, 2017.



Source: Meta Housing/Y&M Architects, 2017.



Source: Gensler, 2017.

On Site 2, the Project includes sidewalk improvements and construction that will significantly impact four City of Los Angeles Street Trees, and ten non-protected significant trees within Site 2 would be removed and replaced at a ratio of 1:1 upon the completion of construction, for a total of 18 new trees on Site 2. Landscaping would also be provided on 6th Street adjacent to Site 2, and on Vermont Avenue adjacent to Site 3.

No trees would be impacted on Site 3, so no trees would be replaced.

Conclusion

Thus, while Project construction would alter the visual character of the Project Sites, such activities would be partially screened, temporary in nature, and visual impacts associated with construction would cease after completion. Based on the above, Project construction activities would not substantially alter or degrade the existing visual character of the Project Site or surrounding area.

The Project's architectural design described above and orientation on the Project Sites, would be integrated into the Project area by incorporating appropriate design, architecture, size, and massing. In addition, the Project's location, height, scale, and architectural features are generally compatible with the existing and planned development for the Wilshire Community Plan Area. As stated above, the visual character of the areas immediately surrounding the Project Sites is defined by a number of mid- to high-rise buildings located in the vicinity of the Wilshire/Vermont Metro Rail station, and on 6th Street, which include the existing Project building on Site 2. These buildings dominate the visual environment in this area of the City. Moreover, new Project development on all Project Sites would provide urban-scale development that would be reflective of the expected visual character of the area as it develops in accordance with adopted City of Los Angeles land use plans, including the Wilshire Community Plan, which envision the concentration of development in transit station areas in the future. Thus, the Project would not substantially degrade the existing visual character of the Project Sites or surrounding area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

CUMULATIVE IMPACTS

As indicated in Section 3.0, Project Description and Environmental Setting, of this Draft EIR, there are 115 related projects in the vicinity of the Project Sites. The related projects generally consist of infill development and redevelopment of existing uses, including mixed-use, residential, office, and hotel developments. There are 3 related projects located near the Project Sites. These proposed developments comprise a variety of uses, including apartments, as well as mixed-use developments, consistent with existing uses in the area. While precise building designs are not yet known for much of the related development proposed in the area, based on the nature of such proposals and in light of continued population increases, it is evident that building densities are increasing in the Wilshire Community Plan Area, which will likely entail general increases in the height, mass, and scale of buildings throughout the area. However, only those projects that would be sufficiently close to influence the visual character of the immediate Project area, that fall within the same viewshed as the Project, or affect the same off-site sensitive uses could pose cumulative effects in conjunction with the Project.

Cumulative impacts regarding aesthetics may occur if any of the related projects are located in close enough proximity to the Project Sites to combine with the Project and result in significant adverse changes in the visual quality and character of the surrounding area. As shown in Figure 3-22 in Section 3.0, Project Description and Environmental Setting, of this Draft EIR, there are three related projects that are located

sufficiently close to the Project Sites to enter the same field of view as the Project: Related Project No. 68, No. 84, and No. 92. With respect to visual quality and character, these related projects would be similar to or smaller in scale than the Project and generally representative of the existing urban fabric and character in the area. Therefore, it is not anticipated that future development, inclusive of the Project and nearby related projects, would substantially alter, degrade, or eliminate the existing visual character of the Project area, including valued existing features or resources, or introduce elements that would substantially detract from the visual character of the area.

In general, related projects have the potential to block views from local streets and other public vantages throughout a Project area. With respect to the Project, the views most likely to be affected on a cumulative basis are views of the Hollywood Hills. As previously indicated, the Project would not affect views of the Hollywood Hills. Related Project Nos. 68, 84, and 92 are located sufficiently close to the Project Sites to enter the same field of view as the Project. Cumulative impacts would occur if the Project and the three closest related projects would further obstruct views of these valued visual resources. Due to the location of the Project and the three closest related projects views of the Hollywood Hills would remain intermittent similar to the existing uses due to the distance to the Hollywood Hills, and the height of the surrounding uses.

The study area for the analysis of cumulative aesthetic impacts includes areas with views of the Project Sites, which occur in certain portions of the Wilshire Community Plan Area. Development of the Project in combination with the related projects located within the CPA would result in an intensification of land uses in an already urbanized area of the City. However, anticipated growth would continue to be guided by the Community Plan and other planning tools that anticipate the continued densification and concentration of development in this area of the City. Consequently, no changes in the nature or land use of various communities that would substantially degrade the area would be permitted to occur under the Community Plan and CEQA review, thereby protecting the visual character of the area. Thus, development of the Project in combination with the related projects located in the Wilshire Community Plan Area would not result in adverse cumulative visual compatibility impacts. As such, cumulative aesthetic and view impacts would not be cumulatively considerable. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are proposed relevant to aesthetics/views, other than the design characteristics of the Project buildings as described in Section 3.0, Project Description and Environmental Setting, of this Draft EIR.

Regulatory Requirements

No Regulatory Requirements are related to aesthetic/ view impacts.

MITIGATION MEASURES

CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

4.1 AESTHETICS

4.1.2. SHADE/SHADOW

INTRODUCTION

The issue of shade and shadow refers to the blockage of direct sunlight for a given amount of time and is a common and expected occurrence in developed areas. Shading can have an adverse impact if it substantially interferes with the enjoyment or performance of sun-related activities. Users or occupants of certain land uses, such as residential, recreational, schools, and outdoor restaurants have expectations for direct sunlight and warmth from the sun. These land uses are termed “shadow-sensitive,” because sunlight is important to function, physical comfort, and commerce. This subsection includes an assessment of several shade-related factors, including the height and size of the building, the proximity and sensitivity of surrounding uses, the season of the year, and the duration of shadow projection. The angle of the sun varies based on 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. This section also includes a depiction of the shadows that would be cast by the Project. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. Therefore, the following analysis regarding shading is provided for informational purposes only.

ENVIRONMENTAL SETTING

Existing Conditions

Shading

Winter and Summer Solstice

“Solstice” is either of the two points on the sun’s elliptic 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 ½° of the arc. At the time of summer solstice, around June 21, 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. At winter solstice, around December 21, the sun is overhead at noon at the Tropic of Capricorn; this marks the beginning of winter in the Northern Hemisphere. Measuring shadow lengths for the winter and summer solstices represents the extreme 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. Shadows cast during the winter solstices generate the longest shadows all year as a result of the angle of the sun.

Spring and Fall Equinoxes

“Equinox” is either of two points of intersection of the sun’s apparent annual path and the plane of the earth’s equator, that is, a point of intersection of the elliptic and the celestial equator. At the equinoxes,

day and night are the same duration as the sun's transit falls on the equator. Shadows cast on the equinoxes are intermediary between the solstices.

Shadow-Sensitive Land Uses

Facilities and operations that are sensitive to the effects of shading generally include, but are not limited to:

- routinely useable outdoor spaces associated with residential or institutional land uses;
- commercial uses, such as pedestrian-oriented outdoor areas or restaurants with outdoor eating areas;
- nurseries;
- existing solar collectors; and
- recreational areas, such as parks.

These land uses are considered to be sensitive because sunlight is important to function, physical comfort, or commerce. The shadow sensitive receptors to Sites 1 and 2 are:

- school use to the south (85 feet);
- school use to the east (90 feet);
- residences to the east (280 feet); and
- residences to the west (300 feet).

The nearest sensitive receptors to Site 3 are:

- adjacent residences to the west (50 feet);
- residences to the north (300 feet);
- residences to the south (335 feet); and
- recreational and residential uses to the northeast (450 feet).

No other shadow-sensitive land uses are located close enough to the Project Sites to be potentially affected by shadows from Project buildings. Non-shadow sensitive uses located in the vicinity of the Project Sites include the Galleria Market, located north of Site 1, office buildings located north of the Shatto Place parking structure, and a commercial center located north of Site 3.

Existing Shadow Patterns

Shadows from the existing buildings on the Project Sites, including the two DPR buildings on Site 1, existing Shatto Place parking structure, existing DMH building and existing WDACS building on Site 2, and existing DPR building on Site 3, are shown in Figures 4.1.2-1 and 4.1.2-2 for the equinox and winter solstice time frames respectively. As shown in Figure 4.1.2-1, equinox shadows from existing buildings on Site 1 cover a small part of the Galleria Market commercial space during the afternoon hours. Existing shadows from the Shatto Place parking structure cover portions of the office buildings to the north throughout the daytime hours, as this structure is immediately adjacent to the office building to the north. Existing shadows from Site 2 only fall on Site 1 and on Vermont Avenue, while existing shadows from Site 3 cover a small portion of the commercial center to the north during portions of the morning and afternoon hours. Existing shadows from Sites 1, 2 and 3 do not fall on any shadow-sensitive receptors during the spring/fall equinox time frame.



EXISTING BUILDINGS

PROPOSED BUILDINGS

Source: Google Earth, December 2016.

0 288 576
Scale (Feet)



Figure 4.1.2-1
Spring/Fall Equinox Shadows
September 22nd and March 22nd



Source: Google Earth, December 2016.

As shown in Figure 4.1.2-2, winter solstice shadows from Site 1 cover part of Vermont Avenue during the morning hours, and a small portion of the Galleria Market commercial space during the afternoon hours. Existing shadows from the Shatto Place parking structure cover portions of Site 1 during the morning hours, and portions of the office buildings to the north during the afternoon hours. Existing shadows from Site 2 extend over the commercial uses on the west side of Vermont Avenue during the morning hours, fall on Site 1 at noon, and fall to the east over the office buildings to the north of the Shatto Place structure during the afternoon hours. Existing shadows from Site 3 cover a small portion of the residential building located to the northwest of Site 3 for a short time during the morning hours, cover a small portion of the commercial center to the north during portions of the morning and afternoon hours, and extend onto Vermont Avenue during the late afternoon hours. Except for the corner of the residential building shaded by the existing Site 3 building for a short period of time in the morning, existing shadows from Sites 1, 2 and 3 do not fall on any shadow-sensitive receptors during the winter solstice time frame.

Regulatory Framework

County of Los Angeles

There are no existing regulations or County ordinances related to shade and shadow that would apply to the Project.

City of Los Angeles

There are no existing regulations or City ordinances related to shade and shadow that would apply to the Project.

ENVIRONMENTAL IMPACTS

Methodology

The effects of shadows on land uses can be positive, such as cooling effects during warm weather, or negative, such as loss of warmth during cooler weather or loss of natural light. Shadow effects are dependent on several factors, including local topography, the height and bulk of a project's structural elements, sensitivity of surrounding uses, season, and duration of shadow projection. In determining the effects of shading, the locations of sensitive uses (such as residential, recreational, schools, and outdoor restaurants) in the surrounding area are identified and the shading effects are calculated according to the proposed building heights and the distance from the sun obstructing structures to the sensitive use.

Shadows have been calculated and plotted for representative hours during the spring and fall equinoxes and winter solstice. Residential, recreational, school, and outdoor restaurant land uses with routinely used outdoor areas and where sunlight may be important to physical comfort or function, are considered sensitive uses. The varying and seasonally adjusted daytime hours represent the period of the day in which the expectation of available sunlight exists. For the purpose of establishing the hours in which significant impacts may occur, winter and spring are described as occurring between late October to early April, and fall is described as occurring between early April and late October.⁶ Summer solstice shadows,

⁶ *City of Los Angeles CEQA Thresholds Guide 2006.*

which occur in June, are shorter than the fall equinox shadows and are therefore not specifically considered in this analysis.

Graphical representations of the shadows that would be cast by the Project's structures have been prepared and provide the basis for the shadow impact analysis in this Draft EIR.

Thresholds of Significance

Appendix G of the State CEQA Guidelines does not include a threshold related to shade/shadow.

The County does not have a numeric threshold for assessing shadow impacts. The County considers shade and shadow impacts significant when they cover shadow-sensitive uses for a substantial amount of time.

The City of Los Angeles, a Responsible Agency under CEQA for this Draft EIR, has adopted specific local thresholds for shading. The City considers that a project would have a significant shading impact if it would cast shadows on shadow-sensitive land uses for more than three hours between the hours of 9:00 AM and 3:00 PM (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM (between early April and late October).

While the County of Los Angeles is not required to utilize the City's local thresholds, the Lead Agency has evaluated those thresholds and has determined based on substantial evidence in the entire record that the application of the City's shading threshold to this Project is appropriate and sufficient to analyze the potential significant environmental effects of the Project. The Project Sites are located in the City and development on the Project Sites would potentially affect off-site uses that are located wholly within the City limits. The City's threshold is not inconsistent with the County's, rather it would provide a more quantitative approach compared to the County's qualitative threshold. Since the City's threshold is more specific and stringent than the County threshold, the following threshold is used in the shade/shadow analysis for the Project.

Threshold 4.1.2-1: Would the Project cast shadows on shadow-sensitive land uses for more than three hours between the hours of 9:00 AM and 3:00 PM (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM (between early April and late October)?

An affirmative answer to this question would represent a significant impact.

Project Design Elements

Project characteristics relevant to shade and shadow are discussed in Section 4.1.1, Aesthetics/Views, above. The design characteristics of the Project as set forth in Section 3.0, Project Description and Environmental Setting, of this Draft EIR provide characteristics of the proposed Project buildings that would define their contribution to shading on and in the vicinity of the Project Sites. No specific Project Design Elements in regards to shade and shadow are proposed.

Impact Analysis

Threshold 4.1.2-1: Would the Project cast shadows on shadow-sensitive land uses for more than three hours between the hours of 9:00 AM and 3:00 PM (between late October and early April), or for more than four hours between the hours of 9:00 AM and 5:00 PM (between early April and late October)?

The Project would involve development of the Project Sites as described below.

Site 1

Proposed development on Site 1 would involve removal of the existing DPR office building, vacant office building, surface parking lots, and parking structure, and construction of a new County office building. The proposed office building would be up to 280 feet in height to the top of the parapet (286 feet to top of elevator machine room, 296 feet to top of emergency helistop), and would consist of 21 stories. In addition, a new parking structure would be constructed on the site of the existing seven-story parking structure. This new structure would be approximately 11 stories, up to 110 feet in height to the top of the parapet (130 feet to top of elevator machine room).

Site 2

Proposed development on Site 2 would involve reuse and conversion of the existing 12-story DMH building into a 12-story, mixed use structure. The new mixed-use building would be approximately 95 feet from the highest adjacent grade to the top of the parapet (105 feet to top of elevator machine room).

Site 3

Proposed development on Site 3 would involve removal of the existing DPR building, and construction of a new six-story, senior affordable housing project. The new building would be 65 feet in height to the top of the parapet (75 feet to top of elevator machine room).

Shadow figures for buildout of the Project are as follows:

- Figure 4.1.2-1 (Project Equinox Shadows) depicts the maximum extent of the Project's shadows during the spring and fall equinox between the hours of 8:00 AM and 4:00 PM.
- Figure 4.1.2-2 (Project Winter Solstice Shadows) depicts the maximum extent of the Project's winter shadows between the hours of 9:00 AM and 3:00 PM.

Equinox Shadows

As shown in Figure 4.1.2-1, Project Equinox Shadows, Project buildings would cast shadows to the northwest in the morning, shifting to the northeast through the end of the day during the Spring and Fall Equinox.

At 8:00 AM, the spring/fall shadow from the new County office building on Site 1 would be cast in a northwesterly direction. The shadow would shade non-sensitive commercial uses on the west side of Vermont Avenue and would extend to the northern boundary of Site 3. Shadows from the new Shatto parking structure would extend onto Site 1 and the office building to the north. Shadows from the redeveloped building on Site 2 would be the same as the existing condition, as the height and bulk of this building would not change, and would extend onto Vermont Avenue. Shadows from the new parking structure and mixed use building on Site 2 would extend onto Site 1. Shadows from the new building on Site 3 would fall on the residential buildings to the west of Site 3.

At 12:00 PM, the spring/fall shadows from the new County office building on Site 1 would be cast in a northerly direction. The shadow would shade the Galleria Market commercial building to the north of Site 1. Shadows from the Shatto Place parking structure would extend onto the office buildings to the north. Shadows from the redeveloped building on Site 2 would be the same as the existing condition, as the height of this building would not change, and would extend onto Site 1. Shadows from the new

parking structure and mixed use building on Site 2 would extend onto Site 1. Shadows from the new building on Site 3 would fall on the commercial center to the north of Site 3. These shadows would be completely off the residential uses to the west by 12:00 PM. Accordingly, the Site 3 building would not shade the shadow sensitive use for more than four hours. At 12:00 PM on the spring/fall equinox, no sensitive uses would be covered by shadows from Project buildings.

At 4:00 PM, the spring/fall shadows from the new County office building on Site 1 would be cast in a northeasterly direction. The shadow would shade the Galleria Market commercial building to the north of Site 1, and commercial and office uses located along Shatto Place to the northeast of Site 1. Shadows from the new County office building on Site 1 would not reach the residential uses located to the northeast of Site 1. Site 1 Shadows from the Shatto Place parking structure would extend onto the office buildings to the north and onto Shatto Place. Shadows from the redeveloped building on Site 2 would be the same as the existing condition, as the height of this building would not change, and would fall within the shadow cast by the new County office building on Site 1. Shadows from the new parking structure and mixed use building on Site 2 would extend onto Site 1. Shadows from the new building on Site 3 would fall on the commercial center to the north of Site 3, its surface parking lot, and onto Vermont Avenue. No sensitive uses would be covered by these shadows at this time.

No sensitive uses would be covered by shadows from Project Site 1 or Project Site 2 buildings during the spring/fall equinox. Residential land uses to the west of Site 3 would not be shaded by the Project more than four hours between the hours of 8:00 AM and 4:00 PM during the spring/fall equinox. Consequently, spring/fall shadow impacts from Site 1, Site 2, and Site 3 would be below the threshold. CEQA provides that aesthetic and parking impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

Winter Shadows

As shown in Figure 4.1.2-2, Winter Solstice Shadows, Project buildings would cast shadows to the northwest in the morning, shifting to the northeast through the end of the day during the Winter Solstice.

At 9:00 AM, the winter shadow from the new County office building on Site 1 would be cast in a northwesterly direction. The shadow would shade residential and commercial uses on the west side of Vermont Avenue. Shadows from the Shatto Place parking structure would extend onto Site 1 and the office building to the north. Shadows from the redeveloped building on Site 2 would be the same as the existing condition, as the height of this building would not change, and would extend across Vermont Avenue onto commercial uses located west of Vermont Avenue. Shadows from the new parking structure and the mixed use building on Site 2 would extend onto Site 1 and a small portion of Vermont Avenue. Shadows from the new building on Site 3 would fall on the residential buildings to the west and northwest of Site 3.

At 12:00 PM, the winter shadows from the new County office building on Site 1 would be cast in a northerly direction. The shadow would shade the Galleria Market commercial building and the Islamic Center located to the north of Site 1. Shadows for the Site 1 County office building would be completely off the residential uses to the west by approximately 11:00 AM. Accordingly, the Site 1 building would not shade the shadow sensitive use for more than three hours. Shadows from the Shatto Place parking structure would extend onto the office buildings to the north. Shadows from the redeveloped building on Site 2 would be the same as the existing condition, as the height of this building would not change, and would extend onto Site 1. Shadows from the new mixed use building with a parking structure on Site 2

would extend onto Site 1. Shadows from the new building on Site 3 would fall on the commercial center to the north of Site 3. These shadows would be completely off the residential uses to the west by 12:00 PM. Accordingly, the Site 3 building would not shade the shadow sensitive use for more than three hours. At 12:00 PM on the winter solstice, no sensitive uses would be covered by shadows from Project buildings.

At 3:00 PM, the spring/fall shadows from the new County office building on Site 1 would be cast in a northeasterly direction. The shadow would shade the Galleria Market commercial building to the north of Site 1, commercial and office uses located along Shatto Place to the northeast of Site 1, and would extend to the residential uses located to the northeast of Site 1. However, this shadow would fall on the residential area for less than three hours. Shadows from the Shatto Place parking structure would extend onto the office buildings to the north and across Shatto Place onto office buildings and a small part of a surface parking lot located on the east side of Shatto Place. Shadows from the redeveloped building on Site 2 would be the same as the existing condition, as the height of this building would not change, and would fall within the shadow cast by the new County office building on Site 1. Shadows from the new mixed use building with a parking structure on Site 2 would extend onto Site 1 and would fall within the shadow cast by the Shatto Place parking structure. Shadows from the new building on Site 3 would fall on the commercial center to the north of Site 3, its surface parking lot, and across Vermont Avenue onto a commercial use located northeast of Site 3. No sensitive uses would be covered by these shadows at this time.

Residential land uses would not be shaded by the Project Sites for more than three hours between the hours of 9:00 AM and 3:00 PM. Consequently, winter shadow impacts from Site 1, Site 2, and Site 3 would be below the threshold. CEQA provides that aesthetic and parking impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

CUMULATIVE IMPACTS

The Project Sites and surrounding area are situated in a high-density, mixed-use area of the Koreatown/Mid-Wilshire community. Development of the Project, in conjunction with the related projects listed in Section 3.0, Project Description and Environmental Setting of this Draft EIR, would result in an increase of shading impacts in the Project vicinity. A cumulative shading impact may occur if a related project were constructed adjacent to or near the Project that resulted in a shadow overlap such that the new combined shadow would be cast upon shadow-sensitive uses in excess of the threshold. The related projects nearest to Sites 1 and 2 include Related Project 92 (605 S Vermont Avenue) and Related Project 114 (631 S Vermont Avenue). Related Project 92, located southeast of Site 2, would consist of a mid-rise building with 103 residential units and would cast shadows that would likely fall on commercial uses to the north of 6th Street, and onto Site 2. Related Project 114 is a high-rise Project located approximately 300 feet southwest of Site 2. Shadows from these projects would not overlap with the Project shadows because of the offset from Site 2. The related project nearest to Site 3 is Related Project 68 (427 W Berendo St). This project is located approximately 650 feet west of Site 3. Shadows from this project would not overlap with the Project shadows because of this offset. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are proposed relevant to shade/shadow.

Regulatory Requirements

No Regulatory Requirements are related to shade/shadow impacts.

MITIGATION MEASURES

CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. Therefore no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

CEQA provides that aesthetic and parking impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

4.1 AESTHETICS

4.1.3. LIGHT/GLARE

INTRODUCTION

This subsection addresses the effects of artificial light and glare (including nighttime illumination) and daytime glare on adjacent land uses cast by the Project buildings and cumulative artificial light and glare cast by existing development, other related development that may occur in the future near the Project Sites, and the Project. Artificial light impacts are typically associated with light during the evening and nighttime hours, and may include streetlights, illuminated signage, vehicle headlights, and other point sources. Land uses such as residences and hotels are considered to be light sensitive because they are typically occupied by persons who have expectations for privacy during evening hours and who are subject to disturbance by bright light.

Glare is primarily a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass or reflective materials, and, to a lesser degree, from broad expanses of light-colored surfaces. Daytime glare is common in urban areas and is typically associated with mid- to high-rise buildings with exterior façades largely or entirely comprised of highly reflective glass or mirror-like materials from which the sun can reflect, particularly following sunrise and prior to sunset. Glare is typically related to sun angles, although glare resulting from reflected sunlight can occur regularly at certain times of the year. Glare can also be produced during evening and nighttime hours by artificial light directed toward a light-sensitive land use. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. Therefore, the following light/glare analysis is provided for informational purposes only.

ENVIRONMENTAL SETTING

Introduction

Artificial Light

The term “artificial light” in this analysis refers to man-made light. Artificial light sources are generally of two types, including:

- (1) point sources of light which include unshielded light sources (e.g., lenses or lamp reflectors); and
- (2) illuminated surfaces which may include light reflected off of the ground, walls, or trees.

Light-sensitive uses are those that light has the potential to interfere with certain functions, including vision, sleep, privacy, and general enjoyment of the natural nighttime environment. Residences are considered to be light-sensitive because they are typically occupied during the evening hours, and are occupied by persons who have reasonable expectations of non-interference in their activities. Artificial light sources can be invasive and interfere with residential privacy by intruding into an individual’s living environment, disrupting evening views, and changing neighborhood character. Additional light-sensitive

land uses may include, but are not limited to, board and care facilities, commercial or institutional land uses that require minimal nighttime illumination for proper function, physical comfort, or commerce and natural areas.

Glare

Glare is a lighting condition that causes an observer to experience visual discomfort as a result of high brightness. Glare is common in urbanized areas, and can be caused by either: (1) the reflection of the sun off reflective surfaces during the day (i.e., daytime glare); or (2) the reflection of artificial light sources (i.e., automobile headlights, special events lighting) off reflective surfaces at night (i.e., nighttime glare).

The generation of substantial amounts of daytime glare is dependent on two factors: (1) the presence of mid- to high-rise buildings, signs, or thematic elements that include reflective building materials (i.e., glass, metals) which provide the opportunity for the reflection of sunlight;⁷ and (2) the location of such uses in highly visible areas. “Highly visible areas” include areas where all of the following apply:

- (1) the glare source is within close proximity to a glare-sensitive use;
- (2) the glare-sensitive use has a direct and unobstructed line-of-sight of the glare source; and
- (3) the glare source is located north, east, or west, but not south, of the glare-sensitive use.

Due to the latitude of the Project Sites, the sun does not shine on glare sources from due north. In other words, when the sun reaches its highest point in the sky for the year (on the summer solstice), it is not located in a position where it would shine on the north faces of buildings or other sources of glare. Since the sun must shine on a reflective surface to be reflected back as glare, glare-sensitive uses in Los Angeles are not impacted by glare sources that are located to the south of the glare-sensitive use.

The generation of substantial amounts of nighttime glare is dependent on the same factors as the generation of daytime glare (i.e., buildings, signs, or thematic elements that include reflective materials and location of such uses in highly visible areas). Lighting may also result in nighttime glare. Nighttime glare can be generated in any direction, so long as the glare sources (e.g., reflective buildings, automobile headlights, and special events lighting) and glare-sensitive uses are within close proximity (several hundred feet) to one another. As no adopted County or City policies exist regarding the measurement of reflective glare impacts, the determination of significance is generally subjective.

Existing Conditions

Artificial Light

The Project Sites are located in a well-lit urban area where there are high levels of ambient nighttime lighting, including street lights, building and security lights, indoor building illumination (light emanating from the interior of structures as it passes through windows) and automobile headlights. Artificial light impacts are largely a function of proximity. The Project Sites are located within an urban environment, so that light emanating from any one source contributes to, rather than is solely responsible for, lighting

⁷ *Mid- to high-rise structures that include reflective building materials are necessary for the generation of substantial amounts of daytime glare because only large surface areas can reflect the sun for any extended period of time. This is due to the fact that, from the perspective of an observer on earth, the sun is constantly moving, making reflective glare transitory. The larger the surface, the longer the sunlight can reflect on this surface, and the longer reflective glare can be generated.*

impacts. Since development surrounding the Project Sites is already impacted by lighting from existing development, new light sources must occupy a highly visible amount of the field of view of light-sensitive uses to have any noticeable effect.

The Project Sites are developed with County office buildings, surface parking lots, and parking structures containing existing light sources that provide nighttime illumination. The Project Sites are generally surrounded by low- to high-intensity commercial, residential and institutional land uses. As such, the Project area, including the Project Sites, already provides high levels of ambient nighttime lighting. The surrounding low- to mid-rise commercial buildings and parking lots contain multiple ambient light sources, including interior uses, exterior security light, and signage. Additionally, along the roadways adjacent to the Project Sites, Vermont Avenue and 6th Street, a high level of artificial lighting currently exists that is typical of major streets. Lighting along these roadways includes street lights, illuminated signage, interior/exterior building light, outdoor activity lights, parking lot lights, security lights, and vehicle headlights.

The nearest sensitive land uses are multi-family residences located to the west and northwest of Site 3, and west and south of Site 2. These land uses presently experience high levels of ambient light typical of the surrounding urbanized area. These land uses also experience light levels generated from the existing light on Project Site 2 and Project Site 3, and perceive the ambient glow that is generated by the surrounding land uses, including the nearby low- to mid-rise buildings.

Glare

Sources of glare in the vicinity of the Project Sites include building windows, light-colored building surfaces and cement parking lots, metal surfaces, and car windshields. Receptors sensitive to daytime glare from reflected sunlight include motorists traveling on the roadways, and the surrounding residential uses. At the Project Sites, the primary sources of glare are windows in the existing buildings, and automobiles located in surface parking lots.

Regulatory Framework

County of Los Angeles

Other than specified areas such as Rural Outdoor Lighting Districts (Los Angeles County Code, Section Chapter 22.44.500), and within the Coastal Zone (Los Angeles County Code, Section 22.44.1270), the County has not established specific standards for exterior lighting. The County has not established specific standards related to glare.

County Code Section 12.12.030 limits the hours of construction projects to 6:30 AM to 8:00 PM, Monday through Saturday. Construction is prohibited on Sundays.

City of Los Angeles

Chapter IX, Article 3, Section 93.0117(b) of the LAMC provides that no person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to either be illuminated by more than two footcandles of lighting intensity or receive direct glare from the light source:

1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units.

2. Any elevated habitable porch, deck, or balcony on any other property containing a residential unit or units.
3. Any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units.

In addition, pursuant to LAMC 17.08.C, plans for street lighting shall be submitted to and approved by the City's Bureau of Street Lighting, which maintains a list of general street lighting standards that would be applicable to the Project, including:

- addressing the need for determination of roadway and sidewalk illumination levels in accordance with Illuminating Engineers Society (IES) standards and adopted City standards;
- the necessity for equipment testing and approval of the Bureau of Street Lighting;
- mandatory street tree placement at least 20 feet from existing or proposed streetlights; and
- the minimization of glare and light impacts on private off-site property.

Pursuant to LAMC Section 41.40, construction activities in the City are limited to 7:00 AM to 9:00 PM Monday through Friday and 8:00 AM to 6:00 PM Saturday.

ENVIRONMENTAL IMPACTS

Methodology

The analysis of light and glare identifies the location of off-site light- and glare-sensitive land uses and describes the existing ambient lighting conditions in the Project area. The analysis evaluates the Project's proposed light and glare sources and the extent to which Project lighting may spill off the Project Sites onto off-site light-sensitive uses. The analysis also describes the affected street frontages, the direction in which light would be focused, and the extent to which the Project would illuminate off-site sensitive land uses. In addition, the analysis considers the potential for sunlight to reflect off of building surfaces (glare) and the extent to which such glare would interfere with the operation of motor vehicles or other activities.

Thresholds of Significance

The following threshold question has been included in accordance with guidance provided in Appendix G to the State CEQA Guidelines:

Threshold 4.1.3-1: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

An affirmative answer to this question would represent a significant impact.

Project Design Elements

Project characteristics relevant to light and glare are discussed in Section 4.1.1, Aesthetics/Views, above. The design characteristics of the Project as set forth in Section 3.0, Project Description and Environmental Setting, of this Draft EIR provide characteristics of the proposed Project buildings that would define their

contribution to light and glare on and in the vicinity of the Project Sites. Design of lighting sources for Project buildings would include shielding of light fixtures to focus light downward and minimize light trespass onto neighboring properties. Design of Project buildings would also not include highly reflective building materials such as mirrored glass in exterior façades. Site 2 development would follow the City of Los Angeles regulations Chapter IX, Article 3, Section 93.0117(b) of the LAMC related to lighting as discussed above.

Impact Analysis

Threshold 4.1.3-1: Would the Project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Artificial Light

Construction

Construction could include nighttime activities involving the use of on-site lighting during demolition, excavation, framing, and building construction. Lighting would include floodlight focused on the work area that would be shielded to focus the light on-site and preclude light trespass onto nearby properties. The principal effect of nighttime construction light would be to increase the overall ambient glow emanating from the Project Sites. This analysis assumes that construction hours would follow County requirements for Sites 1 and 3, and City requirements for Site 2, and would generally be from 6:30 AM to 8:00 PM, Monday through Saturday (Sites 1 and 3), and 7:00 AM to 9:00 PM Monday through Friday and 8:00 AM to 6:00 PM Saturday (Site 2). Construction would occur primarily during daylight hours, and construction lighting would only be used for the duration needed if construction were to occur in the evening hours when daylight is no longer sufficient. In addition, construction-related illumination would be used for safety and security purposes only, and would be shielded and/or aimed so that no direct beam illumination is provided outside of the Project Sites boundary. As the lighting would be shielded and limited to specific hours, Project construction lighting would not adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

Operation

The Project would have the potential to alter nearby lighting patterns. Nighttime sources of light from Project buildings and operations would include interior and exterior building lights, parking structure and other security lighting, and vehicle headlights. Project lighting for the entryways to the buildings would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits for the buildings and the parking structures and would remain on from dusk to dawn, but would be designed to minimize light trespass onto adjacent properties. Illuminated areas near the building and parking structure entry/exits would be localized and would minimize light trespass and spill. Light fixtures that broadcast light over large areas or which are a source of direct glare would not be used. Furthermore, the majority of lighting associated with the Project would be directed internal to the Project Sites, away from neighboring land uses. As a result of distance from adjacent uses, interior and exterior lights on the Project Sites would not shine directly onto light-sensitive uses, and would not adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because

it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

Although additional light associated with the Project could incrementally add to the ambient glow of the Project Sites and surrounding area, the area already has high ambient light levels, including street lights, architectural and security lighting, indoor building illumination (light emanating from the interior of structures as it passes through windows) and automobile headlights. Given the high levels of existing ambient lighting, the Project's contributions to ambient glow likely would not be perceptible from the nearby sensitive receptors across West 6th Street, approximately 90 feet from the Project Sites. In general, light dissipates over distance. As such, lighting from the Project would not result in substantial changes to existing artificial light conditions, and would not adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

Glare

The Project would increase the use of reflective materials such as glass compared to current conditions. Sources of glare that may cause daytime glare include exterior building materials, such as glass and metallic façade materials and finishes. The increased glare associated with this building material could increase the amount of glare that the surrounding commercial, retail and residential land uses experience compared to existing conditions. However, Project design would incorporate the use of low-reflectivity materials that would assure that Project impacts would be less than significant. Examples of commonly used non-reflective building materials include cement, plaster, concrete, wood, coated steel, and non-mirrored glass.

Existing sources of daytime glare on the Project Site (i.e., cars in the surface parking lots that contain light-colored cars, car mirrors, and windshields) would be replaced with less reflective surfaces of building facades and windows, which would result only in a transitory glare condition from certain perspectives during the day. To address daytime glare conditions, glass used in building façades shall be anti-reflective or treated with an anti-reflective coating in order to minimize glare. Thus, daytime glare attributable to the Project Sites would be controlled. Project development would not incorporate substantial amounts of highly reflective building materials or signage that would be highly visible to off-site glare-sensitive uses and would not substantially alter the character of the off-site areas surrounding the Project Sites or interfere with the performance of an off-site activity. As such, the Project would not include substantial amounts of reflective building materials that would adversely affect day or nighttime views of off-site glare-sensitive uses located on West 6th Street and Shatto Place. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

Project buildings would not result in substantial sources of auto headlight-related glare in close proximity to glare-sensitive land uses. The Site 1 office building would be primarily a daytime use, while the auto entrances to residential uses on Sites 2 and 3 would be provided from 6th Street and Vermont Avenue, respectively, streets which already experience high levels of nighttime traffic. Overall, additional nighttime glare introduced to the Project Sites would be comparable to that of adjacent land uses and would not adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

CUMULATIVE IMPACTS

As indicated in Section 3.0, Project Description and Environmental Setting, of this Draft EIR, there are 115 related projects in the vicinity of the Project Sites. The related projects generally consist of infill development and redevelopment of existing uses, including mixed-use, residential, office, and hotel developments. There are 3 related projects located near the Project Sites. These proposed developments comprise a variety of uses, including apartments, as well as mixed-use developments, consistent with existing uses in the area. While precise building designs are not yet known for much of the related development proposed in the area, based on the nature of such proposals and in light of continued population increases, it is evident that building densities are increasing in the Wilshire Community Plan Area, which will likely entail general increases in light and glare throughout the area.

Cumulative impacts regarding light and glare may occur if any of the related projects are located in close enough proximity to the Project Sites to combine with the Project and result in significant adverse changes in the surrounding area. As shown in Figure 3-22 in Section 3.0, Project Description and Environmental Setting, of this Draft EIR, there are three related projects that are located sufficiently close to the Project Sites: Related Project No. 68, No. 84, and No. 92. The existing level of ambient lighting in the Project area is high, due to the high density of development that is already present. The Project, in combination with the Related Project No. 68, no. 84, and No 92, would increase ambient light levels from buildings and signage. However, the incremental increases would not be notable in the context of the high density urban setting, which already experiences high levels of ambient light and would not adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

The Project would remove existing sources of glare emanating from surface parking lots. Furthermore, the facade of Project's building would be clad primarily with high-quality building materials and low- or non-reflective glass, which would produce only transitory glare at certain times of the day. It is anticipated that, like the Project, new buildings developed as part of the related projects would be clad primarily with high-quality building materials and low- or non-reflective glass. Furthermore, the effects of any new glare sources would be transitory and would not disrupt off-site activities or adversely affect day or nighttime views in the area. CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

- PDF LG-1:** Project outdoor lighting shall be designed and installed with shielding from adjacent residential properties, the public right-of-way, and from above.
- PDF LG-2:** All Project buildings, parking structures, and signage within the Project Sites shall be prohibited from using highly reflective building materials such as mirrored glass in exterior façades. Exterior materials, including glazing shall have Visible Light Reflectance (Exterior) of 34 percent or less.

Regulatory Requirements

The following Regulatory Requirement is applicable to Site 2 only.

RR LG-1: Chapter IX, Article 3, Section 93.0117(b) of the LAMC provides that no person shall construct, establish, create, or maintain any stationary exterior light source that may cause the following locations to either be illuminated by more than two footcandles of lighting intensity or receive direct glare from the light source:

1. Any exterior glazed window or sliding glass door on any other property containing a residential unit or units.
2. Any elevated habitable porch, deck, or balcony on any other property containing a residential unit or units.
3. Any ground surface intended for uses such as recreation, barbecue, or lawn areas on any other property containing a residential unit or units.

MITIGATION MEASURES

CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area. Therefore no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

CEQA provides that aesthetic impacts of the Project shall not be considered significant impacts on the environment because it is a qualifying infill project which is both mixed use residential and an employment center in a transit priority area.

4.2 AIR QUALITY

INTRODUCTION

This section examines the degree to which the Project may result in significant adverse changes to air quality. Both short-term construction emissions occurring from activities such as grading and haul truck trips as well as long-term effects related to the ongoing operation of the Project are discussed in this section. The analysis focuses on air pollution from two perspectives: daily emissions and pollutant concentrations. “Emissions” refer to the actual quantity of pollutant measured in pounds per day (“ppd”). “Concentrations” refer to the amount of pollutant material per volumetric unit of air and are measured in parts per million (“ppm”), parts per billion (“ppb”), or micrograms per cubic meter (“ $\mu\text{g}/\text{m}^3$ ”).

The potential for the Project to conflict with or obstruct implementation of the applicable air quality plan, to violate an air quality standard or contribute substantially to an existing or projected air quality violation, to result in a cumulatively considerable net increase of any criteria pollutant for which the region is non-attainment, or to expose sensitive receptors to substantial pollutant concentrations are also discussed. Air quality data utilized in the preparation of this section is included as Appendix 4.2-1 to this Draft EIR.

ENVIRONMENTAL SETTING

Air Pollutants

The Project Sites are located in the South Coast Air Basin (the “Basin”), named so because its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys below. This Basin includes all of Orange County and the non-desert portions of Los Angeles, San Bernardino, and Riverside Counties. The regional climate within the Basin is considered to be semi-arid and is characterized by warm summers, mild winters, infrequent seasonal rainfall, moderate daytime onshore breezes, and moderate humidity. The air quality within the Basin is primarily influenced by a wide range of emissions sources – such as dense population centers, heavy vehicular traffic, and industry – and weather.

Air pollutant emissions in the Basin are generated by stationary and mobile sources. Stationary sources can be divided into two major subcategories: point sources and area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples of point sources are boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and produce many small emissions. Examples of area sources include residential and commercial water heaters, painting operations, lawn mowers, agricultural fields, landfills, and consumer products, such as barbecue lighter fluid and hair spray. Mobile sources are emissions from motor vehicles, including tailpipe and evaporative emissions, and are classified as either on-road or off-road. On-road sources may be legally operated on roadways and highways. Off-road sources include aircraft, ships, trains, race cars, and self-propelled construction equipment. Air pollutants can also be generated by the natural environment, such as when fine dust particles are pulled off the ground surface and suspended in the air during high winds.

Both the federal and State governments have established ambient air quality standards for outdoor concentrations of various pollutants in order to protect public health and welfare. These pollutants are referred to as “criteria air pollutants” as a result of the specific standards or criteria that have been adopted for them. Federal and State standards have been set at levels considered safe to protect public

health, including the health of “sensitive” populations, such as asthmatics, children, and the elderly with a margin of safety; and to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation, and buildings.

Criteria Air Pollutants

Criteria air pollutants that are most relevant to current air quality planning and regulation in the Basin include ozone (“O₃”), carbon monoxide (“CO”), nitrogen dioxide (“NO₂”), respirable particulate matter (“PM₁₀”), fine particulate matter (“PM_{2.5}”), sulfur dioxide (“SO₂”), and lead (“Pb”). In addition, toxic air contaminants (“TACs”) are a concern in the Basin. The characteristics of each of these pollutants are briefly described below.

O₃

Ozone is a highly reactive and unstable gas that is formed when reactive organic gases (“ROGs”), sometimes referred to as volatile organic compounds (“VOC”), and nitrogen oxides (“NO_x”), byproducts of internal combustion engine exhaust, undergo slow photochemical reactions in the presence of sunlight. O₃ concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.

CO

Carbon monoxide is a colorless, odorless gas produced by the incomplete combustion of carbon-containing fuels, such as gasoline or wood. CO concentrations tend to be the highest during the winter morning, when little to no wind and surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike O₃, motor vehicles operating at slow speeds are the primary source of CO in the Basin. The highest ambient CO concentrations are generally found near congested transportation corridors and intersections.

NO₂

Nitrogen dioxide is a nitrogen oxide compound that is produced by the combustion of fossil fuels, such as in internal combustion engines (both gasoline and diesel powered), as well as point sources, especially power plants. Of the seven types of NO_x compounds, NO₂ is the most abundant in the atmosphere. As ambient concentrations of NO₂ are related to traffic density, commuters in heavy traffic may be exposed to higher concentrations of NO₂ than those indicated by regional monitors.

**PM₁₀ and
PM_{2.5}**

Respirable and fine particulate matter PM₁₀ and PM_{2.5} consist of extremely small, suspended particles or droplets 10 microns and 2.5 microns or smaller in diameter, respectively. Some sources of particulate matter, like pollen and windstorms, are naturally occurring. However, in populated areas, most particulate matter is caused by road dust, diesel soot, combustion products, abrasion of tires and brakes, and construction activities.

SO₂

Sulfur dioxide is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of burning high sulfur-content fuel oils and coal and from chemical processes occurring at chemical plants and refineries. When SO₂ oxidizes in the atmosphere, it forms sulfates (SO₄). Collectively, these pollutants are referred to as sulfur oxides (“SO_x”).

Pb

Lead occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne Pb in the Basin. The use of leaded gasoline is no longer permitted for on road motor vehicles, so the majority of such combustion emissions are associated with off-road vehicles, such as racecars. However, because leaded gasoline was emitted in large amounts from vehicles when leaded gasoline was used for on-road motor vehicles, Pb is present in many urban soils and can be re-suspended in the air. Other sources of Pb include the manufacturing and recycling of batteries, paint, ink, ceramics, ammunition, and the use of secondary lead smelters.

Pb is also found in lead-based paint, which is considered to be a health hazard for people, especially children. From the turn of the century through the 1940s, paint manufacturers used lead as a primary ingredient in many oil-based paints. Use of lead in paint decreased but was still used until 1978, when it was banned from residential use. Remodeling, renovations, or demolition activities in older buildings could disturb lead-based paint surfaces.

TAC

Toxic Air Contaminants refer to a diverse group of air pollutants that are capable of causing chronic (i.e., of long duration) and acute (i.e., severe but of short duration) adverse effects on human health. TACs include both organic and inorganic chemical substances that may be emitted from a variety of common sources, including gasoline stations, motor vehicles, dry cleaners, industrial operations, painting operations, and research and teaching facilities. TACs are different from “criteria” pollutants in that ambient air quality standards have not been established for them, largely because there are hundreds of air toxics and their effects on health tend to be felt on a local scale rather than on a regional basis.

Health Effects of Criteria Pollutants

The health effects of criteria pollutants (i.e., O₃, CO, PM₁₀ and PM_{2.5}, NO₂, SO₂, and Pb) and TACs are described below. In addition, a list of the harmful effects of each criteria pollutant is provided in Table 4.2-1, Summary of Health Effects of Criteria Pollutants.

Table 4.2-1
Summary of Health Effects of Criteria Pollutants

Pollutants	Primary Health and Welfare Effects
Ozone (O ₃)	• Aggravation of respiratory and cardiovascular diseases • Reduced lung function • Increased cough and chest discomfort
Carbon Monoxide (CO)	• Aggravation of some heart disease (angina) • Reduced tolerance for exercise • Impairment of mental function • Impairment of fetal development • Death at high levels of exposure
Nitrogen Dioxide (NO ₂)	• Aggravation of respiratory illness
Respirable and Fine Particulate Matter (PM ₁₀ and PM _{2.5})	• Reduced lung function • Aggravation of respiratory and cardio-respiratory diseases • Increases in mortality rate • Reduced lung function growth in children
Sulfur Dioxide (SO ₂)	• Aggravation of respiratory diseases (asthma, emphysema) • Reduced lung function
Lead (Pb)	• Behavioral and hearing disabilities in children • Nervous system impairment
Source: South Coast Air Quality Management District, <i>Guidance Document for Air Quality Issues in General Plans and Local Planning, Appendix C, 2005.</i>	

Ozone

Individuals exercising outdoors, children and people with preexisting lung disease such as asthma and chronic pulmonary lung disease are considered to be the most susceptible sub-groups for ozone effects. Short-term exposures (lasting for a few hours) to ozone 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. Elevated ozone levels are associated with increased school absences. In recent years, a correlation between elevated ambient ozone levels and increases in daily hospital admission rates, as well as mortality, has also been reported. An increased risk for asthma has been found in children who participate in multiple sports and live in high ozone communities.

Ozone exposure under exercising conditions is known to increase the severity of the observed responses mentioned above. Animal studies suggest that exposure to a combination of pollutants that include ozone may be more toxic than exposure to ozone alone. Although lung volume and resistance changes observed after a single exposure diminish with repeated exposures, biochemical and cellular changes appear to persist, which can lead to subsequent lung structural changes.

Carbon Monoxide

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise, and electrocardiograph changes indicative of worsening oxygen supply to the heart.

Inhaled CO has no direct toxic effect on the lungs, but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin ("COHb"). Hence, conditions with an increased demand for oxygen supply can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving heart and blood vessels, fetuses, and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes.

Reduction in birth weight and impaired neurobehavioral development has been observed in animals chronically exposed to CO resulting in COHb levels similar to those observed in smokers. Recent studies have found increased risks for adverse birth outcomes with exposure to elevated CO levels. These include pre-term births and heart abnormalities. Additional research is needed to confirm these results.

Nitrogen Dioxide

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO₂ at levels found in homes with gas stoves, which are higher than ambient levels found in Southern California. Increase in resistance to air flow and airway contraction is observed after short-term exposure to NO₂ in healthy individuals. Larger decreases in lung functions are observed in individuals with asthma or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups.

In animals, exposure to levels of NO₂ considerably higher than ambient concentrations results in increased susceptibility to infections, possibly due to the observed changes in cells involved in maintaining immune functions. The severity of lung tissue damage associated with high levels of ozone exposure increases when animals are exposed to a combination of O₃ and NO₂.

Particulate Matter

A consistent correlation between elevated ambient respirable and fine particulate matter (PM₁₀ and PM_{2.5}) levels and an increase in mortality rates, respiratory infections, number and severity of asthma

attacks and the number of hospital admissions has been observed in different parts of the United States and various areas around the world. In recent years, some studies have reported an association between long-term exposure to air pollution dominated by fine particles and increased mortality, reduction in life span, and an increased mortality from lung cancer.

Daily fluctuations in fine particulate matter concentration levels have also been related to hospital admissions for acute respiratory conditions in children, to school and kindergarten absences, to a decrease in respiratory lung volumes in normal children and to increased medication use in children and adults with asthma. Recent studies show lung function growth in children is reduced with long-term exposure to particulate matter.

The elderly, people with pre-existing respiratory or cardiovascular disease and children appear to be more susceptible to the effects of PM₁₀ and PM_{2.5}.

Sulfur Dioxide

A few minutes exposure to low levels of SO₂ can result in airway constriction in some asthmatics, all of who are sensitive to its effects. In asthmatics, increase in resistance to air flow, as well as reduction in breathing capacity leading to severe breathing difficulties, are observed after acute exposure to SO₂. In contrast, healthy individuals do not exhibit similar acute responses even after exposure to higher concentrations of SO₂.

Animal studies suggest that despite SO₂ being a respiratory irritant, it does not cause substantial lung injury at ambient concentrations. However, high levels of exposure can cause lung edema (fluid accumulation), lung tissue damage, and sloughing off of cells lining the respiratory tract.

Some population-based studies indicate that the mortality and morbidity effects associated with fine particles show a similar association with ambient SO₂ levels. In these studies, efforts to separate the effects of SO₂ from those of fine particles have not been successful. It is not clear whether the two pollutants act synergistically or one pollutant alone is the predominant factor.

Lead

Fetuses, infants, and children are more sensitive than others to the adverse effects of lead exposure. Exposure to low levels of lead can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence levels. In adults, increased lead levels are associated with increased blood pressure.

Lead poisoning can cause anemia, lethargy, seizures and death. It appears that there are no direct effects of lead on the respiratory system. Lead can be stored in the bone from early-age environmental exposure, and elevated blood lead levels can occur due to the breakdown of bone tissue during pregnancy, hyperthyroidism (increased secretion of hormones from the thyroid gland) and osteoporosis (breakdown of bony tissue). Fetuses and breast-fed babies can be exposed to higher levels of lead because of previous environmental lead exposure of their mothers.

Sulfates

Most of the health effects associated with fine particles and SO₂ at ambient levels are also associated with SO₄. Thus, both mortality and morbidity effects have been observed with an increase in ambient SO₄.

concentrations. However, efforts to separate the effects of SO₄ from the effects of other pollutants have generally not been successful.

Clinical studies of asthmatics exposed to sulfuric acid suggest that adolescent asthmatics are possibly a subgroup susceptible to acid aerosol exposure. Animal studies suggest that acidic particles, such as sulfuric acid aerosol and ammonium bisulfate, are more toxic than non-acidic particles like ammonium sulfate. Whether the effects are attributable to acidity or to particles remains unresolved.

Toxic Air Contaminants

TACs are a broad class of compounds known to cause or contribute to cancer or non-cancer health effects such as birth defects, genetic damage, and other adverse health effects. As discussed previously, effects from TACs may be both chronic and acute on human health. Acute health effects are attributable to sudden exposure to high quantities of air toxics. These effects include nausea, skin irritation, respiratory illness, and, in some cases, death. Chronic health effects result from low-dose, long-term exposure from routine releases of air toxics. The effect of major concern for this type of exposure is cancer, which requires a period of 10 to 30 years after exposure to develop.

TACs are found in ambient air, especially in urban areas, and are caused by industry, agriculture, fuel combustion, and commercial operations (e.g., dry cleaners). TACs are typically found in low concentrations, even near their source (e.g., benzene near a freeway). Because chronic exposure can result in adverse health effects, TACs are regulated at the regional, state, and federal level.

Diesel exhaust is the predominant TAC in urban air and is estimated to represent about two-thirds of the cancer risk from TACs (based on the statewide average). According to the California Air Resources Board ("CARB"), diesel exhaust is a complex mixture of gases, vapors, and fine particles. This complexity makes the evaluation of health effects of diesel exhaust a complex scientific issue. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the ARB, and are listed as carcinogens either under the State's Proposition 65 or under the federal Hazardous Air Pollutants programs. The United States Environmental Protection Agency ("U.S. EPA") has adopted Ultra Low Sulfur Diesel ("ULSD") fuel standards that went into effect in June 2006 in an effort to reduce diesel particulate matter substantially. As of June 1, 2006, refiners and importers nationwide have been required by the U.S. EPA to ensure that at least 80 percent of the volume of the highway diesel fuel they produce or import would be ULSD-compliant. As of December 10, 2010, only ULSD fuel was available for highway use nationwide. In California, which was an early adopter of ULSD fuel and engine technologies, 100 percent of the diesel fuel sold – downstream from refineries, up to and including fuel terminals that store diesel fuel – was ULSD fuel since July 15, 2006. Since September 1, 2006, all diesel fuel offered for sale at retail outlets in California have been ULSD fuel.

Existing Conditions

Existing Regional Air Quality

Ambient air quality is determined primarily by the type and amount of pollutants emitted into the atmosphere, as well as the size, topography, and meteorological conditions of a geographic area. The Basin has low mixing heights and light winds, which help to accumulate air pollutants. Exhaust emissions from mobile sources generate the majority of ROG, CO, NO_x, and SO_x both in the Basin generally and specifically the Los Angeles County portion of the Basin. Area-wide sources generate the most airborne particulates (i.e., PM₁₀ and PM_{2.5}) in both the Basin and Los Angeles County. Measurements of ambient concentrations of the criteria pollutants are used by the U.S. EPA and the ARB to assess and classify the

air quality of each air basin, county, or, in some cases, a specific urbanized area. The classification is determined by comparing actual monitoring data with national and State standards. If a pollutant concentration in an area is lower than the standard, the area is classified as being in “attainment.” If the pollutant concentration exceeds the standard, the area is classified as a “non-attainment” area. If there is not enough data available to determine whether the standard is exceeded in an area, the area is designated “unclassified.”

The U.S. EPA and the ARB use different standards for determining whether the Basin is in attainment. Federal and State standards are summarized in Table 4.2-2, Ambient Air Quality Standards. The attainment status for the Los Angeles County portion of the Basin with regard to the national ambient air quality standards (“NAAQS”) and California ambient air quality standards (“CAAQS”) are shown in Table 4.2-3, Attainment Status for the South Coast Air Basin (Los Angeles County Portion).

Table 4.2-2
Ambient Air Quality Standards

Air Pollutant	Averaging Time	State Standard	Federal Standard
Ozone (O ₃)	1 Hour	0.09 ppm	--
	8 Hour	0.07 ppm	0.07 ppm
Carbon Monoxide (CO)	1 Hour	20.0 ppm	35.0 ppm
	8 Hour	9.0 ppm	9.0 ppm
Nitrogen Dioxide (NO ₂)	1 Hour	180 ppb	100 ppb
Sulfur Dioxide (SO ₂)	1 Hour	250 ppb	75 ppb
	24 Hour	40 ppb	140 ppb
Respirable Particulate Matter (PM ₁₀)	24 Hour	50 µg/m ³	150 µg/m ³
Fine Particulate Matter (PM _{2.5})	24 Hour	--	35 µg/m ³
	Annual Arithmetic Mean	12 µg/m ³	12 µg/m ³ (primary) 15 µg/m ³ (secondary)
Lead	30 Day Average	1.5 µg/m ³	--
	Calendar Quarter	--	1.5 µg/m ³ (for certain areas)
	Rolling 3-Month Average	--	0.15 µg/m ³
Sulfates	24 Hour	0.03 ppm	--

Notes:
 ppm = parts per million
 ppb = parts per billion
 µg/m³ = microgram per cubic meter
 Source: California Air Resources Board, Ambient Air Quality Standards, website:
<https://www.arb.ca.gov/research/aaqs/aaqs2.pdf>, accessed May 12, 2017.

Table 4.2-3
Attainment Status for the South Coast Air Basin

Pollutant	Attainment Status	
	NAAQS	CAAQS
Ozone (1-Hour)	Non-Attainment (Extreme)	Non-Attainment
Ozone (8-Hour)	Pending – Expect Non-Attainment (Extreme)	Non-Attainment
Carbon Monoxide (1- & 8-hour)	Attainment (Maintenance)	Attainment
Nitrogen Dioxide (1-Hour)	Unclassifiable/Attainment	Attainment
Nitrogen Dioxide (Annual)	Attainment (Maintenance)	Attainment

Sulfur Dioxide (1-Hour)	Designations Pending (expect Unclassified/Attainment)	Attainment
Sulfur Dioxide (24-Hour & Annual)	Unclassified/Attainment	Attainment
PM ₁₀ (24-Hour)	Attainment (Maintenance)	Non-Attainment
PM ₁₀ (Annual)	N/A	Non-Attainment
PM _{2.5} (24-Hour)	Non-Attainment (Serious)	N/A
PM _{2.5} (Annual)	Non-Attainment (Moderate)	Non-Attainment
Lead	Non-Attainment (Partial)	Attainment
Source: SCAQMD, Air Quality Management Plan Appendix II website: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-ii.pdf?sfvrsn=4 , accessed: May 30, 2017.		

Existing Local Air Quality

The SCAQMD divides the Basin into 38 source receptor areas (“SRAs”), wherein 38 monitoring stations operate to monitor the various concentrations of air pollutants in the region. The Project Sites are located in SRA 1, which covers Central Los Angeles. SCAQMD Station No. 087 collects ambient air quality data for SRA 1. This station monitors emission levels of O₃, CO, NO₂, SO₂, Sulfates, Lead, PM₁₀, and PM_{2.5}. Table 4.2-4 (Summary of Ambient Air Quality in the Project Vicinity) identifies the federal and State ambient air quality standards for the relevant air pollutants, along with the ambient pollutant concentrations that were measured between 2014 and 2016, the most current year data available.

According to air quality data from the SCAQMD Station No. 087 shown in Table 4.2-4, the previous national 1-hour ozone standard was not exceeded between 2014 and 2016 and the state 1-hour ozone standard was exceeded on seven days between 2014 and 2016. The national 8-hour ozone standard was exceeded on 16 days from 2014 to 2016 and the State 8-hour ozone standard was exceeded on 15 days during that time period. The national 24-hour PM₁₀ standard was not exceeded from 2014 to 2016 and the State 24-hour PM₁₀ standard was exceeded on 76 days during that time period. For PM_{2.5}, the national 24-hour standard was exceeded on 15 days from 2014 to 2016. National or State standards for CO, NO₂, or SO₂ were not exceeded from 2014 to 2016.

Table 4.2-4
Summary of Ambient Air Quality in the Project Vicinity

Air Pollutants Monitored Within SRA 1 (Central Los Angeles Area)	Year		
	2014	2015	2016
Ozone (O₃)			
Maximum 1-hour concentration measured	0.113 ppm	0.104 ppm	0.103 ppm
Number of days exceeding previous national 0.124 ppm 1-hour standard	0	0	0
Number of days exceeding State 0.09 ppm 1-hour standard	3	2	2
Maximum 8-hour concentration measured	0.094 ppm	0.074 ppm	0.078 ppm
Number of days exceeding national 0.07 ppm 8-hour standard	6	6	4
Number of days exceeding State 0.07 ppm 8-hour standard	7	6	2
Suspended Particulates (PM₁₀)			
Maximum 24-hour concentration measured	87.0 µg/m ³	88.0 µg/m ³	67.0 µg/m ³
Number of days exceeding national 150 µg/m ³ 24-hour standard	0	0	0
Number of days exceeding State 50 µg/m ³ 24-hour standard	32	26	18
Annual Arithmetic Mean (AAM)	35.4 µg/m ³	33.1 µg/m ³	32.4 µg/m ³
Does measured AAM exceed national 150 µg/m ³ AAM standard?	No	No	No

Table 4.2-4
Summary of Ambient Air Quality in the Project Vicinity

Air Pollutants Monitored Within SRA 1 (Central Los Angeles Area)	Year		
	2014	2015	2016
Does measured AAM exceed State 20 µg/m ³ AAM standard?	Yes	Yes	Yes
Fine Particulates (PM_{2.5})			
Maximum 24-hour concentration measured	59.9 µg/m ³	56.4 µg/m ³	44.4 µg/m ³
Number of days exceeding national 35.0 µg/m ³ 24-hour standard	6	7	2
Annual Arithmetic Mean (AAM)	12.36 µg/m ³	12.38 µg/m ³	11.83 µg/m ³
Does measured AAM exceed national 15 µg/m ³ AAM standard?	No	No	No
Does measured AAM exceed State 12 µg/m ³ AAM standard?	Yes	Yes	No
Carbon Monoxide (CO)			
Maximum 1-hour concentration measured	3	3.2	1.9
Days exceeding national 35.0 ppm 1-hour standard	0	0	0
Days exceeding State 20.0 ppm 1-hour standard	0	0	0
Maximum 8-hour concentration measured	2.0 ppm	1.8 ppm	1.4 ppm
Number of days exceeding national 9.0 ppm 8-hour standard	0	0	0
Number of days exceeding State 9.0 ppm 8-hour standard	0	0	0
Nitrogen Dioxide (NO₂)			
Maximum 1-hour concentration measured	82.1 ppb	79.1 ppb	64.7 ppb
Number of days exceeding State 180 ppb 1-hour standard	0	0	0
Annual average	22.2 ppb	22.2 ppb	20.8 ppb
Does measured annual average exceed national 100 ppb annual average standard?	No	No	No
Does measured annual average exceed State 30 ppb annual average standard?	No	No	No
Sulfur Dioxide (SO₂)			
Maximum 1-hour concentration measured	5.4 ppb	12.6 ppb	13.4 ppb
Number of days exceeding national 75 ppb 1-hour standard	0	0	0
Number of days exceeding state 40 ppb 24-hour standard	0	0	0
Sulfates			
Maximum 24-hour concentration measured	11.0 µg/m ³	6.1 µg/m ³	5.8 µg/m ³
Number of days exceeding state 25 µg/m ³ 24-hour standard	0	0	0
Lead			
Maximum monthly average concentration measured	0.01 µg/m ³	0.01 µg/m ³	0.02 µg/m ³
Number of days exceeding state 1.5 µg/m ³ 30 day standard	0	0	0
Maximum 3-month rolling average measured	0.01 µg/m ³	0.01 µg/m ³	0.01 µg/m ³
Number of days exceeding national 0.15 µg/m ³ 3-month rolling average standard	0	0	0
<i>ppm = parts by volume per million of air</i> <i>ppb = parts by volume per billion of air</i> <i>µg/m³=micrograms per cubic meter</i> <i>n/a = data not available or not collected by the District</i> <i>Source: SCAQMD Historical Data by Year, website: http://www.aqmd.gov/home/library/air-quality-data-studies/historical-data-by-year, accessed: October 2017.</i>			

Site 1 is currently occupied by a two-story abandoned structure with roof parking, a two-story office building occupied by County Department of Parks and Recreation (“DPR”) staff, open parking areas, and carport in the north parking area, and an existing seven-story parking structure at 523 Shatto Place that

is connected to the site. Site 2 is currently occupied by two office buildings, which house County Department of Mental Health (“DMH”) and Workforce Development Aging and Community Services (“WDACS”) staff, respectively. Site 3 is currently occupied by an office building housing DPR staff. The average daily emissions generated by the existing uses at each Project Site have been estimated utilizing the California Emissions Estimator Model (“CalEEMod”) 2016.3.1 model recommended by the SCAQMD. Existing emissions are summarized in Tables 4.2-5 through 4.2-8 below.

Table 4.2-5
Existing Daily Operational Emissions - Site 1

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	0.82	<0.01	0.11	<0.01	<0.01	<0.01
Energy Demand	0.01	0.10	0.09	<0.01	<0.01	<0.01
Mobile (Motor Vehicles)	0.37	1.65	4.84	0.01	0.95	0.27
Total Site 1 Emissions	1.19	1.75	5.03	0.01	0.96	0.27
<i>CalEEMod data included in Appendix 4.2-1 to this Draft EIR. Column totals may not add due to rounding from the model results.</i>						
<i>Source: Pomeroy Environmental Services, 2017.</i>						

Table 4.2-6
Existing Daily Operational Emissions - Site 2

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	4.63	<0.01	0.03	0.00	<0.01	<0.01
Energy Demand	0.06	0.58	0.49	<0.01	0.04	0.04
Mobile (Motor Vehicles)	9.67	43.33	127.08	0.33	14.49	4.42
Total Site 2 Emissions	14.36	43.91	127.59	0.33	14.53	4.46
<i>CalEEMod data included in Appendix 4.2-1 to this Draft EIR. Column totals may not add due to rounding from the model results.</i>						
<i>Source: Pomeroy Environmental Services, 2017.</i>						

Table 4.2-7
Existing Daily Operational Emissions - Site 3

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	0.66	<0.01	<0.01	0.00	<0.01	<0.01
Energy Demand	<0.01	0.08	0.07	<0.01	<0.01	<0.01
Mobile (Motor Vehicles)	0.44	1.99	5.83	0.01	1.14	0.32
Total Site 3 Emissions	1.11	2.07	5.91	0.02	1.15	0.33
<i>CalEEMod data included in Appendix 4.2-1 to this Draft EIR. Column totals may not add due to rounding from the model results.</i>						
<i>Source: Pomeroy Environmental Services, 2017.</i>						

Table 4.2-8
Existing Daily Operational Emissions – Total All Sites

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site 1	1.19	1.75	5.03	0.01	0.96	0.27
Site 2	14.36	43.91	127.59	0.33	14.53	4.46

Table 4.2-8
Existing Daily Operational Emissions – Total All Sites

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site 3	1.11	2.07	5.91	0.02	1.15	0.33
Total Existing Emissions	16.66	47.73	138.53	0.36	16.64	5.06
CalEEMod data included in Appendix 4.2-1 to this Draft EIR. Column totals may not add due to rounding from the model results. Source: Pomeroy Environmental Services, 2017.						

Regulatory Framework

Air quality in the United States is governed by the Federal Clean Air Act (“CAA”). In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (“CCAA”). At the federal level, the CAA is administered by the U.S. EPA. In California, the CCAA is administered by CARB at the state level and by the Air Quality Management Districts at the regional and local levels.

Air quality within the Basin is addressed through the efforts of various federal, State, regional, and local government agencies. These agencies work jointly, as well as individually, to improve air quality through legislation, regulations, planning, policy-making, education, and a variety of programs. The agencies responsible for improving the air quality in the Basin are discussed below.

Federal

The U.S. EPA is responsible for setting and enforcing the federal ambient air quality standards for atmospheric pollutants. It regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain locomotives. The U.S. EPA also has jurisdiction over emissions sources outside state waters (outer continental shelf), and establishes various emissions standards for vehicles sold in states other than California.

As part of its enforcement responsibilities, the U.S. EPA requires each state with nonattainment areas to prepare and submit a State Implementation Plan that demonstrates the means to attain the federal standards. The State Implementation Plan must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution, using a combination of performance standards and market-based programs within the timeframe identified in the State Implementation Plan.

State

The CCAA requires all areas of the State to achieve and maintain the CAAQS by the earliest practicable date. The CARB, a part of the California Environmental Protection Agency, is responsible for the coordination and administration of both federal and State air pollution control programs within California. In this capacity, the CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the State Implementation Plan. The CARB establishes emissions standards for motor vehicles sold in California, consumer products (such as hair spray, aerosol paints, and barbecue lighter fluid), and various types of commercial equipment. It also sets fuel specifications to further reduce vehicular emissions.

Although not originally intended to reduce air emissions, California Code of Regulations (“CCR”) *Title 24 Part 6: California’s Energy Efficiency Standards for Residential and Nonresidential Buildings*, was first adopted in 1978 in response to a legislative mandate to reduce California’s energy consumption. Since then, Title 24 has been amended with recognition that energy-efficient buildings require less electricity and reduce fuel consumption, which, in turn, decreases air emissions.

In compliance with Title 24, new development projects constructed within California after January 1, 2017 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards Code (“CALGreen”) (CCR, Title 24, Part 11).

Regional

Southern California Association of Governments

The Southern California Association of Governments (“SCAG”) is a council of governments for Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. It is a regional planning agency and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment.

Although SCAG is not an air quality management agency, it is responsible for developing transportation, land use, and energy conservation measures that affect air quality. SCAG’s *Regional Transportation Plan/Sustainable Communities Strategy* (“RTP/SCS”) identifies growth forecasts that are used in the development of air quality-related land use and transportation control strategies by the SCAQMD.

South Coast Air Quality Management District (“SCAQMD”)

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 SCAG, county transportation commissions, and 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 provides regulatory enforcement through such measures as educational programs or fines, when necessary.

SCAQMD is directly responsible for reducing emissions from stationary (area and point), mobile, and indirect sources to meet federal and State ambient air quality standards. It has responded to this requirement by preparing a series of Air Quality Management Plans (“AQMPs”). The most recent of these was adopted by the Governing Board of the SCAQMD on March 3, 2017. This AQMP, referred to as the 2016 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2016 AQMP identifies the control measures that will be implemented over a 15-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population’s exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

The future air quality levels projected in the 2016 AQMP are based on several assumptions. For example, the SCAQMD assumes that new development within the Basin will occur in accordance with population growth and transportation projections identified by the SCAG in its most current version of the RTP/SCS, which was adopted April 7, 2016. The 2016 AQMP also assumes that development projects will include

strategies (mitigation measures) to reduce emissions generated during construction and operation in accordance with SCAQMD and local jurisdiction regulations, which are designed to address air quality impacts and pollution control measures.

Although SCAQMD is responsible for regional air quality planning efforts, it does not have the authority to directly regulate the air quality issues associated with plans and new development projects within its jurisdiction. Instead, SCAQMD has used its expertise and prepared the *CEQA Air Quality Handbook* and newer thresholds of significance to indirectly address these issues in accordance with the projections and programs of the AQMPs. The purpose of the *CEQA Air Quality Handbook* and newer thresholds of significance is to assist lead agencies, as well as consultants, project proponents, and other interested parties, in evaluating potential air quality impacts of projects and plans proposed in the Basin.

Specifically, the *CEQA Air Quality Handbook* and newer thresholds of significance explain the procedures that the SCAQMD recommends be followed during environmental review processes required by CEQA. The *CEQA Air Quality Handbook* and newer thresholds of significance provide direction on how to evaluate potential air quality impacts, how to determine whether these impacts are significant, and how to mitigate these impacts. SCAQMD intends that by providing this guidance, the air quality impacts of plans and development proposals will be analyzed accurately and consistently throughout the region, and adverse impacts will be minimized.

Local

County of Los Angeles

Air Quality Element of the County General Plan

The *Air Quality Element of the County of Los Angeles General Plan* (“County Air Quality Element”) was adopted in October 2015. The County Air Quality Element of the County of Los Angeles General Plan summarizes air quality issues and outlines the goals and policies that will improve air quality and reduce greenhouse gas emissions. The County Air Quality Element identifies mobile sources as the leading contributors to air pollution in the region. Additionally, highly congested freeways and highways further contribute to the conditions that produce air pollution. Developing land and transportation systems to reduce the need for vehicle trips and provide alternative modes of transportation can improve air quality. Moreover, integrating land use plans, transportation plans, and air quality management plans can help minimize exposure to toxic air pollutant emissions from industrial and other stationary sources.

The County’s General Plan also includes Mobility and Land Use Elements, which provide transportation-based policies to reduce vehicle miles travelled, such as improving the efficiency of the County roadway network; mobility management, such as increased ridesharing and vanpools; and improving the jobs-housing balance. The County Air Quality Element also identifies continued population growth projected for the County could overwhelm air quality gains unless careful attention is paid to voluntary and regulatory measures that reduce transportation-related emissions.

The County Air Quality Element establishes three goals:

- Protection from exposure to harmful air pollutants;
- The reduction of air pollution and mobile source emissions through coordinated land use, transportation and air quality planning; and
- Implementation of plans and programs to address the impacts of climate change.

Los Angeles County Green Building Standards Code

In response to the mandates set forth in CALGreen, the Board of Supervisors adopted the Los Angeles County Green Building Standards Code (“Title 31”), thus codifying certain provisions of the 2016 CALGreen Code. The provisions of this Code apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure, unless otherwise indicated this Code.

The purpose of this 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 reduced negative impact, or positive environmental impact, and encouraging sustainable construction practices in the following categories: planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental air quality. The Los Angeles County Green Building Standards Code contains both mandatory and voluntary green building measures for the reduction of emissions through energy conservation. For an analysis of potential project impacts regarding greenhouse gas (“GHG”) emissions, please refer to Section 4.6 (Greenhouse Gas Emissions) in this Draft EIR.

City of Los Angeles

Local jurisdictions, such as the City of Los Angeles, have the authority and responsibility to reduce air pollution through their police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals.

Air Quality Element of the City General Plan

The *Air Quality Element of the City of Los Angeles General Plan* (“City Air Quality Element”) was adopted on November 24, 1992 and sets forth the goals, objectives and policies that guide the City in the implementation of its air quality improvement programs and strategies. The City Air Quality Element acknowledges that numerous efforts are underway at the regional, county and city levels addressing clean air concerns and that coordination of these various efforts and the involvement of the area’s residents are crucial to the achievement of state and federal air quality standards.

The City Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City’s mobility and clean air goals. Mutually reinforcing strategies need to be developed which work to reduce the use of single occupant vehicles and which work to reduce vehicle trips and vehicle miles traveled.

The City Air Quality Element establishes six goals:

- Good air quality in an environment of continued population growth and healthy economic structure;
- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;

- Minimize impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new development projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation. The City uses the *CEQA Air Quality Handbook* as the guidance document for the environmental review of plans and development proposals within its jurisdiction. The City does not, however, have the specific technical expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the county and region will meet federal and State standards. Instead, the City relies upon the expertise of the SCAQMD, uses the *CEQA Air Quality Handbook*, and SCAQMD recommended thresholds of significance as the guidance for the environmental review of plans and development proposals.

Plan for a Healthy Los Angeles

The *Plan for a Healthy Los Angeles* (adopted by City Council on March 31, 2015) lays the foundation to create healthier communities for all residents in the City. As an element of the General Plan, it provides high-level policy vision, along with measurable objectives and implementation programs, to elevate health as a priority for the City's future growth and development. With a focus on public health and safety, the *Plan for a Healthy Los Angeles* provides a roadmap for addressing the most basic and essential quality-of-life issues: safe neighborhoods, a clean environment, access to health services, affordable housing, healthy and sustainably produced food, and the opportunity to thrive.

LA Green Plan

The City has begun to address the issue of global climate change by publishing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* ("LA Green Plan"). This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO₂ to 35 percent below 1990 levels. To achieve this, the City will:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency; and
- Change transportation and land use patterns to reduce dependence on automobiles.

Los Angeles Green Building Code

In December 2010, the Los Angeles City Council adopted various provisions of the CALGreen Code as part of Ordinance No. 181,480, thus codifying certain provisions of the CALGreen Code as the new Los Angeles Green Building Code ("LA Green Building Code"). As a result of continuing updates to the CALGreen Code, the City adopted the pertinent provisions of the 2016 CALGreen standards through Ordinance No.

184,691, approved December 19, 2016. The LA Green Building Code is applicable to the construction of every new building, every new building alteration with a permit valuation of over \$200,000, and every building addition unless otherwise noted. Specific mandatory requirements and elective measures are provided for three categories: (1) low-rise residential buildings; (2) nonresidential and high-rise residential buildings; and (3) additions and alterations to nonresidential and high-rise residential buildings.

ENVIRONMENTAL IMPACTS

Methodology

This analysis focuses on the nature and magnitude of the change in the air quality environment due to implementation of the Project. Air pollutant emissions associated with the Project would result from Project operations and traffic volumes. Construction activities would also generate air pollutant emissions at each Project Site and on roadways resulting from construction traffic. The increase in emissions at each Project Site generated by these activities and other secondary sources has been quantitatively estimated and compared to thresholds of significance recommended by SCAQMD. A detailed description of the calculations used in this analysis is provided in Appendix 4.2-1 to this Draft EIR.

Construction Emissions

The regional construction emissions associated with the project were calculated using CalEEMod 2016.3.1 as recommended by the SCAQMD. CalEEMod was developed in collaboration with the air districts of California as 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. Construction activities associated with demolition, site preparation, grading/excavation, and building construction would generate pollutant emissions. Specifically, these construction activities would temporarily create emissions of dusts, fumes, equipment exhaust, and other air contaminants. These construction emissions were compared to the regional thresholds established by the SCAQMD. Because the Project Sites are located in the Basin, these thresholds apply.

In addition to the SCAQMD's regional significance thresholds, the SCAQMD has established localized significance criteria in the form of ambient air quality standards for criteria pollutants. To minimize the need for detailed air quality modeling to assess localized impacts, SCAQMD developed mass-based localized significance thresholds ("LSTs"). These thresholds are defined as the amount of pounds of emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts.

These localized thresholds, which are found in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD,¹ apply to daily construction areas that are less than or equal to five acres in size and are only applicable to the following criteria pollutants: NO_x, CO, PM₁₀, and PM_{2.5}. LSTs represent the maximum emissions from a project that are not expected to cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standards, and are developed based on the ambient concentrations of that pollutant for each SRA.

¹ SCAQMD, *Final Localized Significance Threshold Methodology*, June 2003, Revised July 2008.

In terms of NO_x emissions, the two principal species of NO_x are nitric oxide (“NO”) and NO₂, with the vast majority (95 percent) of the NO_x emissions being comprised of NO. However, because adverse health effects are associated with NO₂, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO₂ levels. NO is converted to NO₂ by several processes, the two most important of which are (1) the reaction of NO with ozone and (2) the photochemical reaction of NO with hydrocarbons. When modeling NO₂ emissions from combustion sources, the SCAQMD assumes that the conversion of NO to NO₂ is complete at a distance of 5,000 meters from the source. For PM₁₀ LSTs, the thresholds were derived based on requirements in SCAQMD Rule 403 — Fugitive Dust. For PM_{2.5} LSTs, the thresholds were derived based on a general ratio of PM_{2.5} to PM₁₀ for both fugitive dust and combustion emissions. As described in more detail below, the resulting on-site construction emissions generated for each construction phase were analyzed against the applicable LST for each phase.

For the purposes of a CEQA analysis, the SCAQMD considers a sensitive receptor to be a receptor such as a residence, hospital, or convalescent facility where it is possible that an individual could remain for 24 hours. In addition, land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

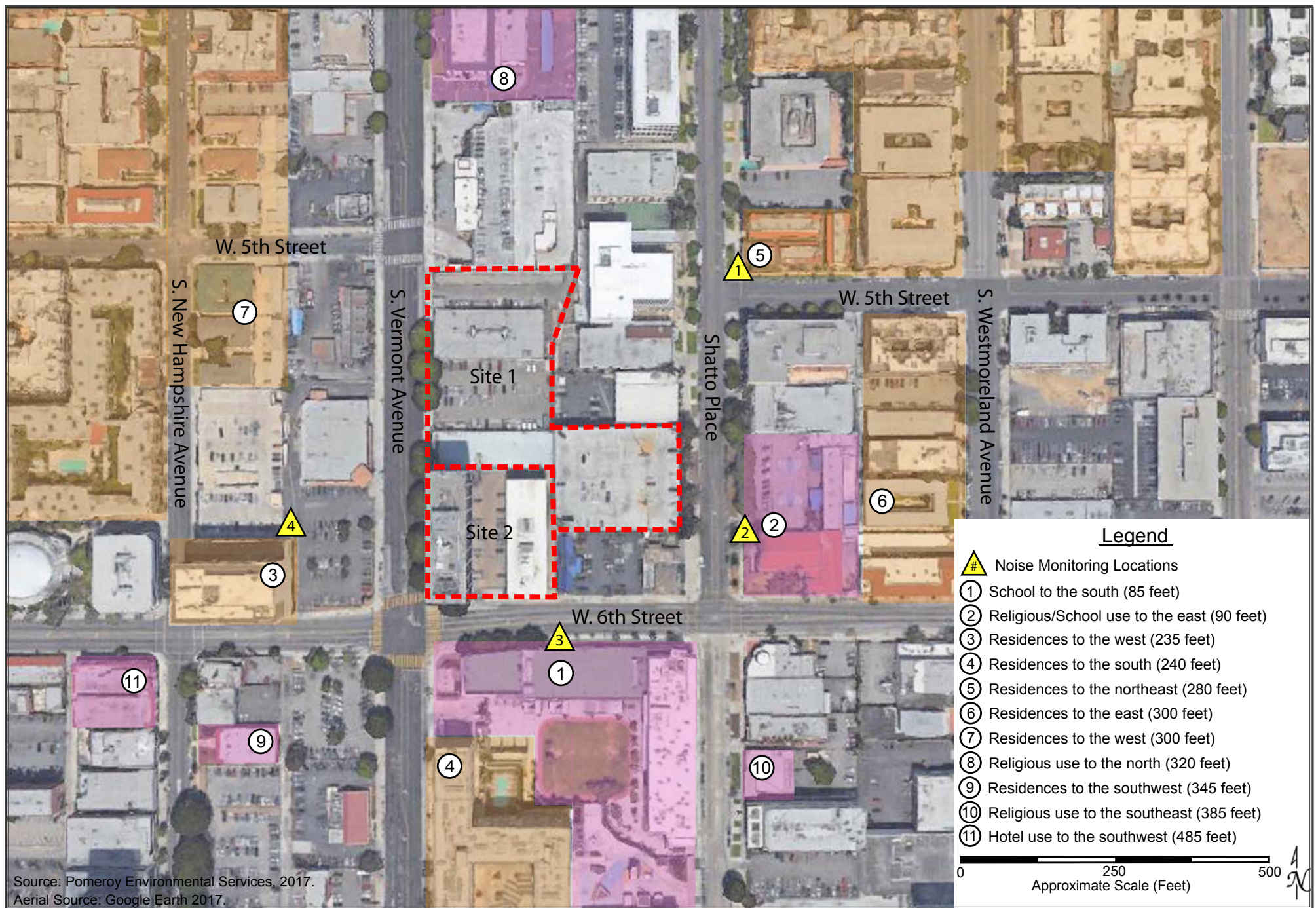
As shown in Figure 4.2-1, the sensitive receptors nearest to Sites 1 and 2 are:

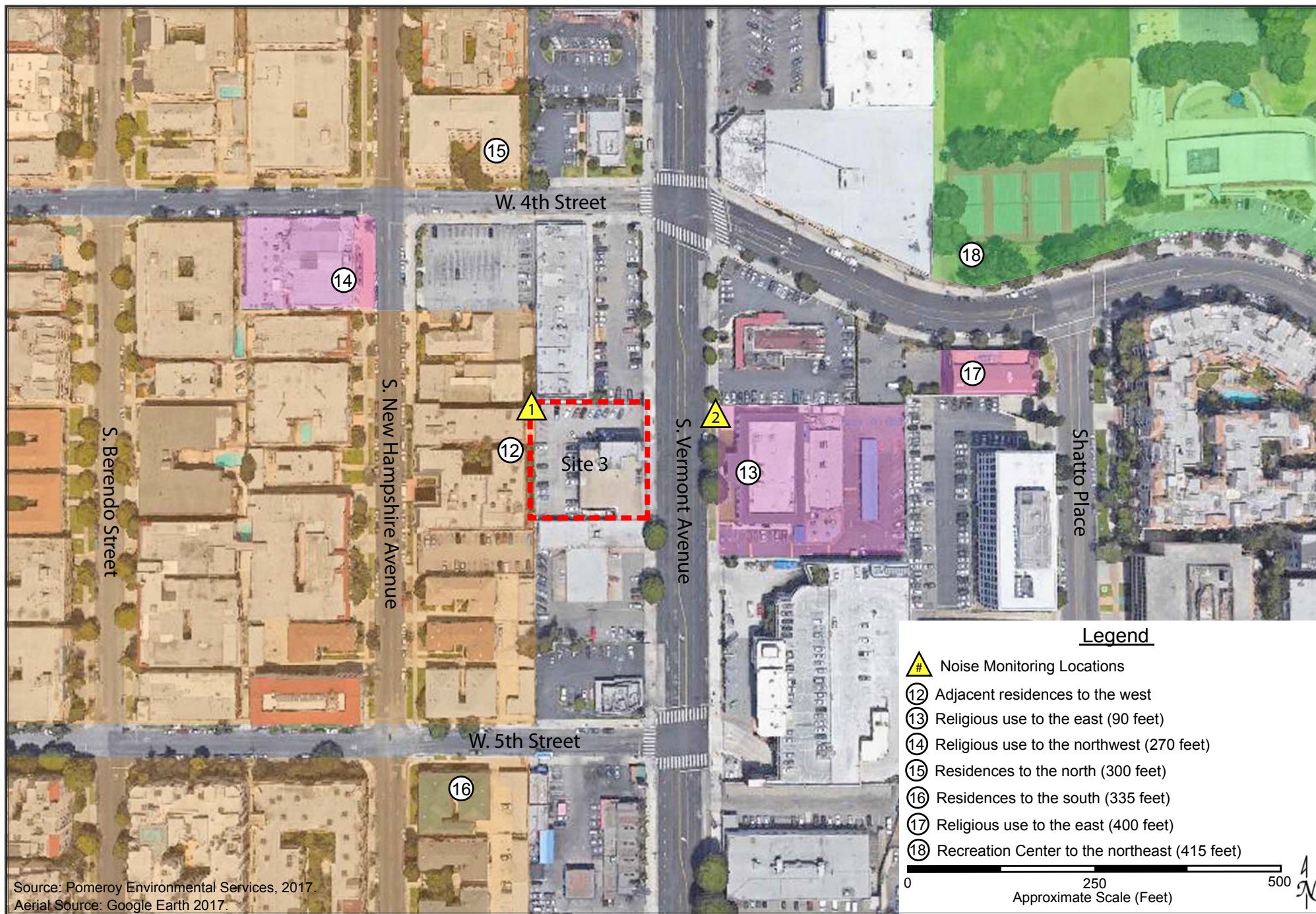
- school to the south (85 feet);
- religious use/school to the east (90 feet);
- residences to the west (235 feet);
- residences to the south (240 feet);
- residences to the northeast (280 feet);
- residences to the east (300 feet);
- residences to the west (300 feet);
- religious use to the north (320 feet);
- residences to the southwest (345 feet);
- religious use to the southeast (385 feet); and
- hotel to the southwest (485 feet).

As shown in Figure 4.2-2, the sensitive receptors nearest to Site 3 are:

- residences to the west (50 feet);
- religious use to the east (90 feet);
- religious use to the northwest (270 feet);
- residences to the north (300 feet);
- residences to the south (335 feet);
- religious use to the east (400 feet); and
- recreation center to the northeast (415 feet).

Thus, according to the SCAQMD, the LSTs for PM₁₀ and PM_{2.5}, which are based on a 24-hour averaging period, would be appropriate to evaluate the localized air quality impacts of a project on nearby sensitive receptors. Additionally, because a sensitive receptor is considered to be present on-site for 24 hours, LSTs





based on shorter averaging times, such as the one-hour NO₂ or the one-hour and eight-hour CO ambient air quality standards, would also apply when evaluating localized air quality impacts on sensitive receptors. However, LSTs based on shorter averaging periods, such as the NO₂ and CO LSTs, are applied to receptors such as industrial or commercial facilities since it is reasonable to assume that workers at these sites could be present for periods of one to eight hours.² Therefore, this analysis evaluates localized air quality impacts from construction activities associated with the project on sensitive receptors for NO₂, CO, PM₁₀, and PM_{2.5}, and on “non-sensitive” receptors (e.g., industrial or commercial facilities) for NO₂ and CO.

Emissions From Project Operations

Emissions associated with Project operation were also calculated using CalEEMod 2016.3.1 and information provided in the traffic study prepared for the Project (Appendix 4.14-1 to this Draft EIR). Operation emissions associated with the Project would be comprised of mobile source emissions, energy demand, and other area source emissions. Mobile source emissions are generated by the net increase in motor vehicle trips to and from the Project Sites associated with operation of the Project. Area source emissions are generated by natural gas consumption for space and water heating, landscape maintenance equipment, and consumer products. To determine if a regional air quality impact would occur, the increase in emissions is compared with the SCAQMD’s recommended regional thresholds for operational emissions, which are applicable to the Project Sites.

As discussed above, the SCAQMD has developed LSTs that are based on the pounds of on-site emissions per day that can be generated by a project that would cause or contribute to adverse localized air quality impacts. For construction, this includes the emissions associated with operating construction equipment on-site throughout the construction period. For operations, this would include emissions associated with on-site stationary sources, and the operation of motor vehicles on-site. The Project includes office and retail uses on Site 1, residential and retail uses on Site 2, and an affordable housing and community recreation center project uses on Site 3. These uses include only limited stationary emissions sources (boilers, etc.), and the compact nature of the parking facilities provided on the Project Sites would result in limited vehicle operations on the Project Sites. Most of the Project’s emissions are generated by mobile sources that occur off-site and do not enter into calculations involving LSTs. In general, LSTs apply to the operational phase of a project only if the project includes numerous stationary sources or attracts mobile sources that may spend long periods queuing and idling at the site. For example, the LST methodology applies to operational projects such as warehouse/transfer facilities.³ Because the Project would include a typical urban mix of residential and commercial uses, an operational analysis utilizing the LST methodology would not apply and, thus, has not been included in this analysis.

Project Design Elements

No specific design elements related to air quality are included in the Project.

² *Ibid.*

³ SCAQMD, *Sample Construction Scenarios for Projects Less than Five Acres in Size*, February 2005, page 1-3.

Thresholds of Significance

Appendix G to the State CEQA Guidelines

The potential for the Project to result in impacts associated with air quality is based on Appendix G of the State CEQA Guidelines, which are addressed in this section. These significance thresholds are listed below.

- Threshold 4.2-1:** Would the Project conflict with or obstruct implementation of the applicable air quality plan?
- Threshold 4.2-2:** Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation? See also Table 4.2-9, SCAQMD Air Quality Significance Thresholds?
- Threshold 4.2-3:** Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
- Threshold 4.2-4:** Would the Project expose sensitive receptors to substantial pollutant concentrations?
- Threshold 4.2-5:** Would the Project create objectionable odors affecting a substantial number of people?

An affirmative answer to any of these questions would represent a significant impact. As discussed in Section 6.5 (Effects Not Found to be Significant), the Project would have a less-than-significant impact with respect to odors (Threshold 4.2-5) because it does not include any substantial odor-generating use, such as an industrial facility or landfill.

Table 4.2-9
SCAQMD Air Quality Significance Thresholds

SCAQMD Air Quality Significance Thresholds		
Mass Daily Thresholds ^a		
Pollutant	Construction	Operation
NO _x	100 pounds/day	55 pounds/day
VOC ^b	75 pounds/day	55 pounds/day
PM ₁₀	150 pounds/day	150 pounds/day
PM _{2.5}	55 pounds/day	55 pounds/day
SO _x	150 pounds/day	150 pounds/day
CO	550 pounds/day	550 pounds/day
Lead	3 pounds/day	3 pounds/day
Toxic Air Contaminants and Odor Thresholds		
Toxic Air Contaminants (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO2eq for industrial facilities	
Ambient Air Quality for Criteria Pollutants ^c		
NO ₂ 1-hour average Annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.10 ppm (federal) ^d 0.03 ppm (State)	
PM ₁₀ 24-hour average Annual average	10.4 µg/m ³ (construction) ^e & 2.5 µg/m ³ (operation) 1.0 µg/m ³	
PM _{2.5} 24-hour average	10.4 µg/m ³ (construction) ^e & 2.5 µg/m ³ (operation)	
SO ₂ 1-Hour average 24-hour average	0.25 ppm (state) & 0.075 ppm (federal – 99 th percentile) 0.04 ppm (state)	
Sulfate 24-hour average	25 µg/m ³ (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 25 ppm (federal) 9.0 ppm (state/federal)	
Lead 30-day Average Rolling 3-month Average	1.5 µg/m ³ (state) 0.15 µg/m ³ (federal)	
<i>Notes: ppm = parts per million by volume; µg/m³ = micrograms per cubic meter</i>		
^a SCAQMD CEQA Handbook (SCAQMD, 1993).		
^b The definition of VOC includes ROG compounds and additional organic compounds not included in the definition of ROG. However, for the purposes of this evaluation, VOC and ROG will be considered synonymous.		
^c Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, table A-2 unless otherwise stated.		
^d In January 2010, the U.S. EPA proposed a new 1-hour national air quality standard of 0.10 ppm for NO ₂ , which is more stringent than the state’s current 1-hour threshold of 0.18 ppm. For the purposes of conducting a conservative analysis, the more stringent national one-hour standard for NO ₂ is used as a threshold in the evaluation of the project’s air quality impacts.		
^e Ambient air quality threshold based on SCAQMD Rule 403.		
Source: SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, website: http://aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2 , revised March 2015 and accessed: May 2017.		

Impact Analysis

Threshold 4.2-1: Would the Project conflict with or obstruct implementation of the applicable air quality plan?

2016 Air Quality Management Plan

The 2016 AQMP, discussed previously, was prepared to accommodate growth, to reduce the high levels of pollutants within the areas under the jurisdiction of SCAQMD, to return clean air to the region, and to minimize the impact of pollution control on the economy. Projects that are consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the 2016 AQMP. Therefore, projects, uses, and activities that are consistent with the applicable assumptions used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they generate emissions exceeding the SCAQMD's recommended daily emissions thresholds.

As discussed in detail in Section 4.11 (Population, Housing, and Employment) of this Draft EIR, SCAG estimated that the City of Los Angeles had a population of 3,845,500 persons, 1,325,500 households, and employment for 1,696,400 persons in 2012. SCAG forecasts that by the year 2020, the City will have a total population of 4,017,000 persons (an increase of 4.4 percent from 2012), 1,441,400 households (an increase of 8.7 percent), and will provide employment for 1,899,500 persons (an increase of 12 percent). For the period of 2020 to 2040, growth in the City of Los Angeles is forecasted to continue; the citywide population is expected to reach 4,609,400 persons (an increase of 14.7 percent between 2020 and 2040), households will total 1,690,300 (an increase of 17.2 percent), and employment will total 2,169,100 jobs (an increase of 14.2 percent).⁴

Site 1 would accommodate approximately 2,193 employees at full occupancy (office and retail) by 2023, which would represent a net increase of approximately 2,100 employees on the Site. The majority of these employees would be relocated from existing County offices within the Project area. The increase in employees would be within SCAG's forecasts of 203,100 additional jobs in the City of Los Angeles between 2012 and 2020 and 269,600 additional jobs between 2020 and 2040 as it represents approximately 1.03 percent and 0.78 percent of the total jobs, respectively. The addition of 618 new residents on Site 2 would be within the SCAG population growth projection, representing approximately 0.10 percent of the Citywide total growth for the period of 2020 to 2040. The addition of 181 new residents on Site 3 would be within the SCAG population growth projection, representing approximately 0.03 percent of the Citywide total growth for the period of 2020 to 2040. Therefore, while the Project would increase employee, housing, and population totals in the City, Project-related growth would be within SCAG's growth forecast for the City. The Project would comply with all SCAQMD rules and regulations that are in effect at the time of development; the Project Developers are not requesting any exemptions from the currently adopted or proposed rules. Therefore, the Project would not conflict with the 2016 AQMP and, as such, would not jeopardize attainment of State and national ambient air quality standards in the area under the jurisdiction of the SCAQMD. This would be a less-than-significant impact.

⁴ Southern California Association of Governments, *Adopted 2016 RTP/SCS Growth Forecast by City*, http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf, accessed: May 15, 2017.

County of Los Angeles General Plan Air Quality Element

The Air Quality Element of the County of Los Angeles General Plan summarizes air quality issues and outlines the goals and policies that will improve air quality and reduce greenhouse gas emissions. These goals and policies would be directly applicable to the Project on Sites 1 and 3. A detailed analysis of the consistency of the Project with relevant policies in the County's Air Quality Element is presented in Table 4.2-10, Project Consistency with Applicable Policies of the County General Plan Air Quality Element.

Table 4.2-10
Project Consistency with Applicable Policies of the County General Plan Air Quality Element

Policy	Consistency Analysis
Policy 1.1: Minimize health risks to people from industrial toxic or hazardous air pollutant emissions, with an emphasis on local hot spots, such as existing point sources affecting immediate sensitive receptors.	Consistent. Site 1 and Site 3 do not involve the construction or operation of industrial uses, nor the placement of sensitive receptors near existing industrial toxic pollutants. Therefore, the Project would be consistent with this policy.
Policy 1.2: Encourage the use of low or no volatile organic compound (VOC) emitting materials.	Consistent. Construction activities on Sites 1 and 3 would be required to comply with the provisions under SCAQMD Rule 1113—Architectural Coatings, as set forth in Regulatory Requirement RR-AQ-2, requiring the use of low VOC architectural coatings. Therefore, the Project would be consistent with this policy.
Policy 1.3: Reduce particulate inorganic and biological emissions from construction, grading, excavation, and demolition to the maximum extent feasible.	Consistent. Construction activities on Sites 1 and 3 would be required to comply with the provisions under SCAQMD Rule 403—Fugitive Dust, as set forth in Regulatory Requirements RR-AQ-1, which would require appropriate dust control measures to be implemented during each phase of development. Consequently, particulate emissions at each of these Project Sites during construction of the Project would be minimized. Therefore, the Project would be consistent with this policy.
Policy 2.1: Encourage the application of design and other appropriate measures when siting sensitive uses, such as residences, schools, senior centers, daycare centers, medical facilities, or parks with active recreational facilities within proximity to major sources of air pollution, such as freeways.	Consistent/Not Applicable. Site 1 and Site 3 do not include the placement of sensitive uses within proximity to a freeway. As such, design features reducing such exposure would not be necessary. Therefore, the Project would be consistent with this policy.
Policy 2.4: Coordinate with different agencies to minimize fugitive dust from different sources, activities, and uses.	Consistent. Construction activities on Sites 1 and 3 would be required to comply with SCAQMD Rule 403—Fugitive Dust, as set forth in Regulatory Requirement RR-AQ-1, which would require appropriate dust control measures to be implemented during each phase of development. These dust control measures include daily watering of unpaved areas and reducing vehicle speed on unpaved areas to less than 15 miles per hour. Therefore, the Project would be consistent with this policy.
Policy 3.1: Facilitate the implementation and maintenance of the Community Climate Action Plan to ensure that the County reaches its climate change and greenhouse gas emission reduction goals.	Consistent. See Section 4.6 (Greenhouse Gas Emissions) for Project consistency with the Community Climate Action Plan.

Table 4.2-10
Project Consistency with Applicable Policies of the County General Plan Air Quality Element

Policy	Consistency Analysis
Policy 3.2: Reduce energy consumption in County operations by 20 percent by 2015.	Consistent. This policy is targeted at energy reduction for County operations, which is applicable only to the Site 1. Site 1 would be consistent with the County Green Building Code standards, as required by Regulatory Requirement RR-AQ-3, which are 25 percent more efficient for residential construction and 30 percent more efficient for non-residential construction as of 2013. ^a Therefore, the Project would be consistent with this policy.
Policy 3.3: Reduce water consumption in County operations.	Consistent. This policy only applies to Site 1. Site 1 would be required to comply with the County Green Building Code, as required by Regulatory Requirement RR-AQ-3, which includes water efficiency measures that result in an approximate 20percent reduction in indoor and outdoor water use. Therefore, the Project would be consistent with this policy.
Policy 3.4: Participate in local, regional and state programs to reduce greenhouse gas emissions.	Consistent. See Section 4.6 (Greenhouse Gas Emissions) for Project consistency with local, regional, and state programs for greenhouse gas reduction.
Policy 3.5: Encourage energy conservation in new development and municipal operations.	Consistent. Site 1 and Site 3 would be consistent with the County Green Building Code, as required by Regulatory Requirement RR-AQ-3, and will include several features to conserve energy. See also Section 4.6 (Greenhouse Gas Emissions). Therefore, the Project would be consistent with this policy.
Policy 3.6: Support rooftop solar facilities on new and existing buildings.	Consistent. Where feasible and applicable, Site 1 and Site 3 would include infrastructure to support rooftop solar panels in accordance with the County Green Building Code, as required by Regulatory Requirement RR-AQ-3. Therefore, the Project would be consistent with this policy.
^a Computed from California Energy Demand, 2012–2022 Final Forecast, June 2012, Form 2.2 on Committed Energy Impacts. Source: County of Los Angeles, General Plan Air Quality Element, adopted October 2015.	

Sites 1 and 3 development would be consistent with goals, objectives, and policies set forth in the County's General Plan Air Quality Element, as discussed above. Therefore, no impact would occur with respect to consistency with the applicable air quality policies in the County General Plan.

City of Los Angeles General Plan Air Quality Element

The Air Quality Element of the City of Los Angeles General Plan sets forth the goals, objectives, and policies that would guide the City in the implementation of its air quality improvement programs and strategies. These goals, objectives and policies are directly applicable to Site 2. A detailed analysis of the consistency of the Project with relevant policies in the Air Quality Element is presented in Table 4.2-11, Project Consistency with Applicable Policies of the City General Plan Air Quality Element.

Table 4.2-11

Project Consistency with Applicable Policies of the City General Plan Air Quality Element

Policy	Consistency Analysis
Policy 1.3.1: Minimize particulate emissions from construction sites.	Consistent. Construction activities on Site 2 would be required to comply with SCAQMD Rule 403—Fugitive Dust, as set forth in Regulatory Requirement RR-AQ-1, which would require appropriate dust control measures to be implemented during each phase of development. Consequently, particulate emissions at Site 2 during construction of the Project would be minimized. Therefore, the Project would be consistent with this policy.
Policy 1.3.2: Minimize particulate emissions from unpaved roads and parking lots which are associated with vehicular traffic.	Consistent. Construction activities on Site 2 would be required to comply with SCAQMD Rule 403—Fugitive Dust, as set forth in Regulatory Requirement RR-AQ-1, which would require appropriate dust control measures to be implemented during each phase of development. These dust control measures include daily watering of unpaved areas and reducing vehicle speed on unpaved areas to less than 15 miles per hour. Therefore, the Project would be consistent with this policy.
Policy 4.2.2: Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.	Consistent. Site 2 includes the redevelopment of an underutilized site in the Wilshire community and would provide a wide variety of compatible and complementary land uses. Site 2 is within walking distance of the Metro Rail Red and Purple Lines. Further, regional and local public bus transit stops are provided near Site 2. The proximity of the Site 2 to these transit stops would provide employees and residents easy access to the new development on Site 2. Therefore, the Project would be consistent with this policy.
Policy 4.2.3: Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	Consistent. Site 2 is a mixed-use development that would include residential, commercial, and retail land uses. Ground-floor retail land uses on Site 2 would be easily accessible to pedestrians. In addition, a plaza would be created along 6 th Street to welcome visitors to Site 2. Site 2 is located within close proximity to multi-modal corridors, such as Vermont Avenue, 4 th Street, and 6 th Street. The characteristics of the nearby multi-modal corridors promote alternative transportation modes (e.g., pedestrian, bicycle, bus, and rail transit). The alternative transportation modes coexist and share the roadway, reinforcing the concept of a balanced and effective transportation system. In addition, Site 2 would provide long- and short-term bicycle parking spaces in accordance with the City Bicycle Ordinance. Therefore, the Project would be consistent with this policy.

Table 4.2-11

Project Consistency with Applicable Policies of the City General Plan Air Quality Element

Policy	Consistency Analysis
Policy 4.2.4: Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	Consistent. The air quality analysis conducted for the Project in this Draft EIR serves to identify potential air quality impacts associated with construction and operation of residential and retail uses on Site 2. The analysis in this Draft EIR will be used by the City's decision makers in the review and approval process for the Project. Therefore, the Project would be consistent with this policy.
<i>Source: City of Los Angeles, General Plan Air Quality Element, adopted November 1992.</i>	

Site 2 development would be consistent with goals, objectives, and policies set forth in the City's General Plan Air Quality Element, as discussed above. Therefore, no impact would occur with respect to consistency with the applicable air quality policies in the City General Plan.

Threshold 4.2-2: Would the Project violate any air quality standard or contribute substantially to an existing or projected air quality violation? See also Table 4.2-9, SCAQMD Air Quality Significance Thresholds?

Construction**Phase I**

Phase I of the Project would include the construction of the new County office building, retail uses, and parking structure on Site 1, and the construction of new senior affordable housing and community recreation center on Site 3. Site 1 construction is anticipated to begin in the summer of 2018, and would take place over a period of approximately 36 months, with occupancy anticipated to be complete in the summer of 2021. Construction on Site 3 is anticipated to commence in the summer of 2019, and be completed and occupied in 2020.

Phase I construction activities on Sites 1 and 3 would include the demolition of existing buildings, parking structures and surface parking lots, excavation to accommodate the underground parking structures, construction of underground and aboveground parking structures, and framing and finishing of the new office and residential buildings. See Appendix 4.2-1 to this Draft EIR for a complete discussion of assumptions utilized in this analysis.

These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. Construction activities involving grading and site preparation would primarily generate PM_{2.5} and PM₁₀ emissions. Mobile sources (such as diesel-fueled equipment on-site and traveling to and from Sites 1 and 3) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. Table 4.2-12, Estimated Peak Daily Construction Emissions – Phase I, identifies daily emissions that are estimated to occur on peak construction days for each construction phase during Phase I at Sites 1 and 3. This table only addresses the discrete activities required to construct the individual projects on Sites 1 and 3. Emissions from construction activities on Sites 1 and 3 that would potentially overlap based on the construction schedules for Site 1 and Site 3 are addressed in Table 4.2-

13 below. As shown in Table 4.2-12, the individual construction activities on Sites 1 and 3, when considered separately, would not exceed the SCAQMD thresholds of significance.

Table 4.2-12
Estimated Peak Daily Construction Emissions – Phase I

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
SITE 1^a						
Demolition Phase	2.71	29.15	16.79	0.04	3.27	1.68
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Grading/Excavation Phase	2.96	48.62	16.18	0.09	5.44	3.04
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase	25.84	74.19	60.73	0.22	10.94	4.19
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
SITE 3^b						
Demolition Phase	1.07	10.52	8.55	0.03	1.35	0.67
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Grading/Excavation Phase	1.67	29.89	12.90	0.07	2.30	1.13
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase	15.37	20.58	19.19	0.07	2.36	1.30
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
^a See Table 1 in Appendix 4.2-1 for a breakdown of each construction phase. ^b See Table 3 in Appendix 4.2-1 for a breakdown of each construction phase. Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Source: Pomeroy Environmental Services, 2017.						

Based on the current conceptual construction schedule (see Appendix 4.2-1 to this Draft EIR), the construction of Site 1 and Site 3 may result in overlapping construction days, potentially resulting in higher peak daily regional construction emissions. Specifically, Site 3 demolition, grading, and building construction could overlap with Site 1 building construction activities. Therefore, Table 4.2-13, Estimated Peak Daily Construction Emissions - Overlapping Activities on Sites 1 and 3, identifies daily emissions estimated to occur on overlapping peak construction days during Phase I. As shown, the overlapping emissions would exceed the SCAQMD thresholds for NO_x under the Grading Phase of Site 3, and the Building Construction Phase of Site 1.

Table 4.2-13
Estimated Peak Daily Construction Emissions – Overlapping Activities on Sites 1 and 3

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Demolition Phase Site 3	1.07	10.52	8.55	0.03	1.35	0.67
Building Construction Phase Site 1	25.84	74.19	60.73	0.22	10.94	4.19
Total Emissions	26.91	84.71	69.28	0.25	12.29	4.86

Table 4.2-13
Estimated Peak Daily Construction Emissions – Overlapping Activities on Sites 1 and 3

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Grading Phase Site 3	1.67	29.89	12.90	0.07	2.30	1.13
Building Construction Phase Site 1	25.84	74.19	60.73	0.22	10.94	4.19
Total Emissions	27.51	104.08	73.63	0.29	13.24	5.32
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	Yes	No	No	No	No
Building Construction Phase Site 3	15.37	20.58	19.19	0.07	2.36	1.30
Building Construction Phase Site 1	25.84	74.19	60.73	0.22	10.94	4.19
Total Emissions	41.21	94.77	79.92	0.29	13.30	5.49
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.</i> <i>Source: Pomeroy Environmental Services, 2017.</i>						

Phase II

Phase II of the Project would include the reuse and conversion of the existing twelve-story building for residential and retail use, and construction of new residential and retail uses and parking structure on Site 2. Construction on Site 2 is anticipated to commence in fall 2021, and be completed and occupied in late 2023. Construction on Site 2 cannot commence until the completion of the Site 1 office building and the relocation of existing County employees from Site 2 to Site 1. Accordingly, there would be no overlap between Phase I and Phase II construction activities on Sites 1 and 2.

Phase II construction activities on Site 2 would include demolition of the existing four-story WDACS office building, and two-story parking structure, excavation to accommodate the new underground parking structure, construction of a new underground and aboveground parking structure, framing and finishing of the new residential building, and demolition and reuse/conversion of the interior spaces of the existing DMH building. See Appendix 4.2-1 to this Draft EIR for a complete discussion of assumptions utilized in this analysis.

These construction activities would temporarily create emissions of dust, fumes, equipment exhaust, and other air contaminants. Construction activities involving grading and site preparation would primarily generate PM_{2.5} and PM₁₀ emissions. Mobile sources (such as diesel-fueled equipment on-site and traveling to and from the Project Site 2) would primarily generate NO_x emissions. The application of architectural coatings would primarily result in the release of ROG emissions. The amount of emissions generated on a daily basis would vary, depending on the amount and types of construction activities occurring at the same time. Table 4.2-14, Estimated Peak Daily Construction Emissions – Phase II,

identifies daily emissions estimated to occur on peak construction days for each construction phase during Phase II at Site 2. As shown, no significant emissions impact would occur during the Demolition Phase, Grading Phase, or Building Construction Phase on Site 2.

Table 4.2-14
Estimated Peak Daily Construction Emissions – Phase II

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site 2^a						
Demolition Phase	2.13	22.42	15.63	0.04	2.33	1.22
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Grading Phase	2.01	35.96	11.93	0.08	4.28	2.17
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
Building Construction Phase	25.11	25.45	30.20	0.10	4.61	1.82
SCAQMD Thresholds	75.00	100.00	550.00	150.00	150.00	55.00
Significant Impact?	No	No	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust.</i> ^a See Table 2 in Appendix 4.2-1 for a breakdown of each construction phase. Source: Pomeroy Environmental Services, 2017.						

The above calculations, for both Phase I and II, assume that appropriate dust control measures would be implemented as part of the project during each phase of development, as required by SCAQMD Rule 403 - Fugitive Dust (Regulatory Requirement RR AQ-1, below). Specific Rule 403 control requirements include, but are not limited to, applying water in sufficient quantities to prevent the generation of visible dust plumes (up to two times per day), applying soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Sites, and maintaining effective cover over exposed areas. The calculations also assume that low-emissions paints would be used as part of the project during the appropriate phases of development, as required by SCAQMD Rule 1113 – Architectural Coatings (Regulatory Requirement RR AQ-2, below).

As shown in Table 4.2-13, construction-related daily emissions associated with the Project would exceed the SCAQMD significance threshold for NO_x during the overlap of the Grading Phase of Site 3 and the Building Construction Phase of Site 1 during Phase I construction activities. As such, regional construction impacts would be significant.

Operation

Operational emissions generated by area sources, motor vehicles and energy demand would result from normal day-to-day activities of the Project. The analysis of daily operational emissions associated with the Project has been prepared utilizing CalEEMod 2016.3.1 as recommended by the SCAQMD. The results of these calculations are presented in Table 4.2-15, Estimated Daily Operational Emissions. The total emissions included in Table 4.2-15 for Phase I reflect the total operational emissions of Site 1 and Site 3. The table also reflects the emissions of the Phase I and Phase II buildout of all of the Project Sites, which represents the total Project operational emissions minus the emissions from the existing development. All of the emissions levels shown would be below the SCAQMD thresholds.

Table 4.2-15
Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Phase I						
Site 1 Emissions ^a	31.59	29.36	76.45	0.26	21.68	6.01
Less Existing Site 1 Emissions	(1.19)	(1.75)	(5.03)	(0.01)	(0.96)	(0.27)
Net Change in Site 1 Emissions	30.40	27.61	71.42	0.25	20.72	5.74
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Site 3 Emissions ^b	4.10	4.16	15.94	0.03	2.52	0.73
Less Existing Site 3 Emissions	(1.11)	(2.07)	(5.91)	(0.02)	(1.15)	(0.33)
Net Change in Site 3 Emissions	2.99	2.09	10.03	0.01	1.37	0.40
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Total Phase I Emissions (net increase in Site 1 emissions + net increase in Site 3 emissions)	33.39	29.70	81.45.45	0.26	22.10	6.14
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Phase II						
Site 2 Emissions ^c	12.65	21.67	84.13	0.25	12.56	3.80
Less Existing Site 2 Emissions	(14.36)	(43.91)	(127.59)	(0.33)	(14.53)	(4.46)
Net Change in Site 2 Emissions	(1.71)	(22.24)	(43.46)	(0.08)	(1.97)	(0.66)
Site 1 – Addition of Office Employees ^d	0.23	1.02	3.07	0.01	1.04	0.28
Total Phase II Emissions	(1.48)	(21.22)	(40.39)	(0.07)	(0.93)	(0.38)
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Phases I and II						
Total Phase I Emissions	33.39	29.70	81.45	0.26	22.10	6.14

Table 4.2-15
Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Total Phase II Emissions	(1.48)	(21.22)	(40.39)	(0.07)	(0.93)	(0.38)
Total Net Project Emissions	31.91	8.21	40.06	0.19	21.17	5.76
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
<i>Calculation data provided in Appendix 4.2-1 to this Draft EIR. Column totals may not add due to rounding from the model results.</i> ^a See Tables 4 and 7 in Appendix 4.2-1 for a breakdown of Site 1 operational emissions. ^b See Tables 6 and 9 in Appendix 4.2-1 for a breakdown of Site 3 operational emissions. ^c See Tables 5 and 8 in Appendix 4.2-1 for a breakdown of Site 2 operational emissions. ^d As noted in the Project Traffic Study, after Phase II completion, approximately 103 employees would be added to Site 1 office building resulting in 150 added vehicle trips. Source: Pomeroy Environmental Services, 2017.						

The Project would also incorporate Transportation Demand Management (“TDM”) programs to reduce vehicle trip generation, as outlined in Section 4.14 (Transportation, Traffic and Parking) of this Draft EIR. TDM program elements could include bicycle amenities, incentives for alternative travel modes, parking incentives, etc. Furthermore, the mixed-use design of the Project would also reduce total Vehicle Miles Travelled by shortening potential trips (i.e., by linking trips in multi-purpose trip chains). The Project is also located near transit opportunities, including the Metro Red and Purple Lines and buses, and would include bicycle parking; all of which would support a decrease in automobile dependence.

Operational emissions generated by the Project would not exceed the regional thresholds of significance set by the SCAQMD under all scenarios. Therefore, impacts associated with regional operational emissions from the Project would be less than significant.

Construction and Operation Overlap

Because the Project would occur over two phases of development, Sites 1 and 3 would be operational during the demolition, grading and building construction phases of Site 2. Moreover, Site 3 would become operational during the Building Construction Phase of Site 1. Therefore, the Project could result in daily operational and construction emissions at the same time. As such, impacts associated with overlapping Project construction and operational emissions are shown in Table 4.2-16, Construction & Operational Overlapping Emissions. This analysis has conservatively applied the SCAQMD operational thresholds of significance to this scenario, which are lower than the construction thresholds of significance.

Table 4.2-16
Construction & Operational Overlapping Emissions

Emissions Source ^a	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Site 1 Building Construction	25.84	74.19	60.73	0.22	10.94	4.19
Site 3 Operational Emissions	4.10	4.16	15.94	0.03	2.52	0.73
Total Emissions	29.94	78.35	76.67	0.25	13.46	4.92

Table 4.2-16
Construction & Operational Overlapping Emissions

Emissions Source ^a	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
SCAQMD Thresholds ^b	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	Yes	No	No	No	No
Phase II Demolition	2.13	22.42	15.63	0.04	2.33	1.22
Phase I Operational Emissions	33.39	29.70	81.45	0.26	22.10	6.14
Total Emissions	35.52	52.12	97.08	0.30	24.43	7.36
SCAQMD Thresholds ^b	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Phase II Grading Phase	2.01	35.96	11.93	0.08	4.28	2.17
Phase I Operational Emissions	33.39	29.70	81.45	0.26	22.10	6.14
Total Emissions	35.40	65.66	93.38	0.34	26.38	8.31
SCAQMD Thresholds ^b	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	Yes	No	No	No	No
Phase II Building Construction Phase	25.11	25.45	30.20	0.10	4.61	1.82
Phase I Operational Emissions	33.39	29.70	81.45	0.26	22.10	6.14
Total Emissions	58.50	55.15	111.65	0.36	26.71	7.96
SCAQMD Thresholds ^b	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	Yes	Yes	No	No	No	No
<i>Calculation data provided in Appendix 4.2-1 to this Draft EIR. Column totals may not add due to rounding from the model results.</i> ^a See Table 4.2-9 above for Phase II construction phase emissions and Table 4.2-11 above for Phase I operational emissions. ^b SCAQMD thresholds for operational emissions are utilized here as they are more conservative than construction thresholds. Source: Pomeroy Environmental Services, 2017						

As shown in Table 4.2-16, an exceedance in the NO_x SCAQMD threshold of significance may occur after Site 3 is operational and Site 1 is under construction. Additionally, an exceedance in the ROG and NO_x SCAQMD thresholds of significance may occur after Sites 1 and 3 are operational and Site 2 is under construction. As such, impacts during construction and operation overlap would be significant.

Threshold 4.2-3: Would the Project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

The geographic extent of potential cumulative air quality impacts is the Basin. Because the Basin is currently in nonattainment for ozone, PM₁₀, and PM_{2.5}, other new projects in the local vicinity could exceed an air quality standard or contribute to an existing or projected air quality exceedance. With regard to determining the significance of the Project contribution, SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those

for project-specific impacts. Furthermore, the SCAQMD states that if an individual development project generates less-than-significant construction or operational emissions impacts, then the development project would not contribute to a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

Construction

As discussed above, construction emissions associated with the project would exceed the SCAQMD's thresholds of significance for NO_x during overlapping construction on Site 1 and Site 3, and NO_x and ROG during construction and operation overlapping phases. Because these pollutants are classified as ozone precursors and because the Basin is in nonattainment for ozone, this would be considered a potentially significant cumulative impact.

Operation

As discussed above, operational emissions generated by the Project would not violate an air quality standard or exceed an SCAQMD threshold of significance. However, an exceedance in the ROG and NO_x SCAQMD thresholds of significance may occur after Sites 1 and 3 are operational and Site 2 is under construction. Because these pollutants are classified as ozone precursors and because the Basin is in nonattainment for ozone, this would be considered a potentially significant cumulative impact.

Threshold 4.2-4: Would the Project expose sensitive receptors to substantial pollutant concentrations?

Construction

Land uses that are considered to be more sensitive to changes in air quality than others are referred to as "sensitive receptors." Primary and secondary schools, hospitals, and convalescent homes, are considered to be sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential land uses are considered to be sensitive because people in residential areas are often at home for extended periods of time, so they could be exposed to pollutants for extended periods. Recreational areas are considered moderately sensitive to poor air quality because vigorous exercise associated with recreation places a high demand on the human respiratory function.

Because Sites 1 and 2 are adjacent to each other, the nearest sensitive receptors for both sites are identified together. The sensitive receptors nearest to Sites 1 and 2 are: school to the south of Site 2 (85 feet), school to the east of Site 1 (90 feet), residences to the south (240 feet), residences to the east (280 feet), residences to the east (300 feet), residences to the west (300 feet), residences to the southwest (345 feet), and hotel to the southwest (485 feet). The nearest sensitive receptors to Site 3 are: residences to the west (50 feet), residences to the north (300 feet), residences to the south (335 feet), and recreational uses to the northeast (450 feet). Locations of sensitive receptors relative to Sites 1, 2 and 3 are shown in Figures 4.2-1 and 4.2-2 above.

Phase I

Emissions from construction activities have the potential to generate localized emissions that may expose sensitive receptors to harmful pollutant concentrations. The SCAQMD has developed localized significance threshold (LST) look-up tables for project sites that are one, two, and five acres in size to simplify the evaluation of localized emissions at small sites. LSTs are provided for each Source Receptor

Area (SRA) and various distances from the source of emissions. In the case of this analysis, the Project Sites are located within SRA 1 covering the Central Los Angeles area. The sensitive receptor nearest to Site 1 is a school approximately 90 feet to the east. As mentioned previously, Site 1 is 2.5 acres in size. Therefore, consistent with SCAQMD recommendations, the LSTs for a two-acre site in SRA 1 with receptors located within 25 meters have been used to address the potential localized NO_x, CO, PM₁₀, and PM_{2.5} emissions for Site 1. As shown in Table 4.2-17, Site 1 Localized On-Site Peak Daily Construction

Table 4.2-17
Site 1 Localized On-Site Peak Daily Construction Emissions

Construction Phase ^a	Total On-site Emissions (Pounds per Day)			
	NO _x ^b	CO	PM ₁₀	PM _{2.5}
Demolition Emissions	24.36	15.11	2.84	1.56
<i>SCAQMD Localized Thresholds</i>	<i>108.00</i>	<i>1,048.00</i>	<i>8.00</i>	<i>5.00</i>
Potentially Significant Impact?	No	No	No	No
Grading/Excavation/Foundation Preparation Emissions	24.29	10.38	3.99	2.58
<i>SCAQMD Localized Thresholds</i>	<i>108.00</i>	<i>1,048.00</i>	<i>8.00</i>	<i>5.00</i>
Potentially Significant Impact?	No	No	No	No
Building Construction Emissions	24.96	21.86	1.42	1.35
<i>SCAQMD Localized Thresholds</i>	<i>108.00</i>	<i>1,048.00</i>	<i>8.00</i>	<i>5.00</i>
Potentially Significant Impact?	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Building construction emissions include architectural coatings and paving.</i> ^a <i>The Project Site is 2.5 acres. Consistent with SCAQMD recommendations, the localized thresholds for Site 1 are based on a two-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 1.</i> ^b <i>The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO₂, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO₂ levels as they are associated with adverse health effects.</i> <i>Source: Pomeroy Environmental Services, 2017.</i>				

Emissions, peak daily emissions generated on Site 1 during construction activities for each phase would not exceed the applicable construction LSTs in SRA 1. Therefore, localized air quality impacts from Site 1 construction activities on the off-site sensitive receptors would be less than significant.

The sensitive receptors nearest to Site 3 are residential uses 50 feet to the west. As mentioned previously, Site 3 is 0.5 acres in size. Therefore, consistent with SCAQMD recommendations, the LSTs for a one-acre site in SRA 1 with receptors located within 25 meters have been used to address the potential localized NO_x, CO, PM₁₀, and PM_{2.5} emissions for Site 3. As shown in Table 4.2-18, Site 3 Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within Site 3 during construction activities for each phase would not exceed the applicable construction LSTs in SRA 1. Therefore, localized air quality impacts from Site 3 construction activities on the off-site sensitive receptors would be less than significant.

Table 4.2-18
Site 3 Localized On-Site Peak Daily Construction Emissions

Construction Phase ^a	Total On-site Emissions (Pounds per Day)			
	NO _x ^b	CO	PM ₁₀	PM _{2.5}
Demolition Emissions	8.60	7.69	1.13	0.60
<i>SCAQMD Localized Thresholds</i>	<i>74.00</i>	<i>680.00</i>	<i>5.00</i>	<i>3.00</i>
Potentially Significant Impact?	No	No	No	No
Grading/Excavation/Foundation Preparation Emissions	8.60	7.69	0.91	0.70
<i>SCAQMD Localized Thresholds</i>	<i>74.00</i>	<i>680.00</i>	<i>5.00</i>	<i>3.00</i>

Table 4.2-18
Site 3 Localized On-Site Peak Daily Construction Emissions

Construction Phase ^a	Total On-site Emissions (Pounds per Day)			
	NO _x ^b	CO	PM ₁₀	PM _{2.5}
Potentially Significant Impact?	No	No	No	No
Building Construction Emissions	15.78	13.56	0.96	0.89
<i>SCAQMD Localized Thresholds</i>	<i>74.00</i>	<i>680.00</i>	<i>5.00</i>	<i>3.00</i>
Potentially Significant Impact?	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Building construction emissions include architectural coatings and paving.</i> ^a <i>The Project Site is 0.5 acre. Consistent with SCAQMD recommendations, the localized thresholds for Site 3 are based on a one-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 1.</i> ^b <i>The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO₂, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO₂ levels as they are associated with adverse health effects.</i> <i>Source: Pomeroy Environmental Services, 2017.</i>				

Phase II

The sensitive receptor nearest to Site 2 is a school approximately 85 feet to the south. As mentioned previously, Site 2 is one acre in size. Therefore, consistent with SCAQMD recommendations, the LSTs for a one-acre site in SRA 1 with receptors located within 25 meters have been used to address the potential localized NO_x, CO, PM₁₀, and PM_{2.5} emissions for Site 2. As shown below in Table 4.2-19, Site 2 Localized On-Site Peak Daily Construction Emissions, peak daily emissions generated within Site 2 during construction activities for each phase would not exceed the applicable construction LSTs in SRA 1. Therefore, localized air quality impacts from Site 2 construction activities on the off-site sensitive receptors would be less than significant.

Table 4.2-19
Site 2 Localized On-Site Peak Daily Construction Emissions

Construction Phase ^a	Total On-site Emissions (Pounds per Day)			
	NO _x ^b	CO	PM ₁₀	PM _{2.5}
Demolition Emissions	19.70	14.49	2.00	1.12
<i>SCAQMD Localized Thresholds</i>	<i>74.00</i>	<i>680.00</i>	<i>5.00</i>	<i>3.00</i>
Potentially Significant Impact?	No	No	No	No
Grading/Excavation/Foundation Preparation Emissions	14.33	6.33	2.72	1.71
<i>SCAQMD Localized Thresholds</i>	<i>74.00</i>	<i>680.00</i>	<i>5.00</i>	<i>3.00</i>
Potentially Significant Impact?	No	No	No	No
Building Construction Emissions	16.62	18.32	0.80	0.77
<i>SCAQMD Localized Thresholds</i>	<i>74.00</i>	<i>680.00</i>	<i>5.00</i>	<i>3.00</i>
Potentially Significant Impact?	No	No	No	No
<i>Note: Calculations assume compliance with SCAQMD Rule 403 – Fugitive Dust. Building construction emissions include architectural coatings and paving.</i> ^a <i>The Project Site is 1 acre. Consistent with SCAQMD recommendations, the localized thresholds for Site 2 are based on a one-acre site with a receptor distance of 25 meters (82 feet) in SCAQMD's SRA 1.</i> ^b <i>The localized thresholds listed for NO_x in this table takes into consideration the gradual conversion of NO_x to NO₂, and are provided in the mass rate look-up tables in the "Final Localized Significance Threshold Methodology" document prepared by the SCAQMD. As discussed previously, the analysis of localized air quality impacts associated with NO_x emissions is focused on NO₂ levels as they are associated with adverse health effects.</i> <i>Source: Pomeroy Environmental Services, 2017.</i>				

Although Site 1 and Site 2 are adjacent to one another, no overlap in construction activities on Sites 1 and 2 would occur since construction on Site 2 cannot commence until the construction on Site 1 is complete and the existing employees on Site 2 have been relocated to the new Site 1 office building.

Operation

Localized Carbon Monoxide Impacts

The Project would not result in potentially significant CO “hot spots” and a Project-specific CO “hot spots” analysis is not needed to reach this conclusion. It has long been recognized that CO exceedances (“hot spots”) are caused by vehicular emissions, primarily when idling at intersections. Vehicle emissions standards have become increasingly more stringent in the last twenty years. With the turnover of older vehicles, introduction of cleaner fuels and implementation of control technology on industrial facilities, CO concentrations in the Project vicinity have steadily declined. For reference, in SRA 1 (Central Los Angeles Area), maximum 1-hour CO concentrations were 3.0 ppm in 2014 and 3.2 ppm in 2015 (1-Hour was not measured in 2013). The national 1-hour standard is 35.0 ppm and the state 1-hour standard is 20.0 ppm. Maximum 8-hour CO concentrations were 2.0 ppm in 2013, 2.0 ppm in 2014, and 1.8 ppm in 2015. The national 8-hour standard is 9.0 ppm and the state 8-hour standard is 9.0 ppm. Also, see Table 4.2-4. Based on these maximum measured concentrations, the 1-hour and 8-hour CO concentrations in SRA 1 have historically been in decline and are substantially within the national and state standards. Accordingly, with the steadily decreasing CO emissions from vehicles, even very busy intersections do not result in localized exceedances of the CO standards. Therefore, the Project would not have the potential to cause or contribute to an exceedance of the California one-hour or eight-hour CO standards of 20 or 9.0 ppm, respectively; or generate an incremental increase equal to or greater than 1.0 ppm for the California one-hour CO standard, or 0.45 ppm for the eight-hour CO standard at any local intersection. Impacts with respect to localized CO concentrations would be less than significant.

Toxic Air Contaminants

As the Project would consist of the development of commercial and residential land uses, and would not include any industrial or other land uses involving the use, storage, or processing of carcinogenic or non-carcinogenic toxic chemicals or air contaminants, or the generation of high levels of diesel truck activity, no toxic airborne emissions would result from its implementation. In addition, operational activities associated with the Project would be typical of other similar commercial and residential developments in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. Therefore, impacts to sensitive receptors associated with the release of TACs from the Project Sites would be less than significant.

CUMULATIVE IMPACTS

Construction

Because the Los Angeles County portion of the Basin is currently in non-attainment for O₃, PM₁₀, and PM_{2.5}, cumulative development could violate an air quality standard or contribute to an existing or projected air quality violation. This would be considered a significant cumulative impact. According to the SCAQMD, individual construction projects that exceed the SCAQMD recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in non-attainment. As previously discussed, construction emissions

associated with the Project would exceed the SCAQMD's thresholds of significance for NO_x during overlapping construction on Site 1 and Site 3, and NO_x and ROG during construction and operation overlapping phases. NO_x and ROG are considered O₃ precursors and the Basin is in non-attainment for O₃. Therefore, the cumulative impact of the Project's construction emissions would be considered significant.

With respect to TACs, the greatest potential for TAC emissions at related projects would involve diesel particulate emissions associated with trucks and heavy equipment. Construction activities associated with the Project and related projects would be similar to other development projects in the City, and would be subject to the regulations and laws relating to toxic air pollutants at the regional, state, and federal level that would protect sensitive receptors from substantial concentrations of these emissions. In addition, and similar to the Project, related projects construction activity would not result in long-term substantial sources of TAC emissions (i.e., 9, 30 or 70 years) and would not combine with the Project to generate ongoing TAC emissions. Therefore, cumulative TAC emissions from the Project and related projects would be less than significant.

With respect to cumulative odor impacts, potential sources that may emit odors during construction activities at each related project include the use of architectural coatings and solvents. SCAQMD Rules 1108 and 1113 limit the amount of volatile organic compounds from cutback asphalt and architectural coatings and solvents, respectively. Based on mandatory compliance with SCAQMD Rules, it is anticipated that construction activities and materials used in the construction of the project and related projects would not combine to create objectionable odors. Therefore, cumulative odor impacts would be less than significant.

Operation

Due to the non-attainment status of O₃, PM₁₀, and PM_{2.5}, the generation of daily operational emissions associated with cumulative development would result in a cumulative significant impact associated with the cumulative net increase of any criteria pollutant for which the region is in non-attainment. With respect to operational emissions, the SCAQMD has indicated that, if an individual project results in air emissions of criteria pollutants (CO, ROG, NO_x, SO_x, PM₁₀, and PM_{2.5}) that exceed the SCAQMD recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the project region is in non-attainment under an applicable federal or state ambient air quality standard.

As previously discussed, operational emissions associated with the Project would not exceed the established SCAQMD thresholds of significance. However, as noted above, Project emissions would exceed the SCAQMD's thresholds of significance for NO_x and ROG during the overlap of the operation phase of Phase I and the construction phase for Phase II. Once Project construction is complete (both Phases), full buildout operational emissions would not exceed established SCAQMD thresholds of significance. Therefore, the long-term cumulative impact of the Project's operational emissions would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are proposed relevant to air quality.

Regulatory Requirements

As noted above, the analysis of Project air emissions incorporates the following regulatory compliance measures:

- RR AQ-1:** The Project shall comply with SCAQMD Rule 403 regarding fugitive dust.
- RR AQ-2:** The Project shall comply with SCAQMD Rule 1113 regarding Architectural Coatings.
- RR AQ-3:** Project construction shall comply with the County of Los Angeles Green Building Standards Code (Sites 1 and 3) and City of Los Angeles Green Building Code (Site 2).

MITIGATION MEASURES

The following mitigation measure has been identified to reduce off-road construction emission impacts to the extent feasible.

- MM AQ-1:** Developer shall use Tier IV off-road equipment with the following features if reasonably available: alternative fuels (biodiesel, compressed natural gas, propane, etc.), electric equipment, diesel oxidation catalyst, and newer tier engines with more stringent U.S. EPA tier emissions standards than is anticipated from the statewide fleet mix.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts related to air quality would be potentially significant with respect to regional construction emissions. Specifically, construction emissions associated with the project would exceed the SCAQMD's thresholds of significance for NO_x during overlapping construction on Site 1 and Site 3, and NO_x and ROG during construction and operation overlapping phases. These emissions are primarily associated with off-road construction equipment. As such, MM AQ-1 would reduce these impacts. No other feasible mitigation measures are available to address this impact. Because measurable reductions from this measure cannot be guaranteed at this time (due to unknown market availability and economic feasibility), this analysis has conservatively concluded that regional construction air quality impacts would be significant and unavoidable.

Impacts would be less than significant with respect to localized construction and operational emissions, regional operational emissions, and plan consistency.

4.3 CULTURAL RESOURCES

4.3.1. HISTORICAL RESOURCES

For purposes of this Draft EIR, the area of cultural resources encompasses historical resources, archaeological resources, and paleontological resources as set forth in CEQA Guidelines, Appendix G. These topics are discussed under separate subheadings within this section of the Draft EIR. Tribal Cultural Resources is discussed in Section 4.15 of this Draft EIR.

INTRODUCTION

This subsection provides an overview of the historical resources in the Project Sites' vicinity and, in accordance with CEQA, evaluates direct and indirect impacts associated with development of the proposed Project. This section includes the following: (1) identification and evaluation of the significance of any historical resources falling within the Project Sites and areas of potential impacts; (2) analysis of the Project's potential impacts on historical resources; and (3) identification of mitigation measures for any significant impacts (pursuant to CEQA Guidelines Section 15126.2) on cultural resources.

The following analysis is based on the following preliminary historical evaluation for the Project:

- *Vermont Corridor Development Plan Historical Resource Report*, prepared by GPA Consulting, May 2017 (Draft EIR Appendix 4.3-1).

The report presents the historical assessment of the Project and discusses the potential for historical resources in the study area and any impacts that the Project may have on the identified historical resources. For the purposes of the report, the study area was identified as the three Project Sites and abutting parcels. The report is based on review of the proposed Project, historical records search results, and ordinances, statutes, regulations, bulletins, and technical materials, as well as field surveys of the Project Sites, and research of the Project Sites' vicinity. Furthermore, the analysis in this subsection includes a description of the regulatory framework, thresholds for determining if the Project would result in significant impacts, mitigation measures (if determined applicable), and the level of significance after mitigation.

ENVIRONMENTAL SETTING

Historical Development of the Project Vicinity

The Project Sites and surrounding vicinity are located in the Wilshire Community Plan Area of the City of Los Angeles. Historically, this neighborhood was known as the Wilshire Boulevard district or Wilshire Center. The area developed to the north and south of Wilshire Boulevard, a major east-west thoroughfare, connects downtown Los Angeles to the ocean. Wilshire Boulevard is located one block south of West 6th Street. Following the initial subdivision of the area in the 1880s, Wilshire Center was developed with a variety of residential, commercial, and institutional property types.

In 1886, brothers Henry Gaylord and William Wilshire subdivided their 35 acres of barley fields speculating for the development of wealthy single-family homes as spillover from the recently developed Westlake Park (today known as MacArthur Park) to the east. The subdivision successfully attracted the social elite from downtown and the area became a well-known enclave of extravagant single-family homes in the late 1800s. The city expanded its borders west to include Vermont Avenue in 1897.

Streetcar lines that ran on 6th Street, 8th Street, 9th Street and Western Avenue connected the area to downtown, and facilitated development. In the 1910s, development trends in the area shifted from single-family homes to luxurious apartment hotels, replacing some of the original single-family homes with denser development. Religious institutions followed their congregants and built large, lavish houses of worship in the area. In 1928, building restrictions that prohibited commercial development on Wilshire Boulevard were removed and the commercial real estate market in the area boomed. With the rapid development of commercial buildings and the influx of department stores, Wilshire Center adopted the moniker “Fifth Avenue of the West,” retaining its elite status, but transitioning to a commercial destination.¹ The new commercial landscape began attracting tourists who wanted to see where the stars shopped and admire their homes.

As automobile ownership became common in the 1930s, downtown was decentralized and the streetcar routes became less important. The eastern and western sections of Wilshire Boulevard were fully connected across Westlake Park in 1934. Western Avenue and Vermont Avenue, major intersecting streets with Wilshire Boulevard, were transformed from residential thoroughfares to major commercial arteries. Specifically, Vermont Avenue contained a concentration of automobile showrooms, both new and used, constructed in the most popular architectural styles of the time.²

In the late 1950s office development spread from Wilshire Boulevard north along Vermont Avenue, beginning a transition from a concentration of auto showrooms to a concentration of corporate office buildings.³ From the 1940s to 1960s, many of the auto showrooms were replaced by office buildings and multi-family housing brought on by post-World War II population growth and the increasing decentralization of the city. Typical developments of the period were high-rise office buildings designed in styles of the Modern Movement and “dingbat” multi-family apartment buildings. The area retained its elite status up until the 1970s, when shopping malls built throughout the region brought on the decline of commercial corridors like Vermont Avenue and Wilshire Boulevard. Although office buildings were still erected in the area throughout the 1970s, the department stores along Wilshire Boulevard closed and wealthier residents moved out of the area, making way for a socioeconomic and demographic shift.

One of the shifts in Wilshire Center in the mid-twentieth century was an influx of residents from Korea. The first wave of Korean immigrants arrived in Los Angeles with the onset of the Japanese occupation of Korea, which lasted from 1910 to 1946. During this period, the Korean population settled and remained in an area south of the Project Sites. As businesses closed and properties were vacated in Wilshire Center in the 1970s, rents became more affordable, which created an opportunity for the growing Korean community. The heart of the Korean American business community was centered along Wilshire Boulevard between Normandie Avenue to the east and Western Avenue to the west. The area officially adopted the name “Koreatown” in 1971 although it included a large Latin American immigrant population. The 1970s saw a wave of mini-mall construction in the area as Korean businesses were established. By

¹ PCR Services Corporation, “Fifth Avenue of the West (1913-1928),” in *Intensive Historic Resources Survey Wilshire Center and Koreatown Recovery Redevelopment Area Report*, June 2009: 23.

² PCR Services Corporation, “Glamour and Infill (1929-1945),” in *Intensive Historic Resources Survey Wilshire Center and Koreatown Recovery Redevelopment Area Report*, June 2009: 30.

³ *Ibid.*

1985, 40 percent of all Korean-owned businesses in the City of Los Angeles were located in the Koreatown area.⁴

Major changes to the area occurred following the opening of the Metro system, with multiple stops along Wilshire Boulevard, and an increasing population of younger people. Multiple new high-rise, mixed-use buildings have been constructed in the area since the late 1990s.

The style of the buildings located on the Project Sites is best described as Mid-Century Modern. Most examples of Mid-Century Modern commercial architecture in Los Angeles were constructed following World War II and are concentrated in communities developed in the postwar era, such as those in the San Fernando Valley.

The prevalent architectural style for commercial buildings constructed between 1946 and 1965 across the United States was Mid-Century Modern. Frequently, buildings from the pre-1946 period were altered to fit modern aesthetics and sensibilities in the postwar era. Mid-Century Modern was fully embraced by the public following World War II. The style utilized the industrial materials and streamlined construction techniques developed during the war years. Designs relied on light metal or concrete frames sheathed in thin glass skins over boxy, geometric forms.⁵ The unadorned simplicity and technological sophistication of the style demonstrated a “faith in the future and progress.”⁶

Nationwide, noted architects designed every type of commercial, residential, and institutional building in the Mid-Century Modern style. With its immense postwar growth and community of émigré exiled European architects, Los Angeles became a center of Mid-Century Modern design. Master architects of the Mid-Century Modern style, such as Richard Neutra, A.C. Martin, Wurdeman & Becket, Edward Durrell Stone, and Charles Luckman designed buildings in the style throughout Los Angeles. Until the late 1950s, newly constructed commercial buildings were relatively small in scale due to existing height restrictions of 150 feet and the emphasis on developing suburban, automobile-centric communities in outlying areas of the city.

In the early 1960s, a new wave of Mid-Century Modern commercial architecture began along the region’s commercial and office corridors, with a concentration of Modern skyscrapers in the redeveloping area of Bunker Hill in downtown Los Angeles. While office-building development had consistently radiated west from downtown along Wilshire Boulevard, in the late 1950s the intersection of Vermont Avenue and Wilshire Boulevard transformed into a corridor of commercial office development from an intersection of relatively low rise automobile dealerships and retail buildings. Most new buildings were constructed in the prevailing Mid-Century Modern commercial styles of the times. These new buildings were boxy in massing and featured walls of glass and stucco as well as accommodations for automobile parking.

Previously Recorded Historical Resources

GPA Consulting requested a search of California State University, Fullerton South Central Coastal Information Center (“SCCIC”) records to identify known and previously recorded historical resources. The

⁴ PCR Services Corporation, “Destination Koreatown (1965-1980),” in *Intensive Historic Resources Survey Wilshire Center and Koreatown Recovery Redevelopment Area Report*, June 2009: 33.

⁵ Leland M. Roth, *American Architecture* (Cambridge, MA: Perseus Books Group, 2001), 430.

⁶ *Ibid.*, 412.

SCCIC collects records on properties listed or determined eligible for listing in the National Register of Historic Places ("National Register"), California Register of Historical Resources ("California Register"), California Historical Landmarks, Points of Historical Interest, as well as properties that have been previously identified or evaluated in historic resource surveys. Additionally, the Los Angeles Historic Resources Survey, SurveyLA was consulted to determine whether or not the Project Sites and vicinity contain any properties that were identified as significant. No previously recorded historical resources have been recorded by SCCIC in the study area⁷; however, SurveyLA determined that a rooftop sign on the Brynmoor Apartments Building, located at 432-436 South New Hampshire Avenue, immediately west of Site 3, is designated as Los Angeles Historic-Cultural Monument #641.⁸ The sign is an example of an intact neon rooftop sign. Though the date of its installation has not been determined, Los Angeles has a long history of neon rooftop signs. Los Angeles became one of the first cities to embrace neon lighting technology after signs were installed at a Packard automobile dealership in 1923. Neon tended to be concentrated along automobile corridors such as Wilshire Boulevard, where multi-family residential and commercial buildings alike used the signs for advertising purposes. The Brynmoor Apartments Neon Roof Sign was designated in 1997.⁹

Regulatory Framework

A lead agency must consider a property a historical resource under CEQA if it is eligible for listing in the California Register. The California Register is modeled after the National Register. Furthermore, a property is presumed to be historically significant if it is listed in a local register of historical resources or has been identified as historically significant in a historic resources survey (provided certain criteria and requirements are satisfied) unless a preponderance of evidence demonstrates that the property is not historically or culturally significant.¹⁰ The National Register, California Register, and local designation programs are discussed below. Site 1 (County office building) and Site 3 (affordable housing and community recreation center public benefit project) are exempt from City land use regulations. Therefore, the applicable local designation program for Sites 1 and 3 is the County of Los Angeles Historic Preservation Ordinance. Site 2 is subject to City zoning regulations and therefore the applicable local historic designation program for that property is set forth in the City of Los Angeles Cultural Heritage Ordinance.

Federal

National Register of Historic Places

The National Register is "an authoritative guide to be used by federal, state, and local governments, private groups, and citizens to identify the nation's cultural resources and to indicate what properties should be considered for protection from destruction or impairment."¹¹

⁷ GPA Consulting, *Vermont Corridor Development Plan Historical Resource Report*, March 2017, page 3.

⁸ *Ibid.*, page 3.

⁹ *Ibid.*, page 11.

¹⁰ *Public Resources Code Section 5024.1 and 14 California Code of Regulations Sections 4850 & 15064.5(a)(2).*

¹¹ *Title 36 Code of Federal Regulations Part 60.2.*

Criteria

To be eligible for listing in the National Register, a property must be at least 50 years of age (unless the property is of “exceptional importance”) and possess significance in American history and culture, architecture, or archaeology. A property of potential significance must meet one or more of four established criteria. A property must be:¹²

- A. Associated with events that have made a significant contribution to the broad patterns of our history; or
- B. Associated with the lives of persons significant in our past; or
- C. Embody the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- D. Yield, or may be likely to yield, information important in prehistory or history.

Context

To be eligible for listing in the National Register, a property must be significant within a historic context. *National Register Bulletin #15* states that the significance of a historic property can be judged only when it is evaluated within its historic context. Historic contexts are “those patterns, themes, or trends in history by which a specific...property or site is understood and its meaning...is made clear.”¹³ A property must represent an important aspect of the area’s history or prehistory and possess the requisite integrity to qualify for the National Register.

Integrity

In addition to possessing significance within a historic context, to be eligible for listing in the National Register a property must have integrity. Integrity is defined in *National Register Bulletin #15* as “the ability of a property to convey its significance.”¹⁴ Within the concept of integrity, the National Register recognizes the following seven aspects or qualities that in various combinations define integrity: feeling, association, workmanship, location, design, setting, and materials. Integrity is based on significance: why, where, and when a property is important. Thus, the significance of the property must be fully established before the integrity is analyzed.

¹² Title 36 Code of Federal Regulations Part 60.4.

¹³ Washington D.C.: National Park Service, Department of the Interior, *National Register Bulletin #15: How to Apply the National Register Criteria for Evaluation*, 1997, pages 7-8.

¹⁴ *Ibid.*, pages 44-45.

State

California Register of Historical Resources

In 1992, Governor Wilson signed Assembly Bill 2881 into law establishing the California Register. The California Register is an authoritative guide used by state and local agencies, private groups, and citizens to identify historical resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse impacts.¹⁵

The California Register consists of properties that are listed automatically as well as those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed in the National Register and those formally Determined Eligible for the National Register;
- State Historical Landmarks from No. 0770 onward; and
- Those California Points of Historical Interest that have been evaluated by the California Office of Historic Preservation ("OHP") and have been recommended to the State Historical Resources Commission for inclusion on the California Register.¹⁶

Criteria and Integrity

For those properties not automatically listed, the criteria for eligibility of listing in the California Register are based upon National Register criteria, but are identified as 1-4 instead of A-D. To be eligible for listing in the California Register, a property generally must be at least 50 years of age and must possess significance at the local, state, or national level, under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States; or
2. It is associated with the lives of persons important to local, California, or national history; or
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values; or
4. It has yielded, or has the potential to yield, information important in the prehistory or history of the local area, California, or the nation.

Properties eligible for listing in the California Register may include buildings, sites, structures, objects, and historic districts. A property less than 50 years of age may be eligible if it can be demonstrated that sufficient time has passed to understand its historical importance. While the enabling legislation for the

¹⁵ Public Resources Code Section 5024.1 (a).

¹⁶ Public Resources Code Section 5024.1 (d).

California Register is less rigorous with regard to the issue of integrity, there is the expectation that properties reflect their appearance during their period of significance.¹⁷

The California Register may also include properties identified during historic resource surveys. However, the survey must meet all of the following criteria:¹⁸

1. The survey has been or will be included in the State Historic Resources Inventory;
2. The survey and the survey documentation were prepared in accordance with office [OHP] procedures and requirements;
3. The resource is evaluated and determined by the office [OHP] to have a significance rating of Category 1 to 5 on a DPR Form 523; and
4. If the survey is five or more years old at the time of its nomination for inclusion in the California Register, the survey is updated to identify historical resources that have become eligible or ineligible due to changed circumstances or further documentation and those that have been demolished or altered in a manner that substantially diminishes the significance of the resource.

OHP Survey Methodology

The evaluation instructions and classification system proscribed by the OHP in its *Instructions for Recording Historical Resources* provide a three-digit evaluation code for use in classifying potential historical resources. In 2003, the codes were revised to address the California Register. The first digit indicates the general category of evaluation. The second digit is a letter code to indicate whether the resource is separately eligible (S), eligible as part of a district (D), or both (B). The third digit is a number, which is coded to describe some of the circumstances or conditions of the evaluation. The general evaluation categories are as follows:

1. Listed in the National Register or the California Register.
2. Determined eligible for listing in the National Register or the California Register.
3. Appears eligible for listing in the National Register or the California Register through survey evaluation.
4. Appears eligible for listing in the National Register or the California Register through other evaluation.
5. Recognized as historically significant by local government.
6. Not eligible for listing or designation as specified.
7. Not evaluated or needs re-evaluation.

¹⁷ Public Resources Code Section 4852.

¹⁸ Public Resources Code Section 5024.1.

California Environmental Quality Act (CEQA)

CEQA requires a lead agency to analyze whether historical resources may be adversely impacted by a proposed project. Under CEQA, a “project that may cause a substantial adverse change in the significance of a historic resource is a project that may have a significant effect on the environment” (Public Resources Code “PRC” Section 21084.1). Answering this question is a 2-part process. First, the determination must be made as to whether the proposed project involves historical resources. Second, if historical resources are present, the proposed project must be analyzed for a potential “substantial adverse change in the significance” of the resource.

According to CEQA Guidelines Section 15064.5, for the purposes of CEQA, historic resources are:

1. A resource listed in, or formally determined eligible for listing in, the California Register of Historical Resources (PRC 5024.1, Title 14 CCR, Section 4850 et seq.);
2. A resource included in a local register of historical resources, as defined in Section 5020.1(k) of the PRC or identified as significance in a historical resources survey meeting the requirements of Section 5024.1(g) of the PRC;
3. Any building, structure, object, site, or district that the lead agency determines eligible for national, State, or local landmark listing; generally, a resource shall be considered by the lead agency to be historically significant (and therefore a historical resource under CEQA) if the resource meets the criteria for listing on the California Register (as defined in PRC Section 5024.1, Title 14 CCR, Section 4852). Resources nominated to the California Register must retain enough of their historic character or appearance to convey the reasons for their significance. Resources whose historic integrity (as defined in previous section) does not meet NRHP criteria may still be eligible for listing in the California Register.

According to CEQA, the fact that a resource is not listed in or determined eligible for listing in the California Register or is not included in a local register or survey shall not preclude the lead agency from determining that the resource may be an historical resource (PRC Section 5024.1). Pursuant to CEQA, a project with an effect that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (CEQA Guidelines, Section 15064.5(b)).

The CEQA Guidelines specify that “substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired” (CEQA Guidelines, Section 15064.5). Material impairment occurs when a project alters in an adverse manner or demolishes “those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion” or eligibility for inclusion in the National Register, California Register, or local register. In addition, pursuant to CEQA Guidelines Section 15126.2, the “direct and indirect significant effects of the project on the environment shall be clearly identified and described, giving due consideration to both the short-term and long-term effects.”

Of particular relevance to this study’s analysis of indirect impacts to historical resources are the following guides and requirements. Pursuant to CEQA Guidelines, Section 15378, study of a project under CEQA requires consideration of “the whole of an action, which has the potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.”

CEQA Guidelines, Section 15064d further define direct and indirect impacts:

1. A direct physical change in the environment is a physical change in the environment which is caused by and immediately related to the project.
2. An indirect physical change in the environment is a physical change in the environment which is not immediately related to the project, but which is caused indirectly by the project. If a direct physical change in the environment in turn causes another change in the environment, then the other change is an indirect physical change in the environment.
3. An indirect physical change is to be considered only if that change is a reasonably foreseeable impact which may be caused by the project.

Local

Los Angeles County Historic Preservation Ordinance (Sites 1 and 3)

Site 1 is owned by the County and would be developed for County use and would be subject to County building regulations. Site 3 is located on land owned by the County and would be developed with a public benefit (affordable housing) project. Site 3 development would be subject to County building code requirements.

Accordingly, the Los Angeles County Historic Preservation Ordinance (Part 28 of Chapter 22.52 of the Los Angeles County Code, or the “Historic Preservation Ordinance”) provides the appropriate historic criteria for Sites 1 and 3.

The Historic Preservation Ordinance seeks to preserve distinctive historical, architectural, and landscape characteristics that are part of the County’s overall history, and includes criteria and procedures for the designation of landmarks within unincorporated Los Angeles County, as well as County-owned properties.¹⁹

A structure, site, object, tree, landscape, or natural land feature may be designated as a Los Angeles County Landmark if it is 50 years of age or older and satisfies one or more of the following criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of the history of the nation, State, County, or community in which it is located;
2. It is associated with the lives of persons who are significant in the history of the nation, State, County, or community in which it is located;
3. It embodies the distinctive characteristics of a type, architectural style, period, or method of construction, or represents the work of an architect, designer, engineer, or builder whose work is of significance to the nation, State, County, or community in which it is located; or possesses artistic values of significance to the nation, State, County, or community in which it is located;
4. It has yielded, or may be likely to yield, significant and important information regarding the prehistory or history of the nation, State, County, or community in which it is located;
5. It is listed, or has been formally determined eligible by the United States National Park Service for listing, in the National Register of Historic Places, or is listed, or has been formally determined

¹⁹ Los Angeles County Historic Preservation Ordinance (Ord. 2015-0033 § 3, 2015).

eligible by the State Historical Resources Commission for listing, on the California Register of Historical Resources;

6. If it is a tree, it is one of the largest or oldest trees of the species located in the County; or
7. If it is a tree, landscape, or other natural land feature, it has historical significance due to an association with an historic event, person, site, street, or structure, or because it is a defining or significant outstanding feature of a neighborhood.

A property less than 50 years of age may be designated as a County Landmark if it meets one or more of the above criteria and exhibits exceptional importance. The interior space of a property or other space held open to the general public, including but not limited to a lobby, may be designated as a Landmark or included in the Landmark designation of a property if the space qualifies for designation as a Landmark under the applicable criteria.²⁰

Los Angeles City Cultural Heritage Ordinance (Site 2)

Site 2 is located in the City, on land owned by the County. Development on Site 2 would include mixed residential and commercial uses under a ground lease, and would be subject to City zoning and building regulations. Thus, the City of Los Angeles Cultural Heritage Ordinance (“Cultural Heritage Ordinance”) provides the appropriate historic criteria for Site 2.

The Los Angeles City Council adopted the Cultural Heritage Ordinance in 1962 and amended it in 2007 (Sections 22.171 et seq. of the Administrative Code). The Ordinance created a Cultural Heritage Commission and criteria for designating Historic-Cultural Monuments (“HCM”). The Commission is comprised of five citizens, appointed by the Mayor, who have exhibited knowledge of Los Angeles history, culture, and architecture. The four criteria for HCM designation are stated below:

- The proposed HCM reflects the broad cultural, economic, or social history of the nation, state or community; or
- The proposed HCM is identified with historic personages or with important events in the main currents of national, state or local history; or
- The proposed HCM embodies the characteristics of an architectural type specimen inherently valuable for a study of a period, style or method of construction;
- The proposed HCM is the notable work of a master builder, designer, or architect whose individual genius influenced his or her age.²¹

Unlike the National and California Registers, the Cultural Heritage Ordinance makes no mention of concepts such as physical integrity or period of significance. Moreover, properties do not have to reach a minimum age requirement, such as 50 years, to be designated as HCMs.

²⁰ Los Angeles County Ord. 2015-0033 § 3, 2015, Section 22.52.3060.

²¹ Los Angeles Administrative Code Section 22.171.7.

Historical Resources Assessment and Evaluation of the Project Sites

The buildings and structures on the Project Sites over 45 years of age were evaluated in this report using the National Register of Historic Places, California Register of Historical Resources, and County Historic Preservation Ordinance criteria for Sites 1 and 3, and City Cultural Heritage Ordinance for Site 2. Applicable sections of the Los Angeles Historic Context Statement, prepared as part of Survey LA and applicable to all properties within the City of Los Angeles, were utilized as a framework for evaluating the properties.

Site 1

Site 1 is developed with two office buildings (510 South Vermont Avenue and 532 South Vermont Avenue), a surface parking lot, and a parking structure (523-531 Shatto Place).

510 South Vermont Avenue

510 South Vermont is a two-story, rectangular office building oriented towards Vermont Avenue, abutting the sidewalk. The building was designed by the architecture firm Wormhoudt & Tennebaum²² and constructed in 1959 as an office building by owner M. William Downs. The first tenant listed for the building was the US Government Justice Department of Immigration and Naturalization Services in 1960.²³ Frequent turnover of tenants was common and many new owners made changes to the interior of the building, however, no major exterior alterations were recorded in building permits.²⁴ The building is now offices for the Los Angeles County Parks & Recreation Department.

The building appears to be one of many office buildings constructed along Vermont Avenue during the late 1950s and early 1960s. While it is associated with the trend of office development in Wilshire Center, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of our history. Research does not indicate that the building's specific association with this trend could be considered important. No information could be found about original owner M. William Downs. The building had a variety of tenants. Though one of these tenants, IBM, is significant in American commercial history, research does not indicate that the building was the site of significant events in the company's history during the two years the firm was a tenant. Long-term owners J.A. Enterprises, a commercial real estate development firm, do not appear to be significant in the history of the Wilshire Center's development. No information was found to suggest that individuals of historic significance were associated with the building.²⁵

The building is best described as Mid-Century Modern in style. While it exhibits several character-defining features of the architectural style as applied to the property type, as a whole, the building is neither an original or unique architectural statement nor an excellent example of the Mid-Century Modern style. The building does not exhibit quality of design through distinctive features that would make it eligible for listing as an example of the Mid-Century Modern style. The architects of the building are listed as Wormhoudt & Tennebaum. Neither the partnership nor individual work of Charles Wormhoudt and David

²² GPA Consulting, *Vermont Corridor Development Plan Historical Resource Report*, March 2017, page 14.

²³ *Ibid.*

²⁴ *Ibid.*, pages 14-15.

²⁵ *Ibid.*, page 15.

Tennebaum has been identified as masterful. Their work was typical of the period, representing variations of the Mid-Century Modern style. No information was found to indicate that either could be considered a master architect. Accordingly, the Historical Resource Report determined that the 510 South Vermont Avenue building does not appear to be eligible for listing as a historical resource under national, state or local criteria.²⁶

532 South Vermont Avenue

532 South Vermont Avenue is a one-story, rectangular office building clad in stucco. The building was designed by John M. Cooper and constructed as a United States Post Office substation in 1938 when the parcel was owned by the Trustees of John G. Bulbeck's Estate.²⁷ Several alterations were made to the interior and exterior after the postal service vacated, including the 1959 replacement of the composition roof with rooftop parking under the direction of engineer R.Y. Lin and contractor Ellis White.²⁸ In 1960, architect Charles Wormhoudt completed an addition of exterior stairs on the north side elevation and the addition of a marquee to the west elevation. Multiple later alterations consisted of reconfigurations of the interior partitions. New York Life Insurance Company is listed as a tenant from 1964 until they relocated their offices in 1974.²⁹ The property was sold to J.A. Enterprises around 1966³⁰ and then to Acoustics Inc. in the late 1970s.³¹

No information was found to indicate the building played an important role in the history of the United States Postal Service. After alterations in 1959, the building appears to be similar to many small office and commercial buildings constructed along Vermont Avenue during the late 1950s and early 1960s. While it is associated with the trend of office development in Wilshire Center, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of our history. Research does not indicate that the building's specific association with this trend could be considered significant. Later owners MW Downs, an individual developer, and J.A. Enterprises, a commercial real estate development firm, do not appear to be significant in the history of development. No information was found to suggest that individuals of historic significance were associated with the property.³²

The building has been substantially altered since its original construction in 1938. It is now best described as Mid-Century Modern in style. While the building exhibits several character-defining features of the architectural style as applied to the property type, as a whole, it is neither an original or unique architectural statement nor an excellent example of the Mid-Century Modern style. The building has been altered since initial construction and does not exhibit quality of design through distinctive features that would make it eligible for listing as an example of the Mid-Century Modern style. The original architect of the building was John Montgomery Cooper (1883-1950), a prolific local Los Angeles architect. Cooper designed a variety of building types, but strongly influenced the design of industrial buildings in Los

²⁶ *Ibid.*, page 15.

²⁷ *Ibid.*, page 17.

²⁸ *Ibid.*

²⁹ *Ibid.*, page 18.

³⁰ *Ibid.*

³¹ *Ibid.*

³² *Ibid.*

Angeles during the 1920s when he was the architect for a concentration of manufacturing and industrial loft buildings in the wholesale manufacturing and garment district in the area southeast of downtown Los Angeles. Cooper's designs ranged in style but like many architects during the Depression, Cooper completed designs for federal public works projects. The post office building at 532 S. Vermont Avenue was one of these buildings. Cooper never cited it as an example of his work. His designs for industrial buildings have been identified as significant and eligible examples of their property type; however, the building at 532 S. Vermont Avenue does not retain any resemblance to Cooper's designs or a building from the late 1930s and is not representative of his work as an architect. Accordingly, the Historical Resource Report determined that the 532 South Vermont Avenue building does not appear to be eligible for listing as a historical resource under national, state or local criteria.³³

523-531 Shatto Place Parking Structure

523-531 Shatto Place is a six-story, rectangular, steel reinforced concrete parking garage facing Shatto Place and is clad in metal horizontal slats and solid stucco. The parking garage was designed by architect L.W. Davidson³⁴ and constructed under the ownership of J.A. Enterprises in 1965. An elevator was added to the building in 1966.³⁵

No information was found to indicate the structure played an important role in the development of Wilshire Center or Vermont Avenue as a center of commercial office development. While it is associated with the trend of office development in Wilshire Center, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of our history. Research does not indicate that the structure's specific association with this trend could be considered significant. No information was found to suggest that individuals of historic significance were associated with the property.³⁶

The parking structure does not appear to be an original or unique architectural statement nor an excellent example of an architectural style. L. W. Davidson was born in Chicago in 1913 and received his Bachelor of Science in Architecture from Illinois Institute of Technology in 1935. He worked primarily as an engineer and did not pursue an architectural career until the early 1950s. In 1953, he started his own firm, L.W. Davidson & Associates, based in North Hollywood. The firm completed projects all over the country, from Alaska to New York, focusing on large industrial buildings, public works projects, and military facilities and was active through the 1980s. His work was typical of the period, representing variations of the Mid-Century Modern style. No information was found to indicate that Davidson could be considered a master architect. As such, the Historical Resource Report determined that 523-531 Shatto Place parking structure does not appear to be eligible for listing as a historical resource under national, state or local criteria.³⁷

³³ *Ibid.*, pages 18-19.

³⁴ *Ibid.*, page 19.

³⁵ *Ibid.*

³⁶ *Ibid.*, page 20.

³⁷ *Ibid.*

Site 2

Site 2 is developed with two office buildings (540-550 South Vermont Avenue and 3175 West 6th Street) separated by a surface parking lot.

540-550 South Vermont Avenue

The 540-550 South Vermont Avenue building is a twelve-story, rectangular Mid-Century Modern high-rise office building. The building was designed by architect Charles Wormhoudt³⁸ and completed in 1964 and was originally named the LeSage Building after the original owner, Robert Le Sage. Major alterations include the addition of a restaurant and a drug store on the first floor in 1965 using the same architect.³⁹ A penthouse dwelling unit was added to the twelfth floor in 1965.⁴⁰ Robert Le Sage resided in the penthouse suite in 1967.⁴¹ Subsequent alterations included the addition and removal of partitions on the interior as tenants changed. The building served as offices for various types of corporations and governments agencies. One of the first tenants was the State Division of Highways, which signed a ten-year lease in 1965 to occupy the first six floors of office space.⁴² Other tenants were typically insurance agencies. Other tenants include J.A. Enterprises, Bristol Myers Products, Republic Insurance Company, and Pacific National Life. The Imperial Drug Company was a tenant from 1967 to 1989.⁴³ The Galleon Restaurant remained in operation at this building from 1967 until at least 1990, when it came under the ownership of Morris Magid.⁴⁴ Building permits indicate that Los Angeles County purchased the property around 1991. The building is currently occupied by DMH.

The LeSage Building is one of many office buildings constructed along Wilshire Boulevard and Vermont Avenue during the late 1950s and early 1960s. While it is associated with the trend of office development in Wilshire Center, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of our history. Research does not indicate that the building's specific association with this trend could be considered important as well. The building had a variety of tenants. Research does not indicate that the tenants of the LeSage Building were significant in the development of Wilshire Center or may be considered significant companies in commercial history. No information was found to suggest that individuals of historic significance were associated with the property.⁴⁵

The LeSage Building is best described as Mid-Century Modern in style. While the building exhibits several character-defining features of the architectural style as applied to the property type, as a whole, it is neither an original or unique architectural statement nor an excellent example of the Mid-Century Modern style. The building has been altered since initial construction and does not exhibit quality of design through distinctive features that would make it eligible for listing as an example of the Mid-Century

³⁸ *Ibid.*, page 23.

³⁹ *Ibid.*

⁴⁰ *Ibid.*

⁴¹ *Ibid.*

⁴² *Ibid.*

⁴³ *Ibid.*

⁴⁴ *Ibid.*

⁴⁵ *Ibid.*

Modern style. The individual work of the architect, Charles Wormhoudt has not been identified as masterful. His work was typical of the period, representing variations of the Mid-Century Modern style. No information was found to indicate that he could be considered a master architect. Accordingly, the Historical Resource Report determined that the LeSage Building at 540-550 S. Vermont Avenue does not appear to be eligible for listing as a historical resource under national, state or local criteria.⁴⁶

3175 West 6th Street

The 3175 West 6th Street building is a four-story, rectangular office building clad in stucco. The building was designed by Norbert W. Pieper⁴⁷ and constructed in 1958 under the ownership of Robert Le Sage. A one-story parking garage was added in 1959. Tenants since the building's completion included various corporations, the majority of which were insurance companies. The building also served as offices for Robert Le Sage and J.A. Enterprises until both companies moved next door to 550 South Vermont Avenue in 1964. The type of tenants remained consistent after 1964, as various firms and insurance agencies moved in and out of the building. In 1969, tenants included several insurance agencies: Great Southern Insurance, Llewellyn Co. Insurance, Washington National Insurance, and Lincoln National Insurance Co.⁴⁸ By 1973, the list of tenants consolidated to just three: Graham Miller & Co, Janpower, and Michael Gary Inc.⁴⁹ The building is currently occupied by Los Angeles County Community Senior Services.

3175 West 6th Street is one of many office buildings constructed along Wilshire Boulevard and Vermont Avenue during the late 1950s and early 1960s. While it is associated with the trend of office development in Wilshire Center, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of our history. Research does not indicate that the building's specific association with this trend could be considered important as well. The building had a variety of tenants, mostly insurance agents. Later owners J.A. Enterprises, a commercial real estate development firm, do not appear to be significant in the history of development. Research does not indicate that the tenants of the building were significant in the development of Wilshire Center or may be considered significant companies in commercial history. No information was found to suggest that individuals of historic significance were associated with the property. Research does not indicate that the original owner, Robert Le Sage, could be considered an individual of historic significance.⁵⁰

The office building is best described as Mid-Century Modern in style. While the building exhibits several character-defining features of the architectural style as applied to the property type, as a whole, it is neither an original or unique architectural statement nor an excellent example of the Mid-Century Modern style. The building has been altered since initial construction and does not exhibit quality of design through distinctive features that would make it eligible for listing as an example of the Mid-Century Modern style. The building was part of a larger development that was never completed. Subsequent changes to the site plan of the building in relation to adjacent buildings and structures have made it a "standalone" building. The architect of the building was Norbert Pieper. Pieper received his B.A. in Architecture from the University of California in 1951 and worked at the architecture and engineering firm

⁴⁶ *Ibid*, pages 23-24.

⁴⁷ *Ibid.*, page 25.

⁴⁸ *Ibid.*

⁴⁹ *Ibid.*

⁵⁰ *Ibid.*

of Sheldon L. Pollack until establishing his own architectural subsidiary within the company. Through the 1970s and 1980s, Pieper designed mid-rise office buildings around Southern California. The firm's principals focused on frugality over design, which is apparent in its designs for 3175 West 6th Street. The architectural work of Pieper has not been identified as masterful. His work was typical of the period, representing variations of the Mid-Century Modern style. No information was found to indicate that he could be considered a master architect. As such, the Historical Resource Report determined that the buildings at 3175 W. 6th Street do not appear to be eligible for listing as a historical resource under national, state or local criteria.⁵¹

Site 3

Site 3 is developed with an office building (427-433 South Vermont Avenue) and a surface parking lot.

427-433 South Vermont Avenue

The 427-433 South Vermont Avenue building is a four-story, slightly "T"-shaped building clad in stone veneer paneling and buff-colored brick. The building was designed by architect Henry Rossine⁵² and built in 1963 by a partnership known as 433 South Vermont Building Company. One of the first tenants listed is the Los Angeles County Probation Department in 1967.⁵³ The County of Los Angeles held a seven-year lease that expired in April of 1972, after which the County bought the building from the partnership.⁵⁴ The building is currently occupied by the Los Angeles County Department of Parks & Recreation. Alterations since 1963 include multiple reconfigurations of interior spaces for changing tenants.

The 427-433 South Vermont Avenue building is one of many office buildings constructed along Vermont Avenue during the late 1950s and early 1960s. While it is associated with the trend of office development in Wilshire Center, mere association with this trend is not enough, in and of itself, to be eligible for an association with events that have made a significant contribution to the broad patterns of our history. Research does not indicate that the building's specific association with this trend could be considered important. The building was an early location of Los Angeles County government offices in the area; however, research does not indicate that the building was the site of significant events in the history of Los Angeles County's government. No information was found to suggest that individuals of historic significance were associated with the property.⁵⁵

The building is best described as Mid-Century Modern in style. While the building exhibits several character-defining features of the architectural style as applied to the property type, as a whole, it is neither an original or unique architectural statement nor an excellent example of the Mid-Century Modern style. The building does not exhibit quality of design through distinctive features that would make it eligible for listing as an example of the Mid-Century Modern style. The architect of the building, Henry Rossine, was a local architect who designed a few commercial and residential buildings, repeating design elements across buildings. The work of Rossine has not been identified as masterful. His designs were typical of the period, representing variations of the Mid-Century Modern style. No information was

⁵¹ *Ibid.*, page 26.

⁵² *Ibid.*

⁵³ *Ibid.*, page 28.

⁵⁴ *Ibid.*

⁵⁵ *Ibid.*

found to indicate that he could be considered a master architect. As such, the Historical Resource Report determined that the building at 427-433 South Vermont Avenue does not appear to be eligible for listing as a historical resource under national, state or local criteria.⁵⁶

ENVIRONMENTAL IMPACTS

Methodology

To evaluate potential impacts relative to historical resources, a Historical Resources Report was prepared by GPA Consulting to identify potential historical resources within the study area. As part of the preparation of the report, SCCIC and SurveyLA records were reviewed and a field inspection was conducted to determine what areas might be impacted by the Project and to identify any properties currently listed as landmarks under national, state, or local programs and whether or not any properties have been previously identified or evaluated as historical resources. Buildings on the Project Sites over 45 years of age were evaluated as potential historical resources according to National Park Service, State Office of Historic Preservation, and County of Los Angeles Historic Preservation Ordinance standards. Although the Project Sites are owned by the County of Los Angeles, they are located in the City of Los Angeles and were therefore evaluated in the context of the city's development according to the Context/Theme/Property Type (CTP) eligibility standards formulated for the Los Angeles Citywide Historic Context Statement (LAHCS). The LAHCS is organized into contexts and themes. The Architecture and Engineering Context and the Mid-Century Modern Theme are the most relevant. Because of the ubiquity of the style in Los Angeles, designated and eligible examples of Mid-Century Modern office buildings generally meet a high threshold for quality of design. Significant examples of Mid-Century Modern office buildings meet the following eligibility standards:

- Constructed during the period of significance (1945-1970)
- Exhibit quality of design through distinctive features
- Retain the essential character-defining features of Mid-Century Modernism from the period of significance:
 - Direct expression of the structural system, often wood or steel post and beam
 - Flat roof, at times with wide overhanging eaves
 - Floor-to-ceiling windows, often flush-mounted metal framed
 - Horizontal massing
 - Simple, geometric volumes

The Historical Resources Report is attached to this Draft EIR as Appendix 4.3-1.

Thresholds of Significance

The potential for the proposed Project to result in impacts to historical resources is based on the CEQA significance threshold set forth in Appendix G of the State CEQA Guidelines.

Threshold 4.3.1-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5?

An affirmative answer to this question would constitute a significant impact.

⁵⁶ *Ibid.*, pages 28-29.

Project Design Elements

The Project would include governmental offices, commercial retail, multi-family residential, community recreational center, and on-site parking. No specific design elements related to historical resources are included in the Project.

Impact Analysis

Threshold 4.3.1-1: Would the project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines § 15064.5?

The Project would involve demolition of all but one of the existing buildings and structures on the Project Sites. The 540-550 South Vermont Avenue building, located on Site 2 would be adaptively reused as a mixed-use building with ground floor commercial space and upper floor residential uses. As discussed in the Environmental Setting section above, the results of the South Central Coastal Information Center's historical records search for the Project indicate that there are no known historical resources on the Project Sites and the Historical Resource Report determined that none of the existing buildings on the Project Sites are eligible for listing as historical resources.⁵⁷ Accordingly, the Project would have no direct impacts on historical resources.

CEQA also requires the analysis of indirect impacts on historical resources in the vicinity of the Project. There is one historical resource in the study area for Site 3, the Brynmoor Apartments Neon Roof Sign, which is designated HCM #641. In determining impacts of adjacent new construction on an individual resource such as the Brynmoor Apartments Neon Roof Sign, the central question is whether the new building would affect the physical integrity of the historical resource to the degree that it would no longer qualify as a historical resource. Such an effect would only occur if the Brynmoor Apartments Neon Roof Sign no longer retained sufficient integrity to convey its significance. According to National Register Bulletin #15, there are seven aspects of integrity: feeling, association, workmanship, location, design, setting, and materials. Because the Project would not directly affect the neon sign, the only relevant aspect with respect to the impact of a new building on this historical resource is setting.⁵⁸

Site 3 abuts the rear of the parcel containing the five-story Brynmoor Apartments Building, on top of which the historical resource is located. The new six-story building on Site 3 would obscure the view of the roof sign from Vermont Avenue. At the time of its construction, the Brynmoor Apartments Neon Roof Sign was oriented towards Wilshire Boulevard and visible from this major automobile thoroughfare.

Although the roof sign is primarily oriented toward Wilshire Boulevard, it is also visible from Vermont Avenue. This secondary view of the sign would be obscured. However, the Vermont Avenue corridor is not identified by the City or the County as an important view location, and it is not a defined scenic resource as discussed in Section 4.1 Aesthetics. The new building would introduce a new visual element to the setting of the Brynmoor Apartments Neon Roof Sign; however, the setting in Wilshire Center is already characterized by a variety of mid and high-rise buildings that obscure views of the roof sign from the primary view from Wilshire Boulevard and secondary view from Vermont Avenue. As such, the Project would not result in a substantial adverse change to the Brynmoor Apartments Neon Roof Sign or its

⁵⁷ *Ibid.*, Executive Summary.

⁵⁸ *Ibid.*, page 32.

immediate surroundings to the degree its eligibility as a resource would be materially impaired. It would continue to possess all aspects of integrity, including setting, and would continue to be eligible for listing as historical resource defined by CEQA.⁵⁹ No additional historical resources were identified in the vicinity of the Project Sites. Therefore, the Project would have a less than significant indirect impact on historical resources.

CUMULATIVE IMPACTS

The study area for cumulative impacts to historical resources is the extent of the related project sites (as listed in Section 3.0, Project Description and Environmental Setting). In terms of historic resources, the analysis of cumulative impacts relates to whether impacts of the proposed Project and future related projects, considered together, might substantially impact/diminish the number of similar historic resources, in terms of context or property type. Because the Project, as proposed, would not result in significant direct impacts to historic resources, the proposed Project would not contribute to a cumulative adverse direct impact to historic resources.

Although impacts to historic resources tend to be site-specific, a cumulative impact analysis of historic resources determines whether the impacts of a Project and the related projects in the surrounding area, when taken as a whole, would substantially diminish the number of historic resources within the same or similar context or property type. Specifically, cumulative impacts would occur if the Project and related projects affect local resources with the same level or type of designation or evaluation, affect other structures located within the same historic district, or involve resources that are significant within the same context. As discussed above, the Project does not include the removal of historic resources and is not located in the historic district. Although the new six-story building on Site 3 would obscure the view of the Brynmoor Apartments Neon Roof Sign from Vermont Avenue, the Project would not result in a substantial adverse change to the Brynmoor Apartments Neon Roof Sign or its immediate surroundings to the degree its eligibility as a resource would be materially impaired. It would continue to possess all aspects of integrity, including setting, and would continue to be eligible for listing as historical resource defined by CEQA. Furthermore, any future related projects would need to be analyzed on a case-by-case basis, with a determination made for each related project on the significance of indirect impacts to historic resources (in particular, to the Brynmoor Apartments Neon Roof Sign), as well as any future historic resources that are identified in the vicinity. If necessary, the applicants of future related projects would be required to implement appropriate mitigation measures. Therefore, Project impacts to the historic resources in the vicinity of the Project would not be cumulatively considerable, and cumulative impacts would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are proposed relevant to historical resources.

⁵⁹ *Ibid.*, page 32.

Regulatory Requirements

No significant impacts related to historical resources have been identified; and no regulatory compliance measures are required.

MITIGATION MEASURES

Because the Project's impacts would be less than significant, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts related to historical resources would be less than significant.

Cumulative impacts related to historical resources would be less than significant.

4.3 CULTURAL RESOURCES

4.3.2. ARCHAEOLOGICAL RESOURCES

INTRODUCTION

This subsection evaluates the Project's impacts to archaeological resources and human remains associated with the development of the Project Sites. The analysis is based on information provided in the archaeological data search prepared by the South Central Coastal Information Center, Department of Anthropology, California State University at Fullerton, dated March 6, 2017. This information is included as Appendix 4.3-2 to this Draft EIR. Analysis of potential impacts to tribal cultural resources is provided in Section 4.15 of this Draft EIR.

ENVIRONMENTAL SETTING

Archaeological Resources

The South Central Coastal Information Center conducted a data search for archaeological resources at the Project Sites as well as within a half-mile radius of the Project Sites on a USGS 7.5-minute quadrangle. The search included a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest, the California Historical Landmarks, the California Register of Historical Resources, the National Register of Historic Places (the "National Register"), the California State Historic Properties Directory, and the City of Los Angeles Historic-Cultural Monuments ("LAHCM") listings were reviewed for the Project Sites and a half-mile radius.

The results of the search are presented in Table 4.3.2-1 (Archaeological Resources Search Results). Due to the sensitive nature of cultural resources, archaeological site locations are not released.⁶⁰

Table 4.3.2-1
Archaeological Resources Search Results

Search	Results	
	Within Project Sites	Within half-mile radius of Project Sites
Archaeological Resources	0	1
Built-Environment Resources	0	40
Reports and Studies	0	45
OHP Historic Properties Directory	0	31
California Points of Historical Interest	0	0
California Historical Landmarks	0	0
California Register of Historical Resources	0	13
National Register of Historic Places	0	1
Archaeological Determinations of Eligibility	0	0
City of Los Angeles Historic-Cultural Monuments	0	11

⁶⁰ *Archaeological Data Search for the Vermont Corridor Project, Stacy St. James and Isabela Kott, South Central Coastal Information Center (SCCIC), March 6, 2017. Note: Sites 1, 2, and 3 were analyzed as one consolidated project site by the SCCIC.*

Table 4.3.2-1
Archaeological Resources Search Results

Search	Results	
	Within Project Sites	Within half-mile radius of Project Sites
<i>Source: Archaeological Data Search for the Vermont Corridor Project, Stacy St. James and Isabela Kott, South Central Coastal Information Center, March 6, 2017.</i>		

The records search notes that, based upon the known archaeological sensitivity in the surrounding area, buried historic cultural resources may be present, and suggests that, in order to identify any previously unidentified cultural resources, an archaeological monitor should be in place for ground-disturbing activities.

Regulatory Framework

State

California Environmental Quality Act

CEQA requires the lead agency to consider whether a project will have a significant effect on unique archaeological resources and to avoid unique archaeological resources when feasible or mitigate any effects to less-than-significant levels per PRC Section 21083.2. PRC Section 21083.2 also deals with the definitions of unique and non-unique archaeological resources. According to PRC Section 21083.2(g), a unique archaeological resource is defined as an “artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

- 1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- 2) Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- 3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.”

Furthermore, if a unique archaeological resource were to be discovered during construction of a project, adherence to the following protocol is required:

- The County of Los Angeles, Department of Regional Planning (for Sites 1 and 3), and Department of City Planning, Office of Historic Resources (for Site 2) shall be notified of the discovery. 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 PRC Section 21083.2. Construction activity may continue unimpeded on other portions of the Project Site.
- Personnel of the Project shall be prohibited from collecting or moving any archaeological materials and associated materials.
- The found deposit shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.

In addition, according to *State CEQA Guidelines* Section 15064.5, all human remains are a significant resource. This section also assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered. These procedures are discussed within PRC Section 5097.98 (see discussion below).

Archaeological Resources Protection Act of 1979

According to the Archaeological Resources Protection Act of 1979, the term “archaeological resource” means any material remains of past human life or activities that are of archaeological interest, as determined under uniform regulations promulgated pursuant to this act. Under such regulations, archaeological resources include, but are not limited to: pottery, basketry, bottles, weapons, weapon projectiles, tools, structures or portions of structures, pit houses, rock paintings, rock carvings, intaglios, graves, human skeletal materials, or any portion or piece of any of the foregoing items. Non-fossilized and fossilized paleontological specimens, or any portions or piece thereof, are not considered archaeological resources unless found in an archaeological context. No item will be treated as an archaeological resource unless such item is at least 100 years of age.⁶¹ Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources, which meet the criteria for historical resources, as discussed above, or which constitute unique archaeological resources.

California Public Resources Code Section 5097.98

PRC Section 5097.98 addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and establishes the Native American Heritage Commission (NAHC) to resolve disputes regarding the disposition of such remains. It has been incorporated into Section 15064.5(e) of the *State CEQA Guidelines*.

California Health and Safety Code Section 7050.5

Under Health and Safety Code Section 7050.5, if human remains are discovered during any project activity, the county coroner must be notified immediately. If human remains are exposed, Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to the origin and disposition pursuant to PRC Section 5097.98. Construction must halt in the area of the discovery of human remains, the area of discovery shall be protected, and consultation and treatment shall occur as prescribed by law. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to PRC Section 5097.98 will immediately notify those persons it believes to be most likely descended from the deceased person so that they can inspect the burial site and make recommendations for treatment or disposal.

⁶¹ *Archaeological Resources Protection Act of 1979 (as amended), Section 3, website: http://www.nps.gov/history/local-law/FHPL_ArchRsrcsProt.pdf, accessed: March 2017.*

Local**Los Angeles County General Conservation and Natural Resources Element**

Chapter 9: Conservation and Natural Resources Element of the County of Los Angeles General Plan, adopted in October 2015, provides goals and policies for the protection of the following conservation areas: Open Space Resources; Biological Resources; Local Water Resources; Agricultural Resources; Mineral and Energy Resources; Scenic Resources; and Historic, Cultural and Paleontological Resources.

City of Los Angeles General Plan Conservation Element

Section 3 of the Los Angeles General Plan Conservation Element, adopted in September 2001, includes policies for the protection of archaeological and paleontological resources. As stated in the Conservation Element, it is the City's policy that archaeological resources be protected for research and/or educational purposes. It is also the City's policy that paleontological resources be protected for historical, cultural research and/or educational purposes. Section 3 sets as an objective the identification and protection of significant paleontological sites and/or resources known to exist or that are identified during "land development, demolition, or property modification activities." Section 5 of the Conservation Element recognizes the City's responsibility for identifying and protecting its cultural and historical heritage. The Conservation Element establishes the policy to continue to protect historic and cultural sites and/or resources potentially affected by proposed land development, demolition or property modification activities, with the related objective to protect important cultural and historical sites and resources for historical, cultural, research, and community educational purposes.⁶²

ENVIRONMENTAL IMPACTS**Methodology**

To evaluate potential impacts to archaeological resources, an archaeological data search was prepared by the South Central Coastal Information Center at California State University, Fullerton. The South Central Coastal Information Center data incorporates a review of technical records of previous studies and findings related to archaeological resources. The data provided in this report was used to inform the environmental setting at the Project Sites for archaeological resources as well as the probability of potential impacts to archaeological resources from implementation of the Project. The report's findings, in addition to the thresholds of significance enumerated below, formed the basis of the impact determination. The archaeological data search prepared by the South Central Coastal Information Center, Department of Anthropology, California State University at Fullerton, dated March 6, 2017 is included in this Draft EIR as Appendix 4.3-2. As discussed in Section 4.3-1 above, none of the Project Sites has been identified as an historical resource.

Thresholds of Significance

The potential for the proposed Project to result in impacts to archaeological resources is based on the CEQA significance thresholds set forth in Appendix G of the State CEQA Guidelines.

⁶² City of Los Angeles General Plan, Conservation Element, September 2001, pages II-4, II-5, and II-8.

Threshold 4.3.2-1: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the *State CEQA Guidelines*?

Threshold 4.3.2-2: Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

An affirmative answer to either of these questions would constitute a significant impact.

Project Design Elements

The Project would include governmental offices, commercial retail, multi-family residential, community recreational center, and on-site parking. Project development would require excavations for the construction of underground parking facilities.

Impact Analysis

Threshold 4.3.2-1: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the *State CEQA Guidelines*?

The results of the South Central Coastal Information Center's archaeological records search for the Project indicate that there are no known archaeological resources on the Project Sites. As such, the Project Sites have not yielded, nor are they likely to yield, information important in prehistory. Therefore, the Project Sites would not be considered historical resources in accordance with CEQA Guidelines Section 15064.5(a)(3)(D). Further, the Project Sites have not been identified as historical resources as discussed in Section 4.3-1 above. One archaeological site is located within a half-mile radius of the Project Sites (see Table 4.3.2-1, above). Because the Project Sites have been previously developed and the archaeological records search does not identify any potential resources within the Project Sites, an on-site archaeological survey has not been conducted specifically for the Project Sites. Nevertheless, construction activities would involve excavation below existing grade up to depths of approximately 28 feet to construct the subterranean levels at each Project Site and, thereby, create a potential to disturb any previously undiscovered archaeological resources. The archaeological records search recommends that, in order to identify any previously unidentified cultural resources, an archaeological monitor should be in place for ground-disturbing activities. Mitigation Measure MM CU-1 provides that a qualified professional archaeologist shall monitor all ground disturbing activities of the Project. If a unique archaeological resource were to be discovered during construction of the Project, adherence to Regulatory Requirement RR CU-1, and the ceasing of all ground disturbing activities within 50 feet of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines would ensure that potentially significant impacts would not result. Therefore, impacts on archaeological resources would be less than significant.

Threshold 4.3.2-2: Would the Project disturb any human remains, including those interred outside of dedicated cemeteries?

No known human burials have been identified on the Project Sites or in recorded resources located within one-half mile of the Project Sites. The Project would require excavation to potential depth of 28 feet below the existing grade to construct the subterranean parking levels and foundation elements of the Project. As such, it is possible that human remains could be discovered during construction activities. Since human remains could be located subsurface, impacts to these resources would be unknown until

encountered during excavation. Mitigation Measure MM CU-1 provides that a qualified professional archaeologist shall monitor all ground disturbing activities of the Project. If human remains are encountered unexpectedly during construction demolition and/or grading activities, compliance with Regulatory Requirement RR CU-2 would ensure that significant impacts do not result. Therefore, impacts on human remains would be less than significant.

CUMULATIVE IMPACTS

The study area for cumulative impacts to archaeological resource and human remains is within the two-mile radius of the Project Sites for the related projects (as listed in Section 3.0, Project Description and Environmental Setting). In this area, Project construction activities could disturb or destroy previously unknown archaeological resources and, thereby, contribute to the progressive loss of these resources, or may discover previously unknown human remains. Development of the related projects could have impacts if archaeological resources and/or human remains were found during construction activities. However, similar to Project, it is reasonably anticipated that the related projects would comply with the existing regulatory requirements related to the inadvertent discovery of archaeological resources at a project site, and the existing State law related to discovery of human remains.

As discussed above, compliance with existing regulatory requirements related to archaeological resources or human remains would reduce Project-related impacts through the monitor of all ground disturbing activities of the Project. The regulatory requirement RR CU-1 related to archaeological resources includes monitoring, treatment of any discovered cultural resources, preparation of a final report, and curation of discovered materials in an approved facility. The existing regulatory requirement related to discovery of human remains includes halting work at the site and immediately contacting the County Coroner. With compliance with existing regulations cited above and implementation of MM-CU-1, the incremental effects of the Project would not result in a cumulatively considerable contribution to a significant cumulative impact on archaeological resources or human remains, and impacts would be reduced to a level of less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No Project Design Features related to archaeological resources have been identified.

Regulatory Requirements

RR CU-1: If a unique archaeological resource were to be discovered during construction of a project, adherence to the following PRC Section 21083.2 protocol is required:

- The County of Los Angeles, Department of Regional Planning (for Sites 1 and 3), and Department of City Planning, Office of Historic Resources (for Site 2) shall be notified of the discovery. Ground-disturbing activities shall cease within 50 feet of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Construction activity may continue unimpeded on other portions of the Project Site.
- Construction personnel of the Project shall be prohibited from collecting or moving any archaeological materials and associated materials.

- The found deposit shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2.

RR CU-2: California Health and Safety Code Section 7050.5 establishes specific requirements that must be followed in the event that human remains are discovered during excavation activities. The requirements include, but are not limited to the following procedure that shall be observed:

- Cease ground-disturbing activities and contact the County Coroner immediately.
- If the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, the Coroner has 24 hours to notify the NAHC.
- The NAHC will immediately notify the person it believes to be the most likely descendent of the deceased Native American.
- The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods.
- If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.

Impacts to archaeological resources and human remains would be less than significant with the compliance of the existing regulatory requirements cited above.

MITIGATION MEASURES

MM CU-1: A qualified professional archaeologist shall monitor all ground disturbing activities of the project. If buried unique archaeological resources are discovered during ground-disturbing activities, work shall cease within 50 feet of the find until a qualified archaeologist can assess the significance of the find and, if necessary, invoke appropriate treatment measures. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Developer shall implement all measure(s) that the County determines necessary, appropriate and feasible. Within 60 days after grading activities are completed, the Monitor shall prepare and submit a final report to the County and the State Office of Historic Preservation. The report shall include documentation of any recovered unique archaeological resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log and photo documentation, accompanied by a photo key, to the County.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With the implementation of MM CU-1, Project impacts related to archeological resources would be less than significant.

With the implementation of MM CU-1, cumulative impacts related to archeological resources would be less than significant.

4.3 CULTURAL RESOURCES

4.3.3. PALEONTOLOGICAL RESOURCES

INTRODUCTION

This subsection evaluates the Project's potential impacts to paleontological resources associated with development of the Project Sites. The analysis is based on information provided in the vertebrate paleontology records check prepared by the Natural History Museum of Los Angeles County, dated February 23, 2017. This information is included in Appendix 4.3-3 to this Draft EIR.

ENVIRONMENTAL SETTING

Existing Conditions

Paleontological resources are limited, nonrenewable, sensitive scientific resources, including fossils preserved either as impressions of soft (fleshy) or hard (skeletal) parts, mineralized remains of skeletons, tracks, or burrows, or other trace fossils, coprolites (fossilized excrement), seeds or pollen, and other microfossils from terrestrial, aquatic, or aerial organisms.

Based on the paleontology records check prepared by the Natural History Museum of Los Angeles County, dated February 23, 2017 (Appendix 4.3-3 to this Draft EIR), in surface deposits of the northwestern part of Site 1 and most or all of Site 3, consist of younger Quaternary Alluvium. The remainder of Site 1 and all of Site 2 have surface deposits composed of older Quaternary Alluvium. The uppermost layers of Quaternary Alluvium in this general portion of Los Angeles usually do not contain significant vertebrate fossils, but vertebrate fossils do occur at varying depths. The closest vertebrate fossil locality from older Quaternary deposits, situated approximately 1.0 mile west of the Project area near the intersection of Wilshire Boulevard and Serrano Avenue, produced a fossil specimen of mammoth, *Mammuthus*, at a depth of 65 feet below grade. Approximately 1.8 miles northwest of the Project area, near the intersection of Western Avenue and Council Street, also from these older Quaternary sediments, a find produced a specimen of fossil mastodon, *Mammutidae*, at a depth of only five to six feet below the surface. Approximately 1.5 miles north of the Project area, at the intersection of Madison Avenue and Middlebury Street, a find produced a fossil specimen of mammoth, *Mammuthus*, at a depth of about eight feet below street level.

The very northwestern portion of Site 3 may contain exposures of the marine late Miocene Puente Formation (also sometimes referred to as the Upper Modelo Formation or as an unnamed shale in this area). Exposed in the surrounding elevated terrain, these Puente Formation deposits also probably underlie the Quaternary Alluvium in the Project area. Just south of the Project area, around the intersection of Vermont Avenue and Wilshire Boulevard, are vertebrate fossil localities from the Puente Formation discovered during excavation for the Metrorail Wilshire / Vermont station at a depth of 60 to 80 feet beneath the surface. Fossil specimens of eels, *Anguilliformes*, and needlefishes, *Belonidae*, were recovered at this location, along with an extensive fauna of fossil fish. A list of the fossil fish taxa from this location can be found in Appendix 4.3-3 to this Draft EIR.⁶³

⁶³ Samuel A. McLeod, Ph.D., *Vertebrate Paleontology, Natural History Museum of Los Angeles County (NHMLAC), Vertebrate Paleontology Records Check for paleontological resources for the proposed Vermont Corridor Project*,

Regulatory Framework

State

California Public Resources Code (PRC) Sections 21000-21189 (CEQA Statute) require the lead agency to determine whether the proposed development project would have a significant impact on the environment. Paleontological resources cannot be replaced once they are destroyed, and therefore, paleontological resources are considered nonrenewable scientific resources and are protected under CEQA. According to Appendix G to the *State CEQA Guidelines*, a project could have a significant effect if it would directly or indirectly destroy a unique paleontological resource or site, or unique geologic feature. PRC Section 21083.2 directs a lead agency to determine whether a project may have a significant effect on unique archaeological resources, which can also be interpreted to include buried paleontological resources. As set forth in PRC Section 21083.2, if the lead agency determines that the project may have a significant effect on unique archaeological [paleontological] resources, the EIR shall address the issue of those resources. Unique archaeological [paleontological] resources are defined in PRC Section 21083.2(g) as an “artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it:

- 1) Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
- 2) Has a special and particular quality such as being the oldest of its type or the best available example of its type; or
- 3) Is directly associated with a scientifically recognized important prehistoric or historic event or person.”

ENVIRONMENTAL IMPACTS

Methodology

To evaluate potential impacts to paleontological resources, a vertebrate paleontology records check was prepared by the Natural History Museum of Los Angeles County. The Natural History Museum reviews technical records of previous studies and findings related to paleontological resources on the Project Sites and in the area of the Project Sites. The data provided in this letter report was used to inform the environmental setting at the Project Sites for paleontological resources as well as the probability of potential impacts to the paleontological resources from implementation of the Project. The letter report’s findings, in addition to the thresholds of significance enumerated below, formed the basis of the impact determination. The report is attached to this Draft EIR as Appendix 4.3-3.

Thresholds of Significance

The potential for the proposed Project to result in impacts to paleontological resources is based on the CEQA significance thresholds set forth in Appendix G of the State CEQA Guidelines.

in the City of Los Angeles, Los Angeles County, project area, February 23, 2017. Note: Sites 1, 2, and 3 were analyzed as a “project area” by the NHMLAC.

Threshold 4.3.3-1: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

An affirmative answer to this question would constitute a significant impact.

Project Design Elements

The Project would include governmental offices, commercial retail, multi-family residential, community recreational center, and on-site parking. Project development would require include excavations for the construction of underground parking facilities. No specific design features would be included with respect to paleontological resources. MM CU-1 provides that ground disturbing activities shall be monitored by an archaeologist, which would also allow for discovery of subsurface paleontological materials, if present.

Impact Analysis

Threshold 4.3.3-1: Would the Project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?

Findings of the paleontological resource records search from the Natural History Museum of Los Angeles County (NHMLAC) reveal that there are no known fossil records associated with the Project Sites. As such, the Project Sites have not yielded, nor are they likely to yield, information important in prehistory. Therefore, the Project Sites would not be considered historical resources in accordance with CEQA Guidelines Section 15064.5(a)(3)(D). Further, the Project Sites have not been identified as historical resources as discussed in Section 4.3-1 above.

Shallow excavations of only a few feet in the Quaternary Alluvium exposed in all or almost all of the Project area may not encounter any significant fossil vertebrate remains due to the fact that the Project Sites have been previously excavated and graded. However, deeper excavations that extend down into older deposits may encounter significant vertebrate fossil remains. This is due to the fact that excavation activities, which may achieve depths of up to approximately 28 feet for the proposed subterranean levels, may extend farther into the underlying geologic materials than the previous activity at the Project Sites.

If a unique paleontological resource were to be discovered during construction of the Project, adherence to Regulatory Requirement RR CU-3, and the ceasing of all ground disturbing activities of the find until a qualified paleontologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2 would ensure that potentially significant impacts would not result. Therefore, impacts on paleontological resources would be less than significant.

CUMULATIVE IMPACTS

The study area for cumulative impacts to paleontological resources is within the two-mile radius of the development sites for the related projects (as listed in Section 3.0 Project Description and Environmental Setting). Development of the related projects could have impacts if paleontological resources were found during construction activities. However, similar to the Project, it is anticipated that these related projects would comply with the existing regulatory requirement related to the discovery of previously unknown paleontological resources.

As discussed above, compliance with existing regulatory requirements related to paleontological resources would reduce Project-related impacts through the monitor of all ground disturbing activities of the Project. The regulatory requirement RR CU-3 related to paleontological resources includes treatment

of any discovered cultural resources, preparation of a final report, and curation of discovered materials in an approved facility. With the compliance of existing regulations cited above, the incremental effects of the Project would not result in a cumulatively considerable contribution to a significant cumulative impact on paleontological resources, and impacts would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are relevant to paleontological resources.

Regulatory Requirements

RR-CU-3: If a unique paleontological resource were to be discovered during construction of a project, PRC Section 21083.2 requires adherence to the following protocol:

- The County of Los Angeles, Department of Regional Planning, and Department of City Planning, Office of Historic Resources shall be notified of the discovery. Work shall cease in the area of the find until a qualified paleontologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. The Developer shall choose the qualified paleontologist, subject to the approval of County of Los Angeles, Department of Regional Planning on Sites 1 and 3, and Department of City Planning, Office of Historic Resources on Site 2. Construction activity may continue unimpeded on other portions of the Project Site.
- Construction personnel of the Project shall be prohibited from collecting or moving any paleontological materials and associated materials.
- The found deposit shall be treated in accordance with federal, State, and local guidelines, including those set forth in PRC Section 21083.2. Such measure(s) may include avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the paleontologist. The Developer shall implement all measure(s) that the County determines necessary, appropriate and feasible. Within 60 days after treatment measures are implemented, the paleontologist shall prepare and submit a final report to the County and the State Office of Historic Preservation. The report shall include documentation of any recovered resources, the significance of the resources, and the treatment of the recovered resources. Any fossils recovered would be deposited in an accredited and permanent scientific institution.

MITIGATION MEASURES

No significant impacts related to paleontological resources have been identified; and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts related to paleontological resources would be less than significant.

Cumulative impacts related to paleontological resources would be less than significant.

4.4 ENERGY

INTRODUCTION

This section analyzes the Project's potential impacts on three energy resources: electricity, natural gas, and transportation-related energy (petroleum-based fuels). This section evaluates whether the current and planned energy supplies are adequate to meet the Project's forecasted energy consumption. In addition, CEQA and Appendix F of the CEQA Guidelines require consideration of Project energy implications, the conservation of energy and avoidance of wasteful, inefficient and unnecessary energy consumption. This section uses information from the Western Electricity Coordinating Council website, the Los Angeles Department of Water and Power ("LADWP") website, the California Energy Commission ("CEC") website, the Southern California Gas Company website, and the *2016 California Gas Report*. This section utilizes the *Vermont Corridor Development Project Utility Infrastructure Technical Report: Water, Wastewater and Energy* ("*Infrastructure Technical Report: Energy*"), prepared by KPFF Consulting Engineers, August 16, 2017. The *Utility Infrastructure Technical Report: Water, Wastewater and Energy* is included as Appendix 4.16-1 to this Draft EIR.

ENVIRONMENTAL SETTING

Existing Conditions

Electricity

LADWP is responsible for providing power supply to the City while complying with County, State, and Federal regulations.

Regional

LADWP's Power system is the nation's largest municipal electric utility, and serves a 465-square-mile area in Los Angeles. The system supplies more than 26 million megawatt-hours ("MWh") of electricity per year for the City of Los Angeles' 1.4 million residential and business customers. LADWP has over 7,460 megawatts ("MW") of generation capacity from a diverse mix of energy sources, including Renewable energy, Natural Gas, Nuclear, Large Hydro, coal and other sources. The distribution network includes 6,800 miles of overhead distribution lines and 3,597 miles of underground distribution cables.¹

Local

LADWP provides electrical service in the City, including the Project Sites. LADWP generates power from a variety of different sources that include approximately 23 percent from renewable energy, approximately 4 percent from hydroelectric, approximately 17 percent from natural gas, approximately 10 percent from nuclear energy, and other fuels. LADWP utilizes renewable energy sources and is committed to meeting the requirement of the Renewable Portfolio Standard ("RPS") Enforcement Program to use at least 33 percent of the state's energy from renewables by 2020.² Eligible renewable

¹ LADWP, *2015 Power Integrated Resource Plan*, December 2015.

² California Environmental Protection Agency, Air Resources Board, *Renewable Portfolio Standard*, website: <http://www.arb.ca.gov/energy/rps/rps.htm>, accessed: May 2017.

resources include biodiesel, biomass, hydroelectric and small hydro, 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.”³ LADWP provides electricity service to over 3.9 million residents in its service area, encompassing the City and parts of the Owens Valley.⁴ LADWP obtains electricity from various generating sources that use renewable energy,⁵ coal, natural gas, nuclear, hydroelectric facilities, and renewable resources (including solar and wind farms) to generate power. Current installed generation capacity is approximately 7,460 MW of power.⁶

Based on available substructure maps from the City of LA Bureau of Engineering’s online Navigate LA database, the Project Sites receive electric power service from LADWP via an existing underground conduit in Vermont Avenue.

Energy and Load Factor

Electricity can be measured in two ways: power, which is the rate of energy being consumed (i.e., watts, kilowatts, or megawatts), or energy, which is the amount of energy consumed per unit time (i.e., watt-hours), which is defined as (“kWhr”). The formula for determining how energy is consumed is the following:

$$\text{Energy (watt-hours)} = \text{Power (watts)} \times \text{time (hours)}$$

A load factor is the ratio of the average load in kilowatts supplied during a designated period to the peak or maximum load in kilowatts occurring in that period. The formula for determining the load factor is the following:

$$\text{Load Factor (\%)} = (\text{kw-h} / \text{hours} / \text{kw}) \times 100\%$$

The existing 30,788 and 13,325 square foot office buildings, and seven-story parking structure on Site 1 are served by two existing 200 ampere, 240/120 volt, three phase, four watt (200A, 240/120V, 3 PH, 4 W) LADWP electrical lines, two existing 600A 120/240V, 1 PH, 3 W electrical lines, and one 400A, 240V, 3 PH, 4 W electrical line. The existing 154,793 and 52,000 square foot office buildings, and two-story parking structure on Site 2 are served by an existing 4,000A, 480/277 V, 3 PH, 4 W LAWDP electrical line and an 800A, 480/277 V, 3 PH, 4 W electrical line. The existing 29,292 square foot building on Site 3 is served by an existing 1,000-1,600 A, 208 V, 3 PH, 4 W LADWP electrical line.

³ City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013, website: http://www.energy.ca.gov/portfolio/pous/ladwp/2013-12-03_LADWP_RPS_Policy_Enforcement_Program.pdf, accessed: May 27, 2017.

⁴ Los Angeles Department of Water and Power, Facts & Figures, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=16690n7j92_4&_afLoop=975447086912333, accessed: May 11, 2017.

⁵ Renewable energy sources include biomass and waste (6 percent), geothermal (1 percent), small hydroelectric (1 percent), solar (1 percent), and wind (14 percent).

⁶ Los Angeles Department of Water and Power, Facts & Figures, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=16690n7j92_4&_afLoop=975447086912333, accessed: May 11, 2017.

Project Sites

Site 1 consists of an existing two-story office building, a one-story office with rooftop parking, two surface parking lots, and a parking structure. Site 2 consists of an existing 12-story building, a four-story building, and a parking structure. Site 3 consists of a 4-story building and surface parking lot.

Electricity demand estimates have been prepared based on the existing building program and are summarized in Table 4.4-1 (Estimated Existing Electricity Demand), below.

**Table 4.4-1
Estimated Existing Electricity Demand**

Existing Use Description	Annual Average Demand Rate (kWhr/unit/year)^(a)	Structure Size (sf)	Average Yearly Demand (kWhr/year)
Site 1			
Two-Story Office	13.32/sf	30,788 sf	410,096
One-Story Office	13.32/sf	13,325 sf	177,489
Seven-Story Parking Structure	6.74/sf	235,248 sf	1,585,572
Subtotal			2,173,157
Site 2			
Twelve-Story Office	13.32/sf	154,793 sf	2,061,842
Four-Story Office	13.32/sf	52,000 sf	692,640
2-Story Parking Structure	6.74/sf	14,010 sf	94,427
Subtotal			2,848,909
Site 3			
Four-Story Office	13.32/sf	29,292 sf	390,169
Subtotal			390,169
Total Existing Electricity Demand			5,412,235
^a CalEEmod version 2016.3.1 was used to calculate the electricity demand based on land use. See Appendix 4.2-1 to this Draft EIR. Source: KPFF, 2017.			

Natural Gas

Southern California Gas Company (“SoCal Gas”) is responsible for providing natural gas supply to the County and City and is regulated by the California Public Utilities Commission and other state and federal agencies.

Regional

SoCal Gas is the principal distributor of natural gas in Southern California, providing retail and wholesale customers with transportation, exchange and storage services and also procurement services to most retail core customers. SoCal Gas is a gas-only utility and, in addition to serving the residential, commercial, and industrial markets, provides gas for enhanced oil recovery (“EOR”) and electric generation (“EG”) customers in Southern California. SoCal Gas’ natural gas system is the nation’s largest natural gas

distribution utility and serves a 20,000 square-mile area in Central and Southern California. The system supplies natural gas to 21.6 million customers through 5.9 million meters in more than 500 communities.⁷

Most natural gas consumed in Southern California is produced out of state.⁸ SoCalGas serves approximately 21.6 million customers in more than 500 communities.⁹ The availability of natural gas is based upon present conditions of gas supply and regulatory policies because SoCalGas is under the jurisdiction of the California Public Utilities Commission (“CPUC”) and federal regulatory agencies. In addition, SoCalGas makes available to its customers, energy efficiency programs with rebates and incentives for the purpose of reducing natural gas consumption.

SoCalGas obtains its gas resources from several sedimentary basins, including: the San Juan Basin in New Mexico, the Permian Basin in West Texas, Rocky Mountain, western Canada, and California.¹⁰

Southwestern United States Gas Supplies

Natural gas obtained from the Southwestern United States, especially the San Juan Basin in New Mexico, provides the majority of gas sold by SoCalGas. This gas is delivered to the Southern California region through the El Paso Natural Gas Company and the Transwestern Pipeline Company pipelines. The conventionally produced gas supplies from the San Juan Basin peaked in 1999 and have been declining at an annual rate of 3.0 percent, with an increase in the rate of decline in recent years. The Permian Basin has provided additional supplies, although increasing demand in Mexico for natural gas may reduce this supply source. There is currently a proposal to construct a North-South Pipeline from SoCalGas’ Adelanto compressor station near Victorville down to the Moreno pressure limiting station in Moreno Valley.¹¹

Rocky Mountain Gas Supplies

Natural gas obtained from the Rocky Mountain sources is considered to be a viable alternative to the traditional source of natural gas in the Southwestern United States. These natural gas supplies are delivered to the Southern California region through the Kern River Gas Transmission Company’s pipeline. Access to Rocky Mountain gas is also available through pipeline interconnections with the San Juan Basin. Rocky Mountain gas has increasingly flowed to Midwestern and Pacific Northwest markets.¹²

⁷ *California Gas and Electric Utilities, 2016 California Gas Report.*

⁸ *2016 California Gas Report, Table 1-SCG, page 96*
<https://www.socalgas.com/regulatory/documents/cgr/2016-cgr.pdf> accessed: July 2017.

⁹ *The SCG, About Us, Company Profile, website: <http://www.socalgas.com/about-us/company-info.shtml>*
 accessed: May 2017.

¹⁰ *The California Gas and Electric Utilities, 2016 California Gas Report, website:*
http://www.pge.com/pipeline_resources/pdf/library/regulatory/downloads/cgr16.pdf, page 79, accessed:
 May 2017.

¹¹ *Ibid.*

¹² *Ibid.*

Canadian Gas Supplies

Natural gas obtained from Canada and delivered to Southern California is not expected to change significantly. Only a small share of Southern California gas supplies come from Canada due to the high cost of transport.¹³

Biogas

There is growing interest regarding biogas¹⁴ production potential in SoCalGas' service territory from the following activities:

- non-hazardous-waste landfills,
- landfill diversion of organic waste material,
- wastewater treatment,
- concentrated animal feeding operations, and
- food/green waste processing.

When biogas is conditioned/upgraded to pipeline quality specifications it can be interconnected to a gas utility's pipeline and distributed to a specific customer. Biomethane may also be consumed on-site for a variety of uses, including electrical power generation from internal combustion engines, fuel cells, and turbines, or as a fuel source for natural gas vehicles. Currently, there are instances where biogas is being vented naturally or flared to the atmosphere, which wastes this valuable renewable resource. In January 2014, the CPUC approved SoCalGas' application to offer a Biogas Conditioning/Upgrading Services Tariff, which would meet the current and future needs of biogas producers seeking to upgrade their biogas for beneficial use.¹⁵

Local

Based on substructure maps provided by the City, the Project Sites receive natural gas service via a SoCalGas operated 2-inch service on the east side of Vermont Avenue and a 6-inch service on the north side of 6th Street.

Project Sites

Site 1 consists of an existing two-story office building, a one-story office with rooftop parking, two surface parking lots, and a parking structure. Site 2 consists of an existing 12-story building, a four-story building, and a parking structure. Site 3 consists of a 4-story building and surface parking lot. The existing on-site natural gas system supplies the natural gas needs to these structures through the existing service described above.

¹³ *Ibid.*, page 80.

¹⁴ *Biogas is a mixture of methane and carbon dioxide produced by the bacterial degradation of organic matter.*

¹⁵ *The California Gas and Electric Utilities, 2016 California Gas Report, website: http://www.pge.com/pipeline_resources/pdf/library/regulatory/downloads/cgr16.pdf, page 81, accessed: May 2017.*

Natural gas demand estimates have been prepared based on the existing equipment program and are summarized in Table 4.4-2 (Estimated Existing Natural Gas Demand), below.

Table 4.4-2
Estimated Existing Natural Gas Demand

Existing Use Description	Annual Average Demand Rate (KBTU/unit/year) ^{a)}	Structure Size (sf)	Average Yearly Demand (KBTU/year)
Site 1			
Two-Story Office	10.46/sf	30,788 sf	322,042
One-Story Office	10.46/sf	13,325 sf	139,380
Seven-Story Parking Structure	0	235,248 sf	0
Subtotal			461,422
Site 2			
Twelve-Story Office	10.46/sf	154,793 sf	1,619,134
Four-Story Office	10.46/sf	52,000 sf	543,920
2-Story Parking Structure	0	14,010 sf	0
Subtotal			2,163,054
Site 3			
Four-Story Office	10.46/sf	29,292 sf	306,394
Subtotal			306,394
Total Existing Gas Demand			2,930,870
^a CalEEmod version 2016.3.1 was used to calculate the natural gas demand based on land use. See Appendix 4.2-1 of this Draft EIR. Source: KPFF, 2017.			

Transportation Energy

According to the CEC, transportation accounts for nearly 37 percent of California's total energy consumption and roughly 37 percent of the State's greenhouse gas emissions.¹⁶ In 2015, California consumed 14.92 billion gallons of gasoline and 2.36 billion gallons of diesel fuel.¹⁷ Petroleum-based fuels currently account for approximately 92 percent of California's transportation energy sources.¹⁸ California is currently working on developing flexible strategies to reduce petroleum use. Over the last decade, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce vehicle miles traveled ("VMT"). Overall, gasoline consumption in California has declined and the CEC predicts that the demand for gasoline will continue to decline over the next 10 years. Eventually, there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity.

¹⁶ California Energy Commission, 2015 Integrated Energy Policy Report, page 3.

¹⁷ California Board of Equalization, Net Taxable Gasoline Gallons 10 Year and Net Taxable Diesel Gallons 10 Year Report.

¹⁸ California Energy Commission, 2015–2016 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, November 2014, page 5.

Regulatory Framework

Federal

No federal regulations related to electricity and natural gas infrastructure and transportation energy are applicable to the Project.

State

The CEC and CPUC have jurisdiction over Investor Owned Utilities (“IOUs”) in California. The CEC also collects information for LADWP.

Senate Bill 1389

Senate Bill 1389 (Public Resources Code Sections 25300-25323) requires the CEC to develop an integrated plan for electricity, natural gas, and transportation fuels. The CEC must prepare and update policy recommendations every two years to conserve these resources, protect the environment, ensure reliable, secure, and diverse energy supplies, enhance the state’s economy, and protect the public health and safety. The most recently completed report, the *2015 Integrated Energy Policy Report*, addresses strategies related to data for improved decisions in the Existing Buildings Energy Efficiency Action Plan. The report analyzes and discusses the following:

- building energy efficiency standards;
- the impact of drought on California’s energy system;
- achieving 50 percent renewables by 2030;
- Renewable Action Plan status;
- the California Energy Demand Forecast;
- the Natural Gas Outlook;
- methane emissions;
- the Transportation Energy Demand Forecast;
- Alternative and Renewable Fuel and Vehicle Technology Program benefits updates;
- landscape-scale planning efforts;
- transmission projects;
- the California Independent System Operator energy imbalance market;
- the Desert Renewable Energy Conservation Plan;
- climate change vulnerability and adaptation options;
- update on electricity infrastructure in Southern California;
- an update on trends in California’s sources of crude oil; and

- an update on California's nuclear plants.¹⁹

2015 Clean Energy and Pollution Reduction Act

In 2015, the State enacted legislation intended to improve air quality, provide aggressive reductions in energy dependency, and boost the employment of renewable power. The 2015 Clean Energy and Pollution Reduction Act, also known as Senate Bill (SB) 350, requires the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources to be increased to 50 percent by December 31, 2030. SB 350 establishes annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas final end uses by January 1, 2030.

Energy Efficiency Act (AB 802)

The Energy Efficiency Act (AB 802) provides aggressive directives to increase the energy efficiency of existing buildings, requires that access to building performance data for nonresidential buildings be provided by energy utilities and encourages pay-for-performance incentive-based programs. This paradigm shift will allow California building owners a better and more effective way to access whole-building information and at the same time will help address climate change, and deliver cost-effective savings for ratepayers.

Energy Efficiency Act (AB 793)

The Energy Efficiency Act (AB 793) is intended to promote and provide incentives to residential or small and medium-sized business utility customers that acquire energy management technology for use in their home or place of business. AB 793 requires energy utilities to develop a plan to educate residential customers and small and medium business customers about the incentive program.²⁰

Title 24 of the California Code of Regulations

Title 24 of the California Code of Regulations ("CCR") is the California Building Code which governs all aspects of building construction. Included therein are standards mandating energy efficiency measures for new construction that are updated every three years to allow new energy efficiency technologies to be considered. These energy measures are known as the State Building Energy Efficiency Standards. The efficiency standards apply to new construction of both residential and non-residential buildings, and regulate energy consumed for heating, cooling, ventilation, water heating, and lighting. The building efficiency standards are enforced through the local building permit process. Local government agencies may adopt and enforce energy standards for new buildings, provided these standards meet or exceed those in the Title 24 guidelines.

California Green Building Standards Code

The 2016 California Green Building Standards Code, referred to as CALGreen, became effective on January 1, 2017. CALGreen sets minimum standards that all new structures must meet to reduce the State's overall carbon output. Local jurisdictions retain the administrative authority to exceed the new CALGreen

¹⁹ California Energy Commission, 2015 Integrated Energy Policy Report, Publication Number: CEC-100-2015-001-CMF, 2015.

²⁰ California Gas and Electric Utilities, 2016 California Gas Report, 2016.

standards. The CALGreen standards are set forth in Part 11 of Title 24 of the California Code of Regulations.

CALGreen requires new buildings to reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and includes low pollutant emitting finish materials. CALGreen's mandatory measures establish a minimum for green construction practices and incorporate environmentally responsible buildings into the everyday fabric of California cities.

CALGreen has mandatory measures as well as more stringent, voluntary provisions that have been placed in the appendix for optional use. Some key mandatory measures for commercial occupancies include specified parking for clean air vehicles, a 20 percent reduction of potable water use in buildings, a 50 percent construction waste diversion from landfills, use of building finish materials that emit low levels of volatile organic compounds, and commissioning for new, nonresidential buildings over 10,000 square feet.

Key optional measures are included in a two-tiered system designed to allow jurisdictions to adopt codes that go beyond the State mandatory provisions. The non-residential tiers include increased reduction in energy usage by 15 or 30 percent and increased reduction in potable water use, parking for clean air vehicles, cool roofs, construction waste diversion, use of recycled materials, and use of low-emitting resilient flooring and thermal insulation.

Western Electricity Coordinating Council and the North American Electric Reliability Council

The Western Electricity Coordinating Council ("WECC") is a voluntary consortium of electrical power providers that is responsible for coordinating and promoting electricity reliability from the Canadian provinces of Alberta and British Columbia in the north of its jurisdiction to the northern Mexican State of Baja California in the south of its jurisdiction, and the 14 western states of the United States.²¹ The LADWP is a member of the WECC. The WECC has implemented Standard BAL-STD-002-0 to require reliable operation of the power system while ensuring adequate generating capacity at all times. As a means of ensuring power system reliability, the LADWP maintains an extra reserve margin of power generation resources in the event of a power system disturbance. In order to determine how much extra generation reserves are needed, the LADWP adheres to the WECC Reliability Standard. WECC Standard BAL-STD-002-0 requires its providers to:

- Supply requirements for load variations;
- Replace generating capacity and energy lost due to forced outages of generation or transmission equipment;
- Meet on-demand obligations; and
- Replace energy lost due to curtailment of interruptible imports.

²¹ *Western Electricity Coordinating Council, About WECC, website: <https://www.wecc.biz/Pages/101.aspx>, accessed: May 2017.*

2016 California Gas Report

The 2016 California Gas Report²² presents a comprehensive outlook for natural gas requirements and supplies for California through the year 2035. This report is prepared in even-numbered years, followed by a supplemental report in odd-numbered years, in compliance with California PUC Decision D.95-01-039. The below projections in the California Gas Report are for long-term planning and do not necessarily reflect the day-to-day operational plans of the utilities.

California natural gas demand, including volumes not served by utility systems, is expected to decrease at a rate of 1.4 percent per year from 2016 to 2035. The forecast decline is due to a combination of moderate growth in the Natural Gas Vehicle (“NGV”) market and across-the-board declines in all other market segments: residential, commercial, electric generation, and industrial markets.

Residential gas demand is expected to decrease at an annual average rate of 0.5 percent. Demand in the commercial market is expected to decline at an annual rate of 1.0 percent, and demand in the industrial market (non-refinery) is expected to decrease at an annual rate of 1.7 percent. Aggressive energy efficiency programs make a significant impact in managing growth in the residential, commercial, and industrial markets. Gas demand in the refinery industrial market sector is forecast to decline approximately 0.34 percent per year.

The electricity generation sector includes all commercial/industrial cogeneration, Enhanced Oil Recovery (“EOR”)-related cogeneration, and non-cogeneration electric generation. The forecast of electric generation (“EG”) load is subject to a high degree of uncertainty. Forecast uncertainty is in large part due to load sensitivity to weather conditions, the expiration of existing contracts with cogeneration facilities, and the construction and retirement of power plants and transmission lines. Additionally, many once through cooling (“OTC”) plants in California are scheduled to either retire or repower during the forecasted period. These are mostly gas-fired thermal plants, located near the coast, that use ocean water for cooling.

For electricity demand in California, SoCalGas relies on the CEC California Energy Demand 2016-2026 Revised/Final Forecast, dated January 2016. SoCalGas selected the Mid Energy Demand scenario with the Mid Additional Achievable Energy Efficiency (“AAEE”) scenario. For the first time in CEC forecasts, the Mid AAEE scenario shows a declining, long-term, state-wide energy demand; per the forecasts, Southern California energy demand will decline at a faster rate than that of Northern California.

SoCalGas engages in a number of energy efficiency and conservation programs designed to help customers identify and implement ways to benefit environmentally and financially from energy efficiency investments. Programs administered by SoCalGas include services that help customers evaluate their energy efficiency options and adopt recommended solutions, as well as simple equipment retrofit improvements, such as rebates for new hot water heaters.

Local

County of Los Angeles

The Los Angeles County Board of Supervisors adopted the Los Angeles County Green Building Standards Code (Title 31). The 2016 CalGreen Standards, as published by the California Building Standards Commission, are adopted and incorporated, by reference, into Title 31. Title 31 will improve public health,

²² *California Gas and Electric Utilities, 2016 California Gas Report.*

safety, and general welfare by enhancing the design and construction of buildings through sustainable building concepts that reduce negative environmental impacts. This includes a reduction in energy, water, and other natural resources, and minimizing solid waste.

City of Los Angeles

Los Angeles Green Building Code

The following types of projects are subject to the Los Angeles Green Building Code:

- All new buildings (residential and non-residential);
- All additions (residential and non-residential); and
- Alterations with building valuations over \$200,000 (residential and non-residential).

The Los Angeles Green Building Code is based on the 2016 CALGreen Standards.

2016 Final Power Integrated Resource Plan

On January 13, 2017, LADWP adopted the *2016 Power Integrated Resource Plan* (“IRP”), which provides a 20-year roadmap to guide LADWP in meeting the future energy needs by forecasting demand for energy and determine how that demand will be met by executing new projects and replacement projects and programs. The IRP is an update of the 2015 IRP, and provides the required reliability and necessary flexibility to adapt to economic, environmental, and regulatory conditions. Major changes from the 2015 IRP include Senate Bill 350, which was signed into law requiring a 55percent renewable portfolio standard by 2030 and increasing to 65 percent by 2036; the completion of the Maximum Distribution Renewable Energy Penetration Study (“MDRPES”); and a natural gas prices and renewable energy costs have been revised downwards compared to the 2014 IRP.²³

The 2016 IRP incorporates updates to reflect the latest load forecast, fuel price, and projected renewable price forecasts, and other numerous modeling assumptions. 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: maintaining a high level of electric service reliability; keeping energy rates competitive; and exercising environmental stewardship.²⁴

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Project with respect to energy are determined based on the proposed increase in electricity, natural gas, and fuel demand relative to the capacity of existing and proposed infrastructure. Existing energy demands are compared to the Project’s current energy demands and electricity and natural gas infrastructure capacity, including planned improvements associated with the Project.

²³ Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, January 2016.

²⁴ Los Angeles Department of Water and Power, *2016 Final Power Integrated Resource Plan*, January 2016.

Thresholds of Significance

Appendix G to the State CEQA Guidelines does not address impacts to energy supplies or utilities. The County has identified the following question with respect to energy, which is used as the significance threshold in this Draft EIR:

- Would the project create energy utility (electricity, natural gas, propane) system capacity problems, or result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

An affirmative answer to this question would represent a significant impact.

In addition, although not a significance threshold, Appendix F to the State CEQA Guidelines provides that, in order to assure that energy implications are considered in project decisions, EIRs shall include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, or unnecessary consumption of energy. The means of achieving this goal shall include:

- 1) Decreasing overall per capita energy consumption;
- 2) Decreasing reliance on fossil fuels such as coal, natural gas, and oil; and
- 3) Increasing reliance on renewable energy sources.

Analysis with respect to Appendix F is also provided in this Section.

Project Design Elements

The Project would incorporate sustainability features set forth in the County and City Green Building Ordinances. Such features would include the following measures, or equivalent measures capable of achieving the same results at minimum:

- Installation of energy efficient heating and cooling systems, equipment, and control systems;
- Installation of efficient lighting and lighting control systems;
- Installation of light colored “cool” roofs to more effectively reflect the sun’s energy from the roof’s surface to reduce the roof surface temperature, and use of shade structures to reduce the heat island effect;
- Incorporation of energy saving features into building design (e.g., use of passive controls, shading, solar energy, ventilation, appropriate building materials), as appropriate;
- Prohibition of HVAC, refrigeration, and fire suppression equipment that contains banned chlorofluorocarbons; and
- Use of Energy Star appliances.

Impact Analysis

Threshold 4.4-1: Would the project create energy utility (electricity, natural gas, propane) system capacity problems, or result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction

Electricity

Electrical power would be consumed to construct the new buildings and facilities of the Project. Typical uses include temporary power for lighting, equipment, and construction trailers. Based on preliminary estimates provided by the prospective general contractors, temporary construction power demands were determined for the Project Sites. Over the course of construction total electricity consumption is estimated to be approximately 5,250,000 kWhr for Site 1, approximately 1,600,000 kWhr for Site 2, and approximately 800,000 kWhr for Site 3. The corresponding annual temporary construction power estimates would be 2,625,000 kWhr/yr for Site 1, 800,000 kWhr/yr for Site 2, and 400,000 kWhr/yr for Site 3.²⁵ While these construction estimates are slightly higher than the existing consumption estimates for all three sites, they would be temporary in nature and they would be within available capacity as they are within the projected consumption associated with operation of the Project, as discussed under Operation below. Furthermore, as discussed below, this level of consumption has been determined to be within the available capacity of the electrical generation system. Therefore, impacts on electricity supply associated with short-term construction activities would be less than significant.

Natural Gas

No natural gas usage is expected to occur during construction. Therefore, impacts on natural gas supply associated with short-term construction activities would not occur.

Construction impacts associated with the Project's electrical and gas infrastructure upgrades would primarily be confined to trenching and other activities required to connect the Project buildings with supply lines that are typically located within the adjacent roadway right-of-way. Infrastructure improvements would comply with all applicable LADWP, SoCal Gas, and City requirements, which would minimize impacts to existing energy systems and to adjacent properties. To reduce any temporary pedestrian access and traffic impacts during any necessary off-site energy infrastructure improvements, a construction management plan would be implemented as discussed in Section 4.14, Transportation, of this Draft EIR to ensure safe pedestrian and vehicular travel. Specifically, the construction management plan would include closure information, detour plans, protection barriers, and flag men to ensure pedestrian and vehicular safety. Therefore, Project impacts on energy infrastructure associated with construction activities would be less than significant.

Transportation Energy

Construction of the Project is anticipated to occur over an approximately five-year period between 2018 and 2023. Phase 1 would begin in 2018 and last approximately three years, during which Sites 1 and 3 would be redeveloped. Site 1 construction, including construction of the Replacement Shatto Structure, would last throughout that period. Site 3 construction would last approximately 20 months beginning in 2019 and concluding in 2020. Phase 2 construction, which is the reuse and redevelopment of Site 2, would begin in year 2021 after completion of Phase 1 and the relocation of existing County employees on Site 2 to Site 1, and conclude in year 2023.

²⁵ KPFF, *Utility Infrastructure Technical Report*, p.22.

During construction of the Project, short-term transportation-related energy consumption would result primarily from petroleum-based fuels used to power off-road construction vehicles and equipment on the Project Site, construction workers traveling to and from the Project Site, and delivery and haul truck trips.

The transportation fuel required by construction workers would depend on the total number of worker trips estimated for the duration of construction activity. Based on construction plans prepared for the Project, there could be a maximum of 225 construction workers at Site 1 at the peak when finishing of the Site 1 Tower overlaps with the construction of the Replacement Shatto Structure. 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 the worst-case estimate for diesel trucks is projected at 6.178 mpg in 2015, and 22.816 miles per gallon (mpg) and the worst-case estimate for diesel trucks is projected at 6.272 mpg in 2020.²⁶

Site 1

Assuming all construction worker vehicles have an average fuel economy consistent with the Caltrans projected 2015 average for mpg for gasoline and diesel, based on the maximum projected number of workers during each phase, and on Site 1's estimated construction VMT of 5.91 million, including worker and delivery trips, Site 1 construction would use approximately 260,072 gallons of gasoline.²⁷ Construction on Site 1 would also use approximately 14,675 gallons of diesel, assuming heavy-duty construction equipment (such as haul route trucks) is primarily diesel-fueled.²⁸ In 2014, California consumed a total of 343,568 thousand barrels (or 10.822 billion gallons) of gasoline for transportation and 2.36 billion gallons of diesel fuel.²⁹ This would represent 0.0002 percent of the statewide gasoline consumption and 0.0006 percent of the statewide diesel consumption. The expected gasoline and diesel fuel gas for Site 1 construction would be negligible compared with statewide supplies and would be accommodated by local or regional suppliers and vendors.

Site 2

Assuming all construction worker vehicles have an average fuel economy consistent with the Caltrans projected 2020 average for mpg for gasoline and diesel, based on the maximum projected number of workers during each phase, and on Site 2 construction's estimated VMT of 2.08 million, Site 2 construction would use approximately 91,200 gallons of gasoline.³⁰ Construction on Site 2 would use approximately 7,659 gallons of diesel, assuming heavy-duty construction equipment (such as haul route trucks) is

²⁶ California Department of Transportation, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, website: <http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF>, accessed: June 2017.

²⁷ $5,906,515 \text{ VMT} / 22.711 \text{ mpg} = 260,072 \text{ gallons of gasoline}$. Construction VMT derived from the air quality trips and VMT model sheets, included Appendix 4.2-1 to this Draft EIR.

²⁸ $90,660 \text{ VMT} / 6.178 \text{ mpg} = 14,675 \text{ gallons of diesel fuel}$. Construction VMT derived from the air quality trips and VMT model sheets, included Appendix 4.2-1 to this Draft EIR.

²⁹ US EPA, State Energy Data System, Table F-3, website: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf, accessed: June 2017.

³⁰ $2,080,823 \text{ VMT} / 22.816 \text{ mpg} = 91,200 \text{ gallons of gasoline}$. Construction VMT derived from the air quality trips and VMT model sheets, included Appendix 4.2-1 to this Draft EIR.

primarily diesel-fueled.³¹ This would represent 0.0008 percent of the statewide gasoline consumption and 0.0003 percent of the statewide diesel consumption. The expected gasoline and diesel fuel gas for Site 2 construction would be negligible compared with statewide supplies and would be accommodated by local or regional suppliers and vendors.

Site 3

Assuming all construction worker vehicles have an average fuel economy consistent with the Caltrans projected 2015 average for mpg for gasoline and diesel, based on the maximum projected number of workers during each phase, and on Site 3 construction's estimated VMT of 554,029, Site 3 construction would use approximately 24,395 gallons of gasoline.³² Construction on Site 3 would use approximately 10,181 gallons of diesel, assuming heavy-duty construction equipment (such as haul route trucks) is primarily diesel-fueled.³³ This would represent 0.0002 percent of the statewide gasoline consumption and 0.0004 percent of the statewide diesel consumption. The expected gasoline and diesel fuel gas for Site 3 construction would be negligible compared with statewide supplies and would be accommodated by local or regional suppliers and vendors.

Compliance with Regulations

With regard to truck trips for hauling demolition material and exported soil, the County and City have adopted plans and regulations including the Los Angeles County Green Building Standards Code (County Code Title 31), and the City of Los Angeles Green Building Code which require the reduction, recycling, and reuse of solid waste generated in their respective jurisdictions. The Project's compliance with these regulations would further reduce the number of trips and fuel required to transport construction debris and exported soil, and in turn would reduce the unnecessary consumption of energy.

With compliance with Title 31 and the Los Angeles Green Building Code, impacts regarding transportation energy would be less than significant.

Operation

Electricity

The Project would increase the demand for electricity resources. The estimated projected electrical loads are provided in Table 4.4-3 (Estimated Proposed Electricity Demand), below.

³¹ 48,040 VMT / 6.272 mpg = 7,659 gallons of diesel fuel. Construction VMT derived from the air quality trips and VMT model sheets, included Appendix 4.2-1 to this Draft EIR.

³² 554,029 VMT / 22.711 mpg = 24,395 gallons of gasoline. Construction VMT derived from the air quality trips and VMT model sheets, included Appendix 4.2-1 to this Draft EIR.

³³ 62,900 VMT / 6.178 mpg = 10,181 gallons of diesel fuel. Construction VMT derived from the air quality trips and VMT model sheets, included Appendix 4.2-1 to this Draft EIR.

Table 4.4-3
Estimated Proposed Electricity Demand

Proposed Use Description	Average Yearly Use (kWhr/unit/year)^(a)	Structure Size (sf)	Average Yearly Demand (kWhr/year)
Site 1			
Retail	13.86/sf	6,350 sf	88,011
Restaurant	447.90/sf	3,650 sf	1,634,835
Parking Structure	6.74/sf	800,002 sf	5,392,013
Office	13.32/sf	461,000 sf	6,140,520
Subtotal			13,255,379
Site 2			
Retail	13.86/sf	7,500 sf	103,950
Residential: Apt	3,116.54/du	246 du	766,668
Parking Structure	6.74/sf	116,324 sf	784,024
Subtotal			1,654,642
Site 3			
Housing	4,579/sf	72 du	329,688
Community Recreation Center	13.32/sf	13,200 sf	175,824
Parking Structure	6.74/sf	51,591 sf	347,723
Subtotal			853,235
Total Proposed Electricity Demand			15,763,256
Total Existing Electricity Demand			5,412,235
Net Increase in Electricity Demand			10,351,023
^a CalEEmod version 2016.3.1 was used to calculate the electricity demand based on land use. Source: KPFF, 2017.			

Will Serve letter requests were sent to LADWP for each Project Site to determine if there is sufficient capacity to serve each Project Site. LADWP confirmed that it has sufficient facilities in the area to serve the Project (all 3 Sites). As shown in Exhibit 4 to Appendix 4.16-1 to this Draft EIR, LADWP indicated that service can be provided to Site 1 (LADWP Metropolitan Service Planning letter dated November 18 2016); Site 2 (LADWP letter dated January 6, 2017); and Site 3 (LADWP Metropolitan Service Planning letter dated December 13, 2016). Thus, impacts related to electrical services would be less than significant.

Natural Gas

The Project would increase the demand for natural gas resources. The estimated projected electrical loads are provided in Table 4.4-4 (Estimated Proposed Natural Gas Demand), below.

Will serve letter requests were sent to the SoCal Gas for each Project Site to determine if there is sufficient capacity to serve each Project Site. Based on the response from the SoCal Gas (Exhibit 5 to Appendix 4.16-1), SoCal Gas confirmed that it has sufficient facilities in the area to serve the Project (all 3 Project Sites). Thus, impacts related to natural gas would be less than significant.

Table 4.4-4
Estimated Proposed Natural Gas Demand

Proposed Use Description	Average Yearly Use (KBTU/unit/year) ^(a)	Structure Size (sf)	Average Yearly Demand (KBTU/year)
Site 1			
Retail	1.65/sf	6,350 sf	10,478
Restaurant	2,310/sf	3,650 sf	8,431,500
Parking Structure	0	800,002 sf	0
Office	10.46/sf	461,000 sf	4,822,060
Subtotal			13,264,038
Site 2			
Retail	1.65/sf	7,500 sf	12,375
Residential: Apt	8,257/du	246 du	2,031,222
Parking Structure	0	116,324 gsf	0
Subtotal			2,043,597
Site 3			
Housing	18,229/sf	72 du	1,312,488
Community Recreation Center	10.46/sf	13,200 sf	138,072
Parking Structure	0	51,591 sf	0
Subtotal			1,450,560
Total Proposed Natural Gas Demand			16,758,195
Total Existing Natural Gas Demand			2,930,870
Net Increase in Natural Gas Demand			13,827,325
^a CalEEmod version 2016.3.1 was used to calculate the natural gas demand based on land use. Source: KPFF, 2017.			

Transportation Energy

The Project Sites are served by Metro, DASH, and Foothill Transit bus lines including Metro Local 20 and Metro Rapid 720 which run on Wilshire Boulevard, and Metro Local 204 and Metro Rapid 754 which run on Vermont Avenue. The Project Sites are also served by the Metro Rail Red and Purple Lines from the Metro Rail Wilshire/Vermont Station located at the northeast corner of Wilshire Boulevard and Vermont Avenue. The entrance to the Wilshire/Vermont Station is located approximately 700 feet south of Site 2, 1000 feet south of Site 1 and 1700 feet south of Site 3. The Metro Red and Purple Lines provide access to the regional rail transit system, including the Metro Blue, Gold, Orange and Exposition Lines, and to regional and commuter rail lines, including Metrolink and Amtrak, through Union Station. All of these options provide residents, employees, and guests with various public transportation opportunities and potentially reduce vehicle miles traveled, resulting in a reduction in the consumption of petroleum-based fuels.

Site 1

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers. Based

on Site 1's estimated net VMT of 8.17 million per year,³⁴ and assuming that Site 1's mix of vehicle types (automobiles, trucks, and motorcycles) have an average fuel economy of 22.816 mpg for 2020,³⁵ approximately 357,912 gallons of fuel would be required in a year.³⁶ In 2014, California consumed a total of 343,568 thousand barrels (or 10.822 billion gallons) of gasoline for transportation.³⁷ This would represent less than 0.003 percent of the statewide gasoline consumption. Furthermore, alternative-fueled electric, and hybrid vehicles, to the extent these types of vehicles would be used by visitors to Site 1, would reduce Site 1 development's consumption of gasoline and diesel. As such, impacts regarding transportation energy use on Site 1 would be less than significant.

Site 2

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers. Based on Site 2's estimated net VMT of 568,062 million per year,³⁸ and assuming that Site 2's mix of vehicle types (automobiles, trucks, and motorcycles) have an average fuel economy of 22.816 mpg,³⁹ approximately 24,898 gallons of fuel would be required in a year.⁴⁰ This would represent less than 0.0002 percent of the statewide gasoline consumption. Furthermore, alternative-fueled electric, and hybrid vehicles, to the extent these types of vehicles would be used by visitors to Site 2, would reduce Site 2 development's consumption of gasoline and diesel. As such, impacts regarding transportation energy use on Site 2 would be less than significant.

Site 3

Transportation fuels, primarily gasoline and diesel, would be provided by local or regional suppliers. Based on Site 3's estimated net VMT 701,238 million per year,⁴¹ and assuming that Site 3's mix of vehicle types (automobiles, trucks, and motorcycles) have an average fuel economy of 22.816 mpg,⁴² approximately

³⁴ Operational VMT derived from the Air quality trips and VMT model sheets, included Appendix 4.2-1 to this Draft EIR.

³⁵ California Department of Transportation, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, website: <http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF>, accessed: June 2017.

³⁶ $8,166,117 \text{ VMT} / 22.816 \text{ mpg} = 357,912 \text{ gallons of gasoline}$. Construction VMT derived from the air quality trips and VMT model sheets, included Appendix 4.2-1 to this Draft EIR.

³⁷ US EPA, State Energy Data System, Table F-3. website: http://www.eia.gov/state/seds/sep_fuel/html/pdf/fuel_mg.pdf, accessed: June 2017.

³⁸ Operational VMT derived from the Air quality trips and VMT model sheets, included Appendix 4.2-1 to this Draft EIR.

³⁹ California Department of Transportation, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, website: <http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF>, accessed: June 2017.

⁴⁰ $568,062 \text{ VMT} / 22.816 \text{ mpg} = 24,898 \text{ gallons of gasoline}$. Construction VMT derived from the air quality trips and VMT model sheets, included Appendix 4.2-1 to this Draft EIR.

⁴¹ Operational VMT derived from the Air quality trips and VMT model sheets, included Appendix 4.2-1 to this Draft EIR.

⁴² California Department of Transportation, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, website: <http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF>, accessed: June 2017.

30,734 gallons of fuel would be required in a year.⁴³ This would represent less than 0.0003 percent of the statewide gasoline consumption. Furthermore, alternative-fueled electric, and hybrid vehicles, to the extent these types of vehicles would be used by visitors to Site 3, would reduce Site 3 development's consumption of gasoline and diesel. As such, impacts regarding transportation energy use on Site 3 would be less than significant.

Combined Sites

In total, operation of the Project on Sites 1, 2, and 3 would consume approximately 413,544 gallons of fuel per year. This would represent approximately 0.0035 percent of the statewide gasoline consumption which is within the available capacity. This estimate does not take into account the use of alternative-fueled electric and hybrid vehicles and other more energy efficient vehicle types.⁴⁴ As such, impacts of the Project regarding transportation energy would be less than significant.

Discussion Regarding Public Resources Code Section 21100(b)(3)

Public Resources Code Section 21100(b)(3) requires EIRs to include a discussion of mitigation measures proposed to minimize significant effects on the environment, including, but not limited to, *measures to reduce the wasteful, inefficient, and unnecessary consumption of energy (emphasis added)*.

Appendix F of the CEQA Guidelines provides a list of energy-related items that may be included throughout the various chapters of an EIR. In addition, while not described as thresholds for determining the significance of impacts related to energy, Appendix F provides the following items that may be considered in the energy analysis to the extent relevant and applicable:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project's life cycle including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- The effects of the project on local and regional energy supplies and on requirements for additional capacity;
- The effects of the project on peak and base period demands for electricity and other forms of energy;
- The degree to which the project complies with existing energy standards;
- The effects of the project on energy resources; or
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

In addition to this Section of the Draft EIR, other sections of the Draft EIR address these subjects, including but not limited to, Section 4.2, Air Quality, Section 4.6, Greenhouse Gas Emissions, Section 4.14, Transportation, Section 4.16, Utilities, and Section 5.0, Alternatives.

Further, as noted above, Appendix F to the State CEQA Guidelines provides that, in order to assure that energy implications are considered in project decisions, EIRs shall include a discussion of the potential

⁴³ 701,238 VMT / 22.816 mpg = 30,734 gallons of gasoline. Construction VMT derived from the air quality trips and VMT model sheets, included Appendix 4.2-1 to this Draft EIR.

⁴⁴ Each Project Site provides electric vehicle charging stations.

energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, or unnecessary consumption of energy. The means of achieving this goal shall include:

- 1) Decreasing overall per capita energy consumption;
- 2) Decreasing reliance on fossil fuels such as coal, natural gas, and oil; and
- 3) Increasing reliance on renewable energy sources.

Decreasing Per Capita Energy Consumption

All new development in California is required to be designed and constructed in conformance with State Building Energy Efficiency Standards outlined in Title 24 of the CCR. As set forth in Regulatory Requirement RR EN-1, the Project would be designed and built in accordance with the 2016 standards of Title 24, California's Energy Efficiency Standards for Residential and Nonresidential Buildings, as set forth in the Los Angeles County Green Building Standards Code (Sites 1 and 3), and LA Green Building Code (Site 2). These standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., HVAC and water heating systems), indoor and outdoor lighting, and illuminated signs. In addition, as set forth in the approved Water Supply Assessment, the Project will incorporate the following conservation measures:

Site 1

- High Efficiency Toilets with a flush volume of 1.1 gallons per flush
- Domestic Water Heating System located in close proximity to point(s) of use: For typical office Levels- electric water heaters are provided at floors 2,5,8, and 11 to supply hot water to lavatories for the floor above, below, and the floor on which the heater is located; for Terrace Level - dedicated electric heater(s) is provided for Showers and Restroom Lavatories; for Ground Floor – a dedicated electric heater is provided for Restroom Lavatories
- Individual metering is provided for each retail space at Ground Level and separate metering is provided for the Office Level use (single use tenant)
- Tankless water heaters (InstaHot) are provided for all pantry sink locations.
- Drip/Subsurface Irrigation (Micro-Irrigation) is provided for 100 percent of the irrigation system
- Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)
- Drought Tolerant Plants: 50 percent of total landscaping

Site 2

- Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together)
- Drought Tolerant Plants: 50 percent of total landscaping

Site 3

- Proper Hydro-zoning/Zoned Irrigation (group plants with similar water requirements together)
- Drought Tolerant Plants: 50 percent of total landscaping

The incorporation of the Title 24 standards into the Project as well as the additional conservation measures incorporated in the building design would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy.

Decreasing Reliance on Fossil Fuels

Most energy consumption related to fossil fuels is associated with transportation. As described in Section 4.14, Transportation and Traffic, of this Draft EIR, the Project shall develop and implement a TDM program to promote non-auto travel and reduce the use of single-occupant vehicle trips. The strategies in the TDM program may include, but are not necessarily limited to, the following:

- TDM-related information available in common area;
- Bicycle amenities such as racks and showers;
- Incentives for using alternative travel modes;
- Parking incentives; and
- Contribution to the City's Bicycle Plan Trust Fund for implementation of bicycle improvements in the Project area.

The combined effect of the various strategies implemented as part of the TDM program would result in a reduction in peak hour trip generation by offering services, actions, specific facilities, etc., aimed at encouraging use of alternative transportation modes. For the Project, a TDM trip reduction credit of 10 percent for Site 1 office workers was assumed as an achievable but conservative estimate. Accordingly, the TDM program would be expected to result in a reduction of 301 daily trips under Phase 1, including 50 during the morning peak hour and 61 during the afternoon peak hour. The TDM program would be expected to result in a reduction of 316 daily trips upon completion of Phase 2, including 52 during the morning peak hour and 65 during the afternoon peak hour.

It should also be noted that the 2016-2040 Regional Transportation Plan/Sustainable Community Strategy states that the Project Site is located in a High Quality Transit Area (HQTa), which is defined as an area within one-half mile of a fixed guideway transit stop. The Project Sites are served by the Metro Rail Red and Purple Lines from the Metro Rail Wilshire/Vermont Station located at the northeast corner of Wilshire Boulevard and Vermont Avenue. The Project would involve a mixed-use project in a HQTa, within walking distance of existing bus lines and transit stations. In addition, as set forth in Regulatory Requirement RR EN-1, the Project would provide electric vehicle charging stations in accordance with the requirements set forth in the Los Angeles County Green Building Standards Code (Sites 1 and 3), and LA Green Building Code (Site 2), and would provide bicycle parking, which would maximize the potential for mobility and accessibility for people and reduce the overall consumption of fuel required for transportation, and would thus not result in the wasteful, inefficient, and unnecessary consumption of energy resources.

Increasing Reliance on Renewable Energy Sources

LADWP Power Generation

As previously discussed, the LADWP utilizes renewable energy sources and is committed to meeting the requirement of the RPS Enforcement Program to use at least 33 percent of the State's energy from

renewables by 2020.⁴⁵ Eligible renewable resources include biodiesel, biomass, hydroelectric and small hydro, 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.”⁴⁶

Project Design

The Project would include conduit to support the installation of solar generating panels on the roof of the new office building on Site 1 to potentially provide an alternative renewable source of power for the new County office building.

The incorporation of renewable energy in the generating portfolio of LADWP, the electric service provider, to the Project, coupled with the inclusion of solar generating infrastructure within the Site 1 Project, would ensure that the Project would not result in the inefficient, unnecessary, or wasteful consumption of energy.

CUMULATIVE IMPACTS

The geographic context for the cumulative analysis of electricity is LADWP’s service area and the geographic context for the cumulative analysis of natural gas is SoCal Gas’ service area. The geographic context for transportation energy use is the City of Los Angeles. Growth within these geographies is anticipated to increase the demand for electricity, natural gas, and transportation energy, as well as the need for energy infrastructure, such as new or expanded energy facilities.

Electricity

Buildout of the Project, related projects, and additional growth forecast to occur in the City would increase electricity consumption during project construction and operation and, thus, cumulatively increase the need for energy supplies and infrastructure capacity, such as new or expanded energy facilities. LADWP forecasts that its net energy for load in the 2023 fiscal year (the project buildout year) will be 28,253 GigaWatt-hours (GWhr) of electricity.⁴⁷ Based on the Project’s estimated net new electrical consumption of 10.35 GWhr⁴⁸ and LADWP’s forecast of 28,253 GWhr, the Project would account for approximately 0.037 percent of LADWP’s projected net energy load for the Project’s build-out year. Furthermore, there are 115 related projects within a 2-mile radius. The related projects consist of multifamily residential, schools, hotels, theaters, and commercial uses. The total increase in energy demand for the related projects is approximately 55.53 GWhr. Combined with the proposed Project, the net increase in energy demand is approximately 65.88 GWhr. The estimated net increase in energy demand resulting from the buildout of related projects combined with the proposed project, would represent approximately 0.23 percent of the LADWP’s forecast for the net energy load in the fiscal year 2023. Exhibit 8 to Appendix 4.16-

⁴⁵ California Environmental Protection Agency, Air Resources Board, Renewable Portfolio Standard, website: <http://www.arb.ca.gov/energy/rps/rps.htm>, accessed: May 27, 2016.

⁴⁶ City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard Policy and Enforcement Program, amended December 2013, website: http://www.energy.ca.gov/portfolio/pous/ladwp/2013-12-03_LADWP_RPS_Policy_Enforcement_Program.pdf, accessed: May 27, 2016.

⁴⁷ LADWP, 2015 Power Integrated Resource Plan, Appendix A, Table A-1.

⁴⁸ The Project’s electricity demand of 10,351,023 kilowatt-hours per year (kWhr, see Table 4.4-3) is equal to 10.35 GWh if considered within the LADWP’s total generating capacity for the year of 28,253 GWh.

1 of this Draft EIR provides a breakdown of the related projects and associated energy consumption. Although future development would result in the irreversible use of renewable and non-renewable electricity resources during project construction and operation which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with growth expectations for LADWP's service area. Furthermore, like the Project, during construction and operation, other future development projects would be required to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. Accordingly, the Project's contribution to cumulative impacts related to electricity consumption would not be cumulatively considerable and, thus, would be less than significant.

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2016 Power Integrated Resource Plan, LADWP would continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. LADWP has indicated that the Power Integrated Resource Plan incorporates the estimated electricity requirement for the Project. The Power Integrated Resource Plan takes into account future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements. Development projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. As such, cumulative impacts with respect to electricity infrastructure would be less than significant.

Natural Gas

Buildout of the Project and related projects in SoCal Gas' service area is expected to increase natural gas consumption during project construction and operation and, thus, cumulatively increase the need for natural gas supplies and infrastructure capacity. Based on the 2016 California Gas Report, the California Energy Commission estimates natural gas availability within SoCal Gas' planning area will be approximately 1,371 million cubic feet/day in 2023.⁴⁹ Based on the Project's estimated net new daily natural gas consumption of 37,883 cubic feet per day⁵⁰ and SoCal Gas' projected 1,371 million cubic feet capacity in 2023, the Project would account for approximately .0028 percent of SoCal Gas projected additional capacity for the Project's build-out year. There are approximately 115 related projects within a 2-mile radius. The related projects consist of multifamily residential, schools, hotels, theaters, and commercial uses. The total increase in gas demand for the related projects is approximately 286,117 cubic feet per day. Combined with the proposed project, the net increase in gas demand is approximately 324,000 cubic feet per day. The estimated net increase in gas demand resulting from the buildout of related projects combined with the proposed Project, would represent approximately 0.024 percent of the SoCalGas forecast for the peak demand in the fiscal year 2023. Exhibit 9 to Appendix 4.16-1 to this Draft EIR provides a breakdown of the related projects and associated gas consumption. SoCal Gas' forecasts take into account projected population growth and development based on local and regional

⁴⁹ *California Gas and Electric Utilities, 2016 California Gas Report, p. 97.*

⁵⁰ *See Table 4.4-4. 1kBTU = 1 cubic foot of natural gas. Annual consumption of 13,827,325 cubic feet of natural gas converts to 37,883 cubic feet per day (13,827,325/365).*

plans. Although future development projects would result in the irreversible use of natural gas resources which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations for SoCal Gas' service area. Furthermore, like the Project, during project construction and operation other future development projects would be expected to incorporate energy conservation features, comply with applicable regulations including CALGreen and State energy standards under Title 24, and incorporate mitigation measures, as necessary. Accordingly, the Project's contribution to cumulative impacts related to natural gas consumption would not be cumulatively considerable and, thus, would be less than significant.

Natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCal Gas occur as needed. It is expected that SoCal Gas would continue to expand delivery capacity if necessary to meet demand increases within its service area. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. As such, cumulative impacts with respect to natural gas infrastructure would be less than significant.

Transportation Energy

Development of the Project, in combination with the related projects and projected population growth in the greater City area, would increase transportation energy consumption and cumulatively increase the need for energy for transportation-related uses. Based on the Traffic Study prepared for the Project, included in Appendix 4.14-1 to this Draft EIR, there are 115 related projects anticipated in the Project area. The potential use of alternative-fueled, electric, and hybrid vehicles utilized by visitors to the Project Sites would reduce the Project's consumption of gasoline and diesel; however, the above estimates of fuel consumption do not account for these other more energy efficient vehicle types. Therefore, this estimate is conservative.

Petroleum currently accounts for 92 percent of California's transportation energy. However, California has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHGs from the transportation sector, and reduce VMT all of which would reduce reliance on petroleum. Therefore, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next ten years and there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity. Furthermore, similar to the Project, future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other project features that promote the reduction of VMT. Thus, cumulative impacts related to transportation energy consumption would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are relevant to energy infrastructure.

Regulatory Requirements

RR EN-1: Project construction shall comply with the County of Los Angeles Green Building Standards Code (Sites 1 and 3) and City of Los Angeles Green Building Code (Site 2).

MITIGATION MEASURES

No significant impacts to energy have been identified, and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to energy would be less than significant.

4.5 GEOLOGY AND SOILS

INTRODUCTION

This section describes the existing geological and seismic conditions at and near the Project Sites and analyzes the Project's potential impacts in regards to the existing conditions. Specifically, this section evaluates potential impacts related to exposing people or structures to the risk of loss, injury or death due to seismic ground shaking and/or seismic ground failure; being located on an unstable geologic unit; and/or conflict with the Hillside Management Area Ordinance or hillside design standards in the County General Plan Conservation and Open Space Element.

The following analysis is based on the following geotechnical evaluations for the Project:

- *Geotechnical Assessment, Site 1: Proposed Office Building and Parking Structure, 500, 510, 526, and 532 South Vermont Avenue including 523 and 531 South Shatto Place, Los Angeles, California*, prepared by Geotechnologies, Inc., August 15, 2017 (Draft EIR Appendix 4.5-1);
- *Geotechnical Assessment, Site 2: Proposed Adaptive Reuse Project and Mixed-Use Structure, 540, 542, and 550 South Vermont Avenue and 3175 West 6th Street, Los Angeles, California*, prepared by Geotechnologies, Inc., August 15, 2017 (Draft EIR Appendix 4.5-2); and
- *Geotechnical Assessment, Site 3: Proposed Affordable Housing Development, 427 and 433 South Vermont Avenue, Los Angeles, California*, prepared by Geotechnologies, Inc., August 15, 2017 (Draft EIR Appendix 4.5-3).

These reports present the geotechnical assessments of the Project Sites and discuss the subsurface conditions anticipated at each site as well as the potential for seismic hazards that could affect the sites. These reports are based on review of the proposed Project and review of published geotechnical and geological information. Furthermore, the analysis in this section includes a description of the regulatory framework, thresholds for determining if the Project would result in significant impacts, mitigation measures (if determined applicable), and the level of significance after mitigation.

ENVIRONMENTAL SETTING

Existing Conditions

Regional Geologic Setting

The Project Sites are located in the Los Angeles Basin, which is at the northern end of the Peninsular Ranges Geomorphic Province that borders the Transverse Ranges Province. The Transverse Ranges geomorphic province is characterized by east-west trending mountain ranges that include the Santa Monica Mountains. The southern boundary of the province is marked by the Santa Monica, Hollywood, Raymond, Sierra Madre, and Cucamonga faults. The Peninsular Range province is characterized by northwest-southeast trending alignments of mountains and hills and intervening basins, reflecting the influence of northwest trending major faults and folds controlling the general geologic structural fabric of the region. This province extends northwesterly from Baja California into the Los Angeles Basin and westerly into the offshore area, including Santa Catalina, Santa Barbara, San Clemente, and San Nicolas islands. This province is bounded on the east by the San Jacinto fault zone.

Over 22 million years ago the Los Angeles basin was a deep marine basin formed by tectonic forces between the North American and Pacific plates. Since that time, over five miles of marine and non-marine sedimentary rock, as well as intrusive and extrusive igneous rocks have filled the basin. During the last two million years, defined by the Pleistocene and Holocene epochs, the Los Angeles basin and surrounding mountains have been uplifted to form the present day landscape. Erosion of the surrounding mountains has resulted in deposition of unconsolidated sediments in low-lying areas by rivers such as the Los Angeles River.

Local Geologic Setting

The topography of the Project Sites is relatively flat with no pronounced highs or lows. Based on review of previous geotechnical investigations conducted in the vicinity of the Project Sites and published geological information, the anticipated geologic materials underlying the Project Sites consist of deep fill materials, alluvial soils, and bedrock of the Puente Formation. The alluvial soils underlying the fill generally consist of mixtures of sands, silty sands, and silty clays. The alluvium is typically medium dense to very dense, or stiff, and well-consolidated with expansion characters that range from low to moderate. Local variations in moisture content and soil type may occur. It is anticipated that the alluvial soils would be underlain by Puente Formation bedrock. This bedrock was encountered at depths ranging between 28 and 46 feet below grade in a previous investigation conducted to the north of Site 1.

Groundwater

Current groundwater levels at the Project are anticipated to be approximately 28 and 30 feet below grade as based on previous investigations near the Project Sites. According to groundwater data provided in the Seismic Hazard Zone Report of the Hollywood 7.5-Minute Quadrangle, the historic-high groundwater level for the Project Sites was on the order of 20 feet below ground surface. Fluctuations in the level of groundwater can be expected to occur over time due to variations in rainfall, temperature, and other factors, including in the vicinity of the Project Sites.

Faulting and Seismicity

The numerous faults in Southern California include active, potentially active, and inactive faults. The criteria for these three major groups are based on criteria developed by the California Geological Survey for the Alquist-Priolo Earthquake Fault Zoning Program. By definition, an active fault is one that has had surface displacement within Holocene time (about the last 11,000 years). A potentially active fault is a fault that has demonstrated surface displacement of Quaternary age deposits (last 1.6 million years). Inactive faults have not moved in the last 1.6 million years.

Review of the Earthquake Zones of Required Investigation Map of the Hollywood Quadrangle indicates that none of the Project Sites are located within an Alquist-Priolo Earthquake Fault Zone. In addition, City of Los Angeles data show that none of the Project Sites are located in a Preliminary Fault Rupture Study Area. Furthermore, based on research of available literature and the results of site reconnaissance, no known active or potentially active faults underlie the Project Sites. However, there are known faults in the immediate vicinity of the Project Sites.¹ The fault nearest to the Project Sites is the Hollywood Fault,

¹ *City of Los Angeles' GIS databases including Zoning Information Map Access System (ZIMAS) and NavigateLA indicate a northwest-southeast trending fault is located approximately 0.3 mile to the southeast of the Project*

approximately three miles to the northwest.

The Hollywood Fault is a reverse, north-dipping fault located along the southern edge of the eastern Santa Monica Mountains. The fault dips steeply to the north and juxtaposes Miocene sedimentary rocks over Pleistocene and Holocene alluvium. Surface rupture is believed to have occurred between 6,000 and 11,000 years ago. The Hollywood Fault is considered active by the State Geologist and the City of Los Angeles considers it active for planning purposes. The California Geological Survey designated an Earthquake Fault Zone for this Fault in the Earthquake Fault Zone map published on November 6, 2014.

Landslide/Slope Stability

The probability of seismically-induced landslides affecting the Project Sites is low due to the lack of significant slopes on the site and surrounding areas. Moreover, the Project Sites are not in an area identified as having a potential for seismic slope instability. The Project Sites are not included in an area of "Landslide Inventory and Hillside Areas" and there are no known landslides at the Project Sites, nor are the Project Sites in the path of any known or potential landslides.²

Liquefaction/Lateral Spreading

Liquefaction is the process in which saturated, silty to cohesionless soils below the groundwater table temporarily lose strength during strong ground shaking as a consequence of increased pore pressure during conditions such as those caused by earthquakes. The vast majority of liquefaction hazards are associated with sandy soils and silty soils of low plasticity. Potentially liquefiable soils must be saturated or nearly saturated to be susceptible to liquefaction. Significant factors that affect liquefaction include water level, soil type, particulate size and gradation, relative density, confining pressure, intensity of shaking, and duration of shaking. Liquefaction potential has been found to be the greatest where the groundwater level is shallow and submerged loose, fine sands occur within a depth of about 50 feet or less. Liquefaction potential decreases with increasing grain size and clay and gravel content, but increases as the ground acceleration and duration of shaking increase. Liquefaction is therefore more likely to occur in sand dune areas. Structures founded on or above potentially liquefiable soils may experience bearing capacity failures due to the temporary loss of foundation support, vertical settlements (both total and differential), and undergo lateral spreading.

The California Geological Survey's Seismic Hazards Map of the Hollywood Quadrangle does not classify the Project Sites as part of a potentially liquefiable area. This determination is based on groundwater depth records, soil type, and distance to a fault capable of producing a substantial earthquake.

Sites; however, based on research by the preparers of the geotechnical assessments, Geotechnologies, Inc., the presence of the fault could not be corroborated or verified with other references including the California Geological Survey, which is listed as the source for the fault data. Additionally, surface manifestations of fault activity in that region could not be ascertained by the geologist representing the City of Los Angeles Department of Building and Safety. Therefore, in the expert opinion of the geotechnical engineers, that fault need not be considered in the design of the proposed structures.

² City of Los Angeles Department of City Planning, General Plan, Safety Element, Exhibit C, Landslide Inventory & Hillside Areas in the City of Los Angeles, June 1994.

Tsunamis, Seiches, Inundation, and Flooding

Tsunamis are large ocean waves generated by sudden water displacement caused by a submarine earthquake, landscape, or volcanic eruption. The Project Sites are located approximately 12 miles from the Pacific Ocean shoreline and are not in an area with the potential to be impacted by a tsunami.³ Moreover, the Project Sites are not located in close proximity to a contained body of water, and as such, there is no potential impact associated with a seiche (wave oscillations in an enclosed or semi-enclosed body of water).

The Project Sites are not located in a flood zone, including the 100-year or 500-year flood zone as designated by the Federal Emergency Management Agency (“FEMA”).⁴ However, the Project Sites are in a potential inundation zone in the event of a breached upgradient reservoir at the Silver Lake Reservoir.⁵

Subsidence

Subsidence is a localized mass movement that involves the gradual downhill settling or sinking of the surface, resulting from the extraction of mineral resources, subsurface oil, groundwater, or other subsurface liquids, such as natural gas. While the Project Sites are in the Los Angeles City Oil Field, subsidence has not been identified in that oil field.⁶

Expansive Soils

Expansive soils are clay-based soils that tend to expand (increase in volume) as they absorb water and shrink (lessen in volume) as water is drawn away. If soils consist of expansive clays, foundation movement and/or damage can occur if wetting and drying of the clay does not occur uniformly across the entire area. Materials underlying the Project Sites are anticipated to be deep fill materials, alluvial soils, and bedrock of the Puente Formation. The alluvial soils underlying the fill generally consists of mixtures of sands, silty sands, and silty clays. The alluvium is typically medium dense to very dense, or stiff, and well-consolidated with expansion characters that range from low to moderate. However, local variations in moisture content and soil type may occur.

Proximity to Subway Tunnel

Los Angeles County Metropolitan Transportation Authority (“Metro”) operates a subway tunnel for the Metro Red Line generally along Vermont Avenue near the western boundary of Sites 1 and 2 and the eastern boundary of Site 3.

³ County of Los Angeles Flood and Inundation Hazards Map.

⁴ County of Los Angeles Department of Public Works, Flood Zone Determination Website, website: <http://dpw.lacounty.gov/wmd/floodzone/>, accessed: February 2017.

⁵ County of Los Angeles Flood and Inundation Hazards Map.

⁶ Law/Crandall, Revised Report of Geotechnical Investigation, Proposed Belmont Learning Center, First Street and Beaudry Avenue, Los Angeles, California, April 16, 1997.

Regulatory Framework

Federal

There are no specific federal regulations addressing geology and soils issues that are not addressed by the more stringent State or local requirements.

State

Alquist-Priolo Earthquake Fault Zoning Act

The Alquist-Priolo Geologic Hazards Zone Act (the “Alquist-Priolo Act”) was enacted by the State of California in 1972 to address the hazards and damage caused by surface fault rupture during an earthquake. The Alquist-Priolo Act was enacted in response to the 1971 San Fernando Earthquake, which was associated with extensive surface fault ruptures that damaged homes, commercial buildings, and other structures. The primary purpose of the Alquist-Priolo Act is to prevent the construction of buildings intended for human occupancy on the surface traces of active faults. The Alquist-Priolo Act is also intended to provide the citizens with increased safety and to minimize the loss of life during and immediately following earthquakes by facilitation seismic retrofitting to strengthen buildings against ground shaking. The Alquist-Priolo Act has been amended ten times, and was renamed the Alquist-Priolo Earthquake Fault Zoning Act, effective January 1, 1994.

The Alquist-Priolo Earthquake Fault Zoning Act requires the State Geologist to establish regulatory zones, known as “Earthquake Fault Zones,” around the surface traces of active faults and to issue appropriate maps to assist cities and counties in planning, zoning, and building regulation functions. Maps are distributed to all affected cities and counties for the controlling of new or renewed construction and are required to sufficiently define potential surface rupture or fault creep. The State Geologist is charged with continually reviewing new geologic and seismic data, and revising existing zones and delineating additional earthquake fault zones when warranted by new information. Local agencies must enforce the Alquist-Priolo Earthquake Fault Zoning Act with respect to local development. For buildings proposed in identified fault zones, cities and counties shall require a geologic investigation, prepared by a licensed geologist, to demonstrate that buildings will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault, and must be set back. Although setback distances may vary, a minimum 50-foot setback is required.

Seismic Safety Act

The California Seismic Safety Commission was established by the Seismic Safety Act in 1975 with the intent of providing oversight, review, and recommendations to the Governor and State Legislature regarding seismic issues. The commission’s name was changed to Alfred E. Alquist Seismic Safety Commission in 2006. Since then, the Commission has adopted several documents based on recorded earthquakes, such as the 1994 Northridge earthquake, 1933 Long Beach earthquake, the 1971 Sylmar earthquake, etc. Some of these documents are listed as follows:

- Research and Implementation Plan for Earthquake Risk Reduction in California 1995 to 2000, report dated December 1994;
- Seismic Safety in California’s Schools, 2004, “Findings and Recommendations on Seismic Safety Policies and Requirements for Public, Private, and Charter Schools,” report dated December 1994;

- Findings and Recommendations on Hospital Seismic Safety, report dated November 2001;
- Commercial Property Owner's Guide to Earthquakes Safety, report dated October 2006; and
- California Earthquake Loss Reduction Plan 2007–2011, report dated July 2007.

Seismic Hazards Mapping Act

The Seismic Hazard Mapping Act of 1990 (the "Seismic Act") [Public Resources Code ("PRC") Section 2690-2699] was enacted, in part, to address seismic hazards not included in the Alquist-Priolo Act, including strong ground shaking, landslides, and liquefaction. Under the Seismic Act, the State Geologist is assigned the responsibility of identifying and mapping seismic hazards zones. Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions of the project site are investigated and appropriate mitigation measures, if any, are incorporated into development plans. The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plan and encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. Under PRC Section 2697, cities and counties shall require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard.

The State of California Geological Survey (formerly known as the California Division of Mines and Geology), adopted seismic design provisions in Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, on March 13, 1997, which was revised as Special Publication 117A on September 11, 2008.

State of California Building Code

The California Building Code ("CBC") [California Code of Regulations ("CCR"), Title 24] is a compilation of building standards, including seismic safety standards, for new buildings. CBC standards are based on building standards that have been adopted by state agencies without change from a model code; building standards based on a national model code that have been changed to address particular California conditions; and building standards authorized by the California legislature but not covered by the national model code. Given the State's susceptibility to seismic events, the seismic standards within the CBC are among the strictest in the world. The CBC includes provisions for demolition and construction as well as regulations regarding building foundations and soil types. The CBC applies to all occupancies in California, except where stricter standards have been adopted by local agencies. The CBC is published on a triennial basis and supplements and errata can be issued throughout the cycle. The operative edition of the CBC is currently the 2016 edition, which became effective on January 1, 2017. The CBC incorporates the latest seismic design standards for structural loads and materials as well as provisions from the National Earthquake Hazards Reduction Program to mitigate losses from an earthquake and provide for the latest in earthquake safety. Specific CBC building and seismic safety regulations have been incorporated by reference in the County and City of Los Angeles' Building Codes.

Local

County of Los Angeles

Site 1 is owned by the County and would be developed for County use. Site 1 development would be subject to County building regulations. Site 3 is located on land owned by the County and would be

developed with a public benefit (senior affordable housing) project. Site 3 development would be subject to County building code requirements.

Los Angeles County Code

In addition to adoption of the CBC by reference, the Los Angeles County Code also contains rules and regulations that govern activities that could result in soil erosion or slope instability. These rules and regulations are organized as Title 26 where provisions for excavation, grading, and earthwork construction have been established; permitting procedures are set forth; and plan approval and grading inspection protocols and procedures have been identified. Section J110 of this chapter also contains provisions for construction-related erosion control, including the preparation of cut-and-fill slopes and the implementation of erosion control measures such as check dams, cribbing, riprap, or other devices or methods.

The County Code also includes seismic safety requirements for certain building types, such as older concrete tilt-up buildings and unreinforced masonry bearing wall buildings (refer to Title 26, Chapters 95 and 96). The stated goal of the County Code is to promote public safety and welfare by reducing the risk of death or injury that could result from earthquake damage to certain types of older buildings during moderate or strong earthquakes. Based on the findings of required structural analysis, deficient buildings may need to be strengthened or demolished.

Los Angeles County General Plan 2035

California Government Code Section 65300 requires general plans to include “a safety element for the protection of the community from any unreasonable risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche, and dam failure; slope instability leading to mudslides and landslides, subsidence and other geologic hazards known to the legislative body; flooding; and wildland and urban fires.” As such, the Los Angeles County General Plan Update (updated in 2015 to horizon year 2035) Safety Element (Chapter 12) addresses hazards, which must be considered in the physical development of the County, including seismic, geologic, erosion; flooding; hazardous materials; noise control; and emergency/disaster preparedness.

County of Los Angeles Low Impact Development (“LID”) Requirements

LID is a design strategy using naturalistic, on-site best management practices (BMPs) to lessen the impacts of development on stormwater quality and quantity. The goal of LID is to mimic the undeveloped runoff conditions of the development site with the post-development conditions. If a project includes water infiltration and/or on-site storage (dry ponds/extended detention basins), geotechnical investigations are required to evaluate effects on ground and slope stability.

Metro

Where facilities constructed and operated by Metro are potentially affected by development or infrastructure proposals, the development shall comply with the requirements of Metro’s most recent “Design Criteria and Standards, Volume III, Adjacent Construction Design Manual.” The specific requirements are administrative and are related to the submittal and review of documents provided by the project proponent. In general, these requirements include, but are not limited to, the following:

1. Facility or structure drawings and calculations showing the relationship between the proposed project and Metro facilities shall be submitted for Metro review.

2. Submittals shall be made at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review.
3. If uncertainty exists on the possible impacts before submitting a formal letter requesting a review, the Metro Third Party Administrator (Permits) shall be contacted for an informal evaluation of the amount of detail required for Metro review.
4. A period of 30 working days shall be allowed for the initial and each successive review as required.
5. The project proponent shall reimburse Metro for any technical review or support services costs.
6. Each part of the project's design may be reviewed and approved by Metro, and after written acceptance of the design, the project proponent must notify Metro prior to the start of construction as noted therein.

City of Los Angeles

Site 2 is located on land owned by the County. Development on Site 2 would be mixed residential and commercial uses under a ground lease, and would be subject to City of Los Angeles building regulations.

General Plan Safety Element

The City's primary seismic regulatory document is the Safety Element of the City's General Plan, adopted November 26, 1996. The City's regulations incorporate the State's requirements. The objective of the Safety Element is to better protect occupants and equipment during various types and degrees of seismic events. In the City's Safety Element, specific guidelines are included for the evaluation of liquefaction, tsunamis, seiches, non-structural elements, fault rupture zones, and engineering investigation reports. The City's Emergency Operations Organization helps to administer certain policies and provisions of the Safety Element, and centralizes the direction and control of the planning, coordination and management of disaster preparedness, mitigation, response and recovery. The Emergency Operations Organization is part of the City's Emergency Management Department and includes representatives from all City agencies.

Los Angeles Building Code

The City of Los Angeles Building Code addresses issues related to site grading, cut and fill slope design, soil expansion, geotechnical investigations before and during construction, slope stability, allowable bearing pressures and settlement below footings, effects of adjacent slopes on foundations, retaining walls, basement walls, shoring of adjacent properties, and potential primary and secondary seismic effects.

The Building Code also addresses ground-disturbing activities, such as grading, that are codified in the Los Angeles Municipal Code (LAMC). Specifically, LAMC Chapter IX, Article 1, section 91.7006 outlines regulations specific to the import and export of materials. Additionally, LAMC Section 91.7010 outlines regulations specific to excavations required for project construction, while LAMC Section 91.7011 outlines regulations specific to the import of fill materials to a project site. Erosion control and drainage guidelines are set forth in LAMC Section 91.7013, and regulations pertaining to flooding and mudflows are set forth in LAMC Section 91.7014. Lastly, LAMC Section 91.7016 outlines regulations specific to soil stability.

The Grading Division of the Department of Building and Safety has also adopted Rules of General Application, a series of Grading Standards that supplement the requirements of the Building Code. The Rules of General Application include specific requirements of seismic design, slope stability, grading, foundation design, geologic investigations and reports, soil and rock testing, and groundwater. Building and Safety is responsible for implementing the provisions of the Building Code and the Grading Standards.

The City requires that firms performing geotechnical investigations, sampling, and testing have their laboratory certified by the Building and Safety Materials Control Section.

ENVIRONMENTAL IMPACTS

Methodology

To evaluate potential impacts relative to geology and soils, a preliminary geotechnical assessment was prepared for each of the Project Sites. The preliminary geotechnical assessments were prepared to address soil and geological issues required by CEQA. These assessments discuss the subsurface conditions anticipated at the sites, the potential for seismic hazards that could affect the sites, and provides an opinion regarding the feasibility of the proposed development at each site from a geotechnical perspective. The reports are based on review of available Project files, published geotechnical and geological information, and the Project summary. The preliminary geotechnical assessments are provided in Appendices 4.5-1, 4.5-2, and 4.5-3 of this Draft EIR.

The proposed site plans, building footprints, and cross sections showing subterranean structures have been reviewed (see Section 3.0, Project Description and Environmental Setting) to ensure that the characteristics of each site and whether reasonable design features can provide adequate protection from potentially adverse geologic and geotechnical features. The presence of the Metro Red Line tunnel passing near the Project Sites generally along Vermont Avenue is also addressed. The analysis addresses how these features could be affected by Project construction for each site individually.

Thresholds of Significance

The potential for the proposed Project to result in impacts associated with geology and soils is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. These significance thresholds are listed below. The balance of the significance thresholds not shown in this section have been determined to have no impact or a less-than-significant impact. These impacts include surface rupture along known faults, landslides, erosion, septic tanks/wastewater treatment, and conflicts with hillside management area ordinance. The analyses for these determinations are provided in Section 6.5, Effects Found Not to be Significant.

The California Supreme Court held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. An exception to this general rule is a project that may exacerbate a condition in the existing environment. For such a situation, the lead agency is required to analyze the impact of that exacerbated condition on future residents and users of a project (as well as other impacted individuals). Thus, the analysis associated with seismicity, soil stability, or expansive soils below focuses on whether the Project would exacerbate environmental conditions so as to increase the potential to expose people to impacts.

- Threshold 4.5-1:** Would the project expose people or structures to potential substantial adverse effects, caused in whole or in part by the project's exacerbation of the existing environmental conditions, including the risk of loss, injury, or death involving:
- Strong seismic ground shaking?
 - Seismic-related ground failure, including liquefaction and lateral spreading?

Threshold 4.5-2: 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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?

An affirmative answer to either of these questions would represent a significant impact.

Project Design Elements

Proposed Project development at each of the Project Sites would incorporate the recommendations of the geotechnical assessments as a Project design element. In addition, adherence to design and construction standards, as required by State, County, and City (where applicable) regulations and codes described previously, would ensure maximum practicable protection for users of the buildings. All aspects of seismic-related hazards, other geotechnical hazards, and erosion and sedimentation issues are regulated by the County, City, and/or the State of California.

Site 1

The current groundwater level at the Site 1 is anticipated to be on the order of 28 feet below grade. The historically highest groundwater level for Site 1 is on the order of 20 feet below grade. The historically highest groundwater level was considered when designing the underground portion of proposed structures. For new development consisting of two levels of underground parking, temporary dewatering would be necessary to achieve a dry and stable excavation, and the expected number and depths of well-points, expected flow rates, and expected pre-pumping timeframes would be determined during a dewatering test program conducted by a qualified dewatering consultant following all applicable regulatory requirements. Once the temporary construction dewatering is discontinued, the water table would likely return to its current elevation.

Due to the depth of the proposed subterranean levels and their proximity to the property lines, shoring would be required for construction of the subterranean levels, and soldier piles would be recommended for shoring. Furthermore, the proposed development on Site 1 would be designed in accordance with the current County Code provisions, which take into account the potential effects of strong ground shaking which would avoid potential collapse and impacts to neighboring properties.

Site 2

The historically highest groundwater level of 20 feet below grade on Site 2 was considered when designing the underground portion of the proposed structures. For new development consisting of an underground and aboveground parking structure (3.5 levels above grade and 1.5 levels below grade), and a possible mixed use building containing five levels of residential uses above the parking structure and ground level retail, temporary dewatering would be necessary to achieve a dry and stable excavation, and the expected number and depths of well-points, expected flow rates, and expected pre-pumping timeframes would be determined during a dewatering test program conducted by a qualified dewatering consultant following all applicable regulatory requirements. Once the temporary construction dewatering is discontinued, the water table would likely return to its current elevation. Thus, as a Project design element, proposed subterranean walls extending below the historically highest groundwater level shall be designed for an undrained condition with full hydrostatic pressure. Proposed concrete slabs-on-grade bearing below the

historically highest groundwater level would be designed to withstand the hydrostatic uplift pressure for an undrained condition.

Due to the depth of the proposed subterranean levels (approximately 20-foot excavation) and their proximity to the property lines, shoring would be required for construction of the subterranean levels, and soldier piles would be recommended for shoring. Furthermore, the proposed development on Site 2 would be designed in accordance with the current City Code provisions, which take into account the potential effects of strong ground shaking which would avoid potential collapse and impacts to neighboring properties.

Site 3

The historically highest groundwater level of 20 feet below grade on Site 3 was considered when designing the underground portion of the proposed structures. Temporary dewatering would be necessary to achieve a dry and stable excavation, and the expected number and depths of well-points, expected flow rates, and expected pre-pumping timeframes would be determined during a dewatering test program conducted by a qualified dewatering consultant following all applicable regulatory requirements. Once the temporary construction dewatering is discontinued, the water table would likely return to its current elevation. The bottom of the proposed structure (three-story underground parking structure) is anticipated to extend below the historically highest groundwater level. Accordingly, a mat foundation may be required to resist hydrostatic uplift pressures anticipated at the lowest finished floor elevation. Thus, as a Project design element, the proposed subterranean walls extending below the historically highest groundwater level shall be designed for an undrained condition with full hydrostatic pressure. Subterranean walls to be located above the historically highest groundwater level would be designed for a drained condition, provided that a retaining wall subdrain would be installed.

Due to the depth of the proposed subterranean levels and their proximity to the property lines, shoring would be required for construction of the subterranean levels, and soldier piles would be recommended for shoring. Furthermore, the proposed development on Site 3 would be designed in accordance with the current County Code provisions, which take into account the potential effects of strong ground shaking which would avoid potential collapse and impacts to neighboring properties.

Impact Analysis

Threshold 4.5-1: Would the project expose people or structures to potential substantial adverse effects, caused in whole or in part by the project's exacerbation of the existing environmental conditions, including the risk of loss, injury, or death involving:

- Strong seismic ground shaking?
- Seismic-related ground failure, including liquefaction and lateral spreading?

Site 1

Strong Seismic Ground Shaking

Because the Los Angeles region is generally considered to be geologically active, most projects would be exposed to some risk from geologic hazards, such as earthquakes. Faults in the County and region present a risk of very strong ground shaking that must be considered for facilities where public safety and post-

earthquake evacuation are necessary. An impact would be considered significant if a project exacerbates a seismic hazard.

Site 1 is within the seismically active Southern California region and is, therefore, susceptible to ground shaking during a seismic event. Seismic ground shaking could damage the building and utility infrastructure. However, State and local regulatory and code requirements discussed above are intended to protect public safety. Project design and construction would be consistent with all applicable provisions of the State and Los Angeles County Building Codes, including Regulatory Requirements RR GS-1 and RR GS-2, which require consideration of seismic loading factors and engineering geology and geotechnical hazards. Project development at Site 1 would also adhere to the recommendations of the geotechnical assessments including but not limited to consideration of the CBC Seismic Parameters. Regulatory Requirement RR GS-3 requires the Developer to undertake the preparation of a Project design-specific geotechnical assessment and to comply with its recommendations. With the implementation of the regulatory requirements, that include specific design, and shoring requirements designed to address building safety during seismic events, Project development at Site 1 would, not cause, exacerbate or accelerate geologic hazards. Therefore, risks from seismic ground shaking at Site 1 would be less than significant.

Liquefaction/Lateral Spreading and Dynamic Settlement

Site 1 is not identified as part of a potentially liquefiable area as based on California Geological Survey's Seismic Hazards Map of the Hollywood Quadrangle. Moreover, based on the depth to the historically highest and current groundwater levels, results from the site-specific liquefaction analysis conducted immediately to the north of Site 1 (separate from the Project), the potential for liquefaction or lateral spreading at Site 1 is considered to be remote. Nonetheless, Regulatory Requirements RR GS-1 through RR GS-3 require preparation of a design-level geotechnical investigation at Site 1. While it is unlikely the underlying soils at Site 1 are susceptible to liquefaction, any design recommendations based on the design-level geotechnical investigation, including site-specific liquefaction conditions, would be required to be incorporated into the Project's design at Site 1 in accordance with Regulatory Requirements RR GS-1 through RR GS-3.

Some seismically-induced dry settlement of the proposed structure could be expected at Site 1 as a result of strong ground-shaking. However, based on the typically dense, stiff, and consolidated nature of the alluvial soils and bedrock expected to underlie Site 1, the potential dynamic settlements would be expected to be negligible.⁷ Even so, Project design and construction would be consistent with all applicable provisions of the State and Los Angeles County Code, including Regulatory Requirements RR GS-1 through RR GS-3, which require consideration of seismic loading factors and engineering geology and geotechnical hazards. With the implementation of the regulatory requirements, that include specific design, and shoring requirements designed to address building safety during seismic events, Project development at Site 1 would not cause or exacerbate seismic ground failure. Therefore, risks from seismic ground failure at Site 1 would be less than significant.

⁷ *Geotechnical Assessment, Site 1: Proposed Office Building and Parking Structure, 500, 510, 526, and 532 South Vermont Avenue including 523 and 531 South Shatto Place, Los Angeles, California, prepared by Geotechnologies, Inc., August 15, 2017 (Draft EIR Appendix 4.5-1).*

Site 2

Strong Seismic Ground Shaking

Because the Los Angeles region is generally considered to be geologically active, most projects would be exposed to some risk from geologic hazards, such as earthquakes. Faults in the County and region present a risk of very strong ground shaking that must be considered for facilities where public safety and post-earthquake evacuation are necessary. An impact would be considered significant if a project exacerbates a seismic hazard.

Site 2 is in the seismically active Southern California region and is, therefore, susceptible to ground shaking during a seismic event. Seismic ground shaking could damage the building and utility infrastructure. However, State and local regulatory and code requirements discussed above are intended to protect public safety. Project design and construction would be consistent with all applicable provisions of the State and City Building Codes, including Regulatory Requirements RR GS-5 and RR GS-6, which require consideration of seismic loading factors and engineering geology and geotechnical hazards. The Project development at Site 2 would also adhere to the recommendations of the geotechnical assessments including but not limited to consideration of the California Building Code Seismic Parameters. Regulatory Requirement RR GS-4 requires the Project to undertake the preparation of a Project design-specific geotechnical assessment and to comply with its recommendations. With the implementation of the regulatory requirements, that include specific design, and shoring requirements designed to address building safety during seismic events, Project development at Site 2 would, thus, not cause, exacerbate or accelerate geologic hazards or expose people to substantial risk of injury. Therefore, risks from seismic ground shaking at Site 2 would be less than significant.

Liquefaction/Lateral Spreading and Dynamic Settlement

Site 2 is not identified as part of a potentially liquefiable area as based on California Geological Survey's Seismic Hazards Map of the Hollywood Quadrangle. Moreover, based on the depth to the historically highest and current groundwater levels, results from the site-specific liquefaction analysis conducted north of Site 2 (separate from the Project), the potential for liquefaction or lateral spreading at Site 2 is considered to be remote. Nonetheless, Regulatory Requirements RR GS-4 through RR GS-6 require preparation of a design-level geotechnical investigation at Site 2. While it is unlikely that the underlying soils at Site 2 are susceptible to liquefaction, any design recommendations based on the design-level geotechnical investigation, including site-specific liquefaction conditions, are required to be incorporated into the Project's design at Site 2 in accordance with Regulatory Requirements RR GS-4 through RR GS-6.

Some seismically-induced dry settlement of the proposed structure could be expected at Site 2 as a result of strong ground-shaking. However, based on the typically dense, stiff, and consolidated nature of the alluvial soils and bedrock expected to underlie Site 2, the potential dynamic settlements would be expected to be negligible.⁸ Even so, Project design and construction would be consistent with all applicable provisions of the State and City Codes, including Regulatory Requirements RR GS-4 through RR GS-6, which require consideration of seismic loading factors and engineering geology and geotechnical hazards. With the implementation of the regulatory requirements, that include specific design, and shoring requirements designed to address building safety during seismic events, Project development at

⁸ *Geotechnical Assessment, Site 2: Proposed Adaptive Reuse Project and Mixed-Use Structure, 540, 542, and 550 South Vermont Avenue and 3175 West 6th Street, Los Angeles, California, prepared by Geotechnologies, Inc., August 15, 2017 (Draft EIR Appendix 4.5-2).*

Site 2 would not cause or exacerbate seismic ground failure. Therefore, risks from seismic ground failure at Site 2 would be less than significant.

Site 3

Strong Seismic Ground Shaking

Because the Los Angeles region is generally considered to be geologically active, most projects would be exposed to some risk from geologic hazards, such as earthquakes. Faults in the County and region present a risk of very strong ground shaking that must be considered for facilities where public safety and post-earthquake evacuation are necessary. An impact would be considered significant if a project exacerbates a seismic hazard.

Site 3 is within the seismically active Southern California region and is, therefore, susceptible to ground shaking during a seismic event. Seismic ground shaking could damage the building and utility infrastructure. However, State and local regulatory and code requirements discussed above are intended to protect public safety. Project design and construction would be consistent with all applicable provisions of the State and Los Angeles County Code, including Regulatory Requirements RR GS-1 and RR GS-2, which require consideration of seismic loading factors and engineering geology and geotechnical hazards. The Project development at Site 3 would also adhere to the recommendations of the geotechnical assessments including but not limited to consideration of the California Building Code Seismic Parameters. Regulatory Requirement RR GS-3 requires the Project to undertake the preparation of a Project design-specific geotechnical assessment and to comply with its recommendations. With the implementation of the regulatory requirements, that include specific design, and shoring requirements designed to address building safety during seismic events, Project development at Site 3 would, thus, not cause, exacerbate or accelerate geologic hazards or expose people to substantial risk of injury. Therefore, risks from seismic ground shaking at Site 3 would be less than significant.

Liquefaction/Lateral Spreading and Dynamic Settlement

Site 3 is not identified as part of a potentially liquefiable area as based on California Geological Survey's Seismic Hazards Map of the Hollywood Quadrangle. Moreover, based on the depth to the historically highest and current groundwater levels, results from the site-specific liquefaction analysis conducted southeast of Site 3 (separate from the Project), the potential for liquefaction or lateral spreading at Site 3 is considered to be remote. Nonetheless, Regulatory Requirements RR GS-1 through RR GS-3 require preparation of a design-level geotechnical investigation at Site 3. While it is unlikely the underlying soils at Site 3 are susceptible to liquefaction, any design recommendations based on the design-level geotechnical investigation, including site-specific liquefaction conditions, are required to be incorporated into the Project's design at Site 3 in accordance with Regulatory Requirements RR GS-1 through RR GS-3.

Some seismically-induced dry settlement of the proposed structure could be expected at Site 3 as a result of strong ground-shaking. However, based on the typically dense, stiff, and consolidated nature of the alluvial soils and bedrock expected to underlie Site 3, the potential dynamic settlements would be expected to be negligible.⁹ Even so, Project design and construction would be consistent with all

⁹ *Geotechnical Assessment, Site 3: Proposed Affordable Housing Development, 427 and 433 South Vermont Avenue, Los Angeles, California, prepared by Geotechnologies, Inc., August 15, 2017 (Draft EIR Appendix 4.5-3).*

applicable provisions of the State and County Codes, including Regulatory Requirements RR GS-1 through RR GS-3, which require consideration of seismic loading factors and engineering geology and geotechnical hazards. With the implementation of the regulatory requirements, that include specific design, and shoring requirements designed to address building safety during seismic events, Project development at Site 3 would not cause or exacerbate seismic ground failure. Therefore, risks from seismic ground failure at Site 3 would be less than significant.

Threshold 4.5-2: 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 caused in whole or in part by the project's exacerbation of the existing environmental conditions?

Site 1

Geologic or soil unit instability resulting from liquefaction/lateral spreading, including dynamic settlement, are discussed above. Subsidence is not considered to be a potential hazard at Site 1, as discussed above. Moreover, there are no known physical characteristics of surficial geologic units present within Site 1 that would result in a significant impact or constraint to development. The probability of seismically-induced landslides affecting Site 1 is low due to the lack of significant slopes on the site and surrounding areas, and there are no known landslides at Site 1, nor is Site 1 in the path of any known or potential landslides.

The potential for impacts to the Metro Red Line tunnel exists due to the proximity of Site 1 to the subway tunnel and the potential for Project excavations to affect soils in the vicinity of the tunnel. Therefore, site exploration and planned facilities (e.g., subterranean levels) could impact the tunnel and train operations. Metro has specific requirements with regard to design and construction of any structures within proximity to one of its tunnels (Design Criteria and Standards Volume III). Each situation (i.e., type of structure, proximity to tunnel, future uses) is evaluated individually because there are no set rules governing minimum setback distances vertically or horizontally. Compliance with Metro's design manual for adjacent construction is required through Regulatory Requirement RR GS-7. Based on these requirements, development at Site 1 would not have an adverse effect on the structural integrity of the tunnel or the operation of the trains.

In summary, with implementation of the required standard, comprehensive geotechnical and soils engineering investigation and analysis mandated by State and County regulations, specifically the current County Code, California Building Code, and Metro Adjacent Construction Design Manual Design Criteria and Standards, Volume III, including Regulatory Requirements RR GS-1 through RR GS-3, and RR GS-7 geologic unit and soil related impacts would be less than significant.

Site 2

Geologic or soil unit instability resulting from liquefaction/lateral spreading, including dynamic settlement, are discussed above. Subsidence is not considered to be a potential hazard at Site 2, as discussion above. Moreover, there are no known physical characteristics of surficial geologic units present at Site 2 that would result in a significant impact or constraint to development. It is anticipated that the majority of the fill materials in the eastern portion of the Site where the mixed-use structure is proposed to be located would be removed during excavation, exposing adequate alluvial soils or bedrock at the subgrade. The proposed subterranean walls extending below the historically highest groundwater level would be

designed for an undrained condition with full hydrostatic pressure. Proposed concrete slabs-on-grade bearing below the historically highest groundwater level would be designed to withstand the hydrostatic uplift pressure for an undrained condition. Furthermore, the probability of seismically-induced landslides affecting Site 2 is low due to the lack of significant slopes on the site and surrounding areas, and there are no known landslides at Site 2 nor is Site 2 in the path of any known or potential landslides.

The potential for impacts to the Metro Red Line tunnel exists due to the proximity of Site 2 to the subway tunnel and the potential for Project excavations to affect soils in the vicinity of the tunnel. Therefore, site exploration and planned facilities (e.g., subterranean levels) could impact the tunnel and train operations. Metro has specific requirements with regard to design and construction of any structures within proximity to one of its tunnels (Design Criteria and Standards Volume III). Each situation (i.e., type of structure, proximity to tunnel, future uses) is evaluated individually because there are no set rules governing minimum setback distances vertically or horizontally. Compliance with Metro's design manual for adjacent construction is required through Regulatory Requirement RR GS-7. Based on these requirements, development at Site 2 would not have an adverse effect on the structural integrity of the tunnel or the operation of the trains.

In summary, with implementation of the required standard, comprehensive geotechnical and soils engineering investigation and analysis mandated by State and County regulations, specifically the current County Code, California Building Code, and Metro Adjacent Construction Design Manual Design Criteria and Standards, Volume III, including Regulatory Requirements RR GS-4 through RR GS-7, geologic unit and soil related impacts would be less than significant.

Site 3

Geologic or soil unit instability resulting from liquefaction/lateral spreading, including dynamic settlement, are discussed above. Subsidence is not considered to be a potential hazard at Site 3, as discussed above. Moreover, there are no known physical characteristics of surficial geologic units present within Site 3 that would result in a significant impact or constraint to development. In order to withstand the hydrostatic uplift imposed by the historically highest groundwater level, it is anticipated that the structure would have to be supported on a mat foundation at the lowest finished floor elevation. Subterranean walls to be located above the historically highest groundwater level may be designed for a drained condition, provided that a retaining wall subdrain would be installed. Furthermore, the probability of seismically-induced landslides affecting Site 3 is low due to the lack of significant slopes on the site and surrounding areas, and there are no known landslides at Site 3, nor is Site 3 in the path of any known or potential landslides.

The potential for impacts to the Metro Red Line tunnel exists from the proximity of Site 3 to the subway tunnel and the potential for Project excavations to affect soils in the vicinity of the tunnel. Therefore, site exploration and planned facilities (e.g., subterranean levels) could impact the tunnel and train operations. Metro has specific requirements with regard to design and construction of any structures within proximity to one of its tunnels (Design Criteria and Standards Volume III). Each situation (i.e., type of structure, proximity to tunnel, future uses) is evaluated individually as there are no set rules governing minimum setback distances vertically or horizontally. Compliance with Metro's design manual for adjacent construction is required through Regulatory Requirement RR GS-7. Overall, development at Site 3 would not have an adverse effect on the structural integrity of the tunnel or the operation of the trains.

In summary, with implementation of the required standard, comprehensive geotechnical and soils engineering investigation and analysis mandated by State and County regulations, specifically the current County Code, California Building Code, and Metro Adjacent Construction Design Manual Design Criteria and Standards, Volume III, including Regulatory Requirements RR GS-1 through RR GS-3, and RR GS-7, geologic unit and soil related impacts would be less than significant.

CUMULATIVE IMPACTS

Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and any 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. None of the related projects would occur directly adjacent to the Project Sites, thus lowering the possibility of localized geological or soil impacts around the Project Sites. Notwithstanding, as with the Project, the related projects would be subject to established guidelines and regulations pertaining to building design and seismic safety, including those set forth in the California Building Code and the Los Angeles Building Code. With adherence to such regulations, potential impacts with regard to geology and soils would not be cumulatively considerable. Furthermore, the analysis of the Project's geology and soils impacts concluded that Project impacts would be less than significant and, consequently, the Project would not contribute to a potential cumulative impact. Therefore, cumulative geology and soil impacts would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are proposed relevant to geology and soils.

Regulatory Requirements

The following standards would be imposed by existing laws and regulations and would work to address Project impacts. These are not required mitigation but are inherent Project components.

County Requirements (Sites 1 and 3)

- RR GS-1:** Structural designs will need to consider seismic (earthquake) loading factors in compliance with Title 26 of the Los Angeles County Code.
- RR GS-2:** Slope stability, expansive soils, compressible soils and other similar engineering geology and geotechnical hazard considerations are addressed by the grading standards in the State of California Building Code, Appendix J of Title 26 of the Los Angeles County Code, and by the general requirement for engineering investigation reports, and by many of the implementation programs within other categories.
- RR GS-3:** A Project design-specific geotechnical and engineering geology report is required to be prepared by a California-licensed geotechnical engineer, California-certified engineering geologist, and civil engineer with expertise in geotechnical issues registered in the State of California during Project design and prior to Project construction in compliance with the most current County of Los Angeles Department of Public Works Geotechnical and Materials Engineering Division ("GMED") guidelines.

The investigation is required to address the proposed Project foundation and structure design to minimize effects from adverse soil conditions including any liquefiable or otherwise unstable/consolidation-prone soils; bedrock characteristics; subsidence; earthquake ground shaking; slope instability; subsurface gas; groundwater; and/or other geotechnical and engineering geologic hazards. The design and construction recommendations will be incorporated into the foundation and structural design of proposed project components, implemented in accordance with the design, and subjected to on-going inspection by the relevant entities/agencies. Prior to Grading Plan approval and issuance of permits, all construction/development plans will be approved by GMED for construction of such improvements. Construction will occur in accordance with the approved plans.

City Requirements (Site 2)

- RR GS-4:** In accordance with the Los Angeles Building Code, Los Angeles Municipal Code ("LAMC") Chapter IX, Article 1, the Project Developer, or successor in interest, shall have a Geotechnical Study prepared for the Project Site that shall be approved by the Department of Building and Safety prior to issuance of building and grading permits. The Project shall be designed and constructed in accordance with the recommendations provided in the Geotechnical Study, as overseen by the Department of Building and Safety.
- RR GS-5:** Earthwork activities associated with the grading and export of soil shall occur in accordance with City requirements, as specified in the Los Angeles Building Code and CBC and through the grading plan review and approval process, including a haul route approval as specified in the LAMC.
- RR GS-6:** Project building design and construction shall conform to the current building and safety design provisions of the LAMC, which incorporates the CBC, including all provisions related to seismic activity.

Metro Requirements (Sites 1, 2 and 3)

- RR GS-7:** The Developer shall comply with the requirements of Metro's most recent "Design Criteria and Standards, Volume III, Adjacent Construction Design Manual." The general requirements include, but are not limited to, the following:
1. Facility or structure drawings and calculations showing the relationship between the proposed Project and Metro facilities shall be submitted for Metro review.
 2. Submittals shall be made at each level of completion such as Preliminary, In-Progress, Pre-final and Final, etc. to facilitate the review.
 3. If uncertainty exists on the possible impacts before submitting a formal letter requesting a review, the Metro Third Party Administrator (Permits) shall be contacted for an informal evaluation of the amount of detail required for Metro review.

4. A period of 30 working days shall be allowed for the initial and each successive review as required.
5. The project proponent shall reimburse Metro for any technical review or support services costs.
6. Each part of the project's design may be reviewed and approved by Metro, and after written acceptance of the design, the project proponent must notify Metro prior to the start of construction as noted therein.

Due to the proximity of the tunnel and the uncertainty that exists on the possible impacts, before submitting a formal letter requesting a review, the Developer shall contact the Metro Third Party Administrator (Permits) for an informal evaluation of the amount of detail required for Metro review. In addition, prior to any geotechnical or other site investigation requiring subsurface exploration (e.g., geotechnical drilling, monitoring wells), the Developer shall obtain approval of drilling locations, drilling depths, and downhole activities from Metro. The Developer shall obtain prior written approval to proceed from Metro prior to commencing exploration activities; written approval shall be submitted to County Department of Regional Planning and GMED. Similarly, the Developer shall submit to GMED a written approval from Metro that final project design may be developed.

MITIGATION MEASURES

Because the Project's impacts would be less than significant, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts with regard to geology and soils would be less than significant.

Cumulative impacts with regard to geology and soils would be less than significant.

4.6 GREENHOUSE GAS EMISSIONS

INTRODUCTION

This section evaluates potential impacts of the Project related to greenhouse gas (“GHG”) emissions. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere regulates Earth’s temperature. The State of California has undertaken initiatives designed to address the effects of GHGs, and to establish targets and emission reduction strategies for GHG emissions in California. The GHG data supporting this section is included as Appendix 4.6-1 to this Draft EIR.

There are several unique challenges to analyzing GHG emissions and climate change under CEQA, largely because of the global nature of climate change. Typical CEQA analyses address local actions that have local – or regional – impacts, whereas climate change presents the considerable challenge of analyzing the relationship between local activities and the resulting potential, if any, for global environmental impacts. Most environmental analyses examine the “project-specific” impacts that a particular project is likely to generate. With regard to global climate change, however, it is generally accepted that while the magnitude of global warming effects is substantial, the contribution of an individual general development project is so small that direct project-specific significant impacts are highly unlikely.

Global climate change is also fundamentally different from other types of air quality impact analyses under CEQA in which impacts are all measured within, and are linked to, a discrete region or area. Instead, a global climate change analysis must be considered on a global level, rather than the typical local or regional setting, and requires consideration of emissions from the project under consideration, and the extent of the displacement, translocation, and redistribution of emissions. In the usual context, where air quality is linked to a particular location or area, it is appropriate to consider the creation of new emissions in that specific area to be an environmental impact whether or not the emissions are truly “new” emissions to the overall globe. When the impact is a global one, however, it makes more sense to consider whether the emissions really are new emissions, or are merely being moved from one place to another. For example, approval of a new developmental plan or project does not necessarily create new automobile drivers - the primary source of a land use project’s emissions. Rather, due to the “relocation” factor, new land use projects often merely redistribute existing mobile emissions;¹ accordingly, the use of models that measure overall emissions increases without accounting for existing emissions will substantially overstate the impact of the development project on global warming. This makes an accurate analysis of GHG emissions substantially different from other air pollutant emissions analysis, where the “addition” of redistributed emissions to a new locale can make a substantial difference to overall air quality.

¹ For example, a new subdivision of 500 homes generates 5,000 new trips per day and those trips would be added to the local streets and intersections. Trips associated with those homes presumably would emit roughly the same volume of GHGs in the City as they would if they were traveling the same number of miles in Cleveland, Ohio. While raw vehicle trip counts accurately predict changes in congestion at intersections, the same certainty cannot be provided for climate change. The trips would certainly increase the number of vehicles passing through local intersections, but they would not increase the amount of GHG emissions into the world’s atmosphere if those trips simply have been relocated from another location on the planet.

ENVIRONMENTAL SETTING

Global Climate Change

Earth's natural warming process is known as the "greenhouse effect." Certain atmospheric gases act as an insulating blanket for solar energy to keep the global average temperature in a suitable range for life support. The greenhouse effect raises the temperature of Earth's surface by about 60 degrees Fahrenheit. With the natural greenhouse effect, the average temperature of Earth is about 45 degrees Fahrenheit; without it, Earth would be about minus 15 degrees. It is normal for Earth's temperature to fluctuate over extended periods of time. Over the past one hundred years, Earth's average global temperature has generally increased by one degree Fahrenheit. In some regions of the world, the increase has been as much as four degrees Fahrenheit.

Scientists studying the particularly rapid rise in global temperatures during the late twentieth century believe that natural variability alone does not account for that rise. Rather, human activity spawned by the industrial revolution has likely resulted in increased emissions of carbon dioxide and other forms of GHGs, primarily from the burning of fossil fuels (i.e., during motorized transport, electricity generation, consumption of natural gas, industrial activity, manufacturing, etc.) and deforestation, as well as agricultural activity and the decomposition of solid waste.²

GHG Components and Effects

The California Global Warming Solutions Act of 2006 (discussed in the following pages) defined GHGs to include carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF₆), and nitrogen trifluoride. A general description of each GHG discussed in this report is provided in Table 4.6-1 (Description of Identified Greenhouse Gases). CO₂ is the most abundant GHG. Other GHGs are less abundant, but have higher global warming potential (discussed below) than CO₂. Thus, emissions of other GHGs are frequently expressed in the equivalent mass of CO₂, denoted as CO₂e. Forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooking are the primary sources of GHG emissions.

Global Warming Potential

Global Warming Potential ("GWP") is one type of simplified index based upon radiative properties that is used to estimate the potential future impacts of emissions of different gases upon the climate system in a relative sense. GWP is based on a number of factors, including the radiative efficiency (heat-absorbing ability) of each gas relative to that of CO₂, as well as the decay rate of each gas (the amount removed from the atmosphere over a given number of years) relative to that of CO₂. A summary of the atmospheric lifetime and GWP of selected gases is presented at Table 4.6-2 (Atmospheric Lifetimes and Global Warming Potentials).

² *Climate Change 101: Understanding and Responding to Global Climate Change, published by the Pew Center on Global Climate Change and the Pew Center on the States.*

Table 4.6-1
Description of Identified Greenhouse Gases

GHG	General Description
CO₂	CO ₂ is an odorless, colorless GHG, which has both natural and man-made sources. Natural sources include the following: decomposition of dead organic matter; respiration of bacteria, plants, animals, and fungus; evaporation from oceans; and volcanic outgassing; man made sources of CO ₂ are burning coal, oil, natural gas, and wood.
CH₄	CH ₄ is a flammable gas and is the main component of natural gas. When one molecule of CH ₄ is burned in the presence of oxygen, one molecule of CO ₂ and two molecules of water are released. There are no ill health effects from CH ₄ . A natural source of CH ₄ is the anaerobic decay of organic matter. Geological deposits, known as natural gas fields, also contain CH ₄ , which is extracted for fuel. Other sources are from landfills, fermentation of manure, and cattle.
N₂O	N ₂ O is a colorless GHG. High concentrations can cause dizziness, euphoria, and sometimes slight hallucinations. N ₂ O is produced by microbial processes in soil and water, including those reactions which occur in fertilizer containing nitrogen. In addition to agricultural sources, some industrial processes (fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to its atmospheric load. It is used in rocket engines, race cars, and as an aerosol spray propellant.
HFCs	HFCs are synthetic man-made chemicals that are used as a substitute for chlorofluorocarbons (CFCs) for automobile air conditioners and refrigerants. CFCs are gases formed synthetically by replacing all hydrogen atoms in methane or ethane with chlorine and/or fluorine atoms. CFCs are nontoxic, nonflammable, insoluble, and chemically unreactive in the troposphere (the level of air at Earth's surface). CFCs were first synthesized in 1928 for use as refrigerants, aerosol propellants, and cleaning solvents. Because they destroy stratospheric ozone, the production of CFCs was stopped as required by the Montreal Protocol in 1987.
PFCs	PFCs have stable molecular structures and do not break down through the chemical processes in the lower atmosphere. High-energy ultraviolet rays about 60 kilometers above Earth's surface are able to destroy the compounds. PFCs have very long lifetimes, between 10,000 and 50,000 years. Two common PFCs are tetrafluoromethane and hexafluoroethane. The two main sources of PFCs are primary aluminum production and semiconductor manufacture.
SF₆	SF ₆ is an inorganic, odorless, colorless, non-toxic, and nonflammable gas. SF ₆ is used for insulation in electric power transmission and distribution equipment, in the magnesium industry, in semiconductor manufacturing, and as a tracer gas for leak detection.

Source: Association of Environment Professionals, Alternative Approaches to Analyze Greenhouse Gas Emissions and Global Climate Change in CEQA Documents, Final, June 29, 2007.

Table 4.6-2
Atmospheric Lifetimes and Global Warming Potentials

GHG	Lifetime (Years)	Global Warming Potential (20-Year)	Global Warming Potential (100-Year)
Carbon Dioxide	100	1	1
Nitrous Oxide	121	264	265
Nitrogen Trifluoride	500	12,800	16,100
Sulfur Hexafluoride	3,200	17,500	23,500
Perfluorocarbons	3,000-50,000	5,000-8,000	7,000-11,000
Black Carbon	days to weeks	270-6,200	100-1,700
Methane	12	84	28
Hydrofluorocarbons	Uncertain	100-11,000	100-12,000

Note: "Global Warming Potential" is a relative measure of how much heat a greenhouse gas traps in the atmosphere, as compared to carbon dioxide.

Source: CARB, First Update to the Climate Change Scoping Plan, May 2014.

Impacts of Global Climate Change in California

The California Environmental Protection Agency (“CalEPA”) published a report titled *Scenarios of Climate Change in California: An Overview* (“Climate Scenarios report”) in February 2006 that, while not adequate for a CEQA project-specific or cumulative analysis, is generally instructive about the future impacts of global warming on California.

In addition, on December 2, 2009, the California Natural Resources Agency released its California Climate Adaptation Strategy report that details many vulnerabilities arising from climate change with respect to matters such as temperature extremes, sea level rise, wildfires, floods and droughts and precipitation changes. This report responds to the Governor’s Executive Order S-13-2008 that called on State agencies to develop California’s strategy to identify and prepare for expected climate impacts.

According to these reports, substantial temperature increases arising from increased GHG emissions potentially could result in a variety of impacts to the people, economy, and environment of California. This includes an associated projected increase in extreme conditions, with the severity of the impacts depending upon actual future emissions of GHGs and associated warming.

Under the emissions scenarios of the Climate Scenarios report, the impacts of global climate change in California have the potential to include, but are not limited to, the areas of public health, water resources, agriculture, forests and landscapes, and rising sea levels.

Regulatory Framework

Climate change and GHG emissions are governed by an evolving body of laws, regulations, and case law. Below are summaries of some of the key regulations; however, the discussion below should not be considered exhaustive of this growing body of regulation.

Federal

Clean Air Act

The U.S. Supreme Court has held that the United States Environmental Protection Agency (“U.S. EPA”) is authorized by the Clean Air Act to regulate CO₂ emissions from new motor vehicles.³ The Court did not mandate that the U.S. EPA enact regulations to reduce GHG emissions, but found that the only instances in which the U.S. EPA could avoid taking action were if it found that GHGs do not contribute to climate change or if it offered a “reasonable explanation” for not determining that GHGs contribute to climate change.

On December 7, 2009, the U.S. EPA issued an “endangerment finding” under the Clean Air Act, concluding that GHGs threaten the public health and welfare of current and future generations and that motor vehicles contribute to GHG pollution.⁴ These findings provide the basis for adopting new national

³ *Massachusetts, et al. v. Environmental Protection Agency* (2007), website: <http://www.law.cornell.edu/supct/html/05-1120.ZS.html>, accessed: May 2017.

⁴ *United States Environmental Protection Agency, Endangerment, and Cause or Contribute Findings for Greenhouse Gases under Section 202(a) of the Clean Air Act*, website: https://19january2017snapshot.epa.gov/climatechange_.html, accessed: May 2017.

regulations to mandate GHG emission reductions under the federal Clean Air Act. The EPA's endangerment finding paves the way for federal regulation of GHGs.

Under the Consolidated Appropriations Act of 2008 (HR 2764), Congress established mandatory GHG reporting requirements for some emitters of GHGs. In addition, on September 22, 2009, the EPA issued the Final Mandatory Reporting of Greenhouse Gases Rule. The rule requires annual reporting to the U.S. EPA of GHG emissions from large sources and suppliers of GHGs, including facilities that emit 25,000 metric tons (MT) or more a year of GHGs.

Federal Vehicle Standards

An Executive Order was issued on May 14, 2007, directing the U.S. EPA, the Department of Transportation, and the Department of Energy to establish regulations that would reduce GHG emissions from motor vehicles, non-road vehicles, and non-road engines by 2008.

On October 10, 2008, the National Highway Traffic Safety Administration ("NHTSA") released a final environmental impact statement analyzing proposed interim standards for passenger cars and light trucks in model years 2011 through 2015. The NHTSA issued a final rule for model year 2011 on March 30, 2009.⁵

On May 7, 2010, the U.S. EPA and the NHTSA issued a final rule regulating fuel efficiency and GHG pollution from motor vehicles for cars and light-duty trucks for model years 2012–2016.⁶ On May 21, 2010, the Secretaries of Transportation and Energy, and the Administrators of the U.S. EPA and the NHTSA, were directed to establish additional standards regarding fuel efficiency and GHG reduction, clean fuels, and advanced vehicle infrastructure.⁷ In response to this directive, U.S. EPA and NHTSA issued a Supplemental Notice of Intent announcing plans to propose stringent, coordinated federal GHG and fuel economy standards for model year 2017-2025 light-duty vehicles.⁸ The agencies proposed standards projected to achieve 163 grams/mile of CO₂ in model year 2025, on an average industry fleet wide basis, which is equivalent to 54.5 miles per gallon if this level were achieved solely through fuel efficiency. California supported this national program.⁹ The final rule was adopted in October 2012 and NHTSA intends to set

⁵ National Highway Traffic Safety Administration, *Laws & Regulations, CARE - Fuel Economy, Average Fuel Economy Standards Passenger Cars and Light Trucks Model Year 2011, Final Rule, March 23, 2009*, website: http://www.nhtsa.gov/DOT/NHTSA/Rulemaking/Rules/Associated%20Files/CAFE_Updated_Final_Rule_MY2011.pdf, accessed: May 2017.

⁶ United States Environmental Protection Agency, *Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, Final Rule, May 7, 2010*, website: <https://www.federalregister.gov/articles/2010/05/07/2010-8159/light-duty-vehicle-greenhouse-gas-emission-standards-and-corporate-average-fuel-economy-standards>, accessed: May 2017.

⁷ Government Printing Office, *Federal Register, Vol. 75, No. 101, Presidential Documents, Improving Energy Security, American Competitiveness and Job Creation, and Environmental Protection Through a Transformation of Our Nation's Fleet of Cars and Trucks, May 21, 2010*, website: <http://www.gpo.gov/fdsys/pkg/FR-2010-05-26/html/2010-12757.htm>, accessed: May 2017.

⁸ Government Printing Office, *Federal Register, Vol. 76, No. 153, Proposed Rules, 2017-2025 Model Year Light-Duty Vehicle GHG Emissions and CAFÉ Standards: Supplemental Notice of Intent, August 9, 2011*, website: <http://gpo.gov/fdsys/pkg/FR-2011-08-09/pdf/2011-19905.pdf>, accessed: May 2017.

⁹ California Air Resource Board, *Commitment Letter to National Program, July 28, 2011*, website: <http://www.epa.gov/otaq/climate/letters/carb-commitment-ltr.pdf>, accessed: May 2017.

standards for model years 2022-2025 in future rulemaking.^{10, 11}

Heavy-Duty Engines and Vehicles Fuel Efficiency Standards

In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the U.S. EPA and the NHTSA announced fuel economy and GHG standards for medium- and heavy-duty trucks, which apply to vehicles from model years 2014 through 2018.¹² The U.S. EPA and the NHTSA adopted standards for CO₂ emissions and fuel consumption, respectively, tailored to each of three main vehicle categories: (1) combination tractors, (2) heavy-duty pickup trucks and vans, and (3) vocational vehicles. According to the U.S. EPA, this program will reduce GHG emissions and fuel consumption for affected vehicles by 6 percent to 23 percent.

Energy Independence and Security Act

On December 19, 2007, the Energy Independence and Security Act of 2007 (“EISA”) was signed into law.¹³ 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:

1. Increase the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard requiring fuel producers to use at least 36 billion gallons of biofuel in 2022.
2. Prescribe or revise standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labelling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.
3. While superseded by NHTSA and U.S. EPA 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.”

¹⁰ National Highway Traffic Safety Administration, *Federal Register*, Vol. 77, No. 199, Rules & Regulations, 2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards, effective December 14, 2012, website: <https://federalregister.gov/a/2012-21972>, accessed: May 2017.

¹¹ National Highway Traffic Safety Administration, *Corporate Average Fuel Economy Standards, Passenger Cars and Light Trucks, Model Years 2017-2025, Final Environmental Impact Statement*, July 2012, website: http://www.nhtsa.gov/staticfiles/rulemaking/pdf/cafe/FINAL_EIS.pdf. Accessed: May 2017.

¹² United States Environmental Protection Agency, Office of Transportation and Air Quality. *EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium-and Heavy-Duty Vehicles*, August 2011, website: <http://www.epa.gov/otaq/climate/documents/420f11031.pdf>, accessed: May 2017.

¹³ Government Printing Office, *Energy Independence and Security Act of 2007*, January 4, 2007, website: <http://www.gpo.gov/fdsys/pkg/BILLS-110hr6enr/pdf/BILLS-110hr6enr.pdf>, accessed: May 2017.

State

Executive Order S-3-05

Executive Order S-3-05, issued in June 2005, established GHG emissions targets for the State, as well as a process to ensure the targets are met. The order directed the Secretary of CalEPA to report every two years on the State's progress toward meeting the Governor's GHG emission reduction targets. As a result of this executive order, the California Climate Action Team, led by the Secretary of CalEPA, was formed. The California Climate Action Team is made up of representatives from a number of State agencies and was formed to implement global warming emission reduction programs and reporting on the progress made toward meeting statewide targets established under the Executive Order. The California Climate Action Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.¹⁴ The statewide GHG targets are as follows:

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

However, with the adoption of the California Global Warming Solutions Act of 2006 (also known as AB 32), discussed below, the Legislature did not adopt the 2050 horizon-year goal from Executive Order No. S-3-05. In the last legislative session, the Legislature rejected legislation to enact the Executive Order's 2050 goal.¹⁵

The California Climate Action Team stated that smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development, and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. "Intelligent transportation systems" is the application of advanced technology systems and management strategies to improve operational efficiency of transportation systems and the movement of people, goods, and service.¹⁶

¹⁴ California Climate Action Team, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006.

¹⁵ The original version of SB 32 as introduced in the Legislature contained a commitment to the 2050 goal, but this commitment was not included in the final version of the bill. See: https://leginfo.ca.gov/faces/billVersionsCompareClient.xhtml?bill_id=201520160SB32&cversion=20150SB3299INT. In addition, the Supreme Court recently held in *Cleveland National Forest Foundation et al. v San Diego Association of Governments (SANDAG)* (S223603, July 13, 2017) that SANDAG did not abuse its discretion in declining to adopt the 2050 goal as a measure of significance in an analysis of the consistency of projected 2050 greenhouse gas emissions with the goals in Executive Order S-3-05.

¹⁶ California Environmental Protection Agency, *Climate Action Team Report to Governor Schwarzenegger and the Legislature*, March 2006, page 58.

Assembly Bill 32 (Statewide GHG Reductions)

The California Global Warming Solutions Act of 2006 (“AB 32”) was signed into law in September 2006 after considerable study and expert testimony before the Legislature. The law instructs the California Air Resources Board (“CARB”) to develop and enforce regulations for the reporting and verifying of statewide GHG emissions. AB 32 directed CARB to set a GHG emission limit based on 1990 levels, to be achieved by 2020. AB 32 set a timeline for adopting a scoping plan for achieving GHG reductions in a technologically and economically feasible manner.¹⁷

The heart of AB 32 is the requirement to reduce statewide GHG emissions to 1990 levels by 2020. AB 32 required CARB to adopt rules and regulations in an open public process to achieve the maximum technologically feasible and cost-effective GHG reductions. CARB accomplished the key milestones set forth in AB 32, including the following:

- June 30, 2007. Identification of discrete early action GHG emissions reduction measures. On June 21, 2007, CARB satisfied this requirement by approving three early action measures.¹⁸ These were later supplemented by adding six other discrete early action measures.¹⁹
- January 1, 2008. Identification of the 1990 baseline GHG emissions level and approval of a statewide limit equivalent to that level and adoption of reporting and verification requirements concerning GHG emissions. On December 6, 2007, CARB approved a statewide limit on GHG emissions levels for the year 2020 consistent with the determined 1990 baseline.²⁰
- January 1, 2009. Adoption of a scoping plan for achieving GHG emission reductions. On December 11, 2008, CARB adopted *Climate Change Scoping Plan: A Framework for Change* (“Scoping Plan”), discussed in more detail below.²¹

¹⁷ Legislative Counsel of California, California Assembly Bill 32, September 2006, website: http://www.leginfo.ca.gov/pub/05-06/bill/asm/ab_0001-0050/ab_32_bill_20060927_chaptered.pdf, accessed: May 2017.

¹⁸ California Air Resources Board, Summary of Board Meeting, Consideration of Recommendations for Discrete Early Actions for Climate Change Mitigation in California, June 21-22, 2007, website: <http://www.arb.ca.gov/board/ms/2007/ms062107.pdf>, accessed: May 2017.

¹⁹ California Air Resources Board, Summary of Board Meeting, Public Meeting to Consider Approval of Additions to Reduce Greenhouse Gas Emissions under the California Global Warming Solutions Act of 2006 and to Discuss Concepts for Promoting and Recognizing Voluntary Early Actions, October 25-26, 2007, website: <http://www.arb.ca.gov/board/ms/2007/ms102507.pdf>, accessed: May 2017.

²⁰ California Air Resources Board, Staff Report, California 1990 Greenhouse Gas Emissions Level and 2020 Emissions Limit, November 16, 2007, website: http://www.arb.ca.gov/cc/inventory/pubs/reports/staff_report_1990_level.pdf, accessed: May 2017.

²¹ California Air Resources Board, Climate Change Scoping Plan, December 2008, website: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf, accessed: May 2017.

- January 1, 2010. Adoption and enforcement of regulations to implement the “discrete” actions. Several early action measures have been adopted and became effective on January 1, 2010.^{22, 23}
- January 1, 2011. Adoption of GHG emissions limits and reduction measures by regulation. On October 28, 2010, CARB released its proposed cap-and-trade regulations, which would cover sources of approximately 85 percent of California's GHG emissions.²⁴ CARB's Board ordered its Executive Director to prepare a final regulatory package for cap-and-trade on December 16, 2010.²⁵
- January 1, 2012. GHG emissions limits and reduction measures adopted in 2011 became enforceable.

As noted above, on December 11, 2008, CARB adopted the Scoping Plan to achieve the goals of AB 32. The Scoping Plan establishes an overall framework for the measures that will be adopted to reduce California's GHG emissions for various categories of emissions. CARB determined that achieving the 1990 emission level by 2020 would require an approximately 28.5 percent reduction of GHG emissions in the absence of new laws and regulations (referred to as “business as usual” or “No Action Taken”). The Scoping Plan evaluates opportunities for sector-specific reductions, integrates all CARB and Climate Action Team early actions and additional GHG reduction measures by both entities, and identifies additional measures to be pursued as regulations, and outlines the role of a cap-and-trade program. The key elements of the Scoping Plan include the following:²⁶

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;
- Achieving a statewide renewable energy mix of 33 percent;
- Developing a California cap-and-trade program that links with other Western Climate Initiative partner programs to create a regional market system and caps sources contributing 85 percent of California's GHG emissions;
- Establishing targets for transportation-related GHG emissions for regions throughout California, and pursuing policies and incentives to achieve those targets;

²² California Air Resources Board, *Summary of Board Meeting, Consideration of Recommendations for Discrete Early Actions for Climate Change Mitigation in California*, June 21-22, 2007, website: <http://www.arb.ca.gov/board/ms/2007/ms062107.pdf>, accessed: May 2017.

²³ California Air Resources Board, *Summary of Board Meeting, Public Meeting to Consider Approval of Additions to Reduce Greenhouse Gas Emissions under the California Global Warming Solutions Act of 2006 and to Discuss Concepts for Promoting and Recognizing Voluntary Early Actions*, October 25-26, 2007, website: <http://www.arb.ca.gov/board/ms/2007/ms102507.pdf>, accessed: May 2017.

²⁴ California Air Resources Board, *Proposed Regulation to Implement the California Cap-and-Trade Program*, December 16, 2010, website: <http://www.arb.ca.gov/regact/2010/capandtrade10/capandtrade10.htm>, accessed: May 2017.

²⁵ California Air Resources Board, *California Cap-and-Trade Program, Resolution 10-42*, December 16, 2010, website: <http://www.arb.ca.gov/regact/2010/capandtrade10/res1042.pdf>, accessed: May 2017.

²⁶ California Air Resources Board, *Climate Change Scoping Plan*, December 2008, website: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf, accessed: May 2017.

- Adopting and implementing measures pursuant to existing state laws and policies, including California's clean car standards, goods movement measures, and the Low Carbon Fuel Standard; and
- Creating targeted fees, including a public goods charge on water use, fees on high global warming potential gases, and a fee to fund the administrative costs of the State of California's long-term commitment to AB 32 implementation.

In connection with preparation of the supplement to the Functional Equivalent Document, CARB released revised estimates of the expected 2020 emission reductions in consideration of the economic recession and the availability of updated information from development of measure-specific regulations. Incorporation of revised estimates in consideration of the economic recession reduced the projected 2020 emissions from 596 metric tons of CO₂ equivalent (MTCO₂e) to 545 million MTCO₂e (MMTCO₂e).²⁷ Under this scenario, achieving the 1990 emissions level in 2020 would require a reduction of GHG emissions of 118 MMTCO₂e, or 21.7 percent. This revised reduction represents a 6.8 percentage point reduction from the 28.5 percent level determined in CARB's 2008 Scoping Plan. The 2020 AB 32 baseline was also updated to account for measures incorporated into the inventory, including Pavley (vehicle model-years 2009 to 2016) and the renewable portfolio standard (12 percent to 20 percent). Inclusion of these measures further reduced the 2020 baseline to 507 MMTCO₂e. As a result, based on both the economic recession and the availability of updated information from development of measure-specific regulations, achieving the 1990 emission level would now require a reduction of GHG emissions of 80 MMTCO₂e or a reduction by approximately 16 percent (down from the 28.5 percent level determined in CARB's 2008 Scoping Plan) by 2020 in the "business as usual" or No Action Taken condition.^{28,29}

On October 1, 2013, CARB released a discussion draft first update to the Scoping Plan. The discussion draft recalculates 1990 GHG emissions using *Intergovernmental Panel on Climate Change Fourth Assessment Report* released in 2007. Using the AR4 global warming potentials ("GWPs"), the 427 MMTCO₂e 1990 emissions level and 2020 GHG emissions limit would be slightly higher, at 431 MMTCO₂e.³⁰ Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the Functional Environmental Document and updated 1990 emissions levels identified in the draft first update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 MMTCO₂e (down from

²⁷ California Air Resources Board, *Status of Scoping Plan Recommended Measures, July 25, 2011*, website: http://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf, accessed: May 2017.

²⁸ *Ibid.*

²⁹ California Air Resources Board, *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document*, website: http://www.arb.ca.gov/cc/scopingplan/document/final_supplement_to_sp_fed.pdf, accessed: May 2017.

³⁰ California Air Resources Board, *Climate Change Scoping Plan First Update, Discussion Draft for Public Review and Comment, October 2013*, website: http://www.arb.ca.gov/cc/scopingplan/2013_update/discussion_draft.pdf, accessed: May 2017.

507 MMTCO₂e) or a reduction by approximately 15 percent (down from 28.5 percent) to achieve in 2020 emissions levels in the “business as usual” or No Action Taken condition.^{31,32,33}

CARB also aims to reduce GHG emissions significantly by 2030. As California moves closer to reaching the 2020 GHG emission reduction goal, state legislation has focused on furthering GHG emission reduction targets. Executive Order B-30-15 was issued April 2015 and establishes a mid-term GHG reduction target for California of 40 percent below 1990 levels by 2030 (discussed in further detail below). In 2016, the Legislature passed SB 37 with the companion bill AB 197, which further mandates the 2030 target and provides additional direction to CARB on strategies to reduce GHG emissions. In response to Executive Order B-30-15 and SB 37, CARB is moving forward with a second update to the Scoping Plan to reflect the 2030 target.

SB 32 (discussed in further detail later below) was enacted in 2016 and expands on AB 32 to require California to reduce GHG emissions to 40 percent below 1990 levels by 2030. The bill targets reductions from the leading GHG emitters in the state. Transportation is the largest sector of GHG emissions in the state and will be a primary subject for reductions. Through advances in technology and improved public transportation the state plans to significantly improve GHG emissions from transportation sources to meet the 2030 reduction goal.

Executive Order B-30-15 & SB 32

On April 29, 2015, Governor Edmund G. Brown Jr. issued Executive Order B-30-15 to establish a California GHG reduction target of 40 percent below 1990 levels by 2030. This new emission reduction target of 40 percent below 1990 levels by 2030 is a step toward the ultimate goal of reducing emissions by 80 percent below 1990 levels by 2050. This matter was submitted in the Senate (SB 32), approved by both houses of the Legislature, and signed by the Governor on September 8, 2016. SB 32 requires the ARB to approve GHG emissions limits equivalent to 40 percent below the 1990 level by 2030.

Senate Bill 97

Per Senate Bill 97, which was signed into law on August 24, 2007, the California Natural Resources Agency adopted amendments to the State CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project’s effects on the environment (codified as Public Resources Code 21083.05). Specifically, Public Resources Code 21083.05 states, “The Office of Planning and Research and the Natural Resources Agency shall periodically update the guidelines for the mitigation of greenhouse gas emissions or the effects of greenhouse gas emissions.”

Senate Bill 375

In September 2008, the California Legislature adopted Senate Bill 375 (“SB 375”), legislation which (1) relaxes CEQA requirements for some housing projects that meet goals for reducing GHG emissions and

³¹ California Air Resources Board, *Status of Scoping Plan Recommended Measures*, July 25, 2011, website: http://www.arb.ca.gov/cc/scopingplan/status_of_scoping_plan_measures.pdf, accessed: May 2017.

³² California Air Resources Board, *Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document*, website: http://www.arb.ca.gov/cc/scopingplan/document/final_supplement_to_sp_fed.pdf, accessed: May 2017.

³³ California Air Resources Board, *Climate Change Scoping Plan First Update, Discussion Draft for Public Review and Comment*, October 2013, website: http://www.arb.ca.gov/cc/scopingplan/2013_update/discussion_draft.pdf, accessed: May 2017.

(2) requires the regional governing bodies in each of the state's major metropolitan areas to adopt, as part of their regional transportation plan, "sustainable community strategies" that will meet the region's target for reducing GHG emissions. SB 375 creates incentives for implementing the sustainable community strategies by allocating federal transportation funds only to projects that are consistent with the emissions reductions.

Local governments would then devise strategies for housing development, road-building and other land uses to shorten travel distances, reduce vehicular travel time and meet the new targets. If regions develop these integrated land use, housing, and transportation plans, residential projects that conform to the sustainable community strategy (and therefore contribute to GHG reduction) can have a more streamlined environmental review process.

Renewable Portfolio Standards (SB 1078, SB 107, and SBX1-2)

Established in 2002 under Senate Bill (SB) 1078, and accelerated in 2006 under SB 107 and again in 2011 under SBX1-2, California's Renewable Portfolio Standards ("RPS") requires retail sellers of electric services to increase procurement from eligible renewable energy resources to 33 percent of total retail sales by 2020.^{34,35} The 33 percent standard is consistent with the RPS goal established in the Scoping Plan.³⁶ As interim measures, the RPS requires 20 percent of retail sales to be sourced from renewable energy by 2013, and 25 percent by 2016. Initially, the RPS provisions applied to investor-owned utilities, community choice aggregators, and electric service providers. SBX1-2 added, for the first time, publicly-owned utilities to the entities subject to RPS. The expected growth in RPS to meet the standards in effect in 2008 is not reflected in the "business as usual" calculation in the AB 32 Scoping Plan, discussed below. In other words, the Scoping Plan's "business as usual" 2020 does not take credit for implementation of RPS that occurred after its adoption.³⁷

GHG Emissions Standard for Baseload³⁸ Generation

Senate Bill 1368, which was signed into law on September 29, 2006, prohibits any retail seller of electricity in California from entering into a long-term financial commitment for baseload generation if the GHG emissions are higher than those from a combined-cycle natural gas power plant. This performance standard (i.e., reducing long-term GHG emissions as a result of electrical baseload generation) applies to electricity generated both within and outside of California, and to publicly owned as well as investor-owned electric utilities.

³⁴ Legislative Counsel of California, Senate Bill 1078, September 2002, website: <http://www.energy.ca.gov/portfolio/documents/documents/SB1078.PDF>, accessed: May 2017.

³⁵ Legislative Counsel of California, Senate Bill 1368, September 2006, website: http://www.energy.ca.gov/emission_standards/documents/sb_1368_bill_20060929_chaptered.pdf, accessed: May 2017.

³⁶ California Air Resources Board, Climate Change Scoping Plan, December 2008, website: http://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf, accessed: May 2017.

³⁷ California Air Resources Board, Climate Change Scoping Plan Appendices, Vol. I, December 2008, website: http://www.arb.ca.gov/cc/scopingplan/document/appendices_volume1.pdf, accessed: May 2017.

³⁸ Baseload is the minimum amount of power an electrical, or other utility, company must generate in a 24-hour time period to meet estimated demand from its customers.

Mobile Source Reductions

Assembly Bill 1493, the “Pavley Standard,” required CARB to adopt regulations by January 1, 2005, to reduce GHG emissions from non-commercial passenger vehicles and light-duty trucks of model year 2009 through 2016. The bill also required the California Climate Action Registry to develop and adopt protocols for the reporting and certification of GHG emissions reductions from mobile sources for use by CARB in granting emission reduction credits. The bill authorizes CARB to grant emission reduction credits for reductions of GHG emissions prior to the date of enforcement of regulations, using model year 2000 as the baseline for reduction.³⁹

In 2004, CARB applied to the U.S. EPA for a waiver under the federal Clean Air Act to authorize implementation of these regulations. The waiver request was formally denied by the U.S. EPA in December 2007 after California filed suit to prompt federal action. In January 2008, the State Attorney General filed a new lawsuit against the U.S. EPA for denying California's request for a waiver to regulate and limit GHG emissions from these vehicles. In January 2009, U.S. EPA was directed to reconsider California's request for a waiver. On June 30, 2009, the U.S. EPA granted the waiver to California for its GHG emission standards for motor vehicles. As part of this waiver, U.S. EPA specified the following provision: CARB may not hold a manufacturer liable or responsible for any noncompliance caused by emission debits generated by a manufacturer for the 2009 model year. CARB has adopted a new approach to passenger vehicles (cars and light trucks), by combining the control of smog-causing pollutants and GHG emissions into a single coordinated package of standards. The new approach also includes efforts to support and accelerate the numbers of plug-in hybrids and zero-emission vehicles in California.

Low Carbon Fuel Standard

Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average fuel carbon intensity for transportation fuels in California regulated by CARB. CARB identified the Low Carbon Fuel Standard (“LCFS”) as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.⁴⁰ In 2009, CARB approved for adoption the LCFS regulation, which became fully effective in April 2010 and is codified at Title 17, California Code of Regulations, Sections 95480-95490. The LCFS will reduce GHG emissions by reducing the carbon intensity of transportation fuels used in California by at least 10 percent by 2020.

Clean Cars

In January 2012, CARB approved the Advanced Clean Cars Program, a new emissions-control program for model year 2017 through 2025. The program combines the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission vehicles. The National Program standards, developed collaboratively by USEPA, NHTSA, and CARB, have been projected by Model Year 2025 to double fuel economy and cut GHG emissions in half, save 6 billion metric tons of CO₂ emissions and 12 billion barrels

³⁹ CARB, *Clean Car Standards - Pavley, Assembly Bill 1493*, website: <https://www.arb.ca.gov/cc/ccms/ccms.htm>.

⁴⁰ California Air Resources Board, *Initial Statement of Reason for Proposed Regulation for The Management of High Global Warming Potential Refrigerant for Stationary Sources*, October 23, 2009, website: <http://www.arb.ca.gov/regact/2009/gwprmp09/isorref.pdf>, accessed: May 2017.

of oil over the lifetime of Model Year 2012-2025 vehicles, and deliver significant savings for consumers at the gas pump.⁴¹

Green Building Code (California Code of Regulations, Title 24)

Although not originally intended to reduce GHG emissions, California Code of Regulations Title 24 Part 6: *California's Energy Efficiency Standards for Residential and Nonresidential Buildings* ("Title 24"), was first adopted in 1978 in response to a legislative mandate to reduce California's energy consumption. Since then, Title 24 has been amended to recognize that energy-efficient buildings require less electricity and reduce fuel consumption, which, in-turn, decreases GHG emissions. The current 2016 Title 24 standards were adopted, among other reasons, to respond to the requirements of AB 32. Specifically, new development projects constructed within California after January 1, 2017 are subject to the mandatory planning and design, energy efficiency, water efficiency and conservation, material conservation and resources efficiency, and environmental quality measures of the California Green Building Standards ("CALGreen") Code (California Code of Regulations, Title 24, Part 11). The outdoor water use standards of the CALGreen Code are already addressed by the City's Water Conservation Ordinance.

Cap-and-Trade Program

As mentioned above, the Scoping Plan identifies a cap-and-trade program as one of the strategies the State will employ to reduce GHG emissions that cause climate change. The cap-and-trade program is implemented by CARB and "caps" GHG emissions from the industrial, utility, and transportation fuels sections, which account for roughly 85 percent of the State's GHG emissions. The program works by establishing a hard cap on about 85 percent of total Statewide GHG emissions. The cap starts at expected business-as-usual emissions levels in 2012, and declines two to three percent per year through 2020. Fewer and fewer GHG emissions allowances are available each year, requiring covered sources to reduce their emissions or pay increasingly higher prices for those allowances. The cap level was originally set in 2020 to ensure California complies with AB 32's emission reduction target of returning to 1990 GHG emission levels. On October 20, 2011, CARB's Board adopted the final cap-and-trade regulation. The cap-and-trade program began on January 1, 2012, with an enforceable compliance obligation beginning with the 2013 GHG emissions.⁴² In July, 2017, the Legislature passed legislation to extend the cap-and-trade program to 2030⁴³ The most recent amendments to the cap-and-trade program were approved by CARB on July 27, 2017 and became effective on October 1, 2017. These regulations would, among other things, extend the Program beyond 2020 by establishing new emissions caps, enabling future auction and allocation of allowances, and continuing all other provisions needed to implement the Program after 2020.⁴⁴ The scope of GHG emission sources subject to cap-and-trade in the first compliance period (2013-2014) includes all electricity generated and imported into California (the first deliverer of electricity into the State in the "capped" entity and that one that will have to purchase allowances as appropriate), and

⁴¹ *Draft Technical Assessment Report: Mid Term Evaluation of Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards for Model Years 2022-2025*, July 2016, page ES-1, <https://nepis.epa.gov/Exe/ZyPDF.cgi/P100OYFR.PDF?Dockey=P100OYFR.PDF>.

⁴² CARB, *Cap-and-Trade Program*, website: <https://www.arb.ca.gov/cc/capandtrade/capandtrade.htm>.

⁴³ *Governor Brown Signs Landmark Climate Bill to Extend California's Cap-and-Trade Program*, <https://www.gov.ca.gov/news.php?id=19891>, July 25, 2017.

⁴⁴ CARB, *Amendments to the California Cap on Greenhouse Gas Emissions and Market-Based Compliance Mechanisms, Final Statement of Reasons*, August, 2017. <https://www.arb.ca.gov/regact/2016/capandtrade16/ctfinsor.pdf>.

large industrial facilities emitting more than 25,000 MTCO₂E per year (e.g., oil refineries and cement manufacturers). The scope of GHG emission sources subjected to cap-and-trade during the second compliance period (2015-2017) expands to include distributors of transportation fuels (including gasoline and diesel), natural gas, and other fuels. The regulated entity will be the fuel provider that distributes the fuel upstream (not the gas station). In total, the cap-and-trade program is expected to include roughly 350 large businesses, representing about 600 facilities. Individuals and small businesses will not be regulated.

Under the program, companies do not have individual or facility-specific reduction requirements. Rather, all companies covered by the regulation are required to turn in allowances⁴⁵ in an amount equal to their total GHG emissions during each phase of the program. The program gives companies the flexibility to either trade allowances with others or take steps to cost-effectively reduce emissions at their own facilities. Companies that emit more will have to turn in more allowances. Companies that can cut their emissions will have to turn in fewer allowances. Furthermore, as the cap declines, total GHG emissions are reduced.

Regional

South Coast Air Quality Management District Policies (SCAQMD)

SCAQMD is principally responsible for comprehensive air pollution control in the Basin, which includes Los Angeles, Orange, and the urbanized portions of Riverside and San Bernardino Counties, including the Project Site. SCAQMD works directly with Southern California Association of Governments, County transportation commissions, and local governments and cooperates actively with all federal and State government agencies to regulate air quality.

In April 2008, the SCAQMD, in order to provide guidance to local lead agencies on determining the significance of GHG emissions identified in CEQA documents, convened a GHG CEQA Significance Threshold Working Group. The goal of the working group is to develop and reach consensus on an acceptable CEQA significance thresholds for GHG emissions that may be utilized on an interim basis until CARB (or some other state agency) develops guidance on assessing the significance of GHG emissions under CEQA. See also 'Thresholds of Significance' subheading herein.

Southern California Association of Governments

On April 6, 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future (2016–2040 RTP/SCS). The SCAG 2016 RTP/SCS is an update to the 2012-2035 RTP/SCS that further integrates land use and transportation in certain areas so that the region as a whole can grow smartly and sustainably. Between 2015 and 2040, the region is anticipated to experience increases in population, households and jobs. The 2016 RTP/SCS includes land use strategies, based on local general plans, as well as input from local governments, to achieve the AB 32 state-mandated reductions in GHG emissions through decreases in regional per capita VMT. As part of the 2016-2040 RTP/SCS, transportation network improvements would be included, and more compact, infill, walkable and mixed-use development strategies to accommodate new region's

⁴⁵ "Allowance" means a limited tradable authorization to emit up to one metric ton of carbon dioxide equivalent.

growth would be encouraged to accommodate increases in population, households, employment, and travel demand.

Within the 2016-2040 RTP/SCS, the Sustainable Communities Strategies chapter demonstrates the region's ability to attain and exceed the GHG emission reduction targets set forth by the CARB. The Sustainable Communities Strategies chapter outlines the region's plan for integrating the transportation network and related strategies with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. The regional vision of the 2016–2040 RTP/SCS maximizes current voluntary local efforts that support the goals of SB 375, as evidenced by several Compass Blueprint Demonstration Projects and various county transportation improvements. The 2016–2040 RTP/SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas in existing main streets, downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. This overall land use development pattern supports and complements the proposed transportation network that emphasizes system preservation, active transportation, and transportation demand management measures.

On June 28, 2016, CARB accepted SCAG's quantification of GHG emission reductions from the 2016–2040 RTP/SCS and determined that the 2016–2040 RTP/SCS would, if implemented, achieve the region's GHG targets with an 8 percent per capita reduction by 2020 and an 18 percent per capita reduction by 2035.

SCAG's Sustainable Communities Strategy provides specific strategies for successful implementation. These strategies include supporting projects that encourage diverse job opportunities for a variety of skills and education, recreation and culture and a full-range of shopping, entertainment and services all within a relatively short distance; encouraging employment development around current and planned transit stations and neighborhood commercial centers; encouraging the implementation of a "Complete Streets" policy that meets the needs of all users of the streets, roads and highways including bicyclists, children, persons with disabilities, motorists, electric vehicles, movers of commercial goods, pedestrians, users of public transportation, and seniors; and supporting alternative fueled vehicles.

Local

County of Los Angeles Green Building Standards Code (Sites 1 and 3)

The Los Angeles County Board of Supervisors adopted the Los Angeles County Green Building Standards Code (Title 31). The 2016 California Green Building Standards Code, as published by the California Building Standards Commission, are adopted and incorporated, by reference, into Title 31. Title 31 will improve public health, safety, and general welfare by enhancing the design and construction of buildings through sustainable building concepts that reduce negative environmental impacts. This includes a reduction in energy, water, and other natural resources, and minimizing solid waste. See also 'Regulatory Requirements' subheading in this section for applicable green building measures.

Unincorporated Los Angeles County Community Climate Action Plan 2020 (Sites 1 and 3)

The County of Los Angeles has adopted a Community Climate Action Plan (CCAP),⁴⁶ a component of the General Plan, which sets a target to reduce GHG emissions from community activities in the

⁴⁶ County of Los Angeles, *Final Unincorporated Los Angeles County Community Climate Action Plan 2020*, (August 2015).

unincorporated areas of Los Angeles County by at least 11 percent below 2010 levels by 2020. The CCAP describes the County's plan for achieving this goal, including specific strategy areas for each of the major emissions sectors, and provides details on the 2010 and projected 2020 emissions in the unincorporated areas. The actions in the CCAP are priority actions and intended for near-term implementation, such that the County can achieve its GHG reduction goal for 2020 for the unincorporated areas of Los Angeles County.

The CCAP includes 26 local actions to reduced GHG emissions and are grouped into the following five strategy areas:

- Green Building and Energy;
- Land Use and Transportation;
- Water Conservation and Wastewater;
- Waste Reduction, Reuse, and Recycling; and
- Land Conservation and Tree Planting.

The County considers many of the local actions to be cost effective, particularly in the green building and energy strategy area. In addition to reducing GHG emissions, all local actions have many co-benefits, such as improved public health, improved air quality, energy savings, increased mobility, and enhanced community well-being.

The CCAP is a resource for the unincorporated areas of the County. Public agencies and private developers can also use the CCAP to comply with project-level review requirements pursuant to CEQA. CEQA Guidelines specify that CEQA project evaluation of GHG emissions can "tier off" a programmatic analysis of GHG emissions, provided that the programmatic analysis (or climate action plan) does the following (CEQA Guidelines Section 15183.5):

- Quantify greenhouse gas emissions, both existing and projected over a specified time period, resulting from activities within a defined geographic area.
- Establish a level, based on substantial evidence, below which the contribution to GHG emissions from activities covered by the plan would not be cumulatively considerable.
- Identify and analyze the GHG emissions resulting from specific actions or categories of actions anticipated within the geographic area.
- Specify measures or a group of measures, including performance standards that substantial evidence demonstrates, if implemented on a project-by-project basis, would collectively achieve the specified emissions level.
- Monitor the plan's progress.
- Adopt the GHG Reduction Strategy in a public process following environmental review.

The CCAP meets CEQA Guidelines Section 15183.5 listed above by: (1) quantifying all primary sectors of GHG emissions within the unincorporated areas for 2010 and 2020; (2) including a reduction target of at least 11 percent below 2010 levels, which is consistent with the recommendations in the AB 32 Scoping Plan for municipalities to support the overall AB 32 reduction targets; (3) analyzing community emissions for the unincorporated areas as a whole and including predicted growth expected by 2020; (4) including specific measures to achieve the overall reduction target; (5) including periodic monitoring of plan progress; and (6) submitting the CCAP to be adopted in a public process following compliance with CEQA. See also 'Thresholds of Significance' subheading herein.

City of Los Angeles Policies and Regulations (Site 2)

CalGreen Code

The City of Los Angeles has not adopted a Climate Action Plan. In December 2016, the Los Angeles City Council approved various provisions of the CALGreen Code as part of Ordinance No. 184,691, thus codifying certain provisions of the 2016 CALGreen Code as the new Los Angeles Green Building Code (the “LA Green Building Code”). The LA Green Building Code imposes more stringent green building requirements than those contained within the CALGreen Code, and is applicable to the construction of every new building, every new building alteration with a permit valuation of over \$200,000, and every building addition unless otherwise noted. Specific mandatory requirements and elective measures are provided for residential and non-residential developments.

Prior to this and the adoption of previous Green Building Ordinances, the City began to address the issue of global climate change by publishing *Green LA, An Action Plan to Lead the Nation in Fighting Global Warming* (LA Green Plan). This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. According to the LA Green Plan, the City is committed to the goal of reducing emissions of CO₂ to 35 percent below 1990 levels. To achieve this, the City will:

- Increase the generation of renewable energy;
- Improve energy conservation and efficiency; and
- Change transportation and land use patterns to reduce dependence on automobiles.

Sustainable City Plan

On April 8, 2015, Mayor Eric Garcetti released the Sustainable City Plan (referred to as the “pLAn”). The pLAn is a roadmap to advance goals for the environment, economy and equity. The pLAn includes a Climate Action Report, which identifies strategies to address current and future climate change impacts and sets goals to reduce the City's GHG emissions by 45percent by 2025, 60percent by 2035, and 80percent by 2050, compared against a 1990 baseline. The pLAn provides guidance to City departments and managers regarding specific strategies and policy initiatives designed to achieve numeric near-term and long-term targets. These targets are designed, among other things, to reduce GHG emissions. The pLAn also includes an annual reporting process to track progress toward these goals.

City of Los Angeles Green Building Code

In order to help implement the Green L.A. Plan’s goal of improving energy conservation and efficiency the Los Angeles City Council adopted the L.A. Green Building Code applicable to new development projects.

In 2010, the City adopted the 2010 CALGreen, with amendments, as Ordinance No. 181,480, thereby codifying provisions of CALGreen as the new Los Angeles Green Code (“L.A. Green Code”). As amended by Ordinance 184,692 in 2016, the L.A. Green Code was amended to incorporate by reference portions of the 2016 Edition of the CALGreen Code. The L.A. Green Code, as amended, contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. Among many requirements, the L.A. Green Code requires projects to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), reduce the overall use of potable water by 20 percent, meet the applicable provisions of the California Energy Code, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC, among other provisions.

City of Los Angeles General Plan

The City of Los Angeles does not have a General Plan Element specific to Global Warming and GHG emissions. However, the following five goals from the Air Quality Element of the City of Los Angeles General Plan would also serve to reduce GHG emissions:

- Less reliance on single-occupant vehicles with fewer commute and non-work trips;
- Efficient management of transportation facilities and system infrastructure using cost-effective system management and innovative demand-management techniques;
- Minimal impacts of existing land use patterns and future land use development on air quality by addressing the relationship between land use, transportation and air quality;
- Energy efficiency through land use and transportation planning, the use of renewable resources and less-polluting fuels and the implementation of conservation measures including passive measures, such as site orientation and tree planting; and
- Citizen awareness of the linkages between personal behavior and air pollution and participation in efforts to reduce air pollution.

Existing Conditions

The statewide emissions inventory of GHGs in 2015 (most recent year available) was 440.4 CO₂e MTY.⁴⁷ Sources of emissions include Transportation (39 percent), Industrial Sources (23 percent), Electricity Generation – In State (11 percent), Electricity Generation – Imported (8 percent), Agriculture (8 percent), Residential Sources (6 percent), Commercial Sources (5 percent), and Other (1 percent).

Site 1 is currently occupied by a two-story abandoned structure with roof parking, a two-story office building occupied by DPR staff, open parking areas, and carport in the north parking area, and an existing parking structure at 523 Shatto Place that is connected to the site. Site 2 is currently occupied by two office buildings, which house DMH and WDACS staff, respectively. Site 3 is currently occupied by an office building housing DPR staff. As such, GHG emissions are currently generated by the use of on-road motor vehicles, energy (electricity and natural gas), water, and generation of solid waste and wastewater. The GHG emissions generated by the existing uses at the Project Sites are shown in Tables 4.6-3a, 3b and 3c, Existing Greenhouse Gas Emissions. GHG emissions generated by existing conditions at the Project Sites are approximately 8,495 CO₂e MTY.

**Table 4.6-3a
Existing Greenhouse Gas Emissions – Site 1**

Emissions Source	Estimated Project CO ₂ e Emissions (Metric Tons per Year)
Energy (Electricity and Natural Gas)	1,185
Mobile (Motor Vehicles)	174
Solid Waste Generation	14
Water Demand	68

⁴⁷ California Air Resources Board, California Greenhouse Gas Emission Inventory – 2017 Edition, <https://www.arb.ca.gov/cc/inventory/data/data.htm>

Existing Project Site 1 Total	1,441
<i>Source: Pomeroy Environmental Services, 2017. See Appendix 4.6-1 to this Draft EIR.</i>	

Table 4.6-3b
Existing Greenhouse Gas Emissions – Site 2

Emissions Source	Estimated Project CO₂e Emissions (Metric Tons per Year)
Energy (Electricity and Natural Gas)	1,706
Mobile (Motor Vehicles)	4,270
Solid Waste Generation	97
Water Demand	457
Existing Project Site 2 Total	6,530
<i>Source: Pomeroy Environmental Services, 2017. See Appendix 4.6-1 to this Draft EIR.</i>	

Table 4.6-3c
Existing Greenhouse Gas Emissions – Site 3 and Project Total

Emissions Source	Estimated Project CO₂e Emissions (Metric Tons per Year)
Energy (Electricity and Natural Gas)	241
Mobile (Motor Vehicles)	204
Solid Waste Generation	14
Water Demand	65
Existing Project Site 3 Total	524
Existing Project Site 2 Total	6,530
Existing Project Site 1 Total	1,441
Existing Project Total	8,495
<i>Source: Pomeroy Environmental Services, 2017. See Appendix 4.6-1 to this Draft EIR.</i>	

ENVIRONMENTAL IMPACTS

Methodology

The California Climate Action Registry General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.⁴⁸ 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.” 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

⁴⁸ California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, website: www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf, accessed: May 2017.

the project. The information provided in this section 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).⁴⁹

The General Reporting Protocol provides a range of basic calculation 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.

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy use aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.⁵⁰ For example, CARB 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, water usage and construction activities."⁵¹ Therefore, direct and indirect emissions have been calculated for the Project.

A fundamental difficulty in the analysis of GHG emissions is the global nature of the existing and cumulative future conditions. Changes in GHG emissions can be difficult to attribute to a particular planning program or project because the planning effort or project may cause a shift in the locale for some type of GHG emissions, rather than causing "new" GHG emissions. As a result, there is a lack of clarity as to whether a project's GHG emissions represent a net global increase, reduction, or no change to GHGs that would exist if the project were not implemented. The analysis of the Project's GHG emissions is particularly conservative in that it assumes all of the GHG emissions are new additions to the atmosphere.

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. CalEEMod was developed in collaboration with the air districts of California. Data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air

⁴⁹ 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.

⁵⁰ CARB, *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, website: www.arb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed: May 2017.*

⁵¹ OPR Technical Advisory, page 5.

districts to account for local requirements and conditions. SCAQMD considers the model to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.⁵²

Construction GHG Emissions

The Project's construction emissions were calculated using CalEEMod Version 2016.3.1. CalEEMod calculates emissions from off-road equipment use and on-road vehicle travel associated with haul, delivery, and construction worker trips. GHG emissions during construction were forecast by assuming a conservative start date (i.e., assuming all construction would occur at the earliest feasible date) and applying the mobile-source emissions factors derived from CalEEMod. The calculations of the emissions generated during project construction activities reflect the types and quantities of construction equipment that would be used to remove the existing structures and surface parking lots, excavate and grade the Project Site, and construct the proposed buildings and related improvements. In accordance with the SCAQMD's guidance, GHG emissions from construction were amortized (i.e., averaged) over the lifetime of the project. The SCAQMD defines the lifetime of a project as 30 years.⁵³ Therefore, total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate, and added to Project operational emissions to derive the total annual GHG emissions of the Project. This methodology provides a means of more accurately reflecting average annual GHG emissions associated with construction over the life of a project.

GHG Emissions From Project Operation

Similar to construction, CalEEMod is used to calculate potential GHG emissions associated with new land uses on the project site, including on-road mobile vehicle traffic, electricity generation, natural gas consumption, solid waste generation and water use. Mobile source emission calculations associated with operation of the new land uses use a projection of the vehicle trips provided in the Project's traffic study. CalEEMod calculates GHG emissions from all other sources based on the size and square footage of the Project.

Project Design Elements

No specific design elements related to GHG emissions are included in the Project.

Thresholds of Significance

The County has not adopted a threshold of significance for GHG emissions from development projects. The significance threshold used in the Draft EIR has been developed from guidance provided by Appendix G to the State CEQA Guidelines, State CEQA Guidelines Section 15064, and the Final Unincorporated Los Angeles County Community Climate Action Plan ("CCAP"). The analysis of potential thresholds also takes into consideration a draft tiered threshold approach developed by the SCAQMD.

⁵² SCAQMD, *Air Quality Modeling*, <http://www.aqmd.gov/home/regulations/ceqa/air-quality-modeling>; see also: www.caleemod.com.

⁵³ SCAQMD, *Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans, 2008*, website: [www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-\(ghg\)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2](http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2), accessed May 2017.

Appendix G to the State CEQA Guidelines

Appendix G to the State CEQA Guidelines lists the following two questions with respect to GHG emissions:

- Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

An affirmative answer to either of these questions would indicate a significant impact.

State CEQA Guidelines Section 15064

As described in Section 15064.4(b) of the State CEQA Guidelines, the following factors, among others, should be considered when assessing the significance of impacts from GHG emissions on the environment:

- (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting.
- (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project.
- (3) The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions.

Per State 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. 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. 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.⁵⁴

SCAQMD Draft Tiered Approach

In December 2008, the SCAQMD adopted an interim 10,000 metric tons CO₂e (MTCO₂e) per year screening level threshold for stationary source/industrial projects for which the SCAQMD is the lead agency. The most recent draft proposal issued in September 2010 uses the following tiered approach to evaluate potential GHG impacts from various uses:

Tier 1: Determine if CEQA categorical exemptions are applicable. If not, move to Tier 2.

Tier 2: Consider whether or not the proposed project is consistent with a locally adopted GHG reduction plan that has gone through public hearings and CEQA review, that has an approved inventory, includes monitoring, etc. If not, move to Tier 3.

⁵⁴ 14 California Code of Regulations Section 15064(h)(3).

Tier 3: Consider whether the project generates GHG emissions in excess of screening thresholds for individual land uses. The 10,000 MTCO₂e/year threshold for industrial uses would be recommended for use by all lead agencies. Under option 1, separate screening thresholds are proposed for residential projects (3,500 MTCO₂e/year), commercial projects (1,400 MTCO₂e/year), and mixed-use projects (3,000 MTCO₂e/year). Under option 2 a single numerical screening threshold of 3,000 MTCO₂e/year would be used for all non-industrial projects. If the project generates emissions in excess of the applicable screening threshold, move to Tier 4.

Tier 4: Consider whether the project generates GHG emissions in excess of applicable performance standards for the project service population (population plus employment). The efficiency targets were established based on the goal of AB 32 to reduce statewide GHG emissions to 1990 levels by 2020. The 2020 efficiency targets are 4.8 MTCO₂e per service population for project level analyses and 6.6 MTCO₂e per service population for plan level analyses. If the project generates emissions in excess of the applicable efficiency targets, move to Tier 5.

Tier 5: Consider the implementation of CEQA mitigation (including the purchase of GHG offsets) to reduce the project efficiency target to Tier 4 levels.

The thresholds identified above have not been adopted by the SCAQMD or distributed for widespread public review and comment, and the working group tasked with developing the thresholds has not met since September 2010. However, for the purpose of illustrating the scope of the GHG emissions associated with the Project and the efficiency of the Project's design features, this analysis utilizes the proposed 4.8 MTCO₂e per service population Tier 4 screening target as a relative comparison point, but not as a significance threshold since it has not been adopted as such. The purpose of Tier 4 is to provide a means of determining significance relative to GHG emissions for larger projects that include design features and or other measures to mitigate GHG emissions, but for which residual GHG emissions would exceed the draft interim Tier 3 screening levels. Per capita GHG emissions that are below the Tier 4 draft screening threshold are indicative of projects that incorporate extra design measures or other features that would minimize GHG emissions. This approach, therefore, is included in the analysis below for informational purposes, but is not a threshold of significance.

Final Unincorporated Los Angeles County Community Climate Action Plan ("CCAP")

The CCAP meets CEQA Guidelines Section 15183.5 by: 1) quantifying all primary sectors of GHG emissions within the unincorporated areas for 2010 and 2020; 2) including a reduction target of at least 11percent below 2010 levels, which is consistent with the recommendations in the AB 32 Scoping Plan for municipalities to support the overall AB 32 reduction targets; 3) analyzing community emissions for the unincorporated areas as a whole and including predicted growth expected by 2020; 4) including specific measures to achieve the overall reduction target; 5) including periodic monitoring of plan progress; and 6) submitting the CCAP to be adopted in a public process following compliance with CEQA.

The CCAP was adopted as part of the Los Angeles County General Plan 2035 on October 6, 2015 and the County is working to implement the CCAP objectives. The CCAP states that project-specific environmental documents that incorporate applicable CCAP actions can "tier off" the Environmental Impact Report (EIR) certified for the County General Plan and CCAP to meet project-level CEQA evaluation requirements for GHG emissions. Tiering from the General Plan EIR potentially eliminates the need to prepare a quantitative assessment of project-level GHG emissions. Rather, project-specific environmental documents that rely on the CCAP can qualitatively evaluate GHG impacts by identifying all applicable CCAP actions and describing how those actions have been incorporated into the project design and/or identified

as mitigation. This type of “tiered” analysis can reduce project costs and streamline the County permit process. Projects that demonstrate consistency with applicable CCAP actions can be determined to have a less than significant cumulative impact on GHG emissions and climate change. This approach is provided for informational purposes since the Project is not located in unincorporated Los Angeles County. However, as a County project, the CCAP is an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Project Thresholds

Taking all of the factors identified above into account, the potential for the Project to result in impacts associated with GHG emissions is based on Appendix G of the State CEQA Guidelines, which are addressed in this section. These significance thresholds are listed above. With respect to the generation of greenhouse gas emissions, either direct or indirect, that may have a significant impact on the environment, no quantitative thresholds have been adopted by any cognizant regulatory agency that would specify a level of emissions that would constitute a significant impact on the environment. As part of AB 32, the County and State recommend general policies and measures to minimize and reduce GHG emissions from land use development projects. Thus, if the Project is designed in accordance with and, would not conflict with these policies and measures, it would result in a less than significant impact since it would be consistent with strategies designed to reduce GHG emissions. Therefore, for purposes of assessing impacts of the Project with respect to GHG emissions, the Appendix G threshold related to consistency with adopted plans, policies, and regulations designed to reduce emissions of GHGs was utilized.

Threshold 4.6-1: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

An affirmative answer to this question would constitute a significant impact.

Impact Analysis

Threshold 4.6-1: Would the Project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs?

Construction

Phase I

Phase I of the Project would include construction of the new County office building, retail uses, and parking structure on Site 1, and construction of new senior affordable housing and community recreation center on Site 3. Site 1 construction is anticipated to begin in summer 2018, and would take place over a period of approximately 36 months, with occupancy anticipated to be complete in summer 2021. Construction on Site 3 is anticipated to commence summer 2019, and be completed and occupied in 2020.

Phase I construction activities on Sites 1 and 3 would include the demolition of existing buildings, parking structures and surface parking lots, excavation to accommodate the underground parking structures, construction of underground and aboveground parking structures, and framing and finishing of the new office and residential buildings.

Phase II

Phase II of the Project would include the reuse and conversion of the existing twelve-story building for residential and retail use, and construction of new residential and retail uses and parking structure on Site 2. Construction on Site 2 is anticipated to commence in fall of 2021, and be completed and occupied in late 2023.

Phase II construction activities on Site 2 would include demolition of the existing four-story WDACS office building, and two-story parking structure, excavation to accommodate the new underground parking structure, construction of a new underground and aboveground parking structure, framing and finishing of the new residential building, and demolition and reuse/conversion of the interior spaces of the existing DMH building.

Emissions of GHGs were calculated using CalEEMod 2016.3.1 for each year for each Site and the results of this analysis are presented in Table 4.6-4a-d, Project Construction-Related GHG Emissions. As shown in Tables 4.6-4a through 4d, the greatest annual increase in GHG emissions from project construction activities would be 2,604 metric tons in 2020, and total construction GHG emissions would be 8,444 metric tons. Consistent with SCAQMD recommendations and to ensure that construction emissions are assessed in a quantitative sense, construction GHG emissions have been amortized over a 30-year period and have been added to the annual operational GHG emissions of the Project identified in Table 4.6-5d.

Table 4.6-4a
Site 1 Construction-Related GHG Emissions

Year^a	CO₂e Emissions (Metric Tons per Year)
2018	326
2019	2,255
2020	2,232
2021	1,234
Total Site 1 Construction GHG Emissions	6,047
<i>Source: Pomeroy Environmental Services, 2017. See Appendix 4.6-1 to this Draft EIR.</i>	

Table 4.6-4b
Site 2 Construction-Related GHG Emissions

Year^a	CO₂e Emissions (Metric Tons per Year)
2021	180
2022	797
2023	760
Total Site 2 Construction GHG Emissions	1,737
<i>Source: Pomeroy Environmental Services, 2017. See Appendix 4.6-1 to this Draft EIR.</i>	

Table 4.6-4c
Site 3 Construction-Related GHG Emissions

Year^a	CO₂e Emissions (Metric Tons per Year)
2019	288
2020	372
Total Site 3 Construction GHG Emissions	660
<i>Source: Pomeroy Environmental Services, 2017. See Appendix 4.6-1 to this Draft EIR.</i>	

Table 4.6-4d
Project Construction-Related GHG Emissions

Year	CO₂e Emissions (Metric Tons per Year)
2018	326
2019	2,543
2020	2,604
2021	1,414
2022	797
2023	760
Total Project Construction GHG Emissions	8,444^a
^a In accordance with SCAQMD guidance, total construction GHG emissions were amortized over 30 years and added to the operation of the Project (281 MTY). <i>Source: Pomeroy Environmental Services, 2017. See Appendix 4.6-1 to this Draft EIR.</i>	

Operation

Phase I of the Project would include the construction of the new County office building, retail uses, and parking structure on Site 1, and the construction of new senior affordable housing and community facilities on Site 3. Phase II of the Project includes the reuse and conversion of the existing twelve story building for residential and retail use, and construction of a new parking structure on Site 2. A future option for the development of Site 2 would include construction of a new mixed-use building above the parking structure, containing 74 residential units, and 2,250 square feet of ancillary space. In addition, 3,400 square feet of retail uses would be provided at the ground level of the new mixed-use building on 6th Street. The operations of the Project plus the future Site 2 option would generate GHG emissions from the use of on-road motor vehicles, electricity, natural gas, water, and generation of solid waste and wastewater. Emissions of operational GHGs are shown in Tables 4.6-5a through 5d, Project Operational GHG Emissions. As shown, the net increase GHG emissions generated by the Project would be approximately 6,400 CO₂e MTY.

Table 4.6-5a
Site 1 Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project CO₂e Emissions (Metric Tons per Year)
Area	0.06
Energy (Electricity and Natural Gas)	3,948
Mobile (Motor Vehicles)	3,524

Table 4.6-5a
Site 1 Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project CO₂e Emissions (Metric Tons per Year)
Mobile (Motor Vehicles) – Phase II	199
Solid Waste Generation	56
Water Demand	840
Project Site 1 Total	8,567
<i>Source: Pomeroy Environmental Services, 2017. See Appendix 4.6-1 to this Draft EIR.</i>	

Table 4.6-5b
Site 2 Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project CO₂e Emissions (Metric Tons per Year)
Area	4
Energy (Electricity and Natural Gas)	809
Mobile (Motor Vehicles)	4,126
Solid Waste Generation	15
Water Demand	166
Project Site 2 Total	5,120
<i>Note: Emissions shown are for the full buildout of Site 2 (reuse and new construction). Source: Pomeroy Environmental Services, 2017. See Appendix 4.6-1 to this Draft EIR.</i>	

Table 4.6-5c
Site 3 Operational Greenhouse Gas Emissions

Emissions Source	Estimated Project CO₂e Emissions (Metric Tons per Year)
Area	1
Energy (Electricity and Natural Gas)	331
Mobile (Motor Vehicles)	522
Solid Waste Generation	18
Water Demand	55
Project Site 3 Total	927
<i>Source: Pomeroy Environmental Services, 2017. See Appendix 4.6-1 to this Draft EIR.</i>	

Table 4.6-5d
Project Operational GHG Emissions

Emissions Source^a	Estimated Project CO₂e Emissions (Metric Tons per Year)
Site 1	8,567
Site 2	5,120
Site 3	927

Table 4.6-5d
Project Operational GHG Emissions

Emissions Source^a	Estimated Project CO₂e Emissions (Metric Tons per Year)
Construction Emissions ^b	281
Project Total	14,895
Less Existing Project Site	8,495
Project Net Increase	6,400
^a Site 2 GHG emissions include full buildout of Site 2. ^b In accordance with SCAQMD guidance, total construction GHG emissions were amortized over 30 years and added to the Project operational emissions. Source: Pomeroy Environmental Services, 2017. See Appendix 4.6-1 to this Draft EIR.	

As illustrated above, the Project would generate GHG emissions due to construction and operational activities; however, the Project would be consistent with the CCAP and other relevant plans as discussed below.

To place this total level of Project emissions in context, the relative efficiency of the increased emissions in terms of population and employment growth (i.e., increased emissions per employee/resident added) was examined for informational purposes. As noted previously, the SCAQMD released a draft guidance document that includes a tiered approach, with a screening level of 4.8 MTCO₂e per service population. As identified in Section 4.11 (Population, Housing, and Employment) of this Draft EIR, the Project would result in a net increase of 907 employees on Sites 1 and 2, reflecting the relocation of County employees from Site 2 to Site 1, and new retail employees on Sites 1 and 2, and a net decrease of 66 employees on Site 3, for a total net increase under the Project of 841 employees. In addition, the Project would result in 618 new residents on Site 2, and 181 new residents on Site 3, for a total increase in residential population under the Project of 799 persons. The Project's net increase in service population, consisting of 1,640 new employees and residents would generate increased GHG emissions of 6,400 MTCO₂e per year. This results in 3.9 MTCO₂e per capita emissions for the Project, which is below the draft SCAQMD Tier 4 threshold of 4.8 MTCO₂e per capita of service population. This illustrates the efficiency of the GHG reduction measures associated with the Project, consistent with GHG emission reduction plans, as further described below.

In response to AB 32, the County and State recommend general policies and measures to minimize and reduce GHG emissions from land use development projects. Thus, if the Project is designed in accordance and, not in conflict with these policies and measures, it would result in a less than significant impact since it would be consistent with the with State, County and local strategies on reducing GHG emissions (including the CCAP as demonstrated previously). Accordingly, Table 4.6-6, Consistency with Applicable State Greenhouse Gas Reduction Strategies, contains a list of GHG-reducing strategies potentially applicable to the Project. As shown in Table 4.6-6, the Project is consistent with GHG reduction measures from applicable plans; therefore the Project would not have the potential to conflict with an applicable

Table 4.6-6
Consistency with Applicable State Greenhouse Gas Reduction Strategies (Sites 1, 2 and 3)

Source	Category/Description	Consistency Analysis
AB 1493 (Pavley Regulations)	Reduces GHG emissions in new passenger vehicles from 2012 through 2016. Also reduces gasoline consumption to a rate of	Not Applicable. The strategy applies to fuel efficiency standards for motor vehicles and is not applicable to development projects.

Table 4.6-6
Consistency with Applicable State Greenhouse Gas Reduction Strategies (Sites 1, 2 and 3)

Source	Category/Description	Consistency Analysis
	31 percent of 1990 gasoline consumption (and associated GHG emissions) by 2020.	
SB 1368	Establishes an emissions performance standard for power plants within the State of California.	Not Applicable. The strategy applies to power plant efficiency and is not applicable to development projects.
Low Carbon Fuel Standard	Establishes protocols for measuring life-cycle carbon intensity of transportation fuels and helps to establish use of alternative fuels.	Not Applicable. The strategy applies to fuels regulation and is not applicable to development projects.
California Green Building Standards Code Requirements	Various	Consistent. The Project would be built in accordance with the requirements of the Los Angeles County Green Building Standards Code (Sites 1 and 3), and LA Green Building Code (Site 2). Both of these Codes apply the CalGreen Code to projects within their respective jurisdictions.
Climate Action Team	Reduce diesel-fueled commercial motor vehicle idling.	Consistent. The idling of all diesel fueled commercial vehicles (weighing over 10,000 pounds) during construction and operation (delivery trucks) would be limited to 5 minutes at any location per SCAQMD and CARB requirements.
	Increase the use of alternative fuels that are less GHG-intensive.	Consistent. While this requirement would be implemented at the state level through regulatory adoption, the Project would provide on-site electric vehicle charging stations in accordance with the Los Angeles County Green Building Standards Code (Sites 1 and 3), and LA Green Building Code (Site 2), supporting and promoting the use of alternative fuels.
	Achieve California's 50 percent waste diversion mandate (Integrated Waste Management Act of 1989) to reduce GHG emissions associated with virgin material extraction.	Consistent. The Project would be consistent with AB 939 and all regulations associated with solid waste. Furthermore, Project construction materials would be recycled in accordance with CalGreen, which requires a minimum construction waste reduction of approximately 65 percent.

Table 4.6-6
Consistency with Applicable State Greenhouse Gas Reduction Strategies (Sites 1, 2 and 3)

Source	Category/Description	Consistency Analysis
	Plant five million trees in urban areas by 2020 to effect climate change emission reductions.	Consistent. The Project would provide open space, on-site landscaping, and street trees in a manner consistent with County (Sites 1 and 3) and City (Site 2) requirements.
	Implement efficient water management practices and incentives, as saving water saves energy and GHG emissions.	Consistent. The Project would reduce water demand by incorporating low-flow and/or high efficiency water fixtures, such as: low-flow toilets, urinals, showerheads, faucets, and high-efficiency clothes-washers and dishwashers in accordance with the Los Angeles County Green Building Standards Code (Sites 1 and 3), and LA Green Building Code (Site 2). In addition, the Project would include drought-tolerant landscaping and would implement efficient landscape irrigation techniques, such as “smart” irrigation technology, to reduce water use and its associated GHG emissions. “Smart” irrigation systems rely on weather, climate and soil moisture information to adjust watering frequency, thus, maintaining adequately moist vegetation while conserving water.
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	Consistent. Project compliance with the requirements of the Los Angeles County Green Building Standards Code (Sites 1 and 3), and LA Green Building Code (Site 2) would ensure energy savings. The Project would include high-efficiency lighting, energy-efficient appliances, and infrastructure to support solar panels on Site 1

Table 4.6-6
Consistency with Applicable State Greenhouse Gas Reduction Strategies (Sites 1, 2 and 3)

Source	Category/Description	Consistency Analysis
	Reduce GHG emissions from electricity by reducing energy demand. The California Energy Commission updates appliance energy efficiency standards that apply to electrical devices or equipment sold in California. Recent policies have established specific goals for updating the standards; new standards are currently in development.	Consistent. Project compliance with the requirements of the Los Angeles County Green Building Standards Code (Sites 1 and 3), and LA Green Building Code (Site 2) would ensure energy savings.
	Advance cleaner transportation and reduce GHG emissions by providing incentives, enhancing outreach and educational programs to bring a coordinated message of sustainable transportation and root causes of GHG emissions, diversifying the transportation energy infrastructure, and slowing the rate of VMT growth.	Consistent. The Project Sites are located between 0.1 and 0.25 miles north of the Wilshire / Vermont Station of the Metro Red Line and Purple Line subways. There are also numerous bus routes serving the Project Site. Metro operates both Rapid and local buses on Vermont Avenue and Wilshire Boulevard and a local bus on 6 th Street. The Project would develop County office, commercial, residential, and community recreation center uses within walking distance of existing bus lines and transit stations, and provide bicycle parking, which would reduce VMTs. The Project would provide opportunities for employees, residents, and visitors to walk to other retail businesses on and near the Project Sites. In addition, the Project would provide long- and short-term bicycle parking spaces in accordance with the County (Sites 1 and 3) and City (Site 2) requirements, and would provide on-site electric vehicle charging stations, supporting and promoting the use of alternative fuels. Thus, while the Project would not directly advance cleaner transportation, the Project would enhance access to existing public transit and pedestrian/bicycle facilities.
Source: EcoTierra Consulting, 2017.		

plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs and impacts would be less than significant.

As noted above, the 2016-2040 RTP/SCS is the primary regional mechanism for achieving GHG reductions in the SCAG region. Consistency of the Project with the RTP/SCS is addressed in Table 4.6-7, Project Consistency with the Applicable Goals of 2016-2040 RTP/SCS.

Table 4.6-7
Project Consistency with the
Applicable Goals of the 2016-2040 RTP/SCS (Sites 1, 2 and 3)

Goal	Project Consistency
Maximize mobility and accessibility for all people and goods in the region.	Consistent. The Project would develop a mix of County office, residential (market rate and affordable) and neighborhood serving commercial uses in a Transit Priority Area and High Quality Transit Area (HQTa) within walking distance of existing bus lines and transit stations, and provide bicycle parking and storage, which would maximize the potential for mobility and accessibility for people.
Protect the environment and health of our residents by improving air quality, and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	Consistent. The Project would incorporate building technologies and design features that would protect the environment by saving energy (which would also reduce air emissions associated with electricity generation), reducing automobile trips and associated air emissions, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. Sites 1 and 3 would achieve the equivalent of a LEED Silver status under the U.S Green Building Council's applicable rating system. Pedestrian access to the Project Site would be provided via sidewalks along Vermont Avenue and 6 th Street. The Project would provide opportunities for employees, residents, and visitors to walk to other retail businesses on and near the Project Site. In addition, the Project would provide long- and short-term bicycle parking spaces and storage. Therefore, the Project would encourage active transportation modes such as bicycling and walking.
Encourage land use and growth patterns that facilitate transit and active transportation.	Consistent. The Project would encourage land use and growth patterns that facilitate transit by being a compact, infill development in a Transit Priority Area and HQTa located near several public transit options, including the Vermont/Wilshire Metro Red Line Station and Metro bus lines, which run along Vermont Avenue and 6 th Street. In addition, the Project would facilitate active transportation by including bicycle parking stalls and storage on the Project Sites. The Project would also improve walkability in the vicinity of the Project Site by providing ground floor neighborhood serving commercial uses, a community recreation center for public use and enhanced pedestrian facilities (sidewalks, landscaping) designed to promote pedestrian access to the Project Sites and surrounding area.
Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016; EcoTierra Consulting, 2017.	

The Project's significance with respect to GHG emissions is also evaluated partly based on its consistency with applicable GHG reduction strategies in the CCAP. There are 26 local actions included in the CCAP. The local actions are grouped into five strategy areas: green building and energy land use and transportation; water conservation and wastewater; waste reduction, reuse, and recycling; and land conservation and tree planting. A consistency analysis with the CCAP for the unincorporated areas is provided in Table 4.6-8, Evaluation of Consistency of the Project with the CCAP.

In accordance with CEQA Guidelines Section 15183.5, which specifies that CEQA project evaluation of GHG emissions can "tier off" a programmatic analysis of GHG emissions, such as the CCAP, the Project would result in less than significant GHG emissions.

The County has established additional policies and ordinances for the purpose of GHG reduction that would be applicable to Sites 1 and 3. Consistency of the Project with these policies is addressed in Table 4.6-9, Project Consistency with the Applicable County Greenhouse Reduction Strategies.

The City of Los Angeles has established additional policies and ordinances for the purpose of GHG reductions that would be applicable to Site 2. Consistency of the Project with these policies is addressed in Table 4.6-10, Project Consistency with Applicable City Greenhouse Reduction Strategies.

CUMULATIVE IMPACTS

Although the Proposed Project would generate GHG emissions, 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 resultant consequences of that climate change can cause adverse environmental effects. A project's GHG emissions typically are relatively very small in comparison to state or global GHG emissions and, consequently, would, in isolation, have no significant direct impact on climate change.

Consistent with CEQA Guidelines Section 15064h(3), the County, as the 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 applicable regulatory plans and policies to reduce GHG emissions. As demonstrated herein, the Project would not have the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. As such, the Project would not generate a cumulatively considerable increase in GHG emissions, and cumulative impacts would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

The Project would incorporate the water conservation features set forth in PDF USS-2 through USS-4 that would reduce GHGs associated with water consumption. These features would exceed Code requirements for water conservation.

Table 4.6-8
Evaluation of Consistency of the Project with the CCAP

Measure	Goal	Measure Applicability			Consistency Status
		Applicable	Consistency Pending	Not Applicable	
Green Building and Energy					
BE-1. Green Building Development	1) Promote and incentivize at least Tier 1 voluntary standards within CALGreen for all new residential and nonresidential buildings. 2) Develop a heat island reduction plan and facilitate green building development by removing regulatory and procedural barriers.	X		X	1) Consistent. Based on the CCAP, implementation of the Tier 1 standards contained in the California Green Building Code (Cal. Code Regs., title. 24, part 11) would “result in approximately 15percent less energy use than the 2013 Title 24 standard for residential development and 10percent less energy use than the 2013 Title 24 standard for commercial development.” (CCAP, p. C-2.) The Project would comply with the Los Angeles County Green Building Standards Code on Sites 1 and 3, which consists of the County’s Green Building Standards Code and third-party certifications as required in Table 22.52.2130-1; Low Impact Development Ordinance, and Drought Tolerant and Native Landscaping Ordinances; all Mandatory Measures of the 2016 California Green Building Standards Code; and the Los Angeles County’s Healthy Design Ordinance. Site 2 development will comply with the LA Green Building Code, which incorporates CalGreen building standards for all projects in the City valued over \$200,000. The Project will also meet or exceed all 2016 CALGreen Residential and Nonresidential Mandatory measures in Chapter 4, Divisions 4.1 through 4.5 and Chapter 7 as applicable; CALGreen Tier 1 Prerequisite Measures and required minimum Tier 1 Elective Measures for Residential Uses. 2) Not Applicable. Removal of regulatory and procedural barriers is beyond the scope and authority of an individual development project.
BE-2. Energy Efficiency Programs	1) Conduct energy efficiency retrofits for at least 25% of existing commercial buildings over 50,000 square feet and at least 5% of existing single-family residential buildings.	X			1) Consistent. Neither Site 1 or Site 3 involves a retrofit; both are all new construction. Redevelopment of the Site 2 building would incorporate enhanced energy efficiency measures.

Table 4.6-8
Evaluation of Consistency of the Project with the CCAP

Measure	Goal	Measure Applicability			Consistency Status
		Applicable	Consistency Pending	Not Applicable	
	2) Promote innovative, low-interest financing for energy efficiency projects for existing development. Create energy conservation campaigns and partner with utilities and other entities on energy efficiency.			X	2) Not Applicable. This emissions reduction strategy pertains to financing of energy efficiency projects and large scale campaigns for energy efficiency, which is beyond the scope of an individual development.
BE-3. Solar Installations	1) Promote and incentivize solar installations for new and existing homes, commercial buildings, carports and parking areas, water heaters, and warehouses.	X			1) Consistent. The Project includes the following measures related to solar: • Site and Building Orientation to Optimize Solar. Buildings will be oriented to optimize passive solar access (such as daylighting) and provide access for solar panels if eventually installed. • Conduits for future installation of solar panels and associated infrastructure will be provided on Site 1 consistent with the Los Angeles County Green Building Program.
BE-4. Alternative Renewable Energy Programs	1) Implement pilot projects for wind, geothermal, and other currently viable forms of alternative renewable energy.			X	1) Not Applicable. Implementation of such pilot projects is beyond the scope and authority of an individual development project. Nevertheless, as discussed above, the Project includes several features to promote solar as an alternate energy source on the Project Site.
BE-5. Wastewater Treatment Plant Biogas	1) Encourage renewable bio-gas projects.			X	1) Not Applicable. Renewable bio-gas projects are beyond the scope and authority of an individual development project. The Project involves County office, commercial and residential uses.
BE-6. Encourage Energy Efficiency Retrofits of Wastewater Equipment	1) Encourage the upgrade and replacement of wastewater treatment and pumping equipment.			X	1) Not Applicable. The Project involves County office, commercial and residential uses.

Table 4.6-8
Evaluation of Consistency of the Project with the CCAP

Measure	Goal	Measure Applicability			Consistency Status
		Applicable	Consistency Pending	Not Applicable	
BE-7. Landfill Biogas	1) Partner with the owners and operators of landfills with at least 250,000 tons of waste-in-place to identify incentives to capture and clean landfill gas to beneficially use the biogas to generate electricity, produce biofuels, or otherwise offset natural gas or other fossil fuels.			X	1) Not Applicable. The Project involves County office, commercial and residential uses.
Land Use and Transportation					
LUT-1. Bicycle Programs and Supporting Facilities	1) Construct and improve bicycle infrastructure to increase biking. Increase bicycle parking and “end-of-trip” facilities offered through the unincorporated County. 2) Construct and improve bicycle infrastructure to increase bicyclist access to transit and transit stations/hubs.	X X			1) Consistent. The Project would incorporate 52 new short-term bicycle spaces and 469 new long-term bicycle spaces. In addition, the Project would provide 527 new bicycle storage units (135 on Site 1, 290 on Site 2, and 102 on Site 3) 2) Consistent. The Project includes bicycle parking, as the Project is located within ¼ mile of an existing bus stop; therefore, the Project would increase bicyclist access to transit and transit stations/hubs.
LUT-2. Pedestrian Network	1) Construct and improve pedestrian infrastructure to increase walking and pedestrian access to transit and transit stations/hubs. Construct 15,000 linear feet of pedestrian improvements per year.	X			1) Consistent. The Project’s ground-floor uses have been designed with landscaping and pedestrian features to promote pedestrian infrastructure, increase walking, and improve pedestrian access to the existing transit.
LUT-3. Transit Expansion	1) Work with Los Angeles County Metropolitan Transportation Authority (LA Metro) on a transit program that prioritizes transit by creating bus priority lanes, improving transit facilities, reducing transit-passenger time, and providing bicycle parking near transit stations. Construct and	X			1) Consistent. The Project involves County office, commercial and residential uses. As described above, the Project would create 52 new short-term bicycle spaces and 469 new long-term bicycle spaces. In addition, the Project would provide 525 new bicycle storage units. Implementation of bus priority lanes, improving transit facilities, reducing transit-passenger time, and providing off-site bicycle parking near transit stations is beyond the scope and authority of a development

Table 4.6-8
Evaluation of Consistency of the Project with the CCAP

Measure	Goal	Measure Applicability			Consistency Status
		Applicable	Consistency Pending	Not Applicable	
	improve bicycle, pedestrian and transit infrastructure to increase bicyclist and pedestrian access to transit and transit stations/hubs.				project and would be the responsibility of multiple state, regional and local agencies.
LUT-4. Travel Demand Management	1) Encourage ride- and bike-sharing programs and employer-sponsored vanpools and shuttles. Encourage market-based bike sharing programs that support bicycle use around and between transit stations/hubs. Implement marketing strategies to publicize these programs and reduce commute trips.	X			1) Consistent. The Project would include a TDM program (see Section 4.14, Transportation, of this Draft EIR) that would include educational programs for user information, promote bicycling and walking, and provide incentives for using alternative travel modes. The Project would include bicycle infrastructure in the form of 52 new short-term bicycle spaces and 469 new long-term bicycle spaces. In addition, the Project would provide 525 new bicycle storage units. The infill location of the Project, with transit opportunities and adjacency to services and jobs helps to minimize vehicle trips and VMT.
LUT-5. Car-Sharing Program	1) Implement a car-sharing program to allow people to have on-demand access to a shared fleet of vehicles on an as-needed basis.	X			1) Consistent. The Project does not include car sharing, but includes other features to reduce VMT on the Project Sites, including transportation demand management and promoting walkability through high quality design with landscaping and pedestrian features to reduce vehicle trips.
LUT-6. Land Use Design and Density	1) Promote sustainability in land use design, including diversity of urban and suburban developments.	X			1) Consistent. The Project includes the following sustainable features related to land use: • Mixed-Use Design. The Project will provide retail, residential County office and community recreation center uses to sites along Vermont Avenue, increasing the diversity compared to the existing uses. • Link to Transit. Bus stops are located in the immediate vicinity of the Project Sites. There are bus stops located immediately adjacent to Site 2 (south of Site 1) on 6th Street and Vermont Avenue, and approximately one block north of Site 3 on Vermont Avenue. In addition, the Project is within

Table 4.6-8
Evaluation of Consistency of the Project with the CCAP

Measure	Goal	Measure Applicability			Consistency Status
		Applicable	Consistency Pending	Not Applicable	
					walking distance of the Vermont/Wilshire Metro Rail Red/Purple Line station. • Healthy Communities. Project sidewalks are designed to be safe and facilitate a walkable community. Repaired and improved sidewalks, on-site parking that would not conflict with pedestrian access to on-street parking, and street trees, are some of the Project's healthy walkable street features. In addition, the Project would provide a new community recreation center on Site 3, and the Shatto Recreation Center is within walking distance of the Project Site and offers opportunities for indoor and outdoor activities.
LUT-7. Transportation Signal Synchronization Program	1) Improve the network of traffic signals on the major streets throughout Los Angeles (LA) County.	X			1) Consistent. The Project would comply with all County requirements regarding street design and access. In addition, the Project would implement a TDM program to promote peak period trip reduction, and includes Transportation Systems Management (TSM) improvements, specifically consisting of the installation of a traffic monitoring camera and fiber optic data transmission line to allow additional video monitoring of the traffic signal system.
LUT-8. Electric Vehicle Infrastructure	1) Install 500 electric vehicle (EV) charging facilities at County-owned public venues (e.g., hospitals, beaches, stand-alone parking facilities, cultural institutions, and other facilities) and ensure that at least one-third of these charging stations will be available for visitor use.				1) Consistent. The Project will provide electric vehicle parking consistent with the requirements of the Los Angeles County Green Building Standards Code (Sites 1 and 3), and LA Green Building Code (Site 2).
LUT-9. Idling Reduction Goal	1) Encourage idling limits of 3 minutes for heavy-duty construction equipment, as feasible within manufacturer's specifications.	X			1) Consistent. The Project's construction equipment would comply with the idling limits established by state law (i.e., five (5) minutes) under the auspices of the California Air Resources Board.

Table 4.6-8
Evaluation of Consistency of the Project with the CCAP

Measure	Goal	Measure Applicability			Consistency Status
		Applicable	Consistency Pending	Not Applicable	
LUT-10. Efficient Goods Movement	1) Support regional efforts to maximize the efficiency of the goods movement system throughout the unincorporated areas.			X	1) Not Applicable. This policy relates to regional transportation facilities, including rail, freeways, and major roadways that support the movement of goods to throughout the region. The Project would include small retail and restaurant uses that would be serviced by local roadways, including Vermont Avenue and 6 th Street.
LUT-11. Sustainable Pavements Program	1) Reduce energy consumption and waste generation associated with pavement maintenance and rehabilitation.	X			1) Consistent. The Project would comply with the requisite permeable paving requirements in CALGreen Section A5.106.3.
LUT-12. Electrify Construction and Landscaping Equipment	1) Utilize electric equipment wherever feasible for construction projects. 2) Reduce the use of gas-powered landscaping equipment.	X X			1) Consistent. Any required construction and/or security lighting would rely on electricity from power poles instead of diesel generators wherever possible. The Project would use electricity from power poles, instead of diesel generators, to power construction equipment, as feasible. For example, while large-scale electric construction equipment does not exist, smaller, hand-held construction-related tools are available in an electric configuration. 2) Consistent. The Developers of Sites 1, 2, and 3 would utilize electric landscape equipment wherever possible.
Water Conservation and Wastewater					
WAW-1. Per Capita Water Use Reduction Goal	1) Meet the State established per capita water use reduction goal as identified by Senate Bill (SB) X7-7 for 2020.	X			1) Consistent. The Project includes design features that would help the State of California meet requirements to achieve a 20 percent reduction in urban per-capita water use by 2020 in accordance with SBX7-7. The Project would comply with the state Model Water Efficient Landscape Ordinance, and CALGreen 4.304.1 Outdoor potable water use in landscape areas. The Project would include: • Irrigation Efficiency. Automatic irrigation systems controllers installed at time of final inspection shall be weather or soil moisture-based.

Table 4.6-8
Evaluation of Consistency of the Project with the CCAP

Measure	Goal	Measure Applicability			Consistency Status
		Applicable	Consistency Pending	Not Applicable	
					• Landscape Irrigation Design. Provide water efficient landscape irrigation design that reduces the use of potable water; • Drought Tolerant Landscaping. The landscape pallet shall be consistent with the County's LID Ordinance, which includes the use of drought tolerant landscaping. • Indoor Water Use - o Plumbing Fixtures. Plumbing fixtures (water closets and urinals) and fittings (faucets and showerheads) installed shall comply with the prescriptive requirements in Sections 5.303.3.1 through 5.303.3.3. - o Plumbing Fixture Installations. Plumbing fixtures and fittings required in Section 5.303.6 shall be installed in accordance with the California Plumbing Code, and shall meet the applicable reference standards of CALGreen Code.
WAW-2. Recycled Water Use, Water Supply Improvement Programs, and Storm Water Runoff	1) Promote the use of wastewater and gray water to be used for agricultural, industrial, and irrigation purposes. Manage storm water, reduce potential treatment, and protect local groundwater supplies.	X			1) Consistent. During construction and operation of the Project, the Project would comply with adopted regulatory requirements that are designed by the Los Angeles Regional Water Quality Control Board to assure that regional development does not adversely affect groundwater, including SUSMP requirements; General Permit and General Dewatering Permit requirements; and benchmark Basin Plan water quality objectives, California Toxic Rules criteria, and TMDLs. Reclaimed water service is not available to the Project Sites.
SW-1. Waste Diversion Goal	1) For the County's unincorporated areas, adopt a waste diversion goal to comply with all state mandates to divert at least 75% of waste from landfill disposal by 2020.	X			1) Consistent. Although not located in an unincorporated County area, the Project nonetheless includes the following design features related to waste reduction and would be consistent with this policy:

Table 4.6-8
Evaluation of Consistency of the Project with the CCAP

Measure	Goal	Measure Applicability			Consistency Status
		Applicable	Consistency Pending	Not Applicable	
					- The Project would establish a Solid Waste Diversion Program of 75 percent for project operations on all Project Sites. - The Project will establish a Solid Waste Diversion Program of 75 percent for project construction. - Construction contractors shall only contract for solid waste disposal services with a company that recycles demolition and construction-related wastes, as demonstrated to the County of Los Angeles Department of Public Works (Sites 1 and 3), or City Department of Building and Safety (Site 2) prior to issuance of demolition or construction permits. - The Project would provide readily accessible areas around the Project Sites for the deposit, storage, and collection of non-hazardous materials for recycling.
Land Conservation and Tree Planting					
LC-1. Develop Urban Forests	1) Support and expand urban forest programs within the unincorporated areas.			X	1) Not Applicable. The expansion of urban forest programs in the unincorporated areas is beyond the scope and authority of an individual development project. However, the Project would provide street trees consistent with County and City requirements.
LC-2. Create New Vegetated Open Space	1) Restore and revegetate previously disturbed land and/or unused urban and suburban areas.			X	1) Not Applicable. The Project Sites are located in an urban area and would redevelop previously developed sites with County office, commercial and residential uses. Landscaped areas would be provided, however, no areas requiring restoration or revegetation are associated with the Project Sites.
LC-3. Promote the Sale of Locally Grown Foods and/or Products	1) Establish local farmers markets and support locally grown food.			X	1) Not Applicable. The promotion and establishment of farmers markets is beyond the scope and authority of an individual development project

Table 4.6-8
Evaluation of Consistency of the Project with the CCAP

Measure	Goal	Measure Applicability			Consistency Status
		Applicable	Consistency Pending	Not Applicable	
LC-4. Protect Conservation Areas	1) Encourage the protection of existing land conservation areas.			X	1) Not Applicable. There are no existing land conservation areas on the Project Sites.
Source: (Table) EcoTierra Consulting, 2017.					

Table 4.6-9
Consistency with Applicable County Greenhouse Gas Reduction Strategies (Sites 1 and 3)

Source	Category/Description	Consistency Analysis
Los Angeles County Green Building Standards Code (Title 31)	Incorporate energy and water efficiency measures in new construction.	Consistent. The Project would meet this requirement as part of its compliance with the requirements of the Los Angeles County Green Building Standards Code.
County General Plan Air Quality Element	Reduce energy and water consumption in new development and municipal operations, and participate in local, regional and state programs to reduce greenhouse gas emissions. .	Consistent. The Project would meet this requirement as part of its compliance with the requirements of the Los Angeles County Green Building Standards Code, and its location in an area well served by transit.
Los Angeles County Low Impact Development (LID) Standards	All Designated Projects (required) must retain 100 percent of Stormwater Design Volume on-site through infiltration, evapotranspiration, stormwater runoff harvest, or a combination thereof.	Consistent. The Project would implement stormwater BMPs consistent with County requirements.
<i>Source: EcoTierra Consulting, 2017.</i>		

Table 4.6-10
Consistency with Applicable City of Los Angeles Greenhouse Gas Reduction Strategies (Site 2)

Source	Category/Description	Consistency Analysis
City of Los Angeles Green Building Code	Various	Consistent. The Project would meet this requirement as part of its compliance with the requirements of the LA Green Building Code.
Sustainable City Plan	Various	Not Applicable. The Sustainable City Plan provides guidance to City departments and managers regarding specific strategies and policy initiatives designed to achieve numeric near-term and long-term targets. These targets are designed, among other things, to reduce GHG emissions. The plan is not directly applicable to development projects.
City General Plan Air Quality Element	Emissions reductions through incorporation of energy efficiency measures and reduced travel.	Consistent. The Project would meet this requirement as part of its compliance with the requirements of the City Green Building Code, and its location in an area well served by transit.

Table 4.6-10
Consistency with Applicable City of Los Angeles Greenhouse Gas Reduction Strategies (Site 2)

Source	Category/Description	Consistency Analysis
City of Los Angeles Low Impact Development (LID) Standards	All Designated Projects (required) must retain 100 percent of Stormwater Design Volume on-site through infiltration, evapo-transpiration, stormwater runoff harvest, or a combination thereof.	Consistent. Site 2 development would be consistent with City requirements.
<i>Source: EcoTierra Consulting, 2017.</i>		

Regulatory Requirements

RR GHG-1: The Project shall be built in accordance with all applicable provisions of the Los Angeles County Green Building Standards Code (Sites 1 and 3), and LA Green Building Code (Site 2).

MITIGATION MEASURES

No mitigation measures have been identified for GHG emissions.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

As demonstrated herein, the Project would not have the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. In addition, Project GHG emissions would be below the draft SCAQMD Tier 4 efficiency metric, which is indicative of a project that incorporates extra design measures or other features that would minimize GHG emissions. As such, the Project would not generate a cumulatively considerable increase in GHG emissions, and project-level and cumulative impacts would be less than significant.

4.7 HAZARDS AND HAZARDOUS MATERIALS

INTRODUCTION

This section evaluates potential impacts related to hazards and hazardous materials at and near the Project Sites and potential hazards associated with development of the Project. Specifically, this section evaluates whether the Project would create a significant hazard to the public or to the environment through upset or accident conditions involving the release of hazardous materials into the environment.

The following analysis is based on the following environmental reports prepared for the Project:

- *Phase I Environmental Site Assessment, Commercial Property, 510, 526, 532 South Vermont Avenue and 523 Shatto Place, Los Angeles, California 90020, Project No. T36444-Rev1*, prepared by Tetra Tech, Inc., December 2016 (Draft EIR Appendix 4.7-1);
- *Phase I Environmental Site Assessment, Commercial Property, 550 South Vermont Avenue and 3175 West 6th Street, Los Angeles, California 90020, Project No. T36444-Rev1*, prepared by Tetra Tech, Inc., December 2016 (Draft EIR Appendix 4.7-2);
- *Phase I Environmental Site Assessment, Commercial Property, 433 South Vermont Avenue, Los Angeles, California 90020, Project No. T36444-Rev1*, prepared by Tetra Tech, Inc., December 2016 (Draft EIR Appendix 4.7-3);
- *Limited Methane Survey Report, Vermont Corridor Development Site 1, 510, 526, and 523 South Vermont Avenue and 523 Shatto Place, Los Angeles, California 90020*, prepared by Citadel Environmental Services, Inc., June 2017 (Draft EIR Appendix 4.7-4);
- *Underground Storage Tank Summary Report, Shatto Place Parking Structure, 523 Shatto Place, Los Angeles, California 90020*, prepared by Tetra Tech, Inc., August 2017 (Draft EIR Appendix 4.7-5);
- *Site 1 Environmental Phase II Investigation Report, Commercial Properties at 510, 526, and 532 South Vermont Avenue and 523 Shatto Place, Los Angeles, California 90020*, prepared by Tetra Tech, Inc., June 2017 (Draft EIR Appendix 4.7-6);
- *Oil Wells on or Adjacent to the Vermont Corridor Development*, prepared by Evans & Walker, Consulting Petroleum Engineers, August 2017 (Draft EIR Appendix 4.7-7); and
- *Los Angeles County Departments of Mental Health And Parks & Recreation 510, 526, And 532 S. Vermont Ave. And 523 Shatto Pl., Los Angeles, Ca 90020 (SMU FILE #17-1094/RO0001712)*, prepared by Los Angeles County Fire Department, Site Mitigation Unit, Health Hazardous Materials Division, September 2017 (Draft EIR Appendix 4.7-8).

The Phase I Environmental Site Assessments (“ESAs”) were conducted in general accordance with the scope and limitations of 40 Code of Federal Regulations (“CFR”) Section 312, *et al.*; the American Society of Testing and Materials (“ASTM”) Standard Practice E1527-13 including all appropriate inquiry; and the scope of work with the applicant. The primary purpose of these ESAs is to identify recognized environmental conditions (“RECs”) in connection with any of the Project Sites. ASTM defines RECs as “the

presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment.” Business Environmental Risks (“BERs”) are defined as “a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate.” The term as further defined by ASTM “is not intended to include *de minimis* conditions that generally do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies.”

RECs are also further subcategorized as controlled RECs (“CRECs”) and historical RECs (“HRECs”). ASTM defines a CREC as a “recognized environmental condition resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls).” A HREC is defined as a “past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and land use limitations, institutional controls, or engineering controls).”

Each Phase I ESA included a visual reconnaissance of the site to identify potential for on-site oil, polychlorinated biphenyls (“PCBs”), suspect asbestos-containing materials (“ACMs”), lead-based paint (“LBP”), lead-containing materials (“LCMs”), or hazardous material release(s); visual inspection and categorization of the surrounding properties and uses; review of local records for historical ownership, usage, and development; review of federal and State regulatory listings, tribal and proprietary records; and interviews with persons knowledgeable about the site, as applicable.

The remaining reports represent follow-on investigations for Site 1 based upon conditions identified in the Phase I ESA for Site 1.

This section includes a description of the regulatory framework, thresholds for determining if the Project would result in significant impacts, mitigation measures (if determined applicable), and the level of significance after mitigation.

ENVIRONMENTAL SETTING

Regulatory Framework

Federal

U.S. Environmental Protection Agency (“U.S. EPA”) Regulations

The U.S. EPA’s mission is to protect human health and the environment. The U.S. EPA takes action to reduce risks associated with exposure to chemicals in commerce, indoor and outdoor environments, and products and food. The U.S. EPA continues to oversee the introduction and use of pesticides, improve their Integrated Risk Information System (“IRIS”) program, reduce radon risks, identify and address

children's health risks in schools and homes, and improve chemical management practices. Oversight of chemical storage and manufacturing in coordination with their interagency partners remains a key focus of the U.S. EPA, as well as efforts to reduce urban air toxics.

Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA")

Enacted in 1980, CERCLA, commonly known as Superfund, creates a tax on the chemical and petroleum industries and provided broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. The tax goes into a trust fund for cleaning up abandoned or uncontrolled hazardous waste sites. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at these sites, and established a trust fund to provide for cleanup when no responsible party could be identified.

CERCLA established the Comprehensive Environmental Response, Compensation and Liability Information System ("CERCLIS"). CERCLIS is the U.S. EPA's system for tracking potential hazardous-waste sites within the Superfund program. A site's presence on CERCLIS does not imply a level of federal activity or progress at a site or indicate that hazardous conditions necessarily exist at the location. The Project Sites are not listed in CERCLIS.

In addition, CERCLA authorizes two kinds of response actions:

- Short-term removals, where actions may be taken to address releases or threatened releases requiring prompt response
- Long-term remedial response actions, that permanently and significantly reduce the dangers associated with releases or threats of releases of hazardous substances that are serious, but not immediately life threatening. These actions can be conducted only at sites listed on the U.S. EPA's National Priorities List ("NPL").

CERCLA also enabled the revision of the National Contingency Plan ("NCP"). The NCP provided the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the NPL. The Project Sites are not listed on the NPL.

Resource Conservation and Recovery Act ("RCRA")

RCRA gives the U.S. EPA the authority to control hazardous waste from the "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste by "large-quantity generators" (1,000 kilograms/month or more). Under RCRA regulations, hazardous wastes must be tracked from the time of generation to the point of disposal. At a minimum, each generator of hazardous waste must register and obtain a hazardous waste activity identification number. If hazardous wastes are stored for more than 90 days or treated or disposed at a facility, any treatment, storage, or disposal unit must be permitted under RCRA. Additionally, all hazardous waste transporters are required to be permitted and must have an identification number. RCRA allows individual states to develop their own program for the regulation of hazardous waste as long as it is at least as stringent as RCRA. The U.S. EPA has delegated RCRA enforcement to the State of California.

Toxic Substances Control Act ("TSCA")

Congress enacted the TSCA of 1976 to give U.S. EPA the ability to track the 75,000 industrial chemicals currently produced or imported into the United States. U.S. EPA repeatedly screens these chemicals and

can require reporting or testing of those that may pose an environmental or human-health hazard. U.S. EPA can ban the manufacture and import of those chemicals that pose an unreasonable risk.

Superfund Amendments and Reauthorization Act of 1986 (“SARA”)

SARA amended CERCLA on October 17, 1986. SARA reflected U.S. EPA’s experience in administering the complex Superfund program during its first six years and made several important changes and additions to the program. Primarily, SARA stressed the importance of permanent remedies and innovative treatment technologies in cleaning up hazardous waste sites, required Superfund actions to consider the standards and requirements found in other State and federal environmental laws and regulations, provided new enforcement authorities and settlement tools, increased State involvement in every phase of the Superfund program, increased the focus on human health problems posed by hazardous waste sites, encouraged greater citizen participation in making decisions on how sites should be cleaned up, and increased the size of the trust fund to \$8.5 billion.

SARA also required U.S. EPA to revise the Hazard Ranking System (“HRS”) to ensure that it accurately assessed the relative degree of risk to human health and the environment posed by uncontrolled hazardous waste sites that may be placed on the NPL.

Occupational Safety and Health Act of 1970 (“OSHA”)

OSHA, contains provisions with respect to hazardous materials handling. Federal OSHA requirements, as set forth in Title 29 of the Code of Federal Regulations Section 1910, *et. seq.*, are designed to promote worker safety, worker training, and a worker’s right-to-know. OSHA has delegated the authority to administer OSHA regulations to the State of California.

Title 49 of the Code of Federal Regulations, which contains the regulations set forth by the Hazardous Materials Transportation Act of 1975, specifies additional requirements and regulations with respect to the transport of hazardous materials. Title 49 of the Code of Federal Regulations requires that every employee who transports hazardous materials receive training to recognize and identify hazardous materials and become familiar with hazardous materials requirements. Drivers are also required to be trained in function and commodity specific requirements.

Emergency and Community Right to Know Act (“EPCRA”)

EPCRA was enacted by Congress as the national legislation on community safety. This law was designated to help local communities protect public health, safety, and the environment from chemical hazards. EPCRA was passed in response to concerns regarding the environmental and safety hazards posed by the storage and handling of toxic chemicals. EPCRA establishes requirements for federal, State and local governments, tribes and industry regarding emergency planning and “Community Right-to-Know” reporting on hazardous and toxic chemicals. The Community Right-to-Know provisions help increase the public’s knowledge and access to information on chemicals at individual facilities, their uses, and releases into the environment. States and communities, working with facilities, can use the information to improve chemical safety and protect public health and the environment. To implement EPCRA, Congress required each State to appoint a State Emergency Response Commission (“SERC”). The SERC’s were required to divide their states into Emergency Planning Districts and to name a Local Emergency Planning Committee for each district.

Other federal laws include:

- Community Environmental Response Facilitation Act (“CERFA”) of 1992

- Clean Water Act
- Clean Air Act
- Safe Drinking Water Act
- Atomic Energy Act
- Federal Insecticide, Fungicide, and Rodenticide Act (“FIFRA”)

State

California Environmental Protection Agency (“Cal-EPA”)

Authority for the State-wide administration and enforcement of RCRA rests with Cal-EPA and the Department of Toxic Substances Control (“DTSC”). While the DTSC has primary State responsibility in regulating the generation, storage and disposal of hazardous materials, DTSC may further delegate enforcement authority to local jurisdictions. In addition, the DTSC is responsible and/or provides oversight for contamination cleanup, and administers State-wide hazardous waste reduction programs. DTSC operates programs to accomplish the following: (1) deal with the aftermath of improper hazardous waste management by overseeing site cleanups; (2) prevent releases of hazardous waste by ensuring that those who generate, handle, transport, store, and dispose of wastes do so properly; and (3) evaluate soil, water, and air samples taken at sites.

The storage of hazardous materials in Underground Storage Tanks (“USTs”) is regulated by the State Water Resources Control Board (“SWRCB”), which has delegated authority to Regional Water Quality Control Boards (“RWQCB”) and, on the local level, typically to the local fire department.

The California Occupational Safety and Health Administration (“Cal-OSHA”) program is administered and enforced by the Division of Occupational Safety and Health (“DOSH”). Cal-OSHA is very similar to the federal OSHA program. For example, both programs contain rules and procedures related to exposure to hazardous materials during demolition and construction activities. In addition, Cal-OSHA requires employers to implement a comprehensive, written Injury and Illness Prevention Program (“IIPP”). An IIPP is an employee safety program for potential workplace hazards, including those associated with hazardous materials.

Hazardous Waste Source Reduction and Management Review Act of 1989

This act requires generators of 12,000 kilograms/year of typical/operational hazardous waste to conduct an evaluation of their waste streams every 4 years and to select and implement viable source reductions alternatives. This act does not apply to non-typical hazardous waste (such as asbestos and PCBs). The California Vehicle Code (Title 13 of the California Code of Regulations (“CCR”)) also states that every motor carrier transporting hazardous materials (for which the display of hazardous materials placards are required or in excess of 500 pounds, transported for a fee, which would require placarding if shipped in greater amounts in the same manner) must have a Hazardous Materials Transportation License issued by the California Highway Patrol.

The transport of hazardous waste materials is further governed by the California Health and Safety Code Section 25163 and Title 22, Division 4.5, Chapter 13, of the CCR. Specifically, Section 25163 of the Health and Safety Code requires transporters of hazardous waste to hold a valid registration issued by the DTSC in his/her possession while transporting hazardous waste. Additionally, Title 22, Division 4.5 Chapter 13 of the CCR includes a number of requirements, which include but are not limited to the following:

- Transporters shall not transport hazardous waste without first receiving an identification number and a registration certificate from DTSC.
- Registration as a hazardous waste transporter expires annually, on the last day of the month in which the registration was issued.
- To be registered as a hazardous waste transporter, an application must be submitted.
- Hazardous waste shall not be accepted for transport without a Uniform Hazardous Waste Manifest that has been properly completed and signed by generator and transporter.
- Hazardous waste shall be delivered to authorized facilities only.

Hazardous Waste Control Act

The Hazardous Waste Control Act created the State hazardous waste management program, which is similar to but more stringent than the federal Resource Conservation and Recovery Act program. The act is implemented by regulations contained in Title 26 of the CCR, which describes the following required aspects for the proper management of hazardous waste: identification and classification; generation and transportation; design and permitting of recycling, treatment, storage, and disposal facilities; treatment standards; operation of facilities and staff training; and closure of facilities and liability requirements. These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from generator to transporter to the ultimate disposal location. Copies of the manifest must be filed with DTSC.

California Code of Regulations (CCR) Title 8

This section of the CCR regulates asbestos exposure for workers as defined in the Code's Section 1502 including, demolition or salvage of structures where asbestos is present, removal or encapsulation of materials containing asbestos, construction, alteration, repair, maintenance, or renovation of structures, substrates, or portions thereof, that contain asbestos, installation of products containing asbestos, asbestos spill/emergency cleanup, transportation, disposal, storage, containment of and housekeeping activities involving asbestos or products containing asbestos, on the site or location at which construction activities are performed, and excavation which may involve exposure to asbestos as a natural constituent which is not related to asbestos mining and milling activities. Enforcement of State asbestos regulations is provided at the local level by South Coast Air Quality Management District (SCAQMD) Rule 1403.

Lead Regulations

Because of its toxic properties, lead is regulated as a hazardous material. Lead is also regulated as a toxic air contaminant. State-certified contractors must perform inspection, testing, and removal (abatement) of lead-containing building materials in compliance with applicable health and safety and hazardous materials regulations.

Other State laws include:

- Safe Drinking Water and Toxic Enforcement Act of 1986 (Proposition 65)
- Carpenter-Presley-Tanner Hazardous Substances Account Act
- Hazardous Waste Management Planning and Facility Siting (Tanner Act)
- Hazardous Materials Release Response Plan and Inventory Law of 1985 (Business Plan Act)
- California Medical Waste Management Act

Local**Los Angeles County Fire Department Health Hazardous Materials Division**

The Certified Unified Program Agency (“CUPA”), which has the responsibility for implementing federal and State laws and regulations pertaining to hazardous materials management, is the Health Hazardous Materials Division (“HHMD”) of the County Fire Department. The Unified Program is the consolidation of six State environmental regulatory programs into one program under the authority of a CUPA. A CUPA is a local agency that has been certified by Cal/EPA to implement the six State environmental programs within the local agency’s jurisdiction. This program was established under the amendments to the California Health and Safety Code made by SB 1082 in 1994. The six consolidated programs are:

- Hazardous Materials Release Response Plan and Inventory (Business Plans)
- California Accidental Release Prevention (“Cal-ARP”)
- Hazardous Waste (including Tiered Permitting)
- Underground Storage Tanks (USTs)
- Above Ground Storage Tanks (Spill Prevention Control and Countermeasures (“SPCC”) requirements)
- Uniform Fire Code (“UFC”) Article 80 Hazardous Material Management Program (“HMMP”) and Hazardous Material Identification System (“HMIS”)

The CUPA maintains the records regarding location and status of hazardous materials sites in the county and administers programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials. By designating a CUPA, the County has accurate and adequate information to plan for emergencies and/or disasters and to plan for public and firefighter safety.

A Participating Agency (“PA”) is a local agency that has been designated by the local CUPA to administer one or more Unified Programs within their jurisdiction on behalf of the CUPA. The City of Los Angeles Fire Department (“LAFD”) is a PA with the HHMD as the CUPA.

Los Angeles Fire Department (LAFD)

The LAFD monitors the storage of hazardous materials in the City for compliance with local requirements. Specifically, businesses and facilities which store more than threshold quantities of hazardous materials as defined in Chapter 6.95 of the California Health and Safety Code are required to file an Accidental Risk Prevention Program with the LAFD. This program includes information such as emergency contacts, phone numbers, facility information, chemical inventory, and hazardous materials handling and storage locations. The LAFD also has delegated authority to administer and enforce federal and State laws and local ordinances for USTs. Plans for the construction/installation, modification, upgrade, and removal of USTs are reviewed by LAFD Inspectors.

City of Los Angeles Methane Regulations

Chapter IX, Article 1, Division 71, Section 91.7103 of the Los Angeles Municipal Code (LAMC), also known as the Los Angeles Methane Seepage Regulations, or the Citywide Methane Code, identifies Methane Hazard Zones and Methane Buffer Zones. The Project Sites are located within a Methane Hazard Zone, as designated by Los Angeles Department of Building and Safety (LADBS). Due to the potential environmental risk associated with Methane Hazard Zones, any property located within a Methane Hazard Zone requires methane testing and possible mitigation before development may occur. While all three sites are within a Methane Hazard Zone, only Site 2 would be subject to the City of Los Angeles’ methane

mitigation system requirements. Sites 1 and 3 would be subject to Los Angeles County Code requirements, as discussed below.

Depending upon the concentration and pressure of subsurface methane that may be located beneath Site 2, varying levels of mitigation are required. Table 4.7-1 (LADBS Minimum Methane Mitigation Requirements) taken from Citywide Methane Code, indicates the elements of methane mitigation that are required to be provided under different site methane concentrations and pressures. All design on Site 2 related to methane must be reviewed and approved by LADBS and LAFD.

Table 4.7-1
LADBS Minimum Methane Mitigation Requirements

Site Design Level			LEVEL I		LEVEL II		LEVEL III		LEVEL IV		LEVEL V
Design Methane Concentration (ppmv)			0-100		101-1,000		1,001-5,000		5,001-12,500		>12,500
Design Methane Pressure (inches water pressure)			≤2	>2	≤2	>2	≤2	>2	≤2	>2	All Pressures
PASSIVE SYSTEM	De-watering System ¹		X	X	X	X	X	X	X	X	X
	Sub-Slab Vent System	Perforated Horizontal Pipes	X	X	X	X	X	X	X	X	X
		Gravel Blanket Thickness Under Impervious Membrane	2"	2"	2"	3"	2"	3"	2"	4"	4"
		Gravel Thickness Surrounding Perforated Horizontal Pipes	2"	2"	2"	3"	2"	3"	2"	4"	4"
		Vent Risers	X	X	X	X	X	X	X	X	X
	Impervious Membrane		X	X	X	X	X	X	X	X	X
ACTIVE SYSTEM	Sub-Slab System	Pressure Sensors Below Impervious Membrane								X	X
		Mechanical Extraction System ²								X	X
	Lowest Occupied Space System	Gas Detection System ³		X		X	X	X	X	X	X
		Mechanical Ventilation ^{3, 4, 5}		X		X	X	X	X	X	X
		Alarm System		X		X	X	X	X	X	X
	Control Panel			X		X	X	X	X	X	X
MISC. SYSTEM	Trench Dam		X	X	X	X	X	X	X	X	X
	Conduit or Cable Seal Fitting		X	X	X	X	X	X	X	X	X
	Additional Vent Risers ⁶										X

X – Indicates a Required Mitigation Component

¹ See Section 91.7104.3.7 for exception.

² The mechanical extraction system shall be capable of providing an equivalent of a complete change of air every 20 minutes of the total volume of the gravel blanket.

³ See Section 91.7104.3.1 for narrow buildings.

⁴ The mechanical ventilation systems shall be capable of providing an equivalent of one complete change of the lowest occupied space air every 15 minutes.

⁵ Vent opening complying with Section 91.7104.3.4 may be used in lieu of mechanical ventilation.

⁶ The total quantity of installed vent risers shall be increased to double the rate for the passive system.

Source: Table 71, LAMC Section 91.7103.

Los Angeles County Methane Regulations

Los Angeles County Building Code Sections 110.03 and 110.4 identifies the County's methane gas requirements. In addition, as set forth in the Los Angeles County Code Section 110.4, permits shall not be issued for new buildings or enclosed structures regulated on, adjacent to, or within 300 feet of active, abandoned or idle oil or gas well(s) unless designed according to recommendations contained in a report prepared by a registered design professional, such as a licensed civil engineer and/or a licensed petroleum engineer, to evaluate whether such wells are being properly operated or maintained, or are abandoned. Section 110.4 further states that no permits shall be issued until documentation of proper operation, maintenance, or abandonment or reabandonment is submitted to and approved by the County Building Official. While all of the Project Sites are located in a Methane Hazard Zone, Site 1 and Site 3 are subject to Los Angeles County Code requirements. As noted above, Site 2 is subject to the City of Los Angeles' requirements.

Existing Conditions

The following discussion is a summary of the findings of the Phase I ESAs for their respective Project Site.

Site 1

Existing Uses

Site 1 is developed with two office buildings and a parking structure: a 30,788-square-foot, two-story office building (northern office building – 510 S. Vermont Avenue), a 13,325-square-foot, one-story office building (southern office building – 532 S. Vermont Avenue), and a seven-level parking structure (523 Shatto Place). At the time of the reconnaissance for the Phase I ESA, the northern office building was occupied by the Los Angeles County Parks and Recreation Department ("DPR") and the southern office building was unoccupied. The entire site is either paved or occupied by the site buildings and parking structure. No areas of staining considered to be significant were observed at Site 1.

Historical Uses

According to the historical records reviewed, nine oil wells were drilled on-site in approximately 1890. It is unknown when or how the oil wells were abandoned (no additional information, such as construction details, production records, abandonment records, was found regarding the on-site oil wells during the Phase I ESA). Site 1 was depicted as undeveloped or vacant land on topographic maps from 1894 to 1902. The eastern portion of the site was developed with two single-family residences with garages from at least 1910 to 1960, a paved parking lot in at least 1965, and the existing parking structure in 1965. The western portion of the site was developed with a garage associated with an off-site adjacent single-family residence (fronting Shatto Place) in at least 1921. The existing southern office building was constructed in 1938 and was occupied by a post office from at least 1950 to 1961, and was occupied by office tenants beginning in 1962. One or two used auto sales facilities were located on-site north of the southern office building from at least 1948 to 1959. The existing northern office building was constructed in 1959 and has been occupied by office tenants since at least 1960. Based on the lack of information regarding the historical on-site used auto sales facilities, they are considered to be a REC.

Regulatory Records Search Results

A review of published federal regulatory records related to on-Site activities and to potential off-Site sources of oil or hazardous material impacts was undertaken as part of the Phase I ESA. Federal records reviewed include the following:

- National Priorities List (NPL)
- Delisted NPL
- Superfund Enterprise Management System (SEMS)
- SEMS Archive
- Resource Conservation and Recovery Act (RCRA) Corrective Action (CORRACTS)
- Treatment, Storage and Disposal (TSD)
- Hazardous Waste Generators (Large Quantity Generator [LQG], Small Quantity Generator [SQG])
- Institutional Controls/Engineering Controls
- Emergency Release Notification System (ERNS)

A review of readily available state and tribal regulatory records and publications for environmental activities related to the Site and potential off-Site sources of oil or hazardous material impacts was also undertaken as part of the Phase I ESA. State and tribal records reviewed include the following:

- State-equivalent NPL (Envirostor, Hist Cal-Sites, CA Bond Ex. Plan)
- State-equivalent SEMS (Response)
- Landfill and/or Solid Waste Disposal
- Leaking Underground Storage Tank (LUST)
- Underground Storage Tank (UST)
- Institutional Controls/Engineering Controls
- Voluntary Cleanup
- Brownfields

Site 1 was not reported to be listed in any of the federal and State regulatory or tribal databases. However, Site 1 was reported to be listed in the following local database: Los Angeles County Hazardous Materials Systems. The site was also listed in the non-ASTM HAZNET database.

Regarding the Los Angeles County Hazardous Materials Systems listing, the portion of Site 1 with the seven-level parking structure is listed in this database as an industrial waste or UST facility with a status of open. As discussed below, according to City of Los Angeles Bureau of Sanitation, Industrial Wastewater Management (“LABS IWM”) permit was issued in 1965 for a facility at this address to discharge industrial wastewater from a floor sink (from floor washing) to an oil and sand trap (3-compartment clarifier). The facility at this address was not listed in any other databases as generating wastes, having USTs, or as having had a release. According to a representative with the Los Angeles County Department of Public Works (“LACDPW”), Environmental Programs (from which information for the Los Angeles County Hazardous Materials Systems database is obtained), an electronic file was opened in 1992; however, a physical file was never created and it is not known why the electronic file was opened. Based on the information above, it appears that the Los Angeles County Hazardous Materials Systems database listing pertains to industrial waste and is not an indication that a UST was present at this address. As discussed below, historical operations at the 523 Shatto Place address that would result in the discharge of industrial wastewater to an oil and sand trap (3-compartment clarifier) is considered to be a REC.

LABS IWM records for the site included a 1979 application for a permit to discharge industrial wastewater from “air conditioning and photo lab” processes (water and chemical for clean down and photo processing) for 510 S. Vermont Avenue, and a 1965 approved application for a permit to discharge industrial wastewater from a floor sink (from floor washing) to an oil and sand trap (3-compartment clarifier) for 523 Shatto Place. The historical site use of the northern office building as a photo lab with industrial wastewater discharge, and historical site operations at 523 Shatto Place that would result in the discharge of industrial wastewater to an oil and sand trap (3-compartment clarifier), are considered to be a REC.

Regarding the non-ASTM HAZNET listing, the site was listed in this database as generating waste in the form of tank bottom waste in 1995. The site representatives were unaware of the reason for this listing or the source of this waste. This facility was not listed in any databases as having had a release. As noted above, an electronic file was opened in 1992 for this address by the LACDPW, Environmental Programs; however, a physical file was never created and it is not known why the electronic file was opened. It is unknown if the tank bottom waste listing is associated with the 3-compartment clarifier referenced above for the 523 Shatto Place listing. As discussed above, historical operations at the 523 Shatto Place address that would result in the discharge of industrial wastewater to an oil and sand trap (3-compartment clarifier) is considered to be a REC.

After preparation of the Phase I ESA additional information was provided by the LAFD UST Division concerning the 10,000-gallon UST on Site 1. This information has been provided in the UST Summary Report. On March 17, 1995 a 10,000-gallon steel UST used to store gasoline was abandoned in-place. The UST is located on Site 1, adjacent to the south side of the entry driveway to the east side of the Shatto Place parking structure. There were either one or two fuel dispensers inside the east side of the Shatto Place parking structure. The UST was abandoned in-place in accordance with a LAFD-issued permit with oversight by a LAFD inspector. The fuel dispenser(s) and piping between the fuel dispenser(s) and the UST were removed at the time the UST was abandoned in-place. Soil sampling was performed adjacent to the UST consistent with standard practice at the time. Soil sampling and analysis was also performed at a fuel dispenser at a very shallow depth (2 feet bgs) and, if there was a second fuel dispenser, no sampling and analysis were performed beneath that fuel dispenser nor beneath piping between the UST and the dispenser(s). No soil sample analyses were performed for oxygenates such as MTBE. No evidence of impacted soil was found in soil samples analyzed for gasoline, BTEX, and lead. No groundwater was encountered to the maximum depth drilled, 17 feet bgs. On May 19, 1995, a no further action letter for the UST was issued by the LAFD.

A Phase II Investigation was performed by Tetra Tech following the Phase I ESA of Site 1 (Appendix 4.7-6 to this Draft EIR). This investigation was performed to evaluate the likelihood that the subsurface at Site 1 has been impacted by historical on-Site activities and adjacent off-Site activities in areas cited as RECs in the Site 1 Phase I ESA.

The investigation consisted of a geophysical survey across both parking lots in the western part of Site 1 and the ground level of the Shatto Place parking structure. Nine soil borings (B1 to B9) were advanced to depths of 10.5 to 40 feet below ground surface (“bgs”), 14 soil gas sample locations (S1 to S14) with soil gas samples were collected at 5 feet bgs, and five temporary groundwater monitoring (“GWM”) wells (G1 to G5) with bottom of casing depths of 32 to 40 feet bgs were installed. Four of the borings were co-located with soil gas sample locations (B3/S7, B4/S8, B7/S11, and B8/S12).

Soil and groundwater samples were analyzed for one or more of the following constituents of potential concern (“COPCs”): volatile organic compounds (“VOCs”), semi-volatile organic compounds (“SVOCs”),

total petroleum hydrocarbons (“TPH”), California Code of Regulations (CCR) metals, and polychlorinated biphenyls (“PCBs”).

Soil gas samples were analyzed for VOCs. None of the VOC concentrations in analyzed soil gas samples were considered to be a REC as none exceeded screening level concentrations.

Petroleum-impacted fill material or soil was found in analyzed samples in two borings. One boring (B2) was in the northwest part of Site 1 at a depth of 35 feet to 36.5 feet bgs and one boring (B9) was on the east side of Site 1 at a depth interval of 29 feet to 34 feet bgs. In these two locations, petroleum related COPC concentrations exceeded their respective screening levels. No other COPCs were found at elevated concentrations in analyzed soil samples.

In boring B9, the analyzed soil sample had an elevated gasoline related organics (“GRO”) concentration above its soil screening level. The source of this zone of soil is likely the former 10,000-gallon UST that was reported to have been located at the eastern part of the parking structure. The depth interval of GRO-impacted soil is below the planned Shatto Place parking structure final floor elevation (“FFE”) of 239.5 feet msl. Depending on the depth of overexcavation needed for construction of the parking structure’s floor slab, petroleum-impacted soil could be encountered. Additionally small quantities of petroleum-impacted soil could be encountered during caisson installation as a part of foundation preparation for the planned Shatto Place parking structure.

Temporary GWM wells G1 and G5 were installed in borings B1 and B9 in the northwestern and eastern parts of Site 1, respectively. Sampled water from these two temporary GWM wells had elevated concentrations of petroleum hydrocarbons. In addition, temporary GWM well G5 had elevated concentrations of petroleum-related VOCs (such as benzene, toluene, ethylbenzene, and xylenes [BTEX]), and selected metals (antimony, lead, nickel and selenium). In sampled water from temporary GWM wells G1 and G5, the total petroleum concentrations were present at concentrations above their respective action levels or notification levels. It is unclear whether the concentrations in sampled water from temporary GWM well G1 are from a petroleum source, possibly related to the fill material, or are from crude oil from historical oil field activities. It is likely that the petroleum-impacted soil and groundwater encountered at boring B9/ temporary GWM well G5 is related to the former 10,000-gallon UST.

The exact location of the former 10,000-gallon UST is unknown at the present time. It is reported to have been a gasoline UST, and may have also contained diesel at one time. The lateral extent of impacted groundwater at the eastern side of the existing Shatto Place parking structure appears to be limited. The extent of the impacted groundwater in the western part of the Site is unknown. If construction of the planned office building and Shatto Place parking structure foundations encounters petroleum-impacted soil, it will need to be disposed of off-Site at an appropriately licensed disposal, recycling, landfarming, or thermal desorption facility.

Underlying Earth Materials

Fill material ranging from approximately 8 to 33 feet below ground surface (bgs) was encountered during a geotechnical investigation at the site by Kleinfelder in 2015. No information regarding the source of fill material was found during the Phase I ESA. The presence at the site of fill material of unknown provenance is considered to be a potential environmental concern.

Oil/Gas Fields and Oil Wells

Site 1 is located within the boundaries of the Los Angeles City Oil/Gas Field. According to California Division of Oil, Gas and Geothermal Resources (DOGGR) information, there are nine on-site oil wells which are reported to be “buried” oil and gas production wells. Four of the oil wells are shown to be within the footprint of the northern office building, two of the oil wells are shown to be within the footprint of the southern office building, and three oil wells are shown to be located within asphalt-paved parking areas. According to DOGGR data, the API numbers for these wells are as follows: 03726057, -59, -60, -62, -63, -64, -65, -66, and -68.¹ These wells were previously operated by Ruhland Oil Co. A DOGGR representative stated there were no physical files/records because the oil wells were originally drilled around 1890 and prior to when DOGGR was created as an agency (in August 1915). No additional information (such as construction details, production records, abandonment records) was found regarding the on-site oil wells during the Phase I ESA. The presence of the nine oil wells with no abandonment documentation, which could serve as a conduit for methane gas, is considered to be a potential environmental concern for possible methane gas.

In boring B2 taken under the Phase II ESA, elevated petroleum hydrocarbon concentrations in the carbon range of diesel range organics and oil range organics were above the screening thresholds. The source of this petroleum-impacted fill material is unknown. Possible sources include: Impacts in the source area(s) from which the fill material was historically obtained, and/or historical oil field activities at the Site. The closest oil well (Ruhland 4) is approximately 30 feet from boring B2. This petroleum-impacted fill material, was well below the planned office building FFE of approximately 248 feet msl. Therefore, it is highly unlikely that this zone of petroleum-impacted fill material will be encountered during building construction, except possibly in small quantities during pile installation as a part of foundation preparation for the planned office building.

To further evaluate the potential oil wells in the western portion of Site 1, an initial review of the oil wells located on or adjacent to the Vermont Corridor Development was conducted by Evans & Walker, Consulting Petroleum Engineers (Appendix 4.7-8 to this Draft EIR). This evaluation concluded the following that the Ruhland Oil Company wells were likely hand dug and no casing was used in the completion of the wells. Accordingly, the anomaly identified in the geophysical survey in the northern parking lot is most likely something other than an oil well. In addition, the fact that two separate methane investigations have yielded non-detect levels of methane support the contention that hydrocarbons are not seeping from the Ruhland wells. Given the above, it is unlikely that the DOGGR will require abandonment of the oil wells present at the Site.

Methane

Methane (CH₄) is a naturally occurring, odorless, colorless, and extremely flammable gas with a wide distribution in nature. It is the major constituent of natural gas that is used as a fuel, and is an important source of hydrogen and a wide variety of other organic compounds. It is often found in conjunction with petroleum deposits. No long-term health effects are known to occur from exposure to methane. However, at very high concentration, methane can act as an asphyxiate by reducing the relative concentration of oxygen in the air that is inhaled (similar to the effects of carbon monoxide), and poses a danger of fire or explosion if methane migrates and concentrates inside buildings.

¹ API numbers are a unique identifier established by the American Petroleum Institute and which are assigned to each well drilled for oil and gas.

According to LADBS information, Site 1 is located in a City of Los Angeles-designated Methane Zone. Areas within a Methane Zone have a risk of methane intrusion emanating from geologic formations. A methane survey was previously performed at the western portion of the site by Kleinfelder in 2015. Initial testing included installation of eight shallow soil gas probes to a depth of approximately five feet bgs. Differential pressure measurements ranged from -0.003 inches of water to 0.025 inches of water. Methane concentrations were not detected at or above the Landtec GEM 2000™ instrument detection limit of 0.1 percent. Based on the results from the shallow soil gas probes, four multi-depth nested soil gas probes were installed: two in the on-site asphalt-paved parking lot to the north of the northern office building, and two in the 526 S. Vermont Avenue asphalt-paved parking area lot between the northern and southern office buildings. These soil gas probes were screened at depths of approximately 11 feet, 18 feet, and 26 feet bgs. Differential pressure measurements ranged from -0.579 inches of water to 0.019 inches of water. Methane concentrations were not detected at or above the Landtec GEM 2000™ instrument detection limit of 0.1 percent or the flame ionization detector (FID) detection limit of 0.1 parts per million by volume (ppmv). Kleinfelder stated that the multi-depth nested soil gas probes are going to be abandoned during site construction/redevelopment activities; the presence of four triple-nested soil gas wells on the site is considered to be a *de minimis* condition.

Citadel Environmental Services prepared an updated methane survey report for Site 1 in 2017, since that Site is a first priority Site for the County and for development phasing and as such is further along on design. Four shallow soil gas probes and two multi-depth, nested gas probes were used for testing. Methane was not detected in the shallow five-foot probes installed in the buildings located at 510 and 532 South Vermont Avenue and 523 Shatto Place. In addition, methane was not detected in the deeper probes (10 and 15 feet below ground surface) installed in the parking garage located at 523 Shatto Place. No soil vapor probe encountered pressures above 0.0 inches of water. Using the maximum reported methane concentration and pressure for methane gas, Site 1 is considered Design Level II. Design Level II with pressures less than two inches of water requires passive methane mitigation systems for all new structures including trench dams and conduit or cable seal fitting. Site 1 is subject to County of Los Angeles methane regulations.

Asbestos-Containing Materials (ACMs)

Building materials containing asbestos were commonly used in structures between 1945 and 1980. These materials include vinyl flooring and mastic, wallboard and associated joint compound, plaster, stucco, acoustic ceiling spray, ceiling tiles, heating systems components, and roofing materials. ACMs do not always pose a hazard to occupants and workers in buildings that contain these materials. Intact, undisturbed ACMs generally do not pose a health risk. ACMs may become hazardous and pose an inhalation risk when they are damaged, disturbed in some manner, or deteriorate over time and asbestos fibers are released into building air. The Occupational Safety and Health Administration (OSHA) defines ACMs as those materials that contain more than one percent asbestos.

Based on the years of construction of the site buildings (1938, 1959, and 1965), it is possible that ACMs are present in the site buildings. Observed or inferred suspect ACMs at the site include: vinyl floor tile and associated mastic, ceramic floor and wall tile mastic, acoustic ceiling tile, baseboard and associated mastic, carpet mastic, painted drywall, and roofing materials. Some areas of damaged drywall and acoustic ceiling tiles were observed in the southern office building. The other observed areas in the site buildings appeared to be in generally good condition, with no significant damage observed. An asbestos survey was previously performed at the northern office building at the site in 2007. Asbestos was reported to be present in the following materials: drywall, gray cove base/mastic, brown linoleum, black mastic, white 12-inches-by-12-inches floor tile/mastic, tan 9-inches-by-9-inches floor tile/mastic, transite pipe,

and penetration mastic. Identified and untested suspect ACMs are considered to be a Business Environmental Risk (BER).

Lead-Based Paint (LBP)

Although LBP has been taken off the market, it is estimated that 80 percent of buildings built prior to 1978 contain some LBP. Even at low levels, lead poisoning can cause IQ deficiencies, reading and learning disabilities, impaired hearing, reduced attention spans, hyperactivity and other behavior problems with children under 6 years old being most at risk. Lead is a highly toxic metal that was used for many years in products found in and around homes and commercial buildings. Lead can be found in dust from moving parts of windows and doors that are painted with LBP, wood trim, walls, cabinets in kitchens and bathrooms, porches, stairs, railings, fire escapes, lamp posts, and soil. Since the 1980s, lead has been phased out in gasoline, reduced in drinking water, reduced in industrial air pollution, and banned or has been limited in use in consumer products. California law requires that all residential buildings constructed on or before January 1, 1979, or schools constructed on or before January 1993 be presumed to contain LBP. Structures (residential, commercial, or industrial) are affected by LBP regulations if remodeling, renovations, or demolition activities would disturb LBP surfaces.

Based on the year of construction of the site buildings (1938, 1959, and 1965), it is possible that LBP and other LCMs are present in the site buildings. The painted surfaces were observed to be in good condition, with no areas of damaged paint noted. Observed inferred suspect LCMs, such as ceramic floor and wall tile, also appeared to be in generally good condition, with no significant damage observed. Untested suspect LBP and other LCMs are considered to be a BER.

Polychlorinated Biphenyls (PCBs)

PCBs are mixtures of chlorinated compounds, which can exist as vapor, oily liquids, or solids. PCBs have been used as coolants and lubricants in transformers and other electrical equipment because they do not burn easily and are good insulators. When PCBs leak into the air, water, and soil they can result in skin rashes and liver damage in humans. PCBs are also probable human carcinogens. In 1977, the U.S. government banned the production of PCBs.

Based on the years of construction of the site buildings (1938, 1959, and 1965), it is possible that the following on-site equipment and fixtures contain PCBs: two pad-mounted transformers, a hydraulic elevator, and fluorescent light ballasts. Additionally, fluorescent light bulbs/tubes contain mercury. No staining or other evidence of leakage associated with the observed equipment and fixtures was noted. The presence of possible PCB-containing equipment and fixtures, as well as mercury-containing fluorescent light bulbs/tubes, is considered to be a *de minimis* condition. Moreover, concrete joint compound in the expansion joints between concrete pours may sometimes be found to be asbestos- and/or PCB-containing. This may become a matter of environmental significance during demolition of concrete. The potential for joint compound within concrete slabs at the site to be asbestos- and/or PCB-containing is considered to be a BER.

Surrounding Uses

Based on adjacent location and lack of information, the adjacent property to the north of Site 1 at 440 and 444 S. Vermont Avenue (former UST, reported historical drycleaner, and historical automobile dealership), and Site 2 at 550 S. Vermont Avenue (parking structure-related UST listing, two former used auto sales facilities, and two reported possible historical gas/service stations), are collectively considered to be a potential environmental concern for Site 1. In addition, based on the relatively low concentrations

of petroleum-related compounds detected in sampled groundwater closest to the site and the Los Angeles Regional Water Quality Control Board's no further action letter, the closed LUST case for the adjacent property to the south of Site 1 at 3151 W. 6th Street is considered to be a HREC to Site 1.

Site 2

Existing Uses

Site 2 is developed with two office buildings and a parking structure between the two office buildings: a 154,793-square-foot, 12-story office building with a concrete-floored basement (western office building – 550 S. Vermont Avenue), a 52,000-square-foot, four-story office building with an at-grade foundation (eastern office building – 3175 W. 6th Street), and a 14,010-square-foot two-level parking structure (with one open deck parking level and one below-grade parking level). At the time of the reconnaissance for the Phase I ESA, the western office building was occupied by the Los Angeles County Department of Mental Health (DMH). The eastern office building was occupied by Workforce Development Aging and Community Services (WDACS). The entire site is either paved or occupied by the site buildings and a parking structure. No areas of staining considered to be significant were observed at Site 2.

Historical Uses

According to the historical records reviewed, three oil wells were drilled on-Site in approximately 1890. It is unknown when or how the oil wells were abandoned (no additional information, such as construction details, production records, abandonment records, was found regarding the on-site oil wells during the Phase I ESA). Site 2 was depicted as undeveloped or vacant land from at least 1894 to at last 1923. By 1928, a small u-shaped feature was located near the southwest corner of the site. By 1938, a small building was located near the northeast corner of the site. Two used auto sales facilities were located on the site between at least 1948 and at least 1955. The existing eastern office building was constructed in 1958 and has been occupied by office tenants since at least 1960. The existing parking structure was constructed in 1959. The existing western office building was constructed in 1966-1967 and has been occupied by office tenants since at least 1967. Two permits were issued by the City of Los Angeles Department of Building and Safety (LADBS) to Shell Oil Co. in 1938 for the construction of a "gas service station" and a "gas canopy" at the Site. One permit was issued by the LADBS to Standard Oil Co. in 1958 for the construction of a service station and maintenance garage at the Site. It is not completely clear from review of the topographic maps, aerial photographs, and Sanborn maps if the two gas/service stations were actually constructed and, if so, how long they operated. Based on the lack of information regarding the two historical on-site used auto sales facilities and the two reported possible on-site historical gas/service stations, these items are considered to be a REC.

Regulatory Records Search Results

Site 2 was not reported to be listed in any of the federal regulatory or tribal databases. Site 2 was reported to be listed in the following State and local databases: HIST UST, CA FID, UST, SWEEPS UST, and Los Angeles County Hazardous Materials System. The site was also listed in the non-ASTM HAZNET database.

Regarding the non-ASTM HAZNET listings, Site 2 at 3175 W. 6th Street is listed for generating hazardous waste in the form of asbestos-containing waste in 1997, 1999, 2000, 2001, 2009, 2010, and 2014. Site 2 at 550 S. Vermont Avenue is also listed in this database for generating hazardous waste in the form of asbestos-containing waste each year from 1996 to 2000 and in 2014, and for generating hazardous waste in the form of pharmaceutical waste, PCBs, and material containing PCBs. According to the site representative, these listings are likely due to renovations for various County departments at the facility.

This facility was not listed in any databases as having had a release. Based on the regulatory status, these site listings are not considered to be of environmental concern to the site.

Underlying Earth Materials

Fill material ranging from approximately 8 to 33 feet bgs was encountered during a geotechnical investigation at Site 1, which is the adjacent property north of Site 2 by Kleinfelder in 2015. Fill material to approximately 33.5 feet bgs was encountered during a geotechnical investigation at a property 350 feet north of Site 2 by Geotechnologies in 2009. Based on the proximity of the site to these two properties and the Geotechnologies conclusion that the site soils would be similar to those encountered at the property 350 feet north of Site 2 (see Section 4.5, Geology and Soils), it is likely that fill material is present at Site 2. No information regarding the source of fill material was found during the Phase I ESA. The likely presence at the site of fill material of unknown provenance is considered to be a REC.

Oil/Gas Fields and Oil Wells

Site 2 is located within the boundaries of the Los Angeles City Oil/Gas Field. According to DOGGR information, the three on-site oil wells are reported to be “buried” oil and gas production wells. Two of the oil wells are shown to be within the footprint of the western office building and one of the oil wells is shown to be within the footprint of the parking structure. According to DOGGR data, the API numbers for these wells are as follows: 03726058, -61, and -67. These wells were previously operated by Ruhland Oil Co. A DOGGR representative stated there were no physical files/records because the oil wells were originally drilled around 1890 and prior to when DOGGR was created as an agency (in August 1915). No additional information (such as construction details, production records, abandonment records) was found regarding the on-site oil wells during the Phase I ESA. The presence of the three oil wells with no abandonment documentation, which could serve as a conduit for methane gas, is considered to be a component of the methane gas REC discussed below.

Methane

According to LADBS information, Site 2 is located in a City of Los Angeles-designated Methane Zone. No information regarding methane testing at Site 2 was found during the performance of the Phase I ESA. The Site’s location within City of Los Angeles-designated Methane Zone, the potential for methane gas to be present at the site, and presence of three oil wells beneath the Site buildings with no abandonment documentation collectively are considered to be a REC. This REC also represents a possible vapor encroachment condition indicative of potential vapor intrusion. Site 2 is subject to the City of Los Angeles Methane Ordinance.

Asbestos-Containing Materials (ACMs)

Based on the years of construction of the Site 2 buildings (1958, 1959-1960, and 1966-1967), it is possible that ACMs are present in the site buildings. Observed or inferred suspect ACMs at the site included vinyl floor tile and associated mastic, ceramic floor tile mastic, acoustic ceiling tile, baseboard and associated mastic, carpet mastic, painted drywall, and roofing materials. The observed site building areas appeared to be in generally good condition, with no significant damage observed. The site representative for the 3175 W. 6th Street building provided Tetra Tech with an Asbestos Records table from 2005 that noted materials at that building that have been confirmed to be ACMs, including debris on register flashing, debris on inside of a vent, and debris on an overhead vent. Confirmed and untested suspect ACMs are considered to be a BER.

Lead-Based Paint (LBP)

Based on the year of construction of the Site 2 buildings (1958, 1959-1960, and 1966-1967), it is possible that LBP and other LCMs are present in the site buildings. The painted surfaces were observed to be in good condition, with no areas of damaged paint noted. Observed inferred suspect LCMs, such as ceramic floor and wall tile, also appeared to be in generally good condition, with no significant damage observed. Untested suspect LBP and other LCMs are considered to be a BER to Site 2.

Polychlorinated Biphenyls (PCBs)

Fluorescent light fixtures (including ballasts and bulbs/tubes) were observed inside the site buildings. Based on the date of construction of the site buildings (1958, 1959-1960, and 1966-1967), it is possible that fluorescent light ballasts containing PCBs are present in the site buildings. Fluorescent bulbs/tubes contain mercury. No evidence of damage or leakage was observed. The presence of possible PCB-containing fluorescent light ballasts, as well as mercury-containing fluorescent light bulbs/tubes, is considered to be a *de minimis* condition. Moreover, concrete joint compound in the expansion joints between concrete pours may sometimes be found to be asbestos- and/or PCB-containing. This may become a matter of environmental significance during demolition of concrete. The potential for joint compound within concrete slabs at the Site to be asbestos- and/or PCB-containing is considered to be a BER.

Surrounding Uses

Based on adjacent location and lack of information, the adjacent Site 1 to the north at 510 to 532 S. Vermont Avenue (two former used auto sales facilities, and use of the northern office building on the property as a photo lab with industrial wastewater discharge), and the adjacent Site 1 to the east and northeast at 523 Shatto Place (historical operations that would result in the discharge of industrial wastewater to an oil and sand trap [3-compartment clarifier]), are collectively considered to be a REC for Site 2.

Site 3**Existing Uses**

Site 3 is developed with one 29,292-square-foot, four-story office building. At the time of the reconnaissance for the Phase I ESA, the building was occupied by DPR. No areas of staining considered to be significant, or stressed vegetation were observed at Site 3.

Historical Uses

According to the historical records reviewed, Site 3 was undeveloped or vacant land from at least 1894 to at least 1938, and developed with a used auto sales facility with two small buildings from at least 1948 to at least 1961. The existing office building was constructed in 1963-1965 and has been occupied by office tenants since at least 1971. One of the small buildings associated with the used auto sales facility remained on-site (near the northwest corner) after the construction of the existing office building; however, it was depicted as vacant on the 1968 and 1970 Sanborn maps, and was demolished in 1972 according to a LADBS building permit. Based on the lack of information regarding the historical on-site used auto sales facility, it is considered to be a REC.

Regulatory Records Search Results

Site 3 was not reported to be listed in any of the federal, State, tribal, local regulatory databases. Site 3 was listed in the non-ASTM HAZNET database.

Site 3 at 433 S. Vermont Avenue was listed in the non-ASTM HAZNET database for generating hazardous waste in the form of asbestos-containing waste in 1995 and 2008, and PCBs and materials containing PCBs in 2006. According to the site representative, these listings were likely due to renovations at the facility. This facility was not listed in any databases as having had a release. Based on the regulatory status, this site listing is not considered to be of environmental concern to the site.

Underlying Earth Materials

Fill material to approximately 33.5 feet bgs was encountered during a geotechnical investigation at the adjacent property southeast of the site beyond S. Vermont Avenue by Geotechnologies in 2009. Fill material ranging from approximately 8 to 33 feet bgs was encountered during a geotechnical investigation at a Site 1 approximately 350 feet south-southeast of Site 3 by Kleinfelder in 2015. Based on the proximity of the site to these two off-site properties and the Geotechnologies conclusion that the site soils would be similar to those encountered at the adjacent property southeast of the site beyond S. Vermont Avenue, it is likely that fill material is present at the site. No information regarding the source of fill material was found during the Phase I ESA. The likely presence at the site of fill material of unknown provenance is considered to be a REC.

Oil/Gas Fields and Oil Wells

Site 3 is located within the boundaries of the Los Angeles City Oil/Gas Field. According to DOGGR information and historical resources reviewed, there are no oil wells reported to have been drilled at the site.

Methane

According to LADBS information, the site is located within a City of Los Angeles-designated Methane Zone. No information regarding methane testing at the site was found during the performance of the Phase I ESA. The Site's location within a City-designated Methane Zone, the potential for methane gas to be present at the site, and the Site's location within the Los Angeles City Oil/Gas Field collectively are considered to be a REC. This REC is also considered to be a potential vapor encroachment condition considered indicative of potential vapor intrusion. Site 3 is subject to the County of Los Angeles methane regulations.

Asbestos-Containing Materials (ACMs)

Based on the years of construction of the site building (1963-1965), it is possible that ACMs are present in the site building. Observed or inferred suspect ACMs at the site included vinyl floor tile and associated mastic, ceramic tile mastic, acoustic ceiling tile, baseboard and associated mastic, carpet mastic, painted drywall, and roofing materials. The observed site building areas appeared to be in generally good condition, with no significant damage observed. Asbestos surveys were previously performed at the site building in 1994 and 2016. The following were reported as ACM during the 1994 survey: grey and black mastic, yellowish white stucco, gypsum wallboard, mud and joint compound, 9-inches-by-9-inches floor tiles and associated mastic, black mastic beneath 12-inches-by-12-inches floor tiles (grey with brownish streaks), white insulation (in a dark grey door), pipe insulation, elbow insulation, white overspray material (in mechanical room), fireproofing, window sealant, and light fixture paper-like insulation. Transite pipes

and panels were not sampled but presumed to be ACM. The following were reported as ACM during the 2016 survey: drywall joint compound, 9-inches-by-9-inches tan floor tiles and associated mastic, white/blue speckled floor tiles and associated mastic, fireproofing, thermal system insulation, floor tiles and associated mastic beneath carpet, stone pattern linoleum, roof mastic, patch pocket mastic, and flashing mastic. Confirmed and untested suspect ACMs are considered to be a BER.

Lead-Based Paint (LBP)

Based on the years of construction of the site building (1963-1965), it is possible that LBP and other LCMs are present in the site building. The painted surfaces were observed to be in good condition, with no areas of damaged paint noted. Observed inferred suspect LCMs, such as ceramic floor and wall tile, also appeared to be in generally good condition, with no significant damage observed. A limited LBP and LCM survey was previously performed at the site building in 2016. Lead concentrations above the Los Angeles County Department of Health Services (LACDHS) action level (0.7 milligrams per square centimeter [mg/cm²]) and/or the United States Department of Housing and Urban Development (HUD) action level (1.0 mg/cm²) were reported to be present in the following materials during the 2016 survey: ceramic wall tiles, ceramic base cove tiles, exterior metal steps, metal stair railing, metal step riser, and metal heating, ventilation, and air conditioning (HVAC) housing. Confirmed and untested suspect LBP and other LCMs are considered to be a BER.

Polychlorinated Biphenyls (PCBs)

Based on the years of construction of the site building (1963-1965), it is possible that the following on-site equipment and fixtures contain PCBs: two hydraulic elevators and fluorescent light ballasts. Additionally, fluorescent light bulbs/tubes contain mercury. No staining or other evidence of leakage associated with the observed equipment and fixtures was noted. The presence of possible PCB-containing equipment and fixtures, as well as mercury-containing fluorescent light bulbs/tubes, is considered to be a *de minimis* condition. Moreover, concrete joint compound in the expansion joints between concrete pours may sometimes be found to be asbestos- and/or PCB-containing. This may become a matter of environmental significance during demolition of concrete. The potential for joint compound within concrete slabs at the site to be asbestos- and/or PCB-containing is considered to be a BER.

Surrounding Uses

Based on the adjacent location and lack of information, historical uses of several adjacent properties to the north, northeast, southeast, and south are collectively considered to be a REC to Site 3. These included used auto sales facilities, auto sales, and service facilities, vehicle service facilities, a dry cleaner, and a mortuary with a reported UST.

ENVIRONMENTAL IMPACTS

Methodology

The Phase I ESAs were reviewed for information on hazardous materials or conditions at the Project Sites. The Phase I ESAs included a site reconnaissance, review of historic aerial photographs, review of historic maps, mapped regulatory database searches, and reviews of other reports prepared for each respective site. In general, as described above, the issue of hazardous materials is highly regulated. These regulations are relied upon in addressing the potential for the Project to impact the environment through the release of hazardous materials.

Thresholds of Significance

The California Supreme Court has held that CEQA generally does not require a lead agency to consider the impacts of the existing environment on the future residents or users of a project. An exception to this general rule is if a project may exacerbate a condition in the existing environment. In such a case, the lead agency is required to analyze that impact of that exacerbated condition on future residents and users of a project (as well as other impacted individuals). Thus, the analysis associated with existing hazardous conditions below focuses on whether the Project would exacerbate these environmental conditions so as to increase the potential to expose people to impacts from dispersion of hazardous materials to the environment.

The potential for the Project to result in impacts associated with hazards and hazardous materials is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. These significance thresholds are listed below. The balance of the significance thresholds not shown in this section have been determined to have no impact or a less-than-significant impact. These include: routine use of hazardous materials, airports, interference with emergency response, and fire hazards. The analyses for these determinations are provided in Section 6.5, Effects Found Not to be Significant.

Threshold 4.7-1: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Threshold 4.7-2: 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?

Threshold 4.7-3: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?

Affirmative answers to any of these questions would represent a significant impact.

Project Design Elements

The Project would include governmental offices, commercial retail, multi-family residential, community recreation center, and on-site parking. No specific Project Design Elements in regards to hazards and hazardous materials are proposed. However, all applicable federal, State, and local requirements regarding hazardous materials acquisition, handling, use, storage, transport, and dispositions would be applied.

Impact Analysis

Threshold 4.7-1: Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Site 1

RECs are defined as “the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. Business Environmental Risks (“BERs”) are defined as “a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate.” *De minimis* conditions are not recognized environmental conditions. RECs, BERs, and *de minimis* conditions have been found in connection with Site 1.

The potential RECs are:

- Two historical on-site used auto sales facilities
- Use of northern office building as a photo lab with industrial wastewater discharge
- Use of 523 Shatto Place that resulted in the discharge of industrial wastewater to an oil and sand trap (3-compartment clarifier)
- Presence of an abandoned on-place 10,000-gallon, steel, gasoline UST system adjacent to the entry driveway to the east side of the Shatto Place Parking Structure at 523 Shatto Place
- Presence of underlying fill material of unknown provenance
- Potential for methane gas/presence of oil wells on site (this environmental concern also represents possible vapor encroachment condition indicative of potential vapor intrusion)
 - Location in Methane Zone and Los Angeles City Oil/Gas Field
 - Presence of nine oil wells (six beneath existing buildings) with no abandonment documentation (which could serve as a conduit for methane gas)
- Adjacent properties at 440 and 444 S. Vermont Avenue (former UST, reported historical drycleaner, and historical automobile dealership), and Site 2 at 550 S. Vermont Avenue (parking structure-related UST listing, two former used auto sales facilities, and two reported possible historical gas/service stations)

The BERs are:

- Confirmed and untested suspect ACMs
- Untested suspect LBP and other LCMs
- Potential asbestos- and/or PCB-containing joint compounds within concrete slabs

The *de minimis* conditions are:

- Presence of possible PCB-containing equipment and fixtures
- Presence of possible mercury-containing fluorescent light bulbs/tubes

Compliance with existing federal and State laws regarding identified hazardous materials would be required. Specifically, Regulatory Requirements RR HH-1 through RR HH-6, address methane gas/vapor intrusion; testing and safe handling/removal of ACMs, LBP, LCMs, and PCB-containing materials; and soil management. RR HH-1 provides methane gas mitigation requirements and standards, and requires the approval of a methane mitigation plan. RR HH-2 provides abatement requirements of known and suspect ACMs prior to any demolition, remodeling, and/or renovation activities (that would disturb the ACMs) in accordance with applicable regulations. RR HH-3 provides abatement requirements of known and possible LBP and other LCMs shall be performed prior to any demolition, remodeling, and/or renovation activities (that would disturb the LBP and other LCMs) in accordance with applicable regulations. RR HH-

4 provides waste treatment recycling requirements for polychlorinated biphenyls (PCB)-containing equipment and fixtures, as well as mercury-containing fluorescent light bulbs/tubes. RR HH-5 provides requirements for a Soil Management Plan (SMP). RR HH-6 provides for characterization and remediation of soil conditions in the vicinity of the former 10,000 gallon UST and the former oil wells in the western portion of Site 1 under the supervision of the County Fire Department, Site Mitigation Unit (SMU). Furthermore, because there is no abandonment documentation for the nine on-site oil wells drill around 1890, potentially significant impacts may result from the redevelopment of the site due to the unknown precise location and condition of the oil wells, which could serve as a conduit for methane gas. Therefore, Mitigation Measure MM HH-1 is required, which requires that the anomaly identified in northwest portion of Site 1 by the geophysical survey be probed and identified to confirm that it is not an oil well and the information gathered on the Ruhland wells be reviewed with the DOGGR and LADBS to confirm that the Ruhland wells will not require reabandonment. Adherence to this mitigation measure would reduce potentially significant impacts associated with the on-site oil wells to a less than significant level, and adherence to the enumerated Regulatory Requirements would ensure that Project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Regarding operation, the proposed development at Site 1 would include governmental offices, commercial retail, and on-site parking. These types of uses would be expected to use and store small amounts of hazardous materials, such as paints, solvents, cleaners, pesticides, etc. As noted in the Regulatory Framework section, the issue of hazardous materials and wastes is highly regulated. Accordingly, all operational hazardous materials on the site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. Impacts would be less than significant.

Site 2

RECs, BERs, and *de minimis* conditions have been found in connection with Site 2.

The RECs are:

- Two historical on-site used auto sales facilities and the two reported possible on-site historical gas/service stations
- Presence of underlying fill material of unknown provenance
- Potential for methane gas/presence of oil wells on site (this environmental concern also represents possible vapor encroachment condition indicative of potential vapor intrusion)
 - Location in Methane Zone and Los Angeles City Oil/Gas Field
 - Presence of three oil wells beneath existing buildings with no abandonment documentation (which could serve as a conduit for methane gas)
- Adjacent properties at Site 1 at 510 and 532 S. Vermont Avenue (two former used auto sales facilities, and use of the northern office building on the property as a photo lab with industrial wastewater discharge) and 523 Shatto Place (historical operations that would result in the discharge of industrial wastewater to an oil and sand trap [3-compartment clarifier])

The BERs are:

- Confirmed and untested suspect ACMs
- Untested suspect LBP and other LCMs

- Potential asbestos- and/or PCB-containing joint compounds within concrete slabs

The *de minimis* conditions are:

- Presence of possible PCB-containing equipment and fixtures
- Presence of possible mercury-containing fluorescent light bulbs/tubes

Compliance with existing federal and State laws regarding identified hazardous materials would be required. Specifically, Regulatory Requirements RR HH-1 through RR HH-5, address methane gas/vapor intrusion; testing and safe handling/removal of ACMs, LBP, LCMs, and PCB-containing materials; and soil management. Moreover, regarding issues related to the underlying fill material, see Section 4.5, Geology and Soils. Furthermore, as there is no abandonment documentation for the three on-site oil wells drill around 1890, potentially significant impacts may result from the redevelopment of the site due to the unknown precise location and condition of the oil wells, which could serve as a conduit for methane gas. Therefore, Mitigation Measure MM HH-2 is required, which requires the Developer to submit development plans to DOGGR for review prior to commencement of any construction activity at Site 2, and the Project shall incorporate DOGGR's recommendations, to the extent feasible, and/or the Developer may be held responsible by DOGGR for re-abandoning the wells as set forth in Public Resources Code Sections 3208.1 and 3255. Adherence to this mitigation measure would reduce potentially significant impacts associated with the on-site oil wells to a less than significant level, and adherence to the enumerated Regulatory Requirements would ensure that Project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Regarding operation, the proposed development at Site 2 would include multi-family residential and amenities, and commercial retail utilizing both existing structure and new construction as well as on-site parking. These types of uses would be expected to use and store small amounts of hazardous materials, such as paints, solvents, cleaners, pesticides, etc. As noted in the Regulatory Framework section, the issue of hazardous materials and wastes is highly regulated. Accordingly, all operational hazardous materials on the site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. Impacts would be less than significant.

Site 3

RECs, BERs, and *de minimis* conditions have been found in connection with Site 3.

The RECs are:

- Historical on-site used auto sales facilities
- Presence of underlying fill material of unknown provenance
- Potential for methane gas on site (this environmental concern also represents possible vapor encroachment condition indicative of potential vapor intrusion)
 - Location in Methane Zone and Los Angeles City Oil/Gas Field
- Historical uses of several adjacent properties to the north, northeast, southeast, and south

The BERs are:

- Confirmed and untested suspect ACMs

- Untested suspect LBP and other LCMs
- Potential asbestos- and/or PCB-containing joint compounds within concrete slabs

The *de minimis* conditions are:

- Presence of possible PCB-containing equipment and fixtures
- Presence of possible mercury-containing fluorescent light bulbs/tubes

Compliance with existing federal and State laws regarding identified hazardous materials would be required. Specifically, Regulatory Requirements RR HH-1 through RR HH-5, address methane gas/vapor intrusion; testing and safe handling/removal of ACMs, LBP, LCMs, and PCB-containing materials; and soil management. Moreover, regarding issues related to the underlying fill material, see Section 4.5, Geology and Soils. Adherence to the enumerated Regulatory Requirements would ensure that Project construction would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

Regarding operation, the proposed Project at Site 3 would include senior affordable housing, a community recreation center, and on-site parking. These types of uses would be expected to use and store small amounts of hazardous materials, such as paints, solvents, cleaners, pesticides, etc. As noted in the Regulatory Framework section, the issue of hazardous materials and wastes is highly regulated. Accordingly, all operational hazardous materials on the site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. Impacts would be less than significant.

Threshold 4.7-2: 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?

Site 1

There are six schools within a quarter-mile of Site 1, which are:

- New Covenant Academy, approximately 125 feet to the east at 3119 W. 6th Street;
- Young Oak Kim Academy, approximately 190 feet to the south at 615 Shatto Place;
- Dongguk University Los Angeles, approximately 340 feet to the northeast at 440 Shatto Place;
- New Horizon School, approximately 350 feet to the north at 434 S. Vermont Avenue;
- Rise Kohyang Middle School, approximately 1,157 feet to the southeast at 3020 Wilshire Boulevard; and
- Pilgrim School, approximately 1,320 feet to the east at 540 Commonwealth Avenue.

As discussed under Threshold 4.7-1, above, impacts related to construction of the Project would be less than significant through the adherence of to the enumerated Regulatory Requirements and Mitigation Measure MM HH-1, which requires that the anomaly identified in northwest portion of Site 1 by the geophysical survey be probed and identified to confirm that it is not an oil well and the information gathered on the Ruhland wells be reviewed with the DOGGR and LADBS to confirm that the Ruhland wells will not require reabandonment. Therefore, the Project would not emit hazardous substances in a manner that would adversely affect a school. With respect to this threshold, the potential impact during construction would be less than significant.

Regarding operation, the proposed development at Site 1 would include governmental offices, commercial retail, and on-site parking. These types of uses would be expected to use and store small amounts of hazardous materials, such as paints, solvents, cleaners, pesticides, etc. As noted in the Regulatory Framework section, the issue of hazardous materials and wastes is highly regulated. Accordingly, all operational hazardous materials on the site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. Therefore, the Project would not emit hazardous substances in a manner that would adversely affect a school. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. With respect to this threshold, the potential impact during operation would be less than significant.

Site 2

There are five schools within a quarter-mile of Site 2, which are:

- Young Oak Kim Academy, approximately 85 feet to the south at 615 Shatto Place;
- New Covenant Academy, approximately 325 feet to the east at 3119 W. 6th Street;
- Dongguk University Los Angeles, approximately 620 feet to the northeast at 440 Shatto Place;
- New Horizon School, approximately 675 feet to the north at 434 S. Vermont Avenue; and
- Rise Kohyang Middle School, approximately 1,230 feet to the southeast at 3020 Wilshire Boulevard.

As discussed under Threshold 4.7-1, above, impacts related to construction of the Project would be less than significant through the adherence of to the enumerated Regulatory Requirements and Mitigation Measure MM HH-2, which requires the Developer to submit development plans to DOGGR for review prior to commencement of any construction activity at Site 2, and the Project shall incorporate DOGGR's recommendations, to the extent feasible, and/or the Developer may be held responsible by DOGGR for re-abandoning the wells as is set forth in Public Resources Code Sections 3208.1 and 3255. Therefore, the Project would not emit hazardous substances in a manner that would adversely affect a school. With respect to this threshold, the potential impact during construction would be less than significant.

Regarding operation, the proposed Project at Site 2 would include multi-family residential and amenities, and commercial retail utilizing both existing structure and new construction as well as on-site parking. These types of uses would be expected to use and store very small amounts of hazardous materials, such as paints, solvents, cleaners, pesticides, etc. As noted in the Regulatory Framework section, the issue of hazardous materials and wastes is highly regulated. Accordingly, all operational hazardous materials on the site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. Therefore, the Project would not emit hazardous substances in a manner that would adversely affect a school. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. With respect to this threshold, the potential impact during operation would be less than significant.

Site 3

There are four schools within a quarter-mile of Site 3, which are:

- New Horizon School, approximately 125 feet to the east at 434 S. Vermont Avenue;
- Dongguk University Los Angeles, approximately 625 feet to the east at 440 Shatto Place;
- New Covenant Academy, approximately 885 feet to the southeast at 3119 W. 6th Street; and

- Young Oak Kim Academy, approximately 1,000 feet to the south at 615 Shatto Place.

As discussed under Threshold 4.7-1, above, impacts related to construction of the Project would be less than significant through the adherence of to the enumerated Regulatory Requirements. Therefore, the Project would not emit hazardous substances in a manner that would adversely affect a school. With respect to this threshold, the potential impact during construction would be less than significant.

Regarding operation, the proposed development at Site 3 would include senior affordable housing, community recreation center, and on-site parking. These types of uses would be expected to use and store small amounts of hazardous materials, such as paints, solvents, cleaners, pesticides, etc. As noted in the Regulatory Framework section, the issue of hazardous materials and wastes is highly regulated. Accordingly, all operational hazardous materials on the site would be acquired, handled, used, stored, transported, and disposed of in accordance with all applicable federal, State, and local requirements. Therefore, the Project would not emit hazardous substances in a manner that would adversely affect a school. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. With respect to this threshold, the potential impact during operation would be less than significant.

Threshold 4.7-3: Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. As part of the Phase I ESA for Sites 1, 2, and 3, a regulatory database search was performed.

Site 1

As discussed above, Site 1 was not reported to be listed in any of the federal and State regulatory or tribal databases. However, Site 1 was reported to be listed in the following local database: Los Angeles County Hazardous Materials Systems. The site was also listed in the non-ASTM HAZNET database.

Regarding the Los Angeles County Hazardous Materials Systems listing, the portion of Site 1 with the seven-level parking structure is listed in this database as an industrial waste or UST facility with a status of open. As discussed above, it appears that the Los Angeles County Hazardous Materials Systems database listing pertains to industrial waste and is not an indication that a UST was present at this address. LABS IWM records for the site included a 1979 application for a permit to discharge industrial wastewater from “air conditioning and photo lab” processes (water and chemical for clean down and photo processing) for 510 S. Vermont Avenue, and a 1965 approved application for a permit to discharge industrial wastewater from a floor sink (from floor washing) to an oil and sand trap (3-compartment clarifier) for 523 Shatto Place (parking structure). The historical use of the northern office building as a photo lab with industrial wastewater discharge, and historical site operations at 523 Shatto Place (parking structure) that would result in the discharge of industrial wastewater to an oil and sand trap (3-compartment clarifier), are considered to be a REC.

Regarding the non-ASTM HAZNET listing, the site was listed in this database as generating waste in the form of tank bottom waste in 1995. The site representatives were unaware of the reason for this listing or the source of this waste. It is unknown whether the tank bottom waste listing is associated with the 3-

compartment clarifier referenced above for the 523 Shatto Place listing. As discussed above, the historical operation at 523 Shatto Place that would result in the discharge of industrial wastewater to an oil and sand trap (3-compartment clarifier) is considered to be a REC.

As discussed above, after preparation of the Phase I ESA additional information was provided by the LAFD UST Division concerning the 10,000-gallon UST on Site 1. However, no evidence of impacted soil was found in soil samples analyzed for gasoline, BTEX, and lead, and no groundwater was encountered to the maximum depth drilled. Furthermore, on May 1995, a no further action letter for the UST was issued by the LAFD.

Impacts related to construction of the Project would be less than significant through adherence to the enumerated Regulatory Requirements and Mitigation Measure MM HH-1. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. As such, the impact during construction and operation would be less than significant.

Site 2

As discussed above, Site 2 was not reported to be listed in any of the federal regulatory or tribal databases. Site 2 was reported to be listed in the following State and local databases: HIST UST, CA FID, UST, SWEEPS UST, and Los Angeles County Hazardous Materials System. The site was also listed in the non-ASTM HAZNET database.

Regarding the non-ASTM HAZNET listings, Site 2 at 3175 W. 6th Street is listed for generating hazardous waste in the form of asbestos-containing waste in 1997, 1999, 2000, 2001, 2009, 2010, and 2014. Site 2 at 550 S. Vermont Avenue is also listed in this database for generating hazardous waste in the form of asbestos-containing waste each year from 1996 to 2000 and in 2014, and for generating hazardous waste in the form of pharmaceutical waste, PCBs, and material containing PCBs. According to the site representative, these listings are likely due to renovations for various County departments at the facility. This facility was not listed in any databases as having had a release. Based on the regulatory status, these site listings are not considered to be of environmental concern to the site.

Impacts related to construction of the Project would be less than significant through adherence to the enumerated Regulatory Requirements and Mitigation Measure MM HH-2. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard. As such, the impact during construction and operation would be less than significant.

Site 3

As discussed above, Site 3 was not reported to be listed in any of the federal, State, tribal, local regulatory databases. Site 3 is listed in the non-ASTM HAZNET database.

Site 3 at 433 S. Vermont Avenue was listed in the non-ASTM HAZNET database for generating hazardous waste in the form of asbestos-containing waste in 1995 and 2008, and PCBs and materials containing PCBs in 2006. According to the site representative, these listings were likely due to renovations at the facility. This facility was not listed in any databases as having had a release. Based on the regulatory status, this site listing is not considered to be of environmental concern to the site.

Therefore, no hazardous material site pursuant to Government Code Section 65962.5 is located on at Site 3, and the Project would not create a significant hazard to the public or the environment. Based on the above, the Project would not have the potential to exacerbate current environmental conditions that

would create a significant hazard. As such, the impact during construction and operation at Site 3 would be less than significant.

CUMULATIVE IMPACTS

Development of the Project in combination with the related projects has the potential to increase the risks for accidental releases of hazardous materials. Each of the related projects would require evaluation for potential threats, including those associated with the use, storage, and/or disposal of hazardous materials, ACMs, LBP, PCBs, and oil and gas, to public safety and schools in the Project vicinity and would be required to comply with all applicable local, state, and federal laws, rules and regulations. Because environmental safety issues related to hazardous materials are largely site-specific, this evaluation would occur on a case-by-case basis for each individual project affected, in conjunction with development on these Project Sites. Thus, the potential impact associated with the Project would be less than significant and, therefore, would not substantially contribute to a cumulative impact.

The related projects that are nearest to the Project Sites are Related Project Nos. 68, 92, and 84. Related Project 68 is an apartment building, while Related Projects 92 and 84 are mixed use projects containing apartments and a museum, and apartments, retail and restaurant uses, respectively. It is unknown whether or not there currently are hazardous materials on these sites. However, the land uses proposed with these related projects are urban uses similar to the Project, and would not involve any large scale use of hazardous materials. Given the similar urban location of the Project and related projects, construction and operational impacts are anticipated to be similar and all future developments would be required to comply with applicable regulations regarding hazardous materials. As such, the combined impacts of these related projects and the Project would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

As discussed above, based on the results of a methane survey done on the western portion of Site 1 in 2015, four multi-depth nested soil gas probes were installed for additional sampling: two in the on-site asphalt-paved parking lot to the north of the northern office building, and two in the 526 S. Vermont Avenue asphalt-paved parking area lot between the northern and southern office buildings. While the multi-depth nested soil gas probes were identified to be abandoned during site construction/redevelopment activities, the following Project Design Feature would be incorporated as a Project component to allow for additional sampling to be undertaken, if needed.

PDF HH-1 At Site 1, the four triple-nested soil gas wells shall be retained for additional sampling, if needed. When no longer needed, because methane concentrations are not detected at or above the Landtec GEM 2000™ instrument detection limit of 0.1 percent or the flame ionization detector (FID) detection limit of 0.1 parts per million by volume (ppmv), they shall be removed/abandoned in accordance with applicable regulations.

Regulatory Requirements

The following standards would be imposed by existing laws and regulations and would address Project impacts. These are not required mitigation but are inherent Project components for all three Project Sites unless otherwise stated.

- RR HH-1a:** For Site 1 and Site 3, Los Angeles County Building Code Sections 110.3 and 110.4 shall be followed regarding methane gas mitigation requirements and standards. Following approval of a methane mitigation plan for the respective site by the County Building Official, redevelopment of each site shall be performed in accordance with all Los Angeles County Building Code's methane-related requirements.
- RR HH-1b:** For Site 2, the City of Los Angeles Methane Ordinance (Ord. No. 175,790) shall be followed, including methane gas sampling and pressure testing, installation, and certification, if required, of a City of Los Angeles-approved methane mitigation system. Following approval by City of Los Angeles Department of Building and Safety (LADBS) and City of Los Angeles Fire Department (LAFD), redevelopment of the site by the Project shall be performed in accordance with all LADBS and LAFD methane-related requirements.
- RR HH-2:** Prior to any demolition, remodeling, and/or renovation activities at the site, untested suspect asbestos-containing materials (ACMs) that may be disturbed, including concrete joint compound, shall be sampled and analyzed in accordance with applicable regulations (including testing concrete joint compound for polychlorinated biphenyls [PCBs]). Abatement of known and suspect ACMs shall be performed prior to any demolition, remodeling, and/or renovation activities (that would disturb the ACMs) in accordance with applicable regulations. In the event that renovation or demolition activities do not take place, known and suspect ACMs at the site shall be managed in accordance with applicable regulations, including the preparation and implementation of an asbestos operation and maintenance (O&M) plan. These activities shall be performed in accordance with applicable regulatory agency guidelines (such as federal Occupational Safety and Health Administration, California OSHA, South Coast Air Quality Management District, and California Environmental Protection Agency, Department of Toxic Substances Control).
- RR HH-3:** Prior to any demolition, remodeling, and/or renovation activities at the site, untested possible lead-based paint (LBP) and other lead-containing materials (LCMs) that may be disturbed shall be sampled and analyzed for total lead content. Abatement of known and possible LBP and other LCMs shall be performed prior to any demolition, remodeling, and/or renovation activities (that would disturb the LBP and other LCMs) in accordance with applicable regulations. These activities shall be performed in accordance with applicable regulatory agency guidelines (such as United States Department of Housing and Urban Development, California Department of Public Health, and Los Angeles County Department of Health Services).
- RR HH-4:** Prior to proposed redevelopment, possible polychlorinated biphenyls (PCB)-containing equipment and fixtures, as well as mercury-containing fluorescent light bulbs/tubes, shall be disposed of or recycled consistent with applicable regulations and regulatory agency guidelines such as the Integrated Waste Management Act, Beverage Container Recycling and Litter Reduction Act, and California Department of Resources Recycling and Recovery requirements.
- RR HH-5:** A Soil Management Plan (SMP) shall be prepared prior to, and implemented during, site redevelopment activities that would result in the exposure of soils at the site. The SMP shall include, but not be limited to, dust suppression measures in accordance with applicable regulations, methods of monitoring for impacted soil, handling and disposal

procedures for impacted soil that is encountered, and procedures for testing of soil imported to or exported from the site. The SMP shall be prepared with local agency oversight, such as the Los Angeles County Fire Department's Health Hazardous Materials Divisions – Site Mitigation Unit.

RR HH-6: Additional regulatory compliance actions are required on Site 1 to address conditions associated with petroleum impacts in soil and groundwater, as identified in the Phase II ESA, prior to construction. As required under existing regulations in conjunction with standard construction practices, these actions would occur at the western portion of Site 1 in the vicinity of on-Site abandoned oil wells, and at the eastern portion of Site 1 (at the parking structure site) in the area of the onsite abandoned UST. Site 1 construction will comply with the requirements of LACFD SMU.

MITIGATION MEASURES

MM HH-1: The anomaly identified in the northwest portion of Site 1 by the geophysical survey shall be probed and identified to confirm that it is not an oil well. The information gathered on the Ruhland wells shall then be reviewed with the DOGGR and LADBS to confirm that the Ruhland wells will not require reabandonment.

MM HH-2: Prior to the commencement of any construction activity at Site 2, a geophysical survey to locate the on-site oil wells shall be undertaken and shall follow California Occupational Safety and Health Administration guidelines for grading and/or shoring. Second, the Developer shall submit Project plans to the Southern District office of the California Department of Conservation's Division of Oil, Gas, & Geothermal Resources (DOGGR) that show, at a minimum, the boundary of the development site property with all known wells plotted on the property, final grade of the development site property, and a visual bar scale for review as a part of its Construction Site Well Review Program. The DOGGR review may include recommendations such as: possible re-abandonment of the on-site oil wells; building/structure redevelopment setbacks and/or other construction-related requirements above or adjacent to the on-site oil wells; the installation of vent cones and related venting-related methane mitigation system above the soil wells and beneath the building slabs. The Project shall incorporate DOGGR's recommendations, to the extent feasible, and/or the Developer may be held responsible by DOGGR for re-abandoning the wells. Any methane mitigation system associated with this measure shall not conflict with Los Angeles County's methane gas mitigation requirements and standards for Site 1, or the City of Los Angeles Methane Ordinance for Site 2.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Upon implementation of Mitigation Measures MM HH-1 and MM HH-2 as they apply to Project development at Site 1 and Site 2, Project impacts with regard to hazards and hazardous materials would be less than significant.

Cumulative impacts with regard to hazards and hazardous materials would be less than significant.

4.8 HYDROLOGY AND WATER QUALITY

INTRODUCTION

This section provides an overview of hydrology and water quality and evaluates the impacts associated with the Project. Topics addressed include water quality, groundwater, and drainage.

The following analysis is based on the following water resources conceptual report prepared for the Project:

- *Vermont Corridor Development Project, Water Resources Conceptual Report*, prepared by KPFF Consulting Engineers, October 25, 2017 (Draft EIR Appendix 4.8-1).

The report presents the description of the existing surface water hydrology, surface water quality, groundwater level, and groundwater quality at the Project Sites. In addition, the report analyzes the Project's potential impacts related to surface water hydrology, surface water quality, groundwater level, and groundwater quality. The report is based on review of the Project and review of published groundwater information and hydrological data. Furthermore, the analysis in this section includes a description of the regulatory framework, thresholds for determining if the Project would result in significant impacts, mitigation measures (if determined applicable), and the level of significance after mitigation.

ENVIRONMENTAL SETTING

Existing Conditions

The Project Sites are located in the South Coast Hydrologic Region, which encompasses all coastal drainages flowing toward the Pacific Ocean between Rincon Point and the eastern County's line, as well as the 5 islands adjacent to the coastline and 19 major rivers and watersheds. This drainage area totals 1,608 square miles. The major drainage systems within the Hydrologic Region are the Los Angeles River, San Gabriel River, Dominguez Channel, Santa Monica Bay and Ballona Creek Watersheds. The Project Sites are located within the Ballona Creek Watershed. Ballona Creek is a 9-mile long flood protection channel that drains the Los Angeles basin, from the Santa Monica Mountains to the north, the Harbor Freeway ("I- 110/SR-110") to the east, and Baldwin Hills to the south. The Ballona Creek Watershed totals approximately 130 square miles. The Watershed borders the Santa Monica Mountains, the Ventura-Los Angeles County line, and extends to downtown Los Angeles. The Watershed also extends to the south across the Los Angeles plain to include the area north of Baldwin Hills. The major tributaries to Ballona Creek include Centinela Creek, Sepulveda Canyon Channel, Benedict Canyon Channel, and numerous storm drains.

Groundwater

Groundwater use for domestic water supply is a beneficial use of groundwater basins in Los Angeles County. The central area of the City of Los Angeles, which includes the Project Sites, overlies the Los Angeles Coastal Plain Groundwater Basin. The Los Angeles Coastal Plain Basin is comprised of the Hollywood, Santa Monica, Central, and West Coast Subbasins. Groundwater flow in the Los Angeles Coastal Plain Groundwater Basin is generally south-southwesterly and may be restricted by natural geological features. Replenishment of groundwater basins occurs mainly by percolation of precipitation throughout the region via permeable surfaces, spreading grounds, and groundwater migration from

adjacent basins, as well as injection wells designed to pump fresh water along specific seawater barriers to prevent the intrusion of salt water.

Within the Los Angeles Coastal Plain Groundwater Basin, the Project Sites specifically overlie the Central Subbasin (also referred to as “the Central Basin”). The Project Sites are located toward the western portion of the Central Basin. The Central Basin is bounded on the north by a surface divide called the La Brea high, and on the northeast and east by emergent less permeable Tertiary rocks of the Elysian, Repetto, Merced and Puente Hills. The southeast boundary between the Central Basin and Orange County Groundwater Basin roughly follows Coyote Creek, which is a regional drainage province boundary. The southwest boundary is formed by the Newport Inglewood fault system and the associated folded rocks of the Newport Inglewood uplift.¹

Groundwater in the Central Basin is naturally replenished from surface inflow through Whittier Narrows. Percolation in the Los Angeles Forebay Area is restricted due to urbanization of the area. Imported and recycled water is also used for artificial recharge at the Rio Hondo and San Gabriel River spreading grounds. There are problems with saltwater intrusions in locations where river systems have eroded through the Newport Inglewood uplift. The Central Basin “Allowed Pumping Allocation” (“APA”) was set at 217,367 acre-feet-per-year (“AFY”).² Two LADWP facilities provide groundwater supplies in the Central Basin: the Manhattan Wells and the 99th Street Wells. The active Manhattan Wells were installed between 1928 and 1974, and have a production capacity of 16.9 cubic feet per second (“cfs”). Wells at the 99th Street location were installed between 1974 and 2002, and have a production capacity of 7.4 cfs.³

The Project Sites are developed with existing buildings and hardscape area with approximately 100 percent impervious surfaces. Due to the primarily impervious condition of the Sites, there is minimal groundwater recharge potential in the existing condition. A previous investigation conducted near the Site 1 encountered groundwater at depths between 28 and 30 feet below grade. According to the geotechnical assessments (attached to this Draft EIR as Appendices 4.5-1, 4.5-2, and 4.5-3) prepared for the Project, it is assumed that the current groundwater level at the Project Sites is similar to the water levels observed by the previous investigation.^{4,5,6} According to groundwater data provided in the Seismic Hazard Zone Report of the Hollywood 7 ½ - Minute Quadrangle, the historic-high groundwater level for

¹ California Department of Water Resources, *California’s Groundwater Bulletin 118, “Coastal Plan of Los Angeles Groundwater Basin, Central Subbasin”*, <http://www.water.ca.gov/groundwater/bulletin118/basindescriptions/4-11.04.pdf>, accessed August 9, 2016.

² Water Replenishment District of Southern California, *Engineering Survey and Report*, http://www.wrd.org/WRD_ESR_Final_Report_March_5_2015.pdf; accessed August 17, 2016.

³ LADWP, *Sources of Supply “Groundwater”*, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/awater/a-w-sourcesofsupply/a-w-sos-localgroundwater?_adf.ctrlstate=jzum6iski_4&_afLoop=1185517062045184; accessed December 7, 2016.

⁴ Geotechnologies, Inc., *Geotechnical Assessment Site 1: Proposed Office Building and Parking Structure*, November 28, 2016, page 4.

⁵ Geotechnologies, Inc., *Geotechnical Assessment Site 2: Proposed Adaptive Reuse Project and Mixed-Use Structure*, November 29, 2016, page 3.

⁶ Geotechnologies, Inc., *Geotechnical Assessment Site 3: Proposed Affordable Housing Development*, November 30, 2016, page 3.

the Project Sites was on the order of 20 feet below the ground surface (CDMG, 1998, Revised 2006).⁷ Fluctuation in the level of groundwater, including in the vicinity of the Project Sites would be expected to occur over time due to variations in rainfall, temperature, and other factors.

Water Quality

In general, urban stormwater runoff occurs following precipitation events with the volume of runoff flowing into the drainage system depends on the intensity and duration of the rain event. Contaminants that may be found in stormwater from developed areas include sediments, trash, bacteria, metals, nutrients, organics and pesticides. The source of contaminants includes surface areas where precipitation falls, as well as the air it falls through. Contaminants on surfaces such as roads, maintenance areas, parking lots, and buildings, which are usually contained in dry weather conditions, may be carried by rainfall runoff into drainage systems. The City has installed catch basins with screens to capture debris before entering the storm drain system, and conducts periodic cleaning and maintenance of the catch basins. In addition, the City conducts routine street cleaning operations to reduce stormwater pollution within the City.

As stated above, the Project Sites lie in the Ballona Creek Watershed. Constituents of concern listed for Ballona Creek under California's CWA Section 303(d) List include Cadmium (sediment), Chlordane (Tissue & Sediment), Coliform Bacteria, Copper (Dissolved), Cyanide, DDT, Exotic Vegetation, Habitat Alterations, Hydromodification, Lead, PAHs, PCBs, Reduced Tidal Flushing, Selenium, Sediment Toxicity, Shellfish Harvesting Advisory, Silver, Toxicity, Trash, Viruses (Enteric), and Zinc.⁸ It appears the existing Project Sites currently do not implement structural BMPs and apparently have no means of treatment for stormwater runoff. Based on the existing operations within the Project Sites, the on-site runoff likely contains the following pollutants of concern: sediment, nutrients, pesticides, metals, pathogens, and oil and grease.⁹

Drainage

Site 1 is currently developed with a 30,788-square foot, two-story office building and a surface parking lot to the north of this building, an unoccupied 13,325 square foot one-story office building, a surface parking lot located between the two office buildings, and a seven-story, 235,248 square foot parking structure. Site 2 is currently developed with a 154,793-square foot, 12-story County office building, an approximately 52,000 square foot, four-story office building, and a 14,010-square foot parking structure. Site 3 is currently developed with a 29,292-square foot, four-story office building and an at-grade parking lot at the rear and north of the existing building.

The existing Site 1 buildings along Vermont Avenue drain directly to the curb face. The existing surface parking lot sheet flows to the gutter in the street. Just north of Site 1 is a City-owned catch basin where stormwater is collected and piped to an 18-inch storm drain main along Vermont Avenue. The existing

⁷ California Department of Conservation, Division of Mines and Geology, *Seismic Hazard Zone Report of the Hollywood 7½-Minute Quadrangle, Los Angeles County, California, C.D.M.G. Seismic Hazard Zone Report 026, map scale 1:24,000, 1998 (Revised 2006).*

⁸ US EPA, *Final 2010 Integrated Report (CWA Section 303(d) List/305(b) Report)*, website: http://www.waterboards.ca.gov/water_issues/programs/tmdl/2010state_ir_reports/category5_report.shtml, accessed: May 23, 2017.

⁹ KPFF Consulting Engineers, *Vermont Corridor Development Project, Water Resources Conceptual Report, September 12, 2017, page 17.*

parking structure on Shatto Place collects stormwater from the roof and discharges to the curb face through multiple rectangular curb drains. Site 2 is located at the corner of 6th Street and Vermont Avenue. The existing structures for Site 2 discharge directly to the curb face along Vermont Avenue and 6th Street. Runoff from Site 2 sheet flows to the same catch basin as Site 1. Site 3 is located north of Site 1 and Site 2 on Vermont Avenue. The existing building discharges directly to the curb face. Runoff from the Site 3 sheet flows north to a catch basin near 4th Street.

Table 4.8-1 shows the stormwater runoff calculations for a 50-year storm event under existing conditions for the three Project Sites. The existing stormwater infrastructure located along Vermont Avenue and Shatto Place has sufficient capacity to accept the stormwater runoff demands from the existing conditions at the Project Sites.¹⁰ Once within the underground pipe networks, stormwater eventually drains into Ballona Creek. Ballona Creek flows generally southwest, ultimately discharging into the Pacific Ocean at the Santa Monica Bay. Ballona Creek is designed to discharge to Santa Monica Bay approximately 71,400 cubic feet per second from a 50-year frequency storm event.

Table 4.8-1
Existing Drainage Stormwater Runoff Calculations

Drainage Area	Area (in Acres)	Q50 (cfs) (volumetric flow rate measured in cubic feet per second)
Site 1 – Vermont Avenue	1.737	5.41
Site 1 – Shatto Place	.797	2.48
Site 2	.994	3.10
Site 3	.498	1.55
<i>Source: KPFF Consulting Engineers, 2017.</i>		

Regulatory Framework

Federal

Federal Water Pollution Control Act (Clean Water Act)

The Clean Water Act (“CWA”) was first introduced in 1948 as the Water Pollution Control Act. The CWA authorizes Federal, state, and local entities to cooperatively create comprehensive programs for eliminating or reducing the pollution of state waters and tributaries. The primary goals of the CWA are to restore and maintain the chemical, physical, and biological integrity of the nation’s waters and to make all surface waters fishable and swimmable. As such, the CWA forms the basic national framework for the management of water quality and the control of pollutant discharges. The CWA also sets forth a number of objectives in order to achieve the abovementioned goals. These objectives include regulating pollutant and toxic pollutant discharges; providing for water quality that protects and fosters the propagation of fish, shellfish and wildlife; developing waste treatment management plans; and developing and implementing programs for the control of non-point sources of pollution.¹¹

¹⁰ *Ibid.*, page 4.

¹¹ *Non-point sources of pollution are carried through the environment via elements such as wind, rain, or stormwater and are generated by diffuse land use activities (such as runoff from streets and sidewalks or agricultural activities) rather than from an identifiable or discrete facility.*

Since its introduction, major amendments to the CWA have been enacted (e.g., 1961, 1966, 1970, 1972, 1977, and 1987). Amendments enacted in 1970 created the U.S. Environmental Protection Agency (“U.S. EPA”), while amendments enacted in 1972 deemed the discharge of pollutants into waters of the United States from any point source unlawful unless authorized by a U.S. EPA National Pollutant Discharge Elimination System (“NPDES”) permit. Amendments enacted in 1977 mandated development of a “Best Management Practices” Program at the state level. Amendments enacted in 1987 required the USEPA to create specific requirements for discharges.

In response to the 1987 amendments to the CWA and as part of Phase I of its NPDES permit program, the USEPA began requiring NPDES permits for: (1) municipal separate storm sewer systems (“MS4”) generally serving, or located in, incorporated cities with 100,000 or more people (referred to as municipal permits); (2) 11 specific categories of industrial activity (including landfills); and (3) construction activity that disturbs five acres or more of land. Phase II of the USEPA’s NPDES permit program, which went into effect in early 2003, extended the requirements for NPDES permits to: (1) numerous small municipal separate storm sewer systems,¹² (2) construction sites of one to five acres, and (3) industrial facilities owned or operated by small municipal separate storm sewer systems. The NPDES permit program is typically administered by individual authorized states. In California, the NPDES stormwater permitting program is administered by the State Water Resources Control Board (SWRCB), which is discussed in greater detail below.

Federal Anti-Degradation Policy

The Federal Anti-degradation Policy (40 Code of Federal Regulations 131.12) requires states to develop statewide anti-degradation policies and identify methods for implementing them. Pursuant to the Code of Federal Regulations (“CFR”), state anti-degradation policies and implementation methods shall, at a minimum, protect and maintain (1) existing in-stream water uses; (2) existing water quality, where the quality of the waters exceeds levels necessary to support existing beneficial uses, unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and (3) water quality in waters considered an outstanding national resource.

Safe Drinking Water Act (SDWA)

The Federal Safe Drinking Act, established in 1974, sets drinking water standards throughout the country and is administered by the USEPA. The drinking water standards established in the SDWA, as set forth in the CFR, are referred to as the National Primary Drinking Water Regulations (Primary Standards, Title 40, CFR Part 141) and the National Secondary Drinking Water Regulations (Second Standards, 40 CFR Part 143). California passed its own Safe Drinking Water Act in 1986 that authorizes the State’s Department of Health Services (“DHS”) to protect the public from contaminants in drinking water by establishing maximum contaminants levels (“MCLs”), as set forth in the CCR, Title 22, Division 4, Chapter 15, that are at least as stringent as those developed by the USEPA, as required by the federal Safe Drinking Water Act.

¹² *A small municipal separate storm sewer system (“MS4”) is any MS4 not already covered by the Phase I program as a medium or large MS4. The Phase II Rule automatically covers on a nationwide basis all small MS4s located in “urbanized areas” as defined by the Bureau of the Census (unless waived by the NPDES permitting authority), and on a case-by-case basis those small MS4s located outside of urbanized areas that the NPDES permitting authority designates.*

State

Porter-Cologne Water Quality Control Act and State Water Resource Control Board

The Porter-Cologne Water Quality Control Act of 1969 established the SWRCB as the principal State agency for coordinating and controlling water quality in California. Specifically, the Porter-Cologne Water Quality Control Act authorizes the SWRCB to adopt, review, and revise policies for all waters of the State (including both surface and groundwaters). Section 13170 of the California Water Code also authorizes the SWRCB to adopt water quality control plans on its own initiative. The SWRCB sets statewide policies and regulations for the implementation of water quality control programs mandated by federal and State water quality statutes and regulations. The SWRCB delegates to the 9 Regional Water Quality Control Boards (“RWQCBs”) the responsibility for the protection of water quality in each major drainage basin throughout the State. The RWQCBs develop and enforce water quality objectives and implement plans that will best protect California’s waters, acknowledging areas of different climate, topography, geology, and hydrology. The RWQCBs develop “basin plans” for their hydrologic areas, issue waste discharge requirements, enforce action against stormwater discharge violators, and monitor water quality.¹³ The Los Angeles Regional Water Quality Control Board (“LARWQCB”) has jurisdiction over the coastal drainages between Rincon Point (on the coast of western Ventura County) and the eastern Los Angeles County line, which includes the Project Sites. The LARWQCB’s Basin Plan is discussed in greater detail below.

NPDES General Construction Activity Stormwater Permit

As discussed above, the USEPA has delegated responsibility for implementation of portions of the CWA, including water quality control planning and control programs, such as the NPDES permit program, to the SWRCB. The SWRCB has elected to adopt one statewide general permit for construction activity at this time. The General Construction Activities Stormwater Permit (“GCASP”) (known as the “General Permit”) applies to stormwater discharges associated with construction activity. The main objectives of the General Permit are to:

1. Reduce erosion;
2. Minimize or eliminate sediment in stormwater discharges;
3. Prevent materials used at a construction site from contacting stormwater;
4. Implement a sampling and analysis program;
5. Eliminate unauthorized non-stormwater discharges from construction sites;
6. Implement appropriate measures to reduce potential impacts on waterways both during and after construction of projects; and
7. Establish maintenance commitments on post-construction pollution control measures.

Currently, the GCASP requires all dischargers where construction activity disturbs one acre or more to conduct the following:

- Develop and implement a Stormwater Pollution Prevention Plan (“SWPPP”), which specifies BMPs that will prevent all construction pollutants from contacting stormwater and with the intent of keeping all products of erosion from moving off-site into receiving waters;

¹³ USEPA. U.S. Environmental Protection Agency - Clean Water Act. July 2011 website: <http://www.epa.gov/lawsregs/laws/cwa.html>.

- Eliminate or reduce non-stormwater discharges to storm sewer systems and other waters of the United States; and
- Perform inspections of all BMPs.

The SWPPP has two major objectives: (1) to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges and (2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater as well as non-stormwater discharges. The SWPPP must include BMPs that address source control and, if necessary, must also include BMPs that address specific pollutant control. The SWPPP includes a description of (1) the site, (2) erosion and sediment controls, (3) means of waste disposal, (4) implementation of approved local plans, (5) control of post-construction sediment and erosion control measures and maintenance responsibilities, and (6) non-stormwater management controls. Dischargers are also required to inspect their construction sites before and after storms to identify stormwater discharge associated with construction activity and to identify and implement controls where necessary.

Total Maximum Daily Loads (TMDLs)

Section 303(d) of the CWA requires that states make a list of waters that are not attaining standards after the technology-based limits are put in place. For waters on this list (and where the USEPA administrator deems they are appropriate), the states are to develop TMDLs, which are calculations of the maximum amount of a pollutant that a water body can have and still meet applicable water quality standards. A TMDL must account for all sources of pollutants that cause the water to be listed. Federal regulations require that TMDLs, at a minimum, account for contributions from point sources and nonpoint sources. Pursuant to this requirement, the SWRCB has adopted a list of impaired water bodies (the 303(d) list) for the State of California identifying water quality impairments including trash, metals, pathogens, and organic pesticides. The list was most recently updated in 2012 and adopted in 2015.¹⁴ Ballona Creek is among the SWRCB listed impaired waterways with TMDLs established for cadmium, chlordane, copper, lead, Polychlorinated Biphenyls, silver, zinc, and trash from point and nonpoint sources.¹⁵

California Anti-Degradation Policy

The California Anti-degradation Policy, otherwise known as the Statement of Policy with Respect to Maintaining High Quality Water in California was adopted by the SWRCB (State Board Resolution No. 68-16) in 1968. Unlike the Federal Anti-degradation Policy, the California Anti-degradation Policy applies to all waters of the State, not just surface waters. The policy states that whenever the existing quality of a water body is better than the quality established in individual Basin Plans, such high quality shall be maintained and discharges to that water body shall not unreasonably affect present or anticipated beneficial use of such water resource.

¹⁴ Clean Water Act, 2006, Section 303(d) list of water quality limited segments requiring Total Maximum Daily Loads, available at: http://www.waterboards.ca.gov/water_issues/programs/tmdl/docs/303dlists2006/epa/r4_06_303d_reqtmlds.pdf, accessed March 22, 2017.

¹⁵ EPA Waterbody Quality Assessment Report, available at: https://ofmpub.epa.gov/waters10/attains_waterbody.control?p_au_id=CAR4051300019980918142302&p_cycle=2012&p_state=CA&p_report_type=#tmdls, accessed March 22, 2017.

California Toxic Rule

In 2000, the EPA promulgated the California Toxic Rule, which establishes water quality criteria for certain toxic substances to be applied to waters in the State. The EPA promulgated this rule based on the EPA's determination that the numeric criteria are necessary in the State to protect human health and the environment. The California Toxic Rule establishes acute (i.e., short-term) and chronic (i.e., long-term) standards for bodies of water such as inland surface waters and enclosed bays and estuaries that are designated by the LA RWQCB as having beneficial uses protective of aquatic life or human health.

California Water Plan

The California Water Plan The Plan provides a framework for water managers, legislators, and the public to consider options and make decisions regarding California's water future. The Plan, which is updated every five years, presents basic data and information on California's water resources including water supply evaluations and assessments of agricultural, urban, and environmental water uses to quantify the gap between water supplies and uses. The Plan also identifies and evaluates existing and proposed statewide demand management and water supply augmentation programs and projects to address the State's water needs. The goal for the California Water Plan Update is to meet Water Code requirements, receive broad support among those participating in California's water planning, and be a useful document for the public, water planners throughout the state, legislators and other decision-makers.

Regional

LARWQCB and the Water Quality Management Plan for the Los Angeles Region

The Project Sites are within the jurisdiction of the LARWQCB. The LARWQCB provides permits that affect surface waters and groundwater. As required by the CWA, the LARWQCB adopted the Water Quality Management Plan for the Los Angeles Region ("Basin Plan") on June 13, 1994. Specifically, the Basin Plan designates beneficial uses for surface and groundwaters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and describes implementation programs to protect all waters in the Los Angeles Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. Those of other agencies are referenced in appropriate sections throughout the Basin Plan.¹⁶

The California Water Code defines water quality objectives as "the allowable limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses of water or the prevention of nuisance within a specific area." The Basin Plan's water quality objectives are intended to: (1) protect the public health and welfare, and (2) maintain or enhance water quality in relation to the designated existing and potential uses of the water. Under Section 303(d) of the CWA, the LARWQCB is also responsible for protecting surface waters and groundwater from both point and non-point sources of pollution within the project area and for establishing water quality standards and objectives in its Basin Plan that protect the beneficial uses of various waters.

¹⁶ Los Angeles Regional Water Quality Control Board. LARWQCB Basin Plan <http://www.waterboards.ca.gov/losangeles/water_issues/programs/basin_plan/> accessed December 6, 2016.

Local**County of Los Angeles****Los Angeles County MS4 Permit**

As described above, USEPA regulations require that MS4 permittees implement a program to monitor and control pollutants being discharged to the municipal system from both industrial and commercial projects that contribute a substantial pollutant load to the MS4. On November 8, 2012, the LARWQCB adopted Order No. R4-2012-0175 under the CWA and the Porter-Cologne Act. This Order is the NPDES Permit or MS4 permit for municipal stormwater and urban runoff discharges within Los Angeles County. The requirements of this Order cover 84 cities and most of the unincorporated areas of Los Angeles County. Development in the project area is subject to the waste discharge requirements issued by the LARWQCB for the MS4 Permit. The Permittees are the 84 Los Angeles County cities (including the City of Los Angeles), Los Angeles County, and the Los Angeles County Flood Control District. Both the City and County of Los Angeles, therefore, have joint/concurrent legal authority to enforce the terms of the permit within its jurisdiction.

The MS4 Permit is intended to ensure that combinations of site planning, source control and treatment control practices are implemented to protect the quality of receiving waters. To do so, the permit requires that new development employ BMPs designed to control pollutants in stormwater runoff to the MEP, details specific sizing criteria for BMPs, and specifies flow control requirements. These BMPs include structural practices, source control and treatment techniques and systems, and site design planning principles addressing water quality. Site design or planning management BMPs are used to minimize runoff from new development and to discourage development in environmentally sensitive areas that are critical to maintaining water quality. Source control BMPs are usually the most effective and economical in preventing pollutants from entering storm and non-storm runoff. Treatment control BMPs involve physical treatment of the runoff, usually through structural means. These are also referred to as structural BMPs.

Stormwater Quality Management Program

In compliance with the Los Angeles County MS4 Permit, the Co-Permittees are required to implement a stormwater quality management program ("SQMP") with the goal of accomplishing the requirements of the Permit and reducing the amount of pollutants in stormwater runoff. Among other things, the MS4 Permit requires the co-permittees to prepare a SQMP specifying the BMPs that will be implemented to reduce the discharge of pollutants in stormwater to the MEP. The emphasis of the SQMP is pollution prevention through education, public outreach, planning, and implementation of source control BMPs first, followed by structural and treatment control BMPs.

County of Los Angeles Hydrology Manual

Per the City of Los Angeles ("City")'s Special Order No. 007-1299, December 3, 1999, the City has adopted the Los Angeles County ("County") Department of Public Works Hydrology Manual as its basis of design for storm drainage facilities. The Hydrology Manual requires that a storm drain conveyance system be designed for a 25-year storm event and that the combined capacity of a storm drain and street flow system accommodate flow from a 50-year storm event. Areas with sump conditions are required to have a storm

drain conveyance system capable of conveying flow from a 50-year storm event.¹⁷ The County also limits the allowable discharge (“Q”) for direct connections to Flood Control facilities. The determination of the allowable Q is based on the infrastructure capacity directly impacted by the service area. Any proposed drainage improvements of County-owned storm drain facilities such as catch basins and storm drain lines requires the approval/review from the County Flood Control District department.

Los Angeles County’s Low Impact Development (“LID”) Ordinance

On November 18, 2013, the Board adopted the LID Ordinance. Chapter 12.84 of the County Code requires the use of LID principles in development projects. LID encourages site sustainability and smart growth in a manner that respects and preserves the characteristics of the County’s watersheds, drainage paths, water supplies and natural resources. LID builds on conventional design strategies by using every softscape and hardscape surface in the development to perform a beneficial hydrologic function by retaining, detaining, storing, changing the timing of, or filtering stormwater and urban runoff. LID encompasses the use of structural devices, engineered systems, vegetated natural designs, and education in order to distribute stormwater and urban runoff across a development site. Over the past decade, LID has emerged along with technologies and practices that allow a sustainable stormwater management strategy to control stormwater and urban runoff at the source rather than centralized, end-of-pipe controls. LID relies on an integrated system of decentralized, small-scale control measures. These measures range from site design practices to technology driven LID BMPs. The underlying principle of LID is that undeveloped land does not present a stormwater runoff or pollution problem. The evolved natural hydrology of any given site manages water in the most efficient manner. This most often translates to high rates of infiltration, vegetative interception, and evapotranspiration. LID attempts to offset the effects of development and changes in land cover by preserving or restoring predevelopment hydrology and water quality through a series of small-scale, decentralized, natural, and engineered controls at or near the point where the stormwater is generated. It is a source control option that minimizes stormwater pollution by recognizing the greatest efficiencies are gained by minimizing stormwater generation. This is a process that begins with functional conservation of watershed resources, reducing impacts of development, and then using innovative management practices to meet the stormwater objective. Site preservation practices coupled with small-scale BMPs that rely on the environmental services of vegetation and soils or systems that mimic these services comprise the control approach of LID. These practices, taken in aggregate, limit the observed hydromodification on a developed site and present a more comprehensive and beneficial control approach. To appropriately implement LID, it is important to assess its role in water quality protection. LID is one part of a toolkit that can be used to better manage natural resources and limit the pollution delivered to waterways. It is not independent of watershed planning. To gain optimal benefits, LID must be integrated with appropriate land use programs. LID, by itself, will not deliver the water quality outcomes desired; yet, it provides enhanced stormwater treatment and mitigates excess volume and flow rates. However, if not integrated in a comprehensive fashion, LID techniques can end up as a series of uncoordinated innovative BMPs that have limited water quality benefits. The following site design elements are used to frame the LID approach to stormwater and are addressed through a combination of BMPs:

- Conserve natural areas, soils, and vegetation—Protect areas outside grading limits, incorporate plants to suit soil and drainage conditions, incorporate planting schemes that replicate natural sites, and use vegetative plantings and bioremediation techniques to neutralize soil contaminants.

¹⁷ Los Angeles County Department of Public Works Hydrology Manual, January 2006, <http://ladpw.org/wrd/publication/index.cfm>, accessed December 7, 2016.

- Minimize disturbances to natural drainage patterns—Minimize manicured lawns and annual beds as the dominant site elements.
- Minimize and disconnect impervious surfaces—Reduce impervious areas by including landscaping and using pervious pavements where practicable. Reduce the amounts of “hydraulically” connected impervious areas by using downspouts directed toward vegetated areas and installing rain barrels and cisterns below downspouts. Direct runoff from impervious areas to pervious areas. Grade surfaces toward open space with infiltration capacity, and infiltrate runoff a suitable distance from foundations.
- Minimize soil compaction—Restrict compaction and grading to areas that will support structures, as compacted soils suffer from reduced infiltration rates and limit root growth and plant survivability.

The County’s LID Ordinance became effective December 5, 2013, and requires that all Designated, Non-Designated, street and road construction, and single family hillside home projects comply. Designated Projects are identified as meeting one or more of the following:

- All development projects equal to one acre or greater of disturbed area and adding more than 10,000 square feet of impervious surface area;
- Industrial parks with 10,000 square feet or more of surface area;
- Commercial malls with 10,000 square feet or more of surface area;
- Retail gasoline outlets with 5,000 square feet or more of surface area;
- Restaurants (Standard Industrial Classification [“SIC”] Code 5812) with 5,000 square feet or more of surface area;
- Parking lots with 5,000 square feet or more of impervious surface area, or with 25 or more parking spaces;
- Automotive service facilities (SIC Codes: 5013, 5014, 5511, 5541, 7532-7534, or 7536-7539) with 5,000 square feet or more of surface area;
- Projects located in or directly adjacent to, or discharging directly to a Significant Ecological Area (“SEA”), where the development will:
 - Discharge stormwater runoff that is likely to impact a sensitive biological species or habitat; and
 - Create 2,500 square feet or more of impervious surface area.
- Redevelopment projects, which are developments that result in creation or addition or replacement of either: (1) 5,000 square feet or more of impervious surface on a site that was previously developed as described in the above bullets (both Sites 1 and 3 fall under this criteria); or (2) 10,000 square feet or more of impervious surface area on a site that was previously developed as a single family home.

Non-Designated Projects fall into the following categories:

- Small-Scale Non-Designated Residential Projects – residential development and redevelopment of four units or less; and
- Large-Scale Non-Designated Projects – all residential development and redevelopment of five units or greater and all non-residential development or redevelopment.

Site 1 (office) and Site 3 (residential greater than 5 units) would be identified as Designated Projects, and, as such, would be subject to the provisions of the County LID ordinance.

County of Los Angeles LID Standards Manual

The County prepared the LID Standards Manual in February 2014 to comply with the requirements of the NPDES MS4 Permit for stormwater and non-stormwater discharges from the MS4 within coastal watersheds of the County (CAS004001, Order No. R4-2012-0175). The LID Standards Manual provides guidance for the implementation of stormwater quality control measures in new development and redevelopment projects in unincorporated areas of the County with the intention of improving water quality and mitigating potential water quality impacts from stormwater and non-stormwater discharges. Moreover, the LID Standards Manual was prepared to complement and be consistent with the County's 2013 LID Ordinance requirements. Ultimately, a project applicant has to submit a comprehensive LID Plan and analysis demonstrating compliance with the LID Standards Manual (which also constitutes compliance with the 2013 LID Ordinance) for review and approved by the Director of Public Works. The LID Standards Manual addresses the following objectives and goals:

- Lessen the adverse impacts of stormwater runoff from development and urban runoff on natural drainage systems, receiving waters, and other water bodies;
- Minimize pollutant loadings from impervious surfaces by requiring development projects to incorporate properly-designed, technically-appropriate Best Management Practices ("BMPs") and other Low Impact Development ("LID") strategies; and
- Minimize erosion and other hydrologic impacts on natural drainage systems by requiring development projects to incorporate properly-designed, technically-appropriate hydromodification control development principles and technologies.

City of Los Angeles

City of Los Angeles LID Ordinance

The City's LID Ordinance became effective in May 2012. The main purpose of this law is to ensure that development and redevelopment projects mitigate runoff in a manner that captures rainwater at its source, while utilizing natural resources. Project applicants are required to prepare and implement a 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")

Any project that cannot comply with the LID Ordinance requirements is required to comply with, at a minimum, all applicable City Standard Urban Stormwater Mitigation Plan ("SUSMP") requirements in order to maximize on-site compliance. This ordinance expands the applicability of the existing City SUSMP requirements by imposing rainwater LID strategies on projects that require building permits from the City.

Since Site 2 would be the only site of the three to require building permits from the City, this ordinance would be applicable only to Site 2 of the Project.

ENVIRONMENTAL IMPACTS

Methodology

The analysis was prepared based on a review of documents from and methodologies specified by the County's Department of Public Works, including the Los Angeles County LID Standards Manual (February 2014) for Sites 1 and 3, and the City of Los Angeles LID Ordinance and Manual for Site 2, for use in developing BMPs for the Project. Additionally, both the County and the City utilize the County Hydrology Manual as the basis of design for storm drainage facilities. The Hydrology Manual requires drainage facilities to meet the Urban Flood level of protection. The Urban Flood is defined as stormwater runoff from a 25-year frequency design storm falling on a saturated watershed; however, the City's CEQA Threshold Guide establishes the 50-year frequency design storm event as the threshold to analyze potential impacts on surface water hydrology due to development. Therefore, the 50-year frequency design storm event was used in this analysis.

The analysis of water quality impacts identifies the types of pollutants potentially associated with construction and operation of the Project and considers their effects on water quality. Consideration is given to BMPs, which would serve to minimize pollutants in stormwater runoff. Further, the Project's consistency with relevant regulatory permits/requirements and applicable screening criteria for pollutants was evaluated to demonstrate how compliance would protect water quality.

Thresholds of Significance

The potential for the Project to result in impacts associated with hydrology and water quality is based on Appendix G of the State CEQA Guidelines, which are addressed in this section. These significance thresholds are listed below.

Threshold 4.8-1:	Would the project violate any water quality standards or waste discharge requirements?
Threshold 4.8-2:	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)?
Threshold 4.8-3:	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?
Threshold 4.8-4:	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?

- Threshold 4.8-5:** 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?
- Threshold 4.8-6:** Otherwise substantially degrade water quality?
- Threshold 4.8-7:** 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, or within a floodway or floodplain?
- Threshold 4.8-8:** Place structures, which would impede or redirect flood flows, within a 100-year flood hazard area, floodway, or floodplain?
- Threshold 4.8-9:** 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?
- Threshold 4.8-10:** Place structures in areas subject to inundation by seiche, tsunami, or mudflow?

An affirmative answer to any of these questions would represent a significant impact. Thresholds 4.8-7, 4.8-8, and 4.8-10 have been determined to have no impact or a less-than-significant impact as set forth in Section 6.5, Effects Found Not to be Significant. Threshold 4.8-7 addresses placement of housing in a 100-year flood hazard area; Threshold 4.8-8 addresses placement of a structures that would impede or redirect flood flows; and Threshold 4.8-10 addresses placement of structures in areas subject to inundation by seiche, tsunami, or mudflow. The Project would not place structures in any of the above situations.

Project Design Elements

The Project would involve the disturbance of more than one acre and, as such, would comply with NPDES and County requirements. Sites 1 and 3 of the Project would be required to be designed to comply with the County's LID Ordinance and LID Standards Manual. The LID strategies require special design features that allow infiltration of stormwater on-site to reduce water pollution and recharge local water supplies. Site 2 of the Project would be required to comply with the City's LID Ordinance since development on this Site would require building permits from the City.

Impact Analysis

- Threshold 4.8-1:** Would the project violate any water quality standards or waste discharge requirements?
- Threshold 4.8-6:** Otherwise substantially degrade water quality?

Construction

Surface Water

Construction of the Project would include grading and other earth moving activities that would expose on-site soils to erosion processes. Such activities could lead to an increase in suspended solids and pollutant loading from site runoff, as unprotected disturbed soil is susceptible to high rates of erosion from wind and rain, as well as from such activities as hosing down of construction sites. Construction

activities also have the potential to generate short-term water pollutants, including sediment, trash, construction materials, and equipment fluids. However, construction contractors disturbing greater than one acre of soil are required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of the General Permit, the Developer would prepare and implement a site-specific SWPPP for each Project Site that adheres to the California Stormwater Quality Association BMP Handbook. The SWPPP would specify BMPs to be used during construction, which would include but not be limited to: erosion control, sediment control, non-stormwater management, and materials management BMPs. In addition, the Project would be required to comply with the County grading permit regulations on Sites 1 and 3, and City grading regulations on Site 2. These require necessary measures, plans (including a wet weather erosion control plan if construction occurs during the rainy season), and inspections to reduce sedimentation and erosion.

In addition to construction-related earth-moving activities, the Project would require dewatering during construction. Dewatering operations are practices that discharge non-stormwater, such as groundwater, that must be removed from a work location to proceed with construction, into the drainage system. Discharges from dewatering operations can contain high levels of fine sediments, which if not properly treated, could lead to exceedance of the NPDES requirements.

Sites 1 and 2

Excavation on Sites 1 and 2 would extend to approximately 20 feet below the ground surface.¹⁸ Due to the presence of the abandoned oil wells on Sites 1 and 2 (discussed in greater detail in Section 4.7, Hazards and Hazardous Materials), contaminated groundwater may be encountered when performing basement and foundation excavations. However, the temporary dewatering system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. These requirements include demonstration that the discharges would not cause or contribute to a violation of any applicable water quality objective/criteria for the receiving waters or exceed the effluent limitations or discharge specifications, and require that the Project perform analysis of a representative sample of groundwater to be discharged. The sample would be analyzed and compared to applicable water quality screening criteria for the constituents and, if necessary, the discharge would pass through a treatment system designed and operated to reduce the concentration of contaminants to meet the effluent limitations prior to discharge into surface waters.

With implementation of site-specific BMPs included as part of the SWPPP and adherence to NPDES discharge requirements, the Project would not significantly increase pollutants in the stormwater runoff.¹⁹ Therefore, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated in Ballona Creek.²⁰ Conformance with applicable NPDES requirements, as identified in Regulatory Requirements RR-HWQ-1 through RR-HWQ-8, which identify BMPs for the treatment of stormwater runoff and maintenance of water quality, would provide adequate surface water

¹⁸ KPFF Consulting Engineers, *op.cit.*, pages 31 and 32.

¹⁹ *Ibid.*, page 22.

²⁰ *Ibid.*

quality protection. Therefore, temporary construction-related impacts on surface water quality would be less than significant.

Site 3

Excavation on Site 3 extend to approximately 30 feet below the ground surface.²¹ With implementation of site-specific BMPs included as part of the SWPPP and adherence to NPDES discharge requirements, the Project would reduce or eliminate the discharge of potential pollutants from the stormwater runoff.²² Therefore, construction of the Project would not result in discharge that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated in Ballona Creek.^{23, 24} Conformance with applicable LID requirements, as identified in Regulatory Requirements RR-HWQ-2, would provide adequate surface water quality protection. Therefore, temporary construction-related impacts on surface water quality would be less than significant.

Groundwater

During on-site grading and building construction, hazardous materials, such as fuels, paints, solvents, and concrete additives, could be used and would therefore require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. Compliance with all applicable federal, state, and local requirements concerning the handling, storage and disposal of hazardous waste, would reduce the potential for the construction of the Project to release contaminants into groundwater that could affect existing contaminants, expand the area or increase the level of groundwater contamination, or cause a violation of regulatory water quality standards at an existing production well. In addition, because there are no groundwater production wells or public water supply wells within one mile of the Project Sites, construction activities would not affect existing wells. Additionally, the Project would not result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation.²⁵

As discussed above, water encountered in the vicinity of the oil wells could be petroleum-impacted. However, the Project would not alter these existing conditions beyond removal of groundwater through dewatering activities in compliance with NPDES discharge requirements, and no additional pollutants would be introduced. Temporary pumps and filtration would be utilized in compliance with the NPDES permit. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Provided adherence to the appropriate RR-HWQ-1 through RR-HWQ-8 compliance and containment measures which identify BMPs for the treatment of stormwater runoff and maintenance of water quality, the Project would result in less than significant impacts related to groundwater quality.²⁶

²¹ *Ibid.*, page 32,

²² *Ibid.*, page 22.

²³ *Ibid.*

²⁴ *Ibid.*

²⁵ *Ibid.*, page 30.

²⁶ *Ibid.*

Operation

Surface Water

Site 1

The Project would slightly decrease the overall percentage of impervious surfaces. The existing Site 1 has approximately 100 percent impervious surface areas, which includes buildings and hardscape surfaces. Existing stormwater discharges from Site 1 without treatment or detention. The Project would develop buildings across Site 1, and it is anticipated that the new overall impervious area of Site 1 would be reduced to approximately 95 percent. This reduction is due to the addition of landscape areas.²⁷ For the purposes of this analysis, runoff from Project irrigation is assumed to be negligible. Development of Site 1 would not increase concentrations of the items listed as constituents of concern for the Ballona Creek Watershed because it would implement BMPs for managing stormwater runoff in accordance with the current County LID Standards Manual. The LID requirements for Site 1 would outline the stormwater treatment post construction BMPs required to control pollutants associated with storm events up to the 85th percentile storm event or 0.75-inch, whichever is larger, per the Los Angeles County LID Standards Manual. Site 1 BMPs would control and treat stormwater runoff in compliance with LID requirements and no increase in runoff would result from the Project. Because there are no existing on-site BMPs, the Project at Site 1 would result in improved surface water quality related to stormwater run-off compared to existing conditions.²⁸

Based on soil conditions mentioned in the geotechnical report (Appendix 4.5-1 to this Draft EIR), infiltration is deemed infeasible for Site 1.²⁹ Therefore, capture and use would be the next priority level BMP to consider. In order to satisfy County requirements for capture and use for Site 1, the volume retained must be used within 96 hours after the rain event. If the County updates their Low Impact Design policy to allow for longer hold times, then capture and use would still be feasible, and the Project would consider longer holding durations. (Refer to Figure 11 in the Water Resources Conceptual Report in Appendix 4.8-1 for calculations).

A cistern would be designed to hold the required volume, and the retained stormwater would be distributed to approved uses on the property such as cooling tower makeup, toilet flushing, or irrigation subject to Los Angeles County Health Department approval. There are multiple options for the system used to hold the collected stormwater. The two most common options include a waterproof cast in place concrete room (similar to a fire tank room), and a large diameter pipe.

Although dimensions for a waterproof room may vary, the tank for Site 1, could be 10'x20'x40'. Additionally, there are multiple pipe sizes that can be used to store the collected stormwater, but assuming an 8-foot diameter pipe would result in approximately 156 linear feet of pipe for Site 1 (Refer to Figure 12 in the Water Resources Conceptual Report for locations which have been identified as adequate to accommodate a cistern for Site 1).

The County's requirement for biofiltration planters is that they are open bottom allowing for incidental infiltration. However, biofiltration planters can be located on structure if the plans are reviewed and approved by the State Water Resources Control Board. Based on geotechnical recommendations for Site

²⁷ *Ibid.*, page 9

²⁸ *Ibid.*, page 22.

²⁹ *Ibid.*, page 23.

1, open bottom biofiltration is infeasible. Therefore, Site 1 would be subject to review and approval from the State Water Resources Control Board.

Due to incorporation of the site specific LID BMPs from the County LID standards manual that are determined to be applicable to Site 1, operation of the Project on Site 1 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. As a result of implementing LID BMPs and RR-HWQ-2, there would be less than significant operational impacts on surface water quality at Site 1.

Site 2

The Project would slightly decrease the overall percentage of impervious surfaces. The existing Site 2 has approximately 100 percent impervious surface areas, which includes buildings and hardscape surfaces. Existing stormwater discharges from Site 2 without treatment or detention. The Project would develop buildings across Site 2, and it is anticipated that the new overall Project Site impervious area would be reduced to approximately 95 percent. This reduction is due to the addition of landscape areas.³⁰ For the purposes of this analysis, the runoff from Project irrigation is assumed to be negligible. Development of Site 2 would not increase concentrations of the items listed as constituents of concern for the Ballona Creek Watershed as it would implement BMPs for managing stormwater runoff in accordance with the current City of Los Angeles LID Manual. The LID requirements for Site 2 would outline the stormwater treatment post construction BMPs required to control pollutants associated with storm events up to the 85th percentile storm event or 0.75-inch, whichever is larger, per the City LID Manual. Site 2 BMPs would control and treat stormwater runoff in compliance with LID requirements and no increase in runoff would result from the Project. Because there are no existing on-site BMPs, the Project at Site 2 would result in improved surface water quality related to stormwater run-off compared to existing conditions.³¹

Based on soil conditions mentioned in the geotechnical report (Appendix 4.5-2 to this Draft EIR), infiltration is deemed infeasible for Site 2.³² Therefore, capture and use would be the next priority level BMP to consider. In order to satisfy the City requirements for capture and use for Site 2, the volume retained must be emptied at least once during the 7-month rain season (October through April). (Refer to Figure 11 in the Water Resources Conceptual Report in Appendix 4.8-1 for calculations).

A cistern would be designed to hold the required volume, and the retained stormwater would be distributed to approved uses on the property such as cooling tower makeup, toilet flushing, or irrigation subject to Los Angeles County Health Department approval. There are multiple options for the system used to hold the collected stormwater. The two most common options include a waterproof cast in place concrete room (similar to a fire tank room), and a large diameter pipe.

Although dimensions for a waterproof room may vary, the tank for Site 2 could be 10'x15'x21'. Additionally, there are multiple pipe sizes that can be used to store the collected stormwater, but assuming an 8-foot diameter pipe would result in approximately 62 linear feet of pipe for Site 2 (Refer to Figure 12 in the Water Resources Conceptual Report for locations which have been identified as adequate

³⁰ *Ibid.*, page 9.

³¹ *Ibid.*, page 22.

³² *Ibid.*, page 23.

to accommodate a cistern for Site 2. For Site 2, the City has no preference on whether the biofiltration planters are closed or open bottom.

Due to incorporation of site specific LID BMPs from the City LID standards manual that are determined to be applicable to Site 2, operation of the Project on Site 2 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. As a result of implementing LID BMPs and RR-HWQ-2, there would be less than significant operational impacts on surface water quality at Site 2.

Site 3

The Project would slightly decrease the overall percentage of impervious surfaces. The existing Site 3 is approximately 100 percent impervious surface areas, which includes buildings and hardscape surfaces. Existing stormwater discharges from Site 3 without treatment or detention. The Project would develop buildings across Site 3, and it is anticipated that the new overall Project Site impervious area would be reduced to approximately 95 percent. This reduction is due to the addition of landscape areas.³³ For the purposes of this analysis, runoff from Project irrigation is assumed to be negligible. The Project Site would not increase concentrations of the items listed as constituents of concern for the Ballona Creek Watershed as it would implement BMPs for managing stormwater runoff in accordance with the current County LID Standards Manual. The LID requirements for the Project Site would outline the stormwater treatment post construction BMPs required to control pollutants associated with storm events up to the 85th percentile storm event or 0.75-inch, whichever is larger, per the Los Angeles County LID Standards Manual. The Project BMPs would control and treat stormwater runoff in compliance with LID requirements and no increase in runoff would result from the Project. Because there are no existing on-site BMPs, the Project would result in improved surface water quality related to stormwater run-off compared to existing conditions.³⁴

Based on soils conditions mentioned in the geotechnical report (Appendix 4.5-3 to this Draft EIR), infiltration is deemed infeasible for Site 3.³⁵ Therefore, capture and use would be the next priority level BMP to consider. In order to satisfy the County requirements for capture and use for Site 3, the volume retained must be used within 96 hours, after the rain event. If the County updates their Low Impact Design policy to allow for longer hold times, then capture and use would still be feasible, and the Project would consider longer holding durations. (Refer to Figure 11 in the Water Resources Conceptual Report in Appendix 4.8-1 for calculations).

A cistern would be designed to hold the required volume, and the retained stormwater would be distributed to approved uses on the property such as cooling tower makeup, toilet flushing, or irrigation subject to Los Angeles County Health Department approval. There are multiple options for the system used to hold the collected stormwater. The two most common options include a waterproof cast in place concrete room (similar to a fire tank room), and a large diameter pipe.

Although dimensions for a waterproof room may vary, the tank for Site 3 could be 10'x11'x15'. Additionally, there are multiple pipe sizes that can be used to store the collected stormwater, but assuming an 8-foot diameter pipe would result in approximately 31 linear feet of pipe for Site 3 (Refer to

³³ *Ibid.*, page 9

³⁴ *Ibid.*, page 22.

³⁵ *KPFF Consulting Engineers, op.cit.*, page 23.

Figure 12 in the Water Resources Conceptual Report for locations which have been identified as adequate to accommodate a cistern for Site 3.

The County's requirement for biofiltration planters is that they are open bottom allowing for incidental infiltration. However, biofiltration planters can be located on structure if the plans are reviewed and approved by the State Water Resources Control Board. Based on geotechnical recommendations Site 3 will require a closed bottom biofiltration planter due to the building limits extending to the property line. Therefore, Site 3 will also be subject to review and approval from the State Water Resources Control Board.

Due to incorporation of site specific LID BMPs from the County LID standards manual that are determined to be applicable to Site 3, operation of the Project on Site 3 would not result in discharges that would violate any water quality standard or waste discharge requirements, or otherwise substantially degrade water quality. As a result of implementing LID BMPs and RR-HWQ-2, there would be less than significant operational impacts on surface water quality.

Groundwater

Site 1

Development of Site 1 would not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. The Project at Site 1 would not include surface or subsurface application or introduction of potential contaminants or waste materials during operation. The Project at Site 1 would not result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation.³⁶

As discussed above, oil wells may be encountered on Site 1. As such, water encountered in the vicinity of the oil wells could be petroleum-impacted. However, operation of the Project would not alter these existing conditions.

As stated in Section 4.7 Hazards and Hazardous Materials, after preparation of the Phase I ESA additional information was provided by the LAFD UST Division concerning the 10,000-gallon UST on Site 1. The 10,000-gallon UST was used to store gasoline and was abandoned in-place. However, no evidence of impacted soil was found in soil samples analyzed for gasoline, BTEX, and lead; and no groundwater was encountered to the maximum depth drilled. Furthermore, on May 1995, a no further action letter for the UST was issued by the LAFD. Provided adherence to the appropriate RR-HWQ-1 through RR-HWQ-8 compliance and containment measures which identify BMPs for the treatment of stormwater runoff and maintenance of water quality, operation of the Project on Site 1 would result in less than significant impacts related to groundwater quality.³⁷

Site 2

Development of Site 2 would not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or

³⁶ *Ibid.*, page 30.

³⁷ *Ibid.*

seawater intrusion, a municipal supply well or spreading ground facility. The Project at Site 2 would not include surface or subsurface application or introduction of potential contaminants or waste materials during operation. The Project at Site 2 would not result in releases or spills of contaminants that could reach a groundwater recharge area or spreading ground or otherwise reach groundwater through percolation.³⁸

As discussed above, oil wells may be encountered on Site 2. As such, water encountered in the vicinity of the oil wells could be petroleum-impacted. However, operation of the Project would not alter these existing conditions. Provided adherence to the appropriate RR-HWQ-1 through RR-HWQ-8 compliance and containment measures which identify BMPs for the treatment of stormwater runoff and maintenance of water quality, operation of the Project on Site 2 would result in less than significant impacts related to groundwater quality.³⁹

Site 3

As stated above, development of Site 3 would not include the installation or operation of water wells, or any extraction or recharge system that is in the vicinity of the coast, an area of known groundwater contamination or seawater intrusion, a municipal supply well or spreading ground facility. Provided adherence to the appropriate RR-HWQ-1 through RR-HWQ-8 compliance and containment measures which identify BMPs for the treatment of stormwater runoff and maintenance of water quality, operation of the Project on Site 3 would result in less than significant impacts related to groundwater quality.⁴⁰

- Threshold 4.8-3:** 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?
- Threshold 4.8-4:** 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?
- Threshold 4.8-5:** 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?

Construction

Construction activities for the Project would include demolition of the existing buildings on Sites 1 and 3, demolition of one building on Site 2, and site work, excavation for subterranean levels, construction of the proposed new structures, and installation of hardscape and landscape around the structures. These activities have the potential to temporarily alter existing drainage patterns and flows on each of the Project Sites by exposing the underlying soils, modifying flow direction, and making each site temporarily more permeable. Exposed and stockpiled soils could be subject to erosion and conveyance into nearby

³⁸ *Ibid.*, page 30.

³⁹ *Ibid.*

⁴⁰ *Ibid.*

storm drains during storm events. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff.

Site 1

Because the construction area on Site 1 would be greater than one acre, the Developer would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. BMPs would be designed to reduce runoff and pollutant levels in runoff during construction. The NPDES and SWPPP measures are designed to contain and treat, as necessary, stormwater or construction watering on the Project Sites to prevent runoff from reaching off-site drainage facilities or receiving waters. Construction activities would be temporary and flow directions and runoff volumes during construction would be controlled.⁴¹

In addition, the construction of the Project on Site 1 would be required to comply with all applicable Los Angeles County grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable Los Angeles County grading regulations, the Project at Site 1 would not substantially alter the drainage patterns at Site 1 in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, adherence to standard compliance measurements in construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Sites into stormwater drainage systems.⁴² Therefore, with compliance with RR-HWQ-1 through RR-HWQ-8, which identify BMPs for the treatment of stormwater runoff and maintenance of water quality, construction-related impacts to drainage patterns and runoff would be less than significant.

Site 2

Because the construction site on Site 2 would be approximately one acre, the Developer would be required to obtain coverage under the NPDES Construction General Permit. In accordance with the requirements of this permit, the Project would implement a SWPPP that specifies BMPs and erosion control measures to be used during construction to manage runoff flows and prevent pollution. BMPs would be designed to reduce runoff and pollutant levels in runoff during construction. The NPDES and SWPPP measures are designed to contain and treat, as necessary, stormwater or construction watering on the Project Sites to prevent runoff from reaching off-site drainage facilities or receiving waters. Construction activities would be temporary and flow directions and runoff volumes during construction would be controlled.⁴³

In addition, the construction of the Project on Site 2 would be required to comply with all applicable City of Los Angeles grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with all NPDES Construction General Permit requirements, including preparation of a SWPPP, implementation of BMPs, and compliance with applicable City grading regulations, the Project at Site 2 would not substantially alter the drainage patterns

⁴¹ *Ibid.*, pages 6-7.

⁴² *Ibid.*, page 7.

⁴³ *Ibid.*, pages 6-7.

at Site 2 in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, adherence to standard compliance measurements in construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Sites into stormwater drainage systems.⁴⁴ Therefore, with compliance with RR-HWQ-1 through RR-HWQ-8, containment measures which identify BMPs for treatment of stormwater runoff and maintenance of water quality, construction-related impacts to drainage patterns and runoff would be less than significant.

Site 3

Because the construction site on Site 3 would be less than one acre, the Developer would not be required to obtain coverage under the NPDES Construction General Permit. However, construction of the Project on Site 3 would be required to comply with all applicable Los Angeles County grading permit regulations that require necessary measures, plans, and inspections to reduce sedimentation and erosion. Thus, through compliance with applicable regulations, the Project on Site 3 would not substantially alter the drainage patterns at the Project Site in a manner that would result in substantial erosion, siltation, or flooding on- or off-site. Similarly, adherence to standard compliance measures in construction activities would not cause flooding, substantially increase or decrease the amount of surface water flow from the Sites into stormwater drainage systems.⁴⁵ Therefore, with compliance with RR-HWQ-2 which identify BMPs for treatment stormwater runoff and maintenance of water quality, construction-related impacts to drainage patterns and runoff would be less than significant.

Operation

During operation of the Project, Sites 1, 2, and 3 would discharge into a City of Los Angeles 18" underground storm drainpipe located along Vermont Avenue. In addition, a portion of Site 1 would discharge toward Shatto Place, which drains north into another 18" underground storm drainpipe located along 4th Street.⁴⁶ Stormwater that leaves the three Project Sites would surface drain into gutters along Vermont Avenue and Shatto Place, where it would flow north toward the nearest catch basins. In general, stormwater runoff would enter offsite catch basins and underground storm drainage pipes, which convey stormwater through underground pipe networks eventually draining into Ballona Creek and eventually into the Santa Monica Bay. As discussed above, implementation of the Project would slightly decrease the percentage of impervious surface area. The existing Sites are approximately 100 percent impervious surface area, including buildings and hardscape. Currently, stormwater is discharged from the Project Sites without treatment or detention. Because each of the Project Sites would include additional new landscape areas, it is anticipated that the new overall impervious area at the Sites would be reduced to approximately 95 percent.⁴⁷

As described in further detail under the surface water quality impact analysis above, the Project would implement stormwater mitigation strategies in accordance with the applicable regulations (County LID Ordinance for Sites 1 and 3, City LID Ordinance for Site 2) to collect the first flush of runoff from building roofs and hardscape areas. Stormwater flow at the Sites would be managed via roof drains, area drains, and pipes to discharge points and existing catch basins located on the adjacent public streets. Table 4.8-

⁴⁴ *Ibid.*, page 7.

⁴⁵ *Ibid.*, page 7.

⁴⁶ *Ibid.*, page 5.

⁴⁷ *Ibid.*, page 7.

2 below shows the existing 50-year frequency design storm event peak flow rate and the proposed 50-year frequency design storm event peak flow rate. As shown, stormwater runoff would not increase after completion of the Project.⁴⁸

Table 4.8-2
Proposed Drainage Stormwater Runoff Calculations Summary

Drainage Area	Area (in acres)	Existing Conditions Q50 (cfs)	Project Q50 (cfs)	Incremental Change
Site 1 – Vermont Avenue	1.737	5.4	5.4	0
Site 1 – Shatto Place	.797	2.5	2.5	0
Site 2	.994	3.1	3.1	0
Site 3	.498	1.6	1.6	0
<i>Source: KPFF Consulting Engineers, 2017.</i>				

Consequently, operation of the Project would not cause flooding during the 50-year storm event, would not create runoff that would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, or result in a permanent adverse change to the movement of surface water.⁴⁹ Therefore, operation-related impacts to drainage patterns and runoff would be less than significant.

Threshold 4.8-2: 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)?

Construction

The Project Sites are not located within a designated groundwater recharge basin. The Project would not directly utilize groundwater supplies as all potable and nonpotable water would be supplied through sources available to the City of Los Angeles Department of Water and Power (“LADWP”). As discussed in Section 4.14, Utilities and Service Systems, temporary construction water use would be substantially less than the existing water consumption. As a result, construction of the Project would not deplete groundwater supplies.

As discussed above, groundwater has historically existed at relatively shallow depths (20 feet below ground surface) at the Sites. The Project would include two levels of subterranean parking below Site 1 (approximately 20 foot excavation), 1.5 levels of subterranean parking below Site 2 (approximately 20 foot excavation), and three levels of subterranean parking below Site 3 (approximately 30 foot excavation). Construction of the subterranean parking levels at the Project Sites would require excavation below the historically high groundwater depths and temporary dewatering would be necessary to achieve a dry and stable excavation. Los Angeles County Regional Water Quality Control Board approval would

⁴⁸ *Ibid.*, pages 7-8.

⁴⁹ *Ibid.*, page 7.

be required to discharge dewatering water to the street or storm drain. The purpose of dewatering operations is for the protection of both existing and proposed building structures. Operation of temporary dewatering systems would incrementally lower local groundwater levels in the immediate vicinity of the Sites. However, groundwater pumping would be limited to the top 10-15 feet of the groundwater table (based on the historic high groundwater level) and impacts to regional groundwater flow and level would not occur. Once the temporary construction dewatering is discontinued, the water table would be expected to return to its current elevation.⁵⁰ Therefore, the Project would result in less than significant impacts related to groundwater levels and would not substantially deplete groundwater supplies in a manner that would result in a net deficit in aquifer volume or lowering of the local groundwater table.

Operation

All potable and nonpotable water at the Project Sites would be supplied through existing developed domestic water sources available to LADWP. As such, operation of the Project would not involve groundwater extraction.

As presented in Section 4.14, Utilities and Service Systems, water supplied from groundwater extraction comprises a small percentage (approximately 10 percent) of LADWP's overall water supply; out of that 10 percent, less than 20 percent is extracted from the Central Groundwater Basin, which is an adjudicated basin. Operation of the Project would not affect the amount of groundwater extracted from the Central Basin by LADWP.

The subterranean levels of the Project would be designed to withstand the hydrostatic forces of groundwater and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods. As such, permanent dewatering operations would not be required and the groundwater level would be expected to return to the existing level during operation of the Project at each of the Project Sites.⁵¹ Therefore the Project's potential impact on groundwater levels during operation at each of the Project Sites would be less than significant.

Interference with groundwater recharge during operation of a project is largely caused by the creation of impervious surface area (e.g., buildings, road, parking lots, etc.). The Project Sites are not located within a designated groundwater recharge area and are not currently used for groundwater recharge activities. The Sites are currently developed with impervious surfaces and stormwater mostly flows off the Sites and does not result in substantial groundwater recharge. Conditions at the Sites would remain largely the same, as the Project would replace the existing impervious surfaces with new slightly reduced impervious surfaces (from 100 percent to 95 percent).⁵² As such, operation of the Project would have a less than significant impact on groundwater recharge.

The Project would result in less-than-significant operational impacts and would not substantially directly 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.

⁵⁰ *Ibid.*, pages 29-30.

⁵¹ *Ibid.*, page 31.

⁵² *Ibid.*

Threshold 4.8-9: 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?

Lands designated as special flood hazard areas are identified by the Federal Emergency Management Agency (“FEMA”) and published in the Flood Insurance Rate Map (“FIRM”) to establish the flood risk 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. The Project Sites are not located within a 100-year flood plain;⁵³ however, the Sites are located within the potential inundation area of the Hollywood Reservoir.⁵⁴ Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. Further, in the event of a dam failure at the Hollywood Reservoir, existing urban development north of the Project Sites, including the US-101, would serve as a physical barrier between the upstream portion of the reservoirs/dams and the Project Sites. Therefore, the risk of flooding from inundation by dam failure is considered low and impacts would be less than significant.⁵⁵

CUMULATIVE IMPACTS

The cumulative impact analysis considers the impacts to hydrology and water quality resulting from the Project in conjunction with the 115 related projects identified in Table 3-4 and Figure 3-22 in Section 3.0, Project Description and Environmental Setting.

Cumulative impacts to surface water could result from an increase in stormwater runoff that would degrade water quality or result in drainage issues and flooding. Cumulative impacts to groundwater could result from the overall utilization of groundwater basins located in proximity to the Project Site and the related projects. In addition, interruptions to existing hydrology flow by dewatering operations of underground water would have the potential to affect groundwater levels. Cumulative impacts are discussed below.

Surface Water Hydrology and Water Quality

The Project in conjunction with forecasted growth in the Ballona Creek Watershed could cumulatively increase stormwater runoff flows. However, as noted above, the Project would not increase stormwater flows. Also, in accordance with City and County of Los Angeles requirements, related projects and other future development projects would be required to implement BMPs to manage stormwater in accordance with LID guidelines, which would hold steady or decrease flows to the storm drain system. Furthermore, the City of Los Angeles Department of Public Works would review each future development project on a case-by-case basis to ensure sufficient local and regional infrastructure would be available to accommodate stormwater runoff. Therefore, potential cumulative impacts associated with the Project on surface water hydrology would be less than significant.

⁵³ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: March 27, 2017.

⁵⁴ City of Los Angeles Department of City Planning, *Safety Element of the Los Angeles City General Plan, Adopted November 26, 1996, Exhibit G: Inundation & Tsunami Hazard Areas in the City of Los Angeles*.

⁵⁵ KPFF Consulting Engineers, *op.cit.*, pages 8-9.

Additionally, future growth in the Ballona Creek Watershed would be subject to NPDES requirements relating to water quality for both construction and operation. These requirements are implemented through the MS4 permit and LID regulations established by the permittees, including the County, and are designed to improve regional water quality over time. With application of these regulations to future new development in the urbanized area over time, future land use changes or development would not adversely affect regional surface water quality. As noted above, the Project would not have an adverse impact on water quality, and would improve the quality of on-site flows due to the introduction of new BMPs that would collect, treat, and discharge runoff from the Project Sites (most of which is not treated before being discharged under existing conditions). Therefore, potential cumulative impacts on water quality would be less than significant.

Groundwater Hydrology and Quality

Dewatering activities associated with the Project and other related projects could affect groundwater levels within the Basin. As mentioned above, the purpose of dewatering operations is for the protection of both existing and proposed building structures and temporary groundwater pumping is limited to the top 10-15 feet of the groundwater table (based on the historic high groundwater level). The dewatering system expected for construction of the Project would be temporary, would not operate at all times, and would only be activated when the level of the water reaches the permitted level that initiates the dewatering operations. While short-term, periodic dewatering has the potential to have a minimal effect on groundwater hydrology locally at the Project Sites, dewatering operations at such a temporary, localized level would not have the potential to affect regional groundwater hydrology.

Similar to the Project, other proposed projects overlying the groundwater basin would likely incorporate structural designs for subterranean levels that are able to withstand hydrostatic forces and incorporate comprehensive waterproofing systems in accordance with current industry standards and construction methods. If any related projects require permanent dewatering systems, such systems would be regulated by the SWRCB. Should excavation for other related projects extend beneath the groundwater level, temporary groundwater dewatering systems would be designed and implemented in accordance with SWRCB permit requirements. These dewatering operations would be limited to temporary and local impact to the groundwater level. As such, cumulative impacts to groundwater hydrology would be less than significant.

Future growth in the Basin would be subject to LARWQCB requirements relating to groundwater quality. In addition, since the Project Sites are located in an urbanized area, future land use changes or development are not likely to cause substantial changes in regional groundwater quality. As noted above, the Project would not have a significant impact on groundwater quality. Also, it is anticipated that as with the Project, future development projects would also be subject to LARWQCB requirements and implementation of measures to comply with total maximum daily loads. Therefore, cumulative impacts to groundwater quality would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are proposed relevant to hydrology and water quality.

Regulatory Requirements

The following standards would be imposed by existing laws and regulations and would work to address Project impacts. These are not required mitigation but are inherent Project components.

- RR HWQ-1:** Compliance with applicable National Pollutant Discharge Elimination System (“NPDES”) permit requirements and the Los Angeles Regional Water Quality Control Board Municipal Storm Water permit (“MS4 permit”) is required.
- RR HWQ-2:** Runoff from parking lots located on Sites 1 and 3 will be treated, as required by County’s LID Ordinance, prior to discharging into existing storm drain systems. Runoff from Site 2 will be treated as required by the City’s LID Ordinance.
- RR HWQ-3:** All wastes from construction of the Project will be disposed of as required by federal, State, County (Sites 1 and 3), and City (Site 2) regulations. Appropriately labeled recycling bins will be used to recycle construction materials including: solvents, water-based paints, vehicle fluids, broken asphalt and concrete; wood, and vegetation. Non-recyclable materials/wastes will be taken to an appropriate landfill. Toxic wastes will be discarded at a licensed regulated disposal site.
- RR HWQ-4:** Leaks, drips, and spills will be cleaned up immediately to prevent contaminated soil on paved surfaces that can be washed away into the storm drains as required by the NPDES Construction General Permit.
- RR HWQ-5:** As required by the NPDES Construction General Permit, material spills will be prohibited from being hosed down at the pavement. Dry cleanup methods will be required.
- RR HWQ-6:** During construction, where truck traffic is frequent, gravel approaches and dirt tracking devices will be used to reduce soil compaction and limit the tracking of sediment into streets as required by the NPDES Construction General Permit.
- RR HWQ-7:** As required by the NPDES Construction General Permit, all construction vehicle/equipment maintenance, repair, and washing will be conducted away from storm drains. All major repairs will be required to be conducted at an appropriate location. Drip pans or drop cloths will be required to catch drips and spills.
- RR HWQ-8:** Project construction will comply with the County’s NPDES and MS4 requirements, and City and County LID requirements for water quality as appropriate to the respective Sites.

MITIGATION MEASURES

Because the Project’s impacts would be less than significant, no mitigation measures would be required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts with regard to hydrology and water would be less than significant.

Cumulative impacts with regard to hydrology and water quality would be less than significant.

4.9 LAND USE AND PLANNING

INTRODUCTION

This section evaluates the Project's potential land use impacts based upon the physical compatibility of the Project with its surrounding area and vicinity, and consistency with applicable local and regional plans, regulations and policies of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating environmental impacts. Whether the Project would physically divide an established community, or impact any applicable habitat conservation plan or natural community conservation plan is discussed in Section 6.5 (Effects Not Found to be Significant) of this Draft EIR.

ENVIRONMENTAL SETTING

Project Site and Surrounding Land Uses

Existing On-Site Land Uses

Site 1

Site 1 is currently developed with a 30,788 square foot, two-story office building built in 1959 that is occupied by 93 employees from the County Department of Parks and Recreation ("DPR"), a surface parking lot north of this building with 20 spaces, an unoccupied 13,325 square foot one-story office building constructed in 1956, with 41 rooftop parking spaces accessed from 6th Street, a surface parking lot containing 79 spaces located between the two office buildings, and a seven-story, 235,248 square foot parking structure (six stories above grade and one story below grade) containing 864 spaces, built in 1958, that connects to the existing County office building and serves all County facilities in the area.

Site 2

Site 2 is currently developed with a 154,793-square foot, 12-story County office building built in 1964 that is occupied by 973 employees from the Department of Mental Health ("DMH"), an approximately 52,000 square foot, four-story office building built in 1958 that is occupied by 250 employees from the Workforce Development, Aging, and Community Services Department ("WDACS"), and a 14,010 square foot parking structure with one level below grade and one level at-grade and containing 53 spaces, built in 1959.

Site 3

Site 3 is currently developed with a 29,292-square foot, four-story office building built in 1963 and occupied by 112 employees from DPR, and an at-grade parking lot at the rear and north of the existing building containing 65 spaces.

Photos of the existing land uses on the Project Site are presented in Figures 3-3 through 3-7 in Section 3.0, Project Description and Environmental Setting, of this Draft EIR.

Surrounding Uses

The Project Sites are located in an urbanized, "Transit Priority Area" containing commercial, office, retail, institutional, and multi-family residential uses, as discussed in Section 3.0, Project Description and Environmental Setting, of this Draft EIR. Site 1 is bounded by a retail center and parking structure on the north, a Walgreens pharmacy and a car wash across Vermont Avenue to the west, Site 2 to the south, and

an office building to the east, north of the existing parking structure. Site 2 is bounded by Site 1 to the north, the Walgreens and a City parking lot across Vermont Avenue to the west, Young Oak Kim Academy and a multi-family residential complex to the south, and a restaurant with surface parking lot and an auto repair shop to the east. Site 3 is bounded by a retail center with surface parking lot to the north, an apartment building to the west, a vacant auto service center to the south, and a religious institution (the Islamic Center) to the east across Vermont Avenue. Photographs of the areas surrounding the Project Sites are included in Figures 3-8 through 3-12 in Section 3.0, Project Description and Environmental Setting, of this Draft EIR.

Applicable Land Use Policies and Regulations

The Project Sites are located in the Wilshire Center/Koreatown community of the City of Los Angeles. As such, the Project Sites are subject to applicable policies and zoning requirements of several local and regional plans. At the regional/subregional level, the Project is subject to the State Senate Bill 375, Southern California Association of Governments' ("SCAG") *2008 Regional Comprehensive Plan*, SCAG's *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS")*, SCAG's *Southern California Compass Blueprint Growth Vision Report*, the South Coast Air Quality Management District's ("SCAQMD") *2016 Air Quality Management Plan ("AQMP")*, and the Los Angeles County Metropolitan Transportation Authority's ("Metro") *Comprehensive Management Plan for Los Angeles County ("CMP")*.

Site 1

Site 1 is located in the City of Los Angeles, but the property is owned by the County and would be developed for County use, and thus, is not subject to City of Los Angeles land use regulations, pursuant to California Government Code Section 53090 *et. seq.* At the same time, Site 1 is not specifically addressed by the County General Plan because it is located in the City of Los Angeles and not in the unincorporated County. Therefore, there are no adopted land use plans that govern development at Site 1. Nevertheless, this Draft EIR evaluates the Project's consistency with applicable County General Plan policies and also, as part of the inter-jurisdictional consultation process required in California Government Code Section 65402, addresses the Project's consistency with City of Los Angeles General Plan and policies. Section 65402 of the California Government Code states that, if a city general plan has been adopted, a County cannot authorize or construct a building within the city limits until the city's planning agency has received and reported upon the project's conformity with the city's general plan. The planning agency has 40 days to report on the conformity with the general plan and failure to timely respond becomes a conclusive determination that the project conforms to the city general plan. Although exempt from City of Los Angeles building and zoning requirements, Site 1 development would be required to comply with County Building Code requirements, and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. Furthermore, the Los Angeles County Department of Regional Planning will review proposed development on Site 1 for consistency with the County General Plan.

Site 2

Site 2 is located in the City of Los Angeles, on land owned by the County. Development on Site 2 would be constructed on County land for mixed use residential and commercial development under a ground lease. Development of Site 2 would be subject to the City of Los Angeles General Plan, Zoning Ordinance and building regulations.

Site 3

Site 3 is located in the City of Los Angeles, on land owned by the County. Development on Site 3 would consist of (i) a senior affordable housing project to be developed and operated in partnership with a non-profit housing corporation and (ii) a community recreation center to be operated by the YMCA of Metropolitan Los Angeles (a non-profit organization), under a ground lease as a public benefit.

Government Code Section 26227 authorizes the Board of Supervisors to make County real property available to a non-profit corporation or association to operate programs that serve the social needs of County residents, and to finance improvements and enter into leases or other transactions to carry out such public benefit programs. In light of the current shortage of deed-restricted senior affordable housing and the need for community and recreational facilities in the area, the proposed development on Site 3 would result in substantial public benefits to County residents. The County therefore intends to exercise its sovereignty under California Government Code Sections 53090 *et. seq.* and 26227 and exempt Site 3 from City of Los Angeles zoning regulations.

Site 3 is not specifically addressed by the County General Plan because it is located in the City of Los Angeles and not in the unincorporated County. Therefore, there are no adopted land use plans that govern development at Site 3. Nevertheless, this Draft EIR evaluates the Project's consistency with applicable County General Plan policies, and also, as part of the inter-jurisdictional consultation process required in Section 65402 of the *California Government Code*, addresses the Project's consistency with City of Los Angeles land use plans and policies. Although exempt from City of Los Angeles building and zoning requirements, Site 3 development would be required to comply with County Building Code requirements and to obtain permits, inspections and final approval of occupancy from the County of Los Angeles, Department of Public Works, Building and Safety Division. Furthermore, the Los Angeles County Department of Regional Planning will review proposed development on Site 3 for consistency with the County General Plan.

At the local level, applicable plans include the *County of Los Angeles General Plan 2035*, *City of Los Angeles General Plan* ("General Plan"), *County and City General Plan Housing Elements*, *Los Angeles Wilshire Community Plan* ("Community Plan"), *Plan for a Healthy Los Angeles*, and *Wilshire Center/Koreatown Redevelopment Plan*. The *Adaptive Reuse Incentive Areas Specific Plan*, *City of Los Angeles Municipal Code* ("LAMC"), particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code ("Planning and Zoning Code"), and the City's *Walkability Checklist* would be applicable to development of Site 2. Not all of these plans are applicable to each of the Project Sites. An overview of each of these plans and regulations is provided below, including identification of the applicability of individual plans to individual Project Sites. However, not every policy or goal of these plans is intended to mitigate or avoid environmental impacts. Where a policy is not intended to mitigate or avoid an environmental impact, consistency with that policy may not be relevant to an environmental impact analysis.

State

Senate Bill 375 (Sites 1, 2 and 3)

In 2006, Governor Schwarzenegger signed Assembly Bill 32 ("AB 32") into law, which requires that California greenhouse gas ("GHG") emissions be reduced to 1990 levels by 2020. Subsequently, the Legislature adopted Senate Bill 375 ("SB 375") as one means of meeting the mandate of AB 32. Effective as of January 1, 2009, SB 375 directs local governments to modify their approach to regional planning and calls for the integration of transportation, land use, and housing in regional plans.

SB 375 requires the California Air Resources Board (“CARB”) to develop regional reduction targets for GHG emissions, and calls for the creation of regional plans to reduce those emissions from vehicle use (passenger vehicles and small trucks) throughout the State. With those targets in mind, California’s 18 Metropolitan Planning Organizations, including SCAG, were required to develop a “Sustainable Community Strategies” (“SCS”). The Metropolitan Planning Organizations are required to develop the SCS through integrated land use and transportation planning and demonstrate an ability to attain the proposed GHG reduction targets by 2020 and 2035. The Metropolitan Planning Organizations must develop an Alternative Planning Strategy if the Sustainable Community Strategies cannot reach the regional target.

SB 375 has special provisions that apply to SCAG. It states that “a subregional council of governments and the county transportation commission may work together to propose the sustainable communities strategy and an alternative planning strategy...for that subregional area.” In addition, SB 375 authorizes SCAG to “adopt a framework for a subregional SCS or a subregional Alternative Planning Strategy to address the intraregional land use, transportation, economic, air quality, and climate policy relationships.” Finally, SB 375 requires SCAG to “develop overall guidelines, create public participation plans, ensure coordination, resolve conflicts, make sure that the overall plan complies with applicable legal requirements, and adopt the plan for the region.”

On April 7, 2016, SCAG adopted the 2016-2040 RTP/SCS. Among other design concepts, these principles call for compact, mixed-use, transit-oriented growth focused around city centers and existing transportation corridors. Sponsors of SB 375 have stated that because most people commute to work, and cars and light trucks generate approximately 30 percent of the GHG emissions in California, reducing the amount of GHGs emitted into the environment is partially dependent on increasing the number of jobs near residential development to shorten commute times. According to the principles of “smart growth,” solutions to ever-increasing commute times and distances include enabling more Californians to live near where they work and/or to increase public transportation ridership. The theory behind SB 375 is that if Californians spend less time and travel fewer miles in their vehicles, those vehicles would emit fewer GHGs. This can be done, in part, by locating growth in areas already devoted to urban uses that are readily accessible to transit.

Regional Plans

2008 Regional Comprehensive Plan (Sites 1, 2 and 3)

SCAG prepared and issued the 2008 *Regional Comprehensive Plan* (“RCP”) in response to SCAG’s Regional Council directive in the 2002 *Strategic Plan* to define solutions to inter-related housing, traffic, water, air quality, and other regional challenges.¹ The most recent RCP, adopted October 2, 2008, serves as a policy framework for implementation of short-term strategies and long-term initiatives to improve regional mobility and sustainability, while also directly addressing the interrelationships between natural resource sustainability, economic prosperity, and quality of life.² The RCP incorporates principles and goals of the Compass Blueprint Growth Vision, as discussed below. The RCP includes nine chapter subjects: Land Use and Housing; Open Space and Habitat; Water; Energy; Air Quality; Solid Waste; Transportation; Security and Emergency Preparedness; and Economy. Each chapter is organized into three sections: goals,

¹ Southern California Association of Governments *Final 2008 Regional Comprehensive Plan*, website: <http://scag.ca.gov/rcp/index.htm>, accessed: December 8, 2016.

² *Final 2008 RCP*, Op. cit.

outcomes, and action plans. Each action plan contains “Constrained Policies,” which provide a series of recommended near-term policies that developer and key stakeholders should consider for implementation.

Southern California Compass Blueprint Growth Vision (Sites 1, 2 and 3)

The *Southern California Compass Blueprint Growth Vision Report* (“Compass Growth Vision”), published by SCAG in June 2004, presents a comprehensive vision for growth in the six-county SCAG region, as well as the means of achieving that growth vision. The Compass Growth Vision is intended to provide planning guidance and mechanisms for improved mobility, livability, prosperity, and sustainability for all Southern Californians by reorienting development around existing and planned transportation infrastructure on just two percent of the region’s land area. The Compass Growth Vision notes that limitations on the amount of undeveloped land suitable for development may hinder the ability to accommodate new housing and jobs within the region. The report identified that, under current adopted general plans, only 29 percent of the SCAG 2030 growth projection for the coastal basin of Los Angeles and Orange counties could be accommodated through new development on vacant land. Infill, or new development in already developed areas, would be relied upon to provide locations for nearly half of the anticipated new housing region-wide. The Compass Growth Vision concludes that the strategy of combining compact, mixed-use development with housing and jobs near major transportation infrastructure would prove to be of enormous benefit in accommodating future growth, while also recognizing that incremental and strategic changes in small parts of the region can yield great benefits to the region as a whole as well as to individual cities. These projected benefits led to the Compass Growth Vision being incorporated into the region’s RTP and SCS, as discussed below.

The Compass Growth Vision principles and related strategies are the following:

- Principle 1.* Improve mobility for all residents. Strategies to support Principle 1 include: (a) encourage transportation investments and land use decisions that are mutually supportive; (b) locate new housing near existing jobs and new jobs near existing housing; (c) encourage transit-oriented development; and (d) promote a variety of travel choices.
- Principle 2.* Foster livability in all communities. Strategies to support Principle 2 include: (a) promote infill development and redevelopment to revitalize existing communities; (b) promote developments that provide a mix of uses; (c) promote “people scaled,” pedestrian friendly communities; and (d) support the preservation of stable, single-family neighborhoods.
- Principle 3.* Enable prosperity for all people. Strategies to support Principle 3 include: (a) provide a variety of housing types in each community to meet the housing needs of all income levels; (b) support educational opportunities that promote balanced growth; (c) ensure environmental justice regardless of race, ethnicity, or income class; (d) encourage civic engagement; and (e) support local and state fiscal policies that encourage balanced growth.
- Principle 4.* Promote sustainability for future generations. Strategies to support Principle 4 include: (a) preserve rural, agricultural, recreational, and environmentally sensitive areas; (b) focus development in urban centers and existing cities; (c) develop strategies to accommodate growth that use resources efficiently, eliminate

pollution, and significantly reduce waste; and (d) utilize “green” development techniques.

A comprehensive review and consistency analysis for each of the Compass Growth Vision principles is discussed in detail and compared to the Project in Table 4.9-1, Consistency with Compass Growth Vision Principles.

Regional Transportation Plan/Sustainable Communities Strategy (Sites 1, 2 and 3)

Federal guidelines require that all new regionally significant transportation projects be included in a *Regional Transportation Plan* (“RTP”) before they can receive federal or State funds or approvals. Metro submits the program of Los Angeles County projects for inclusion in the Regional Transportation Improvement Program. The RTP must be updated and federally approved every three years. Federal approval requires a positive demonstration that the RTP projects would not generate travel emissions that exceed those assumed in the applicable *Air Quality Management Plan*; this requirement is known as “transportation conformity”.

As previously discussed, SCAG adopted the most recent RTP/SCS on April 7, 2016. The RTP/SCS is a long-range plan that is intended to improve overall mobility, reduce greenhouse gases and enhance the quality of life for the region’s residents. In the RTP/SCS, SCAG has integrated land use, housing and environmental strategies with transportation planning to help meet emissions reduction targets set by the CARB, as required by SB 375. The RTP/SCS provides an alternative to “business as usual” development. It encourages community revitalization and neighborhoods that are bike and pedestrian friendly, with convenient access to transit. Approved by State and federal agencies in April 2016, the RTP/SCS includes approximately \$556.5 billion in projected funding for transportation projects for Los Angeles County.

The RTP/SCS contains a plan to provide adequate highway, transit, rail, aviation, and goods movement infrastructure to meet the region’s needs through 2040. The RTP/SCS is linked to Los Angeles County transportation plans and models in the form of shared growth and travel projections. As such, the 2016-2040 RTP/SCS is guided by and incorporates all projects from Metro’s own Long-Range Transportation Plan.

The RTP/SCS includes goals and policies applicable to transportation and, in some cases, land use projects. These policies include identifying regional strategic areas for infill and investment, planning for additional housing and jobs near transit, and planning for changing demand in types of housing. To this end, the 2016 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region’s High Quality Transit Areas (“HQTAs”). HQTAs are a cornerstone of land use planning best practice in the SCAG region because they concentrate roadway repair investments, leverage transit and active transportation investments, reduce regional life cycle infrastructure costs, improve accessibility, avoid greenfield development, create local jobs, and have the potential to improve public health and housing affordability. The Project Sites are located within an HQTA originally identified by SCAG in 2012³ and expanded in the 2016 plan. A consistency analysis of the goals and policies relevant to the Project is provided in Table 4.9-2 (Project Consistency with the Applicable Goals of the RTP/SCS). The regional transportation impacts of the Project are analyzed in greater detail in Section 4.14 (Traffic and Transportation) of this Draft EIR.

³ SCAG, 2016 RTP/SCS, Exhibit 5-1, page 77.

South Coast Air Quality Management District (Sites 1, 2 and 3)

The Project Sites are located within the South Coast Air Basin (“Basin”) and are, therefore, within the jurisdiction of the SCAQMD. In conjunction with SCAG, the SCAQMD is responsible for formulating and implementing air pollution control strategies. It has responded to this requirement by preparing a series of AQMPs. The most recent of these was adopted by the Governing Board of the SCAQMD on March 3, 2017. This AQMP, referred to as the 2016 AQMP, was prepared to comply with the federal and State Clean Air Acts and amendments, to accommodate growth, to reduce the high levels of pollutants in the Basin, to meet federal and State air quality standards, and to minimize the fiscal impact that pollution control measures have on the local economy. The 2016 AQMP identifies the control measures that will be implemented over a 15-year horizon to reduce major sources of pollutants. Implementation of control measures established in the previous AQMPs has substantially decreased the population’s exposure to unhealthful levels of pollutants, even while substantial population growth has occurred within the Basin.

Air quality impacts of the Project and consistency with the AQMP are analyzed in greater detail in Section 4.2 (Air Quality) of this Draft EIR.

Congestion Management Plan (Sites 1, 2 and 3)

In Los Angeles County, Metro is the designated congestion management agency responsible for coordinating regional transportation policies. The CMP for Los Angeles County was developed in accordance with Section 65089 of the California Government Code. The CMP is intended to address vehicular congestion relief by linking land use, transportation, and air quality decisions. Further, the program 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, which are eligible to compete for state gas tax funds. To receive funds from Proposition 111 (i.e., state gasoline taxes designated for transportation improvements) cities, counties, and other eligible agencies must implement the requirements of the CMP. Metro is the designated congestion management agency responsible for coordinating the County’s adopted CMP. The Project’s traffic study, which is presented in greater detail in Section 4.14 (Transportation and Traffic) of this Draft EIR, was prepared in accordance with the County of Los Angeles CMP and City of Los Angeles Department of Transportation (“LADOT”) guidelines.

Local Plans**County of Los Angeles****County of Los Angeles General Plan 2035 (Sites 1, 2 and 3 for informational purposes)**

The Los Angeles County 2035 General Plan was adopted by the Los Angeles County Board of Supervisors on October 6, 2015. The 2035 General Plan provides the policy framework for how and where the unincorporated County will grow through the year 2035, while recognizing and celebrating the County’s wide diversity of cultures, abundant natural resources, and status as an international economic center. Comprising approximately 2,650 square miles, unincorporated Los Angeles County is home to over one million people. The 2035 General Plan accommodates new housing and jobs within the unincorporated areas in anticipation of population growth in the County and the region.

As noted above, Site 1, as a County use, and Site 3, as a public benefit project, both located on property

owned by the County, would not be subject to the City of Los Angeles' land use regulations, pursuant to California Government Code Sections 53090 *et. seq.* and 26227. At the same time, Sites 1 and 3 are not specifically addressed by the County General Plan since they are located in the City of Los Angeles and not in the unincorporated County. Therefore, there are no adopted land use plans that govern development at Sites 1 and 3. Nevertheless, this Draft EIR evaluates the Project's consistency with applicable County General Plan policies, and also, as part of the inter-jurisdictional consultation process required in California Government Code Section 65402, addresses the Project's consistency with the City of Los Angeles General Plan and policies.

City of Los Angeles

City of Los Angeles General Plan

Site 1 (for informational purposes)

As stated above, Site 1 is not subject to the City of Los Angeles General Plan or zoning. However, because Site 1 is located in the City of Los Angeles, it is not specifically addressed by the County General Plan. Therefore, there are no adopted land use plans that directly apply to Site 1. Nevertheless, this Draft EIR evaluates the Project's consistency with the City of Los Angeles General Plan and policies as part of the inter-jurisdictional consultation process required in California Government Code Section 65402, even though the City's land use designations and policies do not directly apply to Site 1.

Site 2 (Applicable)

Site 2 is located in the City of Los Angeles, on land owned by the County. Development on Site 2 would include mixed residential and commercial uses under a ground lease, and would be subject to City zoning and building regulations. Land uses on Site 2 are guided by the *City of Los Angeles General Plan*. The City of Los Angeles General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating a range of state-mandated elements, including Land Use, Transportation, Noise, Safety, Housing, and Open Space/Conservation. The Land Use Element of the City of Los Angeles General Plan consists of the General Plan Framework Element, which addresses citywide policies, and includes the 35 community plans that guide land use at a local level.

Site 3 (for informational purposes)

As stated above, Site 3 is not subject to the City of Los Angeles General Plan or zoning. However, because Site 3 is located in the City of Los Angeles, it is not specifically addressed by the County General Plan. Therefore, there are no adopted land use plans that directly apply to Site 3. Nevertheless, this Draft EIR evaluates the Project's consistency with the City of Los Angeles General Plan and policies as part of the inter-jurisdictional consultation process required in California Government Code Section 65402, even though the City's land use designations and policies do not directly apply to Site 3.

Although development of Sites 1 and 3 are not directly guided by the land use designations contained in the City's General Plan, the Project as a whole across all three Sites is evaluated against pertinent policies of the City of Los Angeles General Plan in this Draft EIR since all three Sites are located in the City. The analysis of Sites 1 and 3 is provided for informational purposes for the reasons indicated above, while the analysis of Site 2 addresses the applicable land use designations and policies of the City.

City of Los Angeles General Plan Framework Element (Sites 1 and 3 for informational purposes; applicable to Site 2)

The *City of Los Angeles General Plan Framework Element* (“City Framework”), adopted in December 1996, and readopted in August 2001, sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. City Framework land use policies are implemented at the community level through community plans and specific plans.

The City Framework Land Use chapter designates Districts (i.e., Neighborhood Districts, Community Centers, Regional Centers, Downtown Centers, and Mixed-Use Boulevards) and provides policies applicable to each District to support the vitality of the City’s residential neighborhoods and commercial districts. The City Framework includes a Long Range Land Use Diagram for the metro region, which identifies the Project Sites as a Regional Center. According to the City Framework’s Long-Range Land Use Diagram for the Metro region, the Regional Center is an area targeted for high-density land uses, and a focal point of regional commerce, identity, and activity.⁴ Table 3-1 of the City Framework lists the following as “encouraged uses” within a Regional Center: corporate and professional offices, retail commercial (including malls), offices, personal services, eating and drinking establishments, telecommunications centers, entertainment, major cultural facilities (libraries, museums, etc.), commercial overnight accommodations, and comparable uses.⁵ In addition to these land uses, a Regional Center contains a diversity of land uses, such as mixed-use structures which integrate housing with commercial uses, and multi-family housing (independent of commercial), along with the inclusion of small parks and other community-oriented activity facilities.⁶ Regional Centers generally have a range of floor area ratios from 1.5:1 to 6.0:1. Some Regional Centers are only commercially oriented, while others contain a mix of residential and commercial uses. Generally, Regional Centers are characterized by buildings ranging from 6 to 20 stories high (or higher). Regional Centers are usually major transportation hubs.⁷

The Urban Form and Neighborhood Design chapter of the City Framework establishes the goal of creating a livable city for existing and future residents; a city that is attractive to future investment; and a city of interconnected, diverse neighborhoods that builds on the strength of those neighborhoods and functions at both the neighborhood and citywide scales. The City Framework does not directly address the design of individual neighborhoods or communities, but embodies generic neighborhood design and implementation programs that guide local planning efforts and lay a foundation for the update of community plans. With respect to neighborhood design, the City Framework’s Urban Form and Neighborhood Design chapter encourages growth in centers that have a sufficient base of both commercial and residential development to support transit service.

The Open Space and Conservation chapter of the City Framework calls for the use of open space to enhance community and neighborhood character. The policies of this chapter recognize that there are communities where open space and recreation resources are currently in short supply and, therefore, suggest that vacated railroad lines, drainage channels, planned transit routes, and utility rights-of-way, or

⁴ *City of Los Angeles Department of City Planning, City of Los Angeles General Plan Framework, Long Range Land Use Diagram, Metro.*

⁵ *Op. Cit., Table 3-1, Land Use Standards, page 3-23.*

⁶ *Op. Cit., page 3-40.*

⁷ *Op. Cit., Table 3-1, Land Use Standards, page 3-23.*

pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of residents.

The Transportation chapter of the City Framework includes proposals for major improvements to enhance the movement of goods and to provide greater access to major intermodal facilities. The Transportation chapter acknowledges that the quality of life for every citizen is affected by the ability to access work opportunities and essential services, affecting the City's economy, as well as the living environment of its citizens.⁸ The Transportation chapter stresses that transportation investment and policies would need to follow a strategic plan, including capitalizing on currently committed infrastructure and adoption of land use policies to better utilize committed infrastructure. The Transportation chapter of the City Framework is implemented through the Transportation Element of the General Plan.

City of Los Angeles General Plan Housing Element (Sites 1 and 3 for informational purposes; applicable to Site 2).

The 2013-2021 Housing Element of the General Plan is the City's blueprint for meeting housing and growth challenges ("City Housing Element"). The 2013-2021 City Housing Element replaces the 2006-2014 Housing Element. The citywide Housing Element 2013-2021 was adopted on December 3, 2013 and contains current population and housing projections for the City.

The City Housing Element identifies a need for more housing, as it stated that the "City of Los Angeles continues to grow, and with that growth comes the need for more housing – not only more units, but a broader array of housing types to meet evolving household types and sizes, and a greater variety of housing price points that people at all income levels can afford."⁹

Chapter 6 of the City Housing Element lists the goals, objectives, policies and programs that "embody the City's commitment to meeting housing needs."¹⁰ The City's four housing goals are:

- **Goal 1:** A City where housing production and preservation result in an adequate supply of ownership and rental housing that is safe, healthy and affordable to people of all income levels, races, ages, and suitable for their various needs.
- **Goal 2:** A City in which housing helps to create safe, livable and sustainable neighborhoods.
- **Goal 3:** A City where there are housing opportunities for all without discrimination.
- **Goal 4:** A City committed to preventing and ending homelessness.

Wilshire Community Plan (Sites 1 and 3 for informational purposes; applicable to Site 2)

The Project Sites are located in the Wilshire Community Plan area. The Wilshire Community Plan provides objectives and policies designed to guide and promote planned development of the Community Plan area. The Wilshire Community Plan area designates all three Project Sites for "Community Commercial" land uses.

⁸ *Op. Cit.*, page 8-2.

⁹ *Los Angeles Department of City Planning, Housing Element 2013-2021, page c-xiii.*

¹⁰ *Los Angeles Department of City Planning, Housing Element 2013-2021, page 6-6.*

Plan for a Healthy Los Angeles (Sites 1 and 3 for informational purposes; applicable to Site 2)

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

City of Los Angeles Adaptive Reuse Incentive Areas Specific Plan (Applicable to Site 2)

The City of Los Angeles adopted the Adaptive Reuse Ordinance in 1999 to help revitalize the Greater Downtown Los Angeles Area and implement the General Plan by facilitating the conversion of older buildings, many of which are economically distressed and historically significant, to more productive uses. The ordinance applied to the modification of buildings constructed before 1974, or designated historical structures, located in the downtown area. In 2002, the City adopted the Adaptive Reuse Incentive Areas Specific Plan (“Specific Plan”), which extended the provisions of the Adaptive Reuse Ordinance to other areas of the City, including Chinatown, Lincoln Heights, the Hollywood Community Redevelopment Project Area, certain portions of the Wilshire Center/Koreatown Community Redevelopment Project Area, and Central Avenue south of Freeway Number 10 and north of Vernon Avenue. With respect to the Wilshire Center/Koreatown Community Redevelopment Project Area, the provisions of the Specific Plan apply to all areas of the Redevelopment Project Area, except for some properties located south of Olympic Boulevard. Accordingly, Site 2 is located within the Adaptive Reuse Incentive Areas Specific Plan. The Specific Plan defines an Adaptive Reuse Project as any change of an existing non-residential use to new dwelling units, guest rooms, or joint living and work quarters in all or any portion of a building constructed prior to July 1, 1974, or a historically significant building. Under the Adaptive Reuse Specific Plan, dwelling units, joint living and work quarters and guest rooms are not subject to the lot area requirements of the zone or height district. In addition, the required number of parking spaces shall be the same as the number of spaces that existed on Site 2 on March 1, 2003, and shall be maintained and not reduced.

City of Los Angeles Planning and Zoning Code (Applicable to Site 2)

All on-site development activity on Site 2 is subject to the Planning and Zoning Code. The Planning and Zoning Code includes development standards for the various districts in the City of Los Angeles. Site 2 is zoned C2-1 (Commercial, Height District 1).

The Site 1 City zoning classification is C2-1 for the office buildings and surface parking lot areas, and the zoning classification for the existing Shatto Place parking structure is PB-1 (Parking Building, Height District 1). Sites 3 is zoned C2-1. However, as discussed above, City zoning and building requirements do not apply to Sites 1 and 3.

City of Los Angeles Permitted Land Uses (Applicable to Site 2)

C2 is a commercial zone, which allows for the construction of a variety of commercial uses, including retail stores, offices, restaurants, parking structures, as well as hotel and multi-family residential uses. The Project would include uses that are within these categories and would therefore be consistent with the C2 zoning designation.

Height District (Applicable to Site 2)

The Site 2 is located within Height District 1. Height District 1 permits development at a Floor Area Ratio (“FAR”) of 1.5:1 with no height limit (i.e., height is only limited by the allowable floor area). Although the existing Site 2 office building exceeds the C2-1 1.5:1 floor area, the Adaptive Reuse Specific Plan nevertheless permits adaptive reuse of the existing commercial square footage for residential and ground floor commercial uses. However, the new construction proposed at Site 2 would require entitlements from the City of Los Angeles to exceed the 1.5 to 1 floor area limitation otherwise allowed by the C2-1 zone/height district.

City of Los Angeles Parking Requirements (Applicable to Site 2)

Parking requirements for commercial and residential development are subject to the Planning and Zoning Code. For commercial land uses, one parking space is required for every 500 square feet of floor area.¹¹ For residential land uses, one parking space is required for each unit with less than three habitable rooms (i.e., typical studio unit), 1.5 spaces for each unit with three habitable rooms (i.e., typical one-bedroom unit), and two spaces for each unit with more than three habitable rooms (i.e., typical two and three bedroom units).¹²

Department of City Planning Walkability Checklist (Applicable to Site 2)

In January of 2007, the Department of City Planning created the *Walkability Checklist: Guidance for Entitlement Review* (“Walkability Checklist”). The purpose of the Walkability Checklist is to guide the Department of City Planning, as well as developers, architects, engineers, and all community members, in creating enhanced pedestrian movements, access, comfort, and safety contributing to overall walkability throughout the City. Each of the implementation strategies in the Walkability Checklist should be considered in a project, although not all strategies would be appropriate in every project. While the Walkability Checklist is neither a requirement nor part of the Planning and Zoning Code, it provides guidance for consistency relating to the policies contained in the City Framework. Incorporating these guidelines into a project’s design encourages pedestrian activity, more adequate forms, and place making.

Wilshire Center/Koreatown Redevelopment Plan (Sites 1 and 3 for informational purposes; applicable to Site 2)

The Wilshire Center/Koreatown Redevelopment Plan (the “Redevelopment Plan”) was adopted under the provisions of State law by the City of Los Angeles on December 13, 1995. The objectives of the Redevelopment Plan are to promote the redevelopment, rehabilitation, and revitalization of the Redevelopment Project Area. The Redevelopment Project Area generally extends from 11th Street and 12th Street on the south, Vermont Avenue and Wilton Avenue on the west, 5th Street on the north, and Hoover Street on the east, with two additional areas extending north of 5th Street on both sides of Vermont Avenue north to the Hollywood Freeway, and along both sides of Western Avenue north to Melrose Avenue, respectively. Sites 1 and 2 are located in an area designated in the Redevelopment Plan as Community Commercial. Site 3 is located in an area designated for High/Medium Residential use.

¹¹ LAMC Section 12.21.A.4(x)(3).

¹² LAMC Section 12.21.A.4.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Appendix G to the State CEQA Guidelines

The potential for the Project to result in impacts associated with land use is based on the thresholds specified by Appendix G to the *State CEQA Guidelines*, which are addressed in this section. These significance thresholds are listed below.

Threshold 4.9-1: Would the Project physically divide an established community.

Threshold 4.9-2: Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect.

Threshold 4.9-3: Would the Project conflict with any applicable habitat conservation plan or natural community conservation plan.

Affirmative answers to any of these questions would represent a significant impact. The Project would have a less-than-significant impact with respect to physically dividing an established community (Threshold 4.9-1), because there is no residential community located within the Project Sites, and conflict with any applicable habitat conservation plan or natural community conservation plan (Threshold 4.9-3), because no such plans are applicable to the Project Sites. The analyses for these determinations are provided in Section 6.5, Effects Found Not to be Significant.

Project Design Elements

No design elements are included in the Project with respect to land use.

Impact Analysis

Threshold 4.9-2: Would the Project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Construction

Project construction activities would follow all applicable County Code requirements for construction on Sites 1 and 3, and City Code requirements for construction on Site 2, which would avoid conflicts with land use plans, policies, and regulations. Therefore, construction of the Project would not conflict with applicable land use plans, policies and regulations, and no impact would occur.

Operation

As previously discussed, development on Site 2 would be subject to City land use plans as well as the development regulations in the LAMC. Although Sites 1 and 3 are not governed by the City of Los Angeles General Plan and zoning regulations, an analysis of consistency with the City of Los Angeles General Plan

on Sites 1 and 3 is included for informational purposes. As required by CEQA, the Project's consistency with the AQMP is addressed in Section 4.2 (Air Quality), with CalGreen regulations in Section 4.6 (Greenhouse Gas Emissions), and with the CMP is addressed in Section 4.14 (Traffic, Transportation and Parking) of this Draft EIR.

2008 Regional Comprehensive Plan (Sites 1, 2 and 3)

The Project (i.e., Sites 1, 2 and 3) would be consistent with the goals in the RCP, including goals related to land use, housing, and air quality. The Land Use and Housing Goals of the RCP support implementation of the Compass Blueprint Strategy. The policies include focusing growth in existing and emerging centers and along major transportation corridors, creating significant areas of mixed-use development and walkable, "people-scaled" communities, providing new housing opportunities, with building types and locations that respond to the region's changing demographics, and targeting growth in housing, employment and commercial development within walking distance of existing and planned transit stations.

The Project would redevelop existing underused sites with new County office facilities at Site 1, residential and complimentary neighborhood serving commercial development at Site 2, and new senior affordable housing and a community recreation center at Site 3. This new development would occur in an urbanized area located within one-third mile of the existing Metro Rail Red/Purple Line Wilshire/Vermont station. Sites 1 and 3 would involve all new construction. The Site 2 development would reuse the existing County office building by converting existing space to residential units, and would also provide new residential units. Residential units that would be provided by the Project would accommodate a variety of socioeconomic groups. The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor commercial uses as well as enhanced pedestrian facilities, through repair of sidewalks and adding landscaping, all of which are designed to promote pedestrian access to the Project Sites and surrounding areas. Accordingly, the Project (i.e., Sites 1, 2 and 3 collectively) would be consistent with the 2008 RCP Goals.

Southern California Compass Blueprint Growth Vision (Sites 1, 2 and 3)

Table 4.9-1, Consistency with Compass Growth Vision Principles, addresses the four main principles of the Compass Growth Vision and their applicability to the Project.

Table 4.9-1
Consistency with Compass Growth Vision Principles

Principle	Project Consistency
<u>Improve Mobility For All Residents.</u>	Consistent. The Project Sites are located within one-third mile (Site 3 is the farthest at 1,700 feet) of the Metro Rail Red/Purple line Wilshire/Vermont station. The Project Sites are also served by Metro buses that operate on Vermont Avenue and 6 th Street. Furthermore, the Project would incorporate design elements, such as ground floor commercial space and restaurants along Vermont Avenue and 6 th Street that would promote access by walking, bicycle or transit. Access and circulation improvements would accommodate traffic generated by the Project. The location of the parking and driveway entrances along Vermont Avenue and 6 th Street, and the entrance to the parking garage on Shatto Place would allow continued

Table 4.9-1
Consistency with Compass Growth Vision Principles

Principle	Project Consistency
	traffic flow along streets and driveways. In addition, the Project would provide efficient access to the surrounding street system, bikeways, sidewalks, and transit (e.g., Metro Red Line and bus lines), while minimizing traffic impacts on surrounding uses. Bicycle parking and storage would be provided within all three Project Sites. The Project would, therefore, be consistent with the Compass Growth Vision principle to improve mobility for all residents.
Foster Livability In All Communities.	Consistent. This principle promotes infill development and redevelopment of underutilized sites to revitalize the existing community, promote future development of the area with a mix of uses, and promote a “people-scaled” pedestrian-friendly community. The Project would redevelop existing underused sites with new County office facilities to serve critical County functions, and new residential and complimentary commercial development in an urbanized area. The Project would reuse an existing County office building to provide residential units (Site 2), and provide new residential units, including deed-restricted senior affordable housing (Site 3), and a community recreation center (Site 3) to serve the existing community. The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor neighborhood serving commercial uses and enhanced pedestrian facilities (sidewalks, landscaping) designed to promote pedestrian access to the Project Sites and surrounding areas. The Project would contribute to ongoing efforts to bring investment and revitalization to the area. Residents and visitors would have access to the various uses in the immediate area within convenient walking distance. The Project would be consistent with the Compass Growth Vision principle to foster livability in all communities.
Enable Prosperity For All People.	Consistent. This objective is primarily an economic objective, not directly related to environmental impacts. Nonetheless, the proposed office and commercial land uses, as well as Project construction, would provide a variety of jobs for critical County governmental functions, both existing and future high-wage and entry-level employment opportunities and career growth opportunities with potential benefits for the regional economy. The Project would provide employment opportunities and, thus, would be consistent with the Compass Growth Vision principle of enabling prosperity for all people.
Promote Sustainability For Future Generations.	Consistent. The Project would be designed to incorporate building technologies and design features that would help promote a sustainable environment by saving energy, reducing water consumption, making use of recycled

Table 4.9-1
Consistency with Compass Growth Vision Principles

Principle	Project Consistency
	materials, and producing better indoor and outdoor environmental quality. The Project would meet the requirements in the County (Sites 1 and 3 development) and City (Site 2 development) Green Building Codes. Moreover, Sites 1 and 3 would be equivalent to LEED Silver status (under the U.S Green Building Council's applicable rating system). In addition, the Project is located in the dense mid-Wilshire/Koreatown community, in a "Transit Priority Area" where bus and rail transit are readily available, which would reduce vehicle trips compared to a project not equally served by transit. Therefore, the Project would be consistent with the Compass Growth Vision principle to promote sustainability for future generations.
<i>Source: Southern California Compass Growth Plan, June 2004; EcoTierra Consulting, 2017.</i>	

Overall, the Project (i.e., Sites 1, 2 and 3) would be consistent with the principles of the Compass Growth Vision.

Regional Transportation Plan/Sustainable Communities Strategy (Sites 1, 2 and 3)

The consistency of the Project with the RTP/SCS is addressed in Table 4.9-2, Project Consistency with the Applicable Goals of 2016-2040 RTP/SCS.

Table 4.9-2
Project Consistency with the
Applicable Goals of the 2016-2040 RTP/SCS

Goal	Project Consistency
Maximize mobility and accessibility for all people and goods in the region.	Consistent. The Project would develop a mix of County office, residential (market rate and affordable) and neighborhood serving commercial uses in a Transit Priority Area and HQTAs within walking distance of existing bus lines and transit stations, and provide bicycle parking and storage, which would maximize the potential for mobility and accessibility for people.
Protect the environment and health of our residents by improving air quality, and encouraging active transportation (non-motorized transportation, such as bicycling and walking).	Consistent. The Project would incorporate a wide range of building technologies and design features that would protect the environment by saving energy (which would also reduce air emissions associated with electricity generation), reducing automobile trips and associated air emissions, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. Moreover Sites 1 and 3 would achieve the equivalent of a LEED Silver status under the U.S Green Building Council's applicable rating system. Pedestrian access to the Project Sites would be provided via the sidewalks along Vermont Avenue and 6 th Street. The Project would provide opportunities for employees,

**Table 4.9-2
Project Consistency with the
Applicable Goals of the 2016-2040 RTP/SCS**

Goal	Project Consistency
	residents, and visitors to walk to other retail businesses within and near the Project Sites. In addition, the Project would provide long- and short-term bicycle parking spaces and storage. Therefore, the Project would encourage active transportation modes such as bicycling and walking.
Encourage land use and growth patterns that facilitate transit and active transportation.	Consistent. The Project would encourage land use and growth patterns that facilitate transit by being a compact, infill development in a Transit Priority Area and HQTAs located near several public transit options, including the Vermont/Wilshire Metro Red Line Station and Metro bus lines which run along Vermont Avenue and 6 th Street. In addition, the Project encourages active transportation by including bicycle parking stalls and storage on all three Project Sites. The Project also improves walkability in the immediate vicinity of the Project Sites by providing ground floor neighborhood serving commercial uses, a community recreation center for public use and enhanced pedestrian facilities (sidewalks, landscaping) designed to promote pedestrian access to the Project Sites and surrounding area.
<i>Source: Southern California Association of Governments, 2016-2040 RTP/SCS, April 2016; EcoTierra Consulting, 2017.</i>	

Based on the above, the Project would be consistent with the applicable goals in the RTP/SCS.

The Project would also be consistent with the SCS Land Use Strategy of “Focusing New Growth Around Transit”. The Project would develop new County office, residential (market rate and affordable) and neighborhood serving commercial uses, and a community recreation center within one-third mile of the Metro Rail Red/Purple Line Wilshire/Vermont Station, within an identified Transit Priority Area and HQTAs. The Strategy identifies that focusing future growth in HQTAs can provide expanded housing choices that nimbly respond to trends and market demands, encourage adaptive reuse of existing structures, and revitalize main streets. The Project would contribute to each of these objectives by providing deed-restricted senior affordable housing (Site 3), reusing the existing County office building to provide residential units (Site 2), and activating the street on Vermont Avenue and 6th Street. The Strategy also notes that additional local policies that ensure that development in HQTAs achieve the intended reductions in VMT and greenhouse gas emissions include: adaptive reuse of existing structures, and mixed-use development standards that include local serving retail, both of which are components of the Project. Overall, the Project (Sites 1, 2 and 3) includes numerous components that work to implement the Land Use Strategy of the SCS.

County General Plan (Sites 1, 2 and 3 for informational purposes)

While the land use plan contained in the General Plan focuses on unincorporated areas of the County and thus does not apply directly to the Project Sites, the General Plan contains a number of elements that address specific issues and establish various goals, policies, and objectives that pertain to the County as a whole and that are relevant to this County-sponsored project. These goals, policies, and objectives fall

into three basic categories, including (1) supporting infill and pedestrian-friendly development; (2) providing adequate public facilities; and (3) supporting development of affordable housing.

Infill and Pedestrian Friendly Development

The County General Plan Land Use Element includes the following goals and policies related to infill and pedestrian friendly development:

Goal LU 4:	Infill development and redevelopment that strengthens and enhances communities.
Policy LU 4.1	Encourage infill development in urban and suburban areas on vacant, underutilized, and/or brownfield sites.
Policy LU 4.2	Encourage the adaptive reuse of underutilized structures and the revitalization of older, economically distressed neighborhoods.
Policy LU 4.3	Encourage transit-oriented development in urban and suburban areas with the appropriate residential density along transit corridors and within station areas.
Policy LU 4.4:	Encourage mixed use development along major commercial corridors in urban and suburban areas.
Goal LU 10	Well-designed and healthy places that support a diversity of built environments.
Policy LU 10.3	Consider the built environment of the surrounding area and location in the design and scale of new or remodeled buildings, architectural styles, and reflect appropriate features such as massing, materials, color, detailing or ornament.
Policy LU 10.4	Promote environmentally-sensitive and sustainable design.
Policy LU 10.5	Encourage the use of distinctive landscaping, signage and other features to define the unique character of districts, neighborhoods or communities, and engender community identity, pride and community interaction.
Policy LU 10.6	Encourage pedestrian activity through the following: • Designing the main entrance of buildings to front the street; • Incorporating landscaping features; • Limiting masonry walls and parking lots along commercial corridors and other public spaces; • Incorporating street furniture, signage, and public events and activities; and • Using wayfinding strategies to highlight community points of interest.
Policy LU 10.7	Promote public spaces, such as plazas that enhance the pedestrian environment, and, where appropriate, continuity along commercial corridors with active transportation activities.
Policy LU 10.9	Encourage land uses and design that stimulate positive and productive human relations and foster the achievement of community goals.
Policy LU 10.10	Promote architecturally distinctive buildings and focal points at prominent locations, such as major commercial intersections and near transit stations or open spaces.

The Project would redevelop existing underused sites with new County office facilities, and new residential and complimentary mixed-use commercial development in an urbanized area located within one-third mile of the existing Metro Rail Red/Purple Line Wilshire/Vermont station, and along the major commercial corridors of Vermont Avenue and 6th Street. The Project would reuse an existing County office building to provide residential units and would provide new residential units (both at Site 2), including deed-restricted senior affordable housing, and a community recreation center to serve the existing community (at Site 3). The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor commercial uses as well as enhanced pedestrian facilities, through repair

of sidewalks and adding landscaping, all of which are designed to promote pedestrian access to the Project Sites and surrounding areas. The Project would include a public plaza on Site 1 to serve employees and visitors to the new County office building, and a new community recreation center at Site 3 to serve the residents of the area. The Project would include architecturally distinctive buildings that would contribute to an enhanced aesthetic environment, and would be designed to incorporate a wide range of building technologies and design features that would help promote a sustainable environment by saving energy, reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. The Project would meet the requirements in the County Green Building Standards Code (Sites 1 and 3) and City Green Building Code (Site 2). Further, Sites 1 and 3 would achieve the equivalency of LEED Silver as determined by the US Green Building Council's applicable rating system(s). In addition, the Project is located in the dense mid-Wilshire/Koreatown community in an identified Transit Priority Area and HQT, where bus and rail transit are readily available, which would reduce vehicle trips and commute times compared to a project not similarly served by transit. The Project would be consistent with the policies of the County General Plan with respect to infill and pedestrian friendly development.

Public Facilities

The County General Plan Public Services and Facilities Element includes the following goals and policies related to public facilities:

Goal PS/F 1	A coordinated, reliable, and equitable network of public facilities that preserves resources, ensures public health and safety, and keeps pace with planned development.
Policy PS/F 1.7	Consider resource preservation in the planning of public facilities.
Policy PS/F 1.3	Ensure coordinated service provision through collaboration between County departments and service providers.

Although the policies listed above are not designed to address or reduce environmental impacts, as a County-sponsored Project designed to improve the delivery of services to County residents, the policies of the General Plan Public Services and Facilities Element are relevant to the Project. The Project would include new facilities for the Department of Mental Health and WDACS on Site 1 that would allow for more efficient and effective delivery of services to County residents and implement the facilities plans of the County, and a new community recreation center on Site 3 to serve the residents of the area. The new County office building would be designed with sustainable features (LEED Silver equivalent) and located in an identified Transit Priority Area and HQT well served by transit in order to reduce energy and water consumption, automobile trips and associated air emissions. The Project would be consistent with the policies of the County General Plan with respect to public facilities.

Affordable Housing

The County General Plan Housing Element includes the following goals and policies related to affordable housing:

Goal 1	A wide range of housing types in sufficient supply to meet the needs of current and future residents, particularly for persons with special needs, including but not limited to low income households, seniors, persons with disabilities, large households, single-parent households, the homeless and at risk of homelessness, and farmworkers.
Policy 1.3	Coordinate with the private sector in the development of housing for low and moderate income households and those with special needs. Where appropriate, promote such development through incentives.
Policy 1.4	Assist housing developers to identify and consolidate suitable sites for developing housing for low and moderate income households and those with special needs.
Policy 2.1	Support the development of housing for low and moderate income households and those with special needs near employment and transit.
Policy 8.1	Support the distribution of affordable housing, shelters, and transitional housing in geographically diverse locations throughout the unincorporated areas, where appropriate support services and facilities are available in close proximity.
Policy 8.4	Encourage housing design to accommodate special needs. Designs may include: units with multiple bedrooms; shared facilities; universal design; onsite child care; health clinics; or onsite job training services.
Policy 9.1	Ensure collaboration among County departments and other agencies in the delivery of housing and related services.

Although the policies listed above are not designed to address or reduce environmental impacts, as a County-sponsored Project designed to use County property to increase the supply of affordable housing for County residents, the policies of the General Plan Housing Element with respect to the provision of affordable housing are relevant to the Project. The Project would include deed-restricted senior affordable housing units on Site 3 within one-third mile of the existing Metro Rail Red/Purple Line Wilshire/Vermont station. The County would provide the land for the affordable housing units on Site 3, which would facilitate this development. The Project does not involve the displacement of any housing units, and in fact, creates new housing in the area. The Project would be consistent with the policies of the County General Plan with respect to affordable housing.

City of Los Angeles General Plan Framework Element (Sites 1 and 3 for informational purposes; applicable to Site 2)

The City General Plan Framework promotes the development of a diversity of uses to serve existing and future residents, businesses and visitors in the areas of the City that are most capable of accommodating growth. By concentrating future growth in these areas, the City Framework promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution. The City Framework also promotes the development of high-activity areas in appropriate locations that are designed to induce pedestrian activity, and encourages the location of new commercial and multi-family housing development to occur in proximity to transit stations.

Accommodation of Growth and Development (Sites 1 and 3 for informational purposes; applicable to Site 2)

The City Framework includes the following objectives and policies related to growth and development:

Objective 3.1	Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.

Policy 3.1.1	Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.
Policy 3.1.4	Accommodate new development in accordance with land use and density provisions of the General Plan Framework Element Long-Range Land Use Diagram.
Objective 3.2	To provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.
Policy 3.2.3	Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.
Objective 3.4	Encourage new multi-family residential, retail commercial, and office development in the City's neighborhood districts, community, regional, and downtown centers as well as along primary transit corridors/boulevards, while at the same time conserving existing neighborhoods and related districts.
Objective 3.7	Provide for the stability and enhancement of multi-family residential neighborhoods and allow for growth in areas where there is sufficient public infrastructure and services and the residents' quality of life can be maintained or improved.
Policy 3.7.4	Improve the quality of new multi-family dwelling units based on the standards in Chapter 5 Urban Form and Neighborhood Design Chapter of this Element.
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.
Policy 3.10.1	Accommodate land uses that serve a regional market in areas designated as "Regional Center" in accordance with Tables 3-1 (Land Use Standards and Typical Development Characteristics) and 3-6 (Land Use Designation and Corresponding Zones). 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.
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, and provide adequate transitions with adjacent residential uses at the edges of the centers.
Objective 4.2	Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.

The Project Sites are included in an area identified as a Regional Center on the City Framework's Long-Range Land Use Diagram (Metro). Development of County office, residential and commercial land uses would serve the needs of existing and future residents in the area and would expand the diversity of uses in this Regional Center. The Project would increase the vitality in the area through maximizing development of underutilized sites with new land uses that would provide housing and job opportunities. The concentration of development would support the Project area's existing range of services and

activities and would be consistent with the Regional Center designation. The Regional Center is an area targeted for high-density, and a focal point of regional commerce, identity, and activity. Encouraged uses include corporate and professional offices, residential, retail commercial malls, government buildings, major health facilities, major entertainment and cultural facilities and supporting services. The Project would provide pedestrian-oriented development in proximity to transit to encourage the development of an activity center in the area of the Project Sites. The Project would provide opportunities for residents, employees, and visitors to use public transit, and walk to other retail businesses and commercial land uses within and near the Project Site. As such, the Project would support the reduction of vehicle trips, vehicle miles travelled, and air pollution. The Project (i.e., Sites 1, 2 and 3 collectively) would be consistent with the policies of the City of Los Angeles General Plan Framework regarding location and accommodation of growth and development in the City.

Urban Form and Neighborhood Design (Sites 1 and 3 for informational purposes; applicable to Site 2)

The City Framework includes the following objectives and policies related to urban form and neighborhood design:

Goal 5A	A livable City for existing and future residents and one that is attractive to future investment. A City of interconnected, diverse neighborhoods that builds on the strengths of those neighborhoods and functions at both the neighborhood and citywide scales.
Objective 5.2	Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.
Policy 5.2.2	Encourage the development of centers, districts, and selected corridor/boulevard nodes such that the land uses, scale, and built form allowed and/or encouraged within these areas allow them to function as centers and support transit use, both in daytime and nighttime.
Objective 5.8	Reinforce or encourage the establishment of a strong pedestrian orientation in designated neighborhood districts, community centers, and pedestrian-oriented subareas within regional centers, so that these districts and centers can serve as a focus of activity for the surrounding community and a focus for investment in the community.
Policy 5.8.1	Buildings in pedestrian-oriented districts and centers should have the following general characteristics: • An exterior building wall high enough to define the street, create a sense of enclosure, and typically located along the sidewalk; • A building wall more-or-less continuous along the street frontage; • Ground floor building frontage designed to accommodate commercial uses, community facilities, or display cases; • Shops with entrances directly accessible from the sidewalk and located at frequent intervals; • Well lit exteriors fronting on the sidewalk that provide safety and comfort commensurate with the intended nighttime use, when appropriate; • Ground floor building walls devoted to display windows or display cases; • Parking located behind the commercial frontage and screened from view and driveways located on side streets where feasible; • Inclusion of bicycle parking areas and facilities to reduce the need for vehicular use; and

	The area within 15 feet of the sidewalk may be an arcade that is substantially open to the sidewalk to accommodate outdoor dining or other activities.

The Project would include County office, residential and neighborhood serving commercial land uses. The Project design would incorporate design elements, such as ground floor commercial spaces along Vermont Avenue and 6th Street. By developing a mix of land uses on the Project Site, the Project would generate economic activity in the area and could help attract future investment to the area. The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor commercial uses as well as an enhanced pedestrian facilities, through repair of sidewalks and adding landscaping, all of which are designed to promote pedestrian access to the Project Sites and surrounding areas. The Project would include many of the specific design characteristics listed in Policy 5.8.1, including ground floor building frontage designed to accommodate active, pedestrian friendly neighborhood serving commercial uses, community facilities, or display cases, shops with entrances directly accessible from the sidewalk and located at frequent intervals, well-lit exteriors fronting on the sidewalk that provide safety and comfort commensurate with the intended nighttime use, ground floor building walls devoted to display windows or display cases, parking located behind the commercial frontage, and inclusion of bicycle parking and storage areas and facilities to reduce the need for vehicular use. The Project (Sites 1, 2 and 3 collectively) would be consistent with the policies of the City Framework regarding urban form and neighborhood design. Therefore, the Project would be consistent with the applicable goals, objectives, and policies in the City General Plan Framework Element.

City of Los Angeles General Plan Housing Element (Sites 1 and 3 for informational purposes; applicable to Site 2)

The City's Housing Element provides objectives and policies designed to promote development of the City's housing supply and affordability.

Objective 1.1	Produce an adequate supply of rental and ownership housing in order to meet current and projected needs.
Policy 1.1.3	Facilitate new construction and preservation of a range of different housing types that address the particular needs of the city's households.
Policy 1.1.4	Expand opportunities for residential development, particularly in designated Centers, Transit Oriented Districts and along Mixed-Use Boulevards.
Policy 1.1.7	Strengthen the capacity of the development community to develop affordable housing.
Objective 2.2	Promote sustainable neighborhoods that have mixed-income housing, jobs, amenities, services and transit.
Policy 2.2.5	Provide sufficient services and amenities to support the planned population while preserving the neighborhood for those currently there.
Objective 2.3	Promote sustainable buildings, which minimize adverse effects on the environment and minimize the use of non-renewable resources.
Policy 2.3.2	Promote and facilitate reduction of water consumption in new and existing housing.
Policy 2.3.3	Promote and facilitate reduction of energy consumption in new and existing housing.

Policy 2.3.4	Promote and facilitate reduction of waste in construction and building operations.
Objective 2.4	Promote livable neighborhoods with a mix of housing types, quality design and a scale and character that respects unique residential neighborhoods in the City.

Although the policies listed above are not designed to address or reduce environmental impacts, the Project would provide housing, and the policies of the General Plan Housing Element with respect to the provision of housing supply and affordable housing are relevant to the Project. The Project includes the development of new market rate (Site 2) and deed-restricted affordable housing units (Site 3) that will increase the City's housing supply for all income levels. The County will provide the land for the affordable housing project on Site 3, which will facilitate this development by a non-profit affordable housing provider. Site 2 would provide market rate units with a range of unit types by adaptively reusing an existing office building and through new construction. The new units at Sites 2 and 3 would be located near bus and rail transit lines and would incorporate sustainability features that would reduce energy and water consumption and promote recycling and waste reduction. Site 3 would be developed to LEED Silver standards. The Project would not remove any existing residences or displace any residential tenants. The proposed commercial land uses would provide amenities that would serve the Project's future residents and visitors, as well as the existing neighborhood residents, workers, and visitors. Therefore, the Project (i.e., Sites 1, 2 and 3 collectively) would be consistent with the applicable objectives and policies in the City's Housing Element.

Wilshire Community Plan (Sites 1 and 3 for informational purposes; applicable to Site 2)

The Wilshire Community Plan provides objectives and policies designed to promote planned development of the Community Plan area.

Goal 1	Provide a safe, secure, high quality residential environment for all economic, age and ethnic segments of the Wilshire Community;
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 existing residents and expected new residents in the Wilshire Community Plan Area;
Policy 1-1.3	Provide for adequate Multiple Family residential development;
Objective 1-2	Reduce vehicular trips by developing new housing in close proximity to regional and community commercial centers, subway stations and existing bus stops;
Policy 1-2.1	Encourage higher density residential uses near major public transportation centers;
Objective 1-3	Preserve and enhance the varied and distinct residential character and integrity of existing residential neighborhoods;
Policy 1-4.1	Promote greater individual choice in type, quality, price and location of housing;
Policy 1.4-3	Encourage multiple family residential and mixed use development in commercial zones;
Policy 11-1.4	Support the provision of bicycle parking facilities in all new development;
Objective 11-2	Promote pedestrian mobility, safety, amenities, and access between employment centers, residential areas, recreational areas, schools, and transit centers;

Goal 2	Encourage strong and competitive commercial sectors which promote economic vitality and serve the needs of the Wilshire community through well-designed, safe and accessible areas, while preserving historic and cultural character;
Policy 2-1.1	New commercial uses should be located in existing established commercial areas or shopping centers.
Objective 2-3	Enhance the visual appearance and appeal of commercial districts.

The Project would redevelop existing underused sites with new County office facilities, and new residential and complementary commercial development in an urbanized area located within one-third mile of the existing Metro Rail Red/Purple Line Wilshire/Vermont station. The Project would reuse the existing County office building to provide residential units and provide new residential units in a commercial zone (Site 2), and deed-restricted senior affordable housing, and a community recreation center to serve the existing community (Site 3). The Project would provide appropriate density in an area that is well-served by rail and bus transit in an identified Transit Priority Area and HQTAs. The Project would improve the pedestrian environment in the area of the Project Sites by providing ground floor commercial uses on established commercial corridors as well as enhanced pedestrian facilities, through repair of sidewalks and adding landscaping, all of which are designed to promote pedestrian access to the Project Sites and surrounding areas. The Project would also include bicycle parking spaces on all three Project Sites to encourage the use of alternate transportation modes.

The range of commercial and residential Project uses would be consistent with the Community Commercial land use designation of the Project Sites. The Wilshire Community Plan land use map includes a footnote restricting development within the “Community Commercial” land use designation to Height District 1 (i.e., Footnote #5). Height District 1 generally permits a floor area ratio of 1.5 to 1 with unlimited height (i.e., the development envelope is only restricted by the floor area limitation). Thus, the developments at Sites 1 and 2 (new construction/floor area only)¹³ would exceed the floor area and intensity contemplated by the Wilshire Community Plan land use map.¹⁴ However, as noted above, the City Framework Element of the General Plan identifies the Project Sites as within a “Regional Center” designation where the highest intensity developments are encouraged (e.g., high rise construction up to a 6:1 floor area ratio). Moreover, the Project would advance multiple Community Plan goals, policies and objectives, including encouraging a strong and competitive commercial sector along the Vermont Corridor (Site 1) and providing market rate and affordable housing in close proximity to transit (Sites 2 and 3).

¹³ *The Adaptive Re-Use Incentives Area Specific Plan permits adaptive reuse of the existing office building for residential use. Therefore, adaptive re-use of the existing building as a stand-alone project (i.e., without any new floor area) would supersede the Wilshire Community Plan footnote #5 FAR limitation. However, the Site 2 new proposed construction is not authorized by the Adaptive Reuse Specific Plan and would therefore exceed the 1.5 to 1 FAR limit imposed by the Wilshire Community Plan land use footnote #5.*

¹⁴ *Site 3 is also limited to 1.5 to 1 FAR by the Wilshire Community Plan Land Use Map (i.e., Footnote #5). However, as a 100 percent affordable housing project the Site 3 development could exceed this floor area limitation through development incentives and/or waivers permitted by the State Density Bonus Law (California Government Code Section 65915) and the City of Los Angeles’ Density Bonus Ordinance (LAMC Section 12.22A.25). Thus, if Site 3 were governed by the Wilshire Community Plan, the 1.5 to 1 development limitation imposed by Land Use Map Footnote #5 would be superseded by State law.*

The developments at the Project Sites would also increase the vitality in the area through maximizing development of underutilized sites with new land uses that would provide housing and job opportunities. Notwithstanding that Site 1 and 2 conflict with Wilshire Community Plan Land Use Map Footnote #5 (as noted above), the Project as a whole would reinforce the existing character of the surrounding areas on Vermont Avenue and Wilshire Boulevard. The concentration of development would support the Community Plan area's existing range of services and activities.

The developments at Sites 1, 2 and 3 would be compatible with the existing commercial and multi-family land uses in the area. Project buildout would be of a scale and built form consistent with the surrounding area, which includes medium and high rise buildings, particularly in the area of the Metro Rail station and on Wilshire Boulevard (see Section 4.1, Aesthetics, of this Draft EIR), and would serve the housing needs of existing and possible future residents, and the needs of employees, visitors, and patrons within Wilshire Community Plan Area. Thus, notwithstanding that Site 1 and 2 conflict with Wilshire Community Plan Land Use Map Footnote #5, the Project (i.e., Sites 1, 2 and 3) would on balance be consistent with the land use goals of the Wilshire Community Plan that are applicable to the Project Sites and surrounding area.

Plan For A Healthy Los Angeles (Sites 1 and 3 for informational purposes; applicable to Site 2).

The Healthy LA Plan provides objectives and policies designed to promote the health of the City's residents through design.

Policy 2.2	Healthy Building Design and Construction: Promote a healthy built environment by encouraging the design and rehabilitation of buildings and sites for healthy living and working conditions, including promoting enhanced pedestrian-oriented circulation, lighting, attractive and open stairs, healthy building materials and universal accessibility using existing tools practices, and programs.
Policy 2.6	Repurpose Underutilized Spaces for Health: Work proactively with residents to identify and remove barriers to leverage and repurpose vacant and underutilized spaces as a strategy to improve community health.
Policy 5.1	Air Pollution and Respiratory Health: Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.
Policy 5.7	Land Use Planning For Public Health and GHG Emission Reduction: Promote land use policies that reduce per capita greenhouse gas emissions, result in improved air quality and decreased air pollution, especially for children, seniors and other susceptible to respiratory diseases.

The Project would promote a healthy built environment that could reduce automobile trips and associated air and GHG emissions by providing an enhanced pedestrian-oriented design of the Project Sites that would promote alternate means of access to the Project. The Project would improve pedestrian facilities in the area to promote walking and would provide bicycle parking and storage spaces on all three Project Sites to promote bicycle use. The Project is located in an area with various bicycle facilities, including on-street bicycle lanes on 1st Street, 7th Street, 11th Street, and Oxford Avenue, and sharrows (shared lanes between bicycles and vehicles on 4th Street and New Hampshire Avenue), further increasing the likelihood of bicycle use. The Project would convert underutilized sites into County office, residential, commercial and community recreation center uses that would enhance the built environment in the surrounding

Project vicinity and promote interaction with surrounding uses through walking and bicycling. The Project Sites are located in an area that is well-served by rail and bus transit, which would help to reduce automobile trips and associated air emissions, and improve air quality. In addition to adhering to smart growth principles of locating infill development adjacent to existing employment centers and public transportation options, the Project would incorporate a wide range of building technologies and design features that would protect the environment by saving energy (which would also reduce air pollutant and GHG emissions associated with electricity generation), reducing water consumption, making use of recycled materials, and producing better indoor and outdoor environmental quality. Further, the Project Sites would achieve the equivalent of LEED Silver status. Therefore, the Project would be consistent with the applicable policies in the Healthy LA Plan.

Wilshire Center/Koreatown Redevelopment Plan (Sites 1 and 3 for informational purposes; applicable to Site 2)

The Project would provide County office, multifamily residential and commercial uses on Sites 1 and 2, which would be consistent with the Community Commercial land use designation for these sites set forth in the Redevelopment Plan.¹⁵ The Project would provide deed-restricted affordable housing units and a community recreation center on Site 3, which would be consistent with the Community Commercial land use designation set forth in the Redevelopment Plan for Site 3.

Adaptive Reuse Incentive Areas Specific Plan (Site 2 only)

The Adaptive Reuse Incentive Areas Specific Plan (“Specific Plan”) provides that the following provisions shall apply to the adaptive reuse of buildings constructed prior to July 1, 1974, or historically significant buildings:

- (1) Floor Area. Existing floor area exceeding that permitted by the zone, height district, specific plan, supplemental use district, or any other land use regulation shall be permitted.
- (2) Height. Existing height exceeding that permitted by the zone, height district, specific plan, supplemental use district, or any other land use regulation shall be permitted.
- (3) Yards. Existing observed yards not meeting the yards required by the zone, height district, specific plan, supplemental use district, or any other land use regulation shall be permitted.

Because the existing County office building on Site 2 was constructed in 1964, these provisions would apply to the proposed reuse of this building. Adaptive Reuse Projects must be approved by a City Zoning Administrator. With this approval, the proposed reuse of the existing County office building for residential units would be consistent with the Specific Plan.

¹⁵ Section 503 of the Redevelopment Plan defers to land uses permitted by the City of Los Angeles land use designation and regulations. Further, the Successor Agency to the City of Los Angeles Community Redevelopment Agency adopted a resolution on June 21, 2012 clarifying that permitted land uses under the Wilshire Center/Koreatown Redevelopment Plan are governed by the Los Angeles General Plan, Community Plan and the Zoning Ordinance. Thus, as the Project’s commercial, residential and public benefit uses are permitted by the Project sites’ Community Plan “Community Commercial” land use designation and C2-1 zoning, the uses are also permitted under the Redevelopment Plan.

City of Los Angeles Planning and Zoning Code (Site 2 only)**Permitted Uses**

Site 2 is zoned C2-1. The proposed land uses that are proposed for the remainder of Site 2 (multifamily residential over a parking structure with ground floor commercial) are permitted in the C2 zone.

Height District

The zoning classification for Site 2 limits FAR to 1.5 to 1 with unlimited height. While this limitation would not apply to the reuse of the existing County office building, as discussed above pursuant to the Adaptive Reuse Incentives Area Specific Plan, the proposed new construction would exceed the permitted floor area allowed under the C2-1 zone/height district. Thus, a discretionary land use entitlement such as a General Plan Amendment to “Regional Center Commercial” and a Height District Change to Height District 2 (i.e., from C2-1 to C2-2) would be required to accommodate an FAR up to 6:1. With a City discretionary land use approval, the proposed new residential construction would be consistent with the Planning and Zoning Code.

Site 2 is located in the urbanized mid-Wilshire/Koreatown community of the City, within walking distance of regionally serving transit service. The Project’s bulk and massing is consistent with multiple high-rise commercial and mixed-use developments located along Vermont Avenue. Densification of this area has long been planned for and encouraged given its close proximity to public transit and major employers, and the Project would fit within the existing neighborhood context and pattern of development along Vermont Avenue and 6th Street. In addition, the proposed parking structure and residential building would be located immediately adjacent to the existing County office building, which is approximately 173 feet in height. A discretionary approval to authorize the Site 2 new construction would replace an underutilized property with a new, mixed use building that would contribute to the revitalization of this area of Vermont Avenue and 6th Street. Thus, the height district change for Site 2 would further realize the City’s goal and policies for the Wilshire Community Plan area, including encouraging higher density residential uses near major public transportation centers, and encouraging multiple family residential and mixed use development in commercial zones.

Parking Requirements

New development on Site 2 would provide parking meeting the requirements of the Planning and Zoning Code. The LAMC requires 1 parking space per studio unit, 1.5 spaces per 1-bedroom unit, and 2 parking spaces per 2-bedroom unit. The 3,400 square feet of ground-floor commercial space must provide 1 space per 500 square feet under the City’s Enterprise Zone parking requirements. Accordingly, the new mixed-use building would require a total of 108 parking spaces (101 residential plus 7 commercial parking spaces). In total, Site 2 would be required to provide a total of 161 parking spaces under the combination of Specific Plan and LAMC requirements (53 Specific Plan spaces plus 108 spaces for new mixed use construction). Because the Project proposes 263 spaces at Site 2, the Project would satisfy resident and visitor parking needs. The provision of parking supply is discussed in Section 3.0, Project Description and Environmental Setting, of this Draft EIR.

City of Los Angeles Walkability Checklist (Site 2 only)

While the guidance provided by the Walkability Checklist is not mandatory and is not a part of the LAMC, incorporating the criteria listed to the maximum extent feasible would create a more walkable

environment and a higher quality of urban form for the Project. The essential purpose of the Walkability Checklist is to guide Department of City Planning staff in working with developers to make developments more “walkable” by way of enhancing pedestrian activity, access, comfort, and safety. In addition, the Walkability Checklist encourages planners and developers to protect neighborhood character and pursue high-quality urban form. The following is an analysis of Site 2 development and its consistency with the applicable guidelines.

Sidewalks

Site 2 development generally supports the walkability guidelines discussing sidewalks, which describes that pedestrian corridors should be delineated by creating a consistent rhythm, should be wide enough to accommodate pedestrian flow, and provide pedestrian safety, specifically by creating a clear separation from the roadway and from traffic. Pedestrian access on Site 2 would be provided via sidewalks along 6th Street and Vermont Avenue that would provide direct access to ground floor commercial uses. Therefore, the Project would be consistent with Walkability Checklist guidelines related to sidewalks.

Utilities

Site 2 development generally supports the walkability guidelines regarding utilities, which describe that ideally utilities should be placed underground in order to improve and preserve the character of the street and neighborhood, increase visual appeal, and minimize obstructions in the pedestrian travel path. The Project would place all utility equipment within and around the perimeter of the Site 2 underground and/or in the specified zones outlined in the Walkability Checklist.

Per LADWP standards, the proposed domestic water lines would have the meter installed in an underground vault in the sidewalk, and the fire water lines would have the detector check installed in an underground vault in the sidewalk. The backflow preventers for the water lines would be private and would be located on private property, either within the building or along the site perimeter, maintaining 12 feet of clearance. Equipment would be buffered with landscaping, if outside the building.

Site 2 would connect to the existing sewer lines located underground within the public right-of-way on Vermont Avenue and 6th Gower Street. Storm drains would either discharge through the curb face via a parkway drain, located underneath the sidewalk, or be hard-piped to a catch basin, which would be also located underneath the public sidewalk. Therefore, Site 2 development would be substantially consistent with Walkability Checklist guidelines related to utilities.

Building Orientation

Site 2 development supports the walkability guidelines regarding building orientation, which describe that a building’s placement on a site establishes its relationship to the sidewalk and street and could enhance pedestrian activity. Site 2 development would provide direct access to commercial uses on Vermont Avenue and 6th Street. Direct access to the residential buildings would be provided from the Vermont Avenue and 6th Street sidewalks. Furthermore, ground floor commercial uses would support outdoor dining. Therefore, Site 2 development would be consistent with Walkability Checklist guidelines related to building orientation.

Off-Street Parking and Driveways

Site 2 development supports the walkability guidelines regarding off-street parking and driveways, which states that the safety of the pedestrian is primary in an environment where pedestrians and automobiles must both be accommodated. Vehicular access to Site 2 would be provided via a new driveway entrance off of 6th Street that leads to the parking structure and loading areas. Vehicle entries and exits would be clearly marked to indicate a clear vehicular circulation path, separate from the pedestrian pathways.

Bicycle parking would be provided in accordance with the Bicycle Parking Ordinance (LAMC 12.21-A,16). A total of 290 bicycle parking spaces would be provided on Site 2 (see Table 3-2 in Section 3.0, Project Description and Environmental Setting). Long-term bicycle parking and storage spaces would be configured to protect bicycles from inclement weather and would consist either of bicycle lockers, bicycle rooms or cages, or attended facilities. While the exact location of the bicycle storage is subject to change, all bicycle parking would be provided either at grade level or one level below ground in the garage.

Furthermore, pedestrian walkways from the parking structure and to the building entrances would be identifiable with the use of lighting and signage. The width of driveways would meet and not exceed the standard width identified as necessary to accommodate vehicles and all parking areas would be illuminated with adequate, uniform, and glare-free lighting. Lighting on Site 2 would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes. Therefore, Site 2 development would be substantially consistent with Walkability Checklist guidelines related to off-street parking and driveways.

On-Site Landscaping

Site 2 development would be designed to generally support the walkability guidelines regarding on-site landscaping. Each street would include landscaping intended to create a pedestrian friendly environment and a pleasing transition from the street to the building. Site 2 development would improve the pedestrian environment in the area of the Project Sites by providing enhanced pedestrian facilities, through repair of sidewalks and adding landscaping, which is designed to promote pedestrian access to the Project Sites and surrounding areas. Landscaping would be provided at the ground floor on Site 2, including at the entrances to the commercial and residential components of the building, and along the sidewalk. Landscaping would consist of a variety of trees, shrubs, and ground coverings. Therefore, Site 2 development would be substantially consistent with Walkability Checklist guidelines related to on-site landscaping.

Building Façade

Site 2 development generally supports the walkability guidelines regarding building façade, which describe that a building's facade could be employed to meet many objectives for a safe, accessible, and comfortable pedestrian environment, specifically by adding visual interest and emphasizing pedestrian movement and comfort. Site 2 development is a proposed mixed use development that would be contained in the reused County office building and a new building, both of which are designed to be welcoming to pedestrians through provision of an active and engaging streetscape, and landscaped entrances to the Project's residential lobbies, thereby fostering a quality urban environment. Site 2 development would promote the public convenience and welfare by enhancing pedestrian activity through these building design and streetscape enhancements. Therefore, Site 2 development would be substantially consistent with Walkability Checklist guidelines related to building frontage.

Building Signage and Lighting

Site 2 development would be designed to generally support the walkability guidelines regarding building signage and lighting, which describe signage as part of the visual urban language and contributing to neighborhood identity and “place making”. Pedestrian wayfinding signage would be located at parking garage entrances, elevator lobbies, vestibules, and residential corridors, while Site 2 lighting would incorporate low-level exterior lights on the building and along pathways for security and wayfinding purposes.

Site 2 lighting would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties.

Therefore, Site 2 development would be consistent with Walkability Checklist guidelines related to building signage and lighting.

Conclusion

Overall, the Project would have a less-than-significant impact with respect to consistency with applicable land use plans, policies, and regulations and it would be generally compatible with surrounding land uses.

CUMULATIVE IMPACTS

The study area for the land use cumulative impacts analysis includes the Project Sites and the Wilshire Community Plan area. The related projects are located in the Wilshire Community Plan Area and would be expected to promote the goals and policies related to future development within the Community Plan Area as well as state and regional policies that promote the concentration of new development in areas well served by public transportation. The Project (Sites 1, 2 and 3) would not result in any significant impacts related to consistency with land use plans. As discussed above, the Project would be consistent with all applicable land use regulations and policies and it would be generally compatible with surrounding land uses. The less-than-significant land use impacts associated with the Project Sites discussed above would not result in any cumulatively considerable impacts related to land use.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

No Project Design Features or Regulatory Requirements (other than those discussed in the preceding sections) are applicable to the Project with regard to land use.

MITIGATION MEASURES

The Project would not result in a significant land use and planning impact. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts related to land use as a result of the Project would be less than significant.

4.10 NOISE

INTRODUCTION

This section evaluates the noise and groundborne vibration impacts resulting from the construction and operation of the Project. Noise monitoring data and calculations are included as Appendix 4.10-1 to this Draft EIR.

Fundamentals of Sound and Environmental Noise

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

Noise, on the other hand, is typically defined as unwanted sound audible at such a level that the sound becomes an undesirable by-product of society’s normal day-to-day activities. Sound becomes unwanted when it interferes with normal activities, causes actual physical harm, or results in adverse health effects. The definition of noise as unwanted sound implies that it has an adverse effect to people and their environment. However, not every unwanted audible sound interferes with normal activities, causes harm, or has adverse health effects. For unwanted audible sound (i.e., noise) to be considered adverse, it must occur with sufficient frequency and at such a level that these adverse impacts are reasonably likely to occur. Thresholds of significance, discussed below, differentiate between benign unwanted audible sound and significant adverse unwanted audible sound.

A typical noise environment consists of a base of steady ambient noise that is the sum of many distant and indistinguishable noise sources. Superimposed on this background, noise is the sound from individual local sources. These can vary from an occasional aircraft or train passing by to virtually continuous noise, such as traffic on a major highway. Table 4.10-1, Representative Environmental Noise Levels, illustrates representative noise levels in the environment.

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

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

Table 4.10-1
Representative Environmental Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	—110—	Rock Band
Jet Fly-over at 100 feet		
	—100—	
Gas Lawnmower at 3 feet		
	—90—	
		Food Blender at 3 feet
Diesel Truck going 50 mph at 50 feet	—80—	Garbage Disposal at 3 feet
Noisy Urban Area during Daytime		
Gas Lawnmower at 100 feet	—70—	Vacuum Cleaner at 10 feet
Commercial Area		Normal Speech at 3 feet
Heavy Traffic at 300 feet	—60—	
		Large Business Office
Quiet Urban Area during Daytime	—50—	Dishwasher in Next Room
Quiet Urban Area during Nighttime	—40—	Theater, Large Conference Room (background)
Quiet Suburban Area during Nighttime		
	—30—	Library
Quiet Rural Area during Nighttime		Bedroom at Night, Concert Hall (background)
	—20—	
		Broadcast/Recording Studio
	—10—	
Lowest Threshold of Human Hearing	—0—	Lowest Threshold of Human Hearing

Source: California Department of Transportation, Technical Noise Supplement, October 1998.

- CNEL** - The Community Noise Equivalent Level (“CNEL”) is a 24-hour average Leq with a 5 dBA “weighting” during the hours of 7:00 P.M. to 10:00 P.M. and a 10 dBA “weighting” added to noise during the hours of 10:00 P.M. to 7:00 A.M. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a constant 60 dBA 24 hour Leq would result in a CNEL of 66.7 dBA.

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

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

to most people, while the human ear perceives a 10 dBA CNEL increase as a doubling of sound. However, there is no direct correlation between increasing or even doubling noise-generating sources and what is detectable by the human ear as an increase in noise level. The human ear perceives a 10 dBA increase in sound level to be a doubling of sound volume, but doubling the sound energy (i.e., the noise-generating activity) only results in a 3 dBA increase in sound. This means that a doubling of sound wave energy (e.g., doubling the volume of traffic on a roadway) would result in a barely perceptible change in sound level to the human ear. Thus, relatively sizeable increases in baseline noise generation are not necessarily perceived as substantial noise increases by the human ear.

Noise levels from a particular source generally decline as distance to the receptor increases. Other factors, such as the weather and reflective barriers, also help intensify or reduce the noise level at any given location. A commonly used rule of thumb for roadway noise is that for every doubling of distance from the source (assume a starting point of 50 feet), the noise level is reduced by about 3 dBA at acoustically “hard” locations (i.e., the area between the noise source and the receptor is nearly complete asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically “soft” locations (i.e., the area between the source and receptor is normal earth or has vegetation, including grass). Noise from stationary or point sources is reduced by about 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels are also generally reduced by about 1 dBA for each 1,000 feet of distance due to air absorption. Noise levels may also be reduced by intervening structures – generally, a single row of buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm can reduce noise levels by 5 to 10 dBA. The normal noise attenuation within residential structures with open windows is about 17 dBA, while the noise attenuation with closed windows is about 25 dBA.¹

Fundamentals of Environmental Groundborne Vibration

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

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

¹ *National Cooperative Highway Research Program Report 117, Highway Noise: A Design Guide for Highway Engineers, 1971.*

to 100 VdB, which is the general threshold where minor damage can occur in fragile buildings, such as historic buildings.

The general human response to different levels of groundborne vibration velocity levels is described in Table 4.10-2, Human Response to Different Levels of Groundborne Vibration.

Table 4.10-2
Human Response to Different Levels of Groundborne Vibration

Vibration Velocity Level	Human Perception
65 VdB	Approximate threshold of perception for many people.
75 VdB	Approximate dividing line between barely perceptible and distinctly perceptible. Many people find that transportation-related vibration at this level is unacceptable.
85 VdB	Vibration acceptable only if there are an infrequent number of events per day.
<i>Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.</i>	

ENVIRONMENTAL SETTING

Existing Conditions

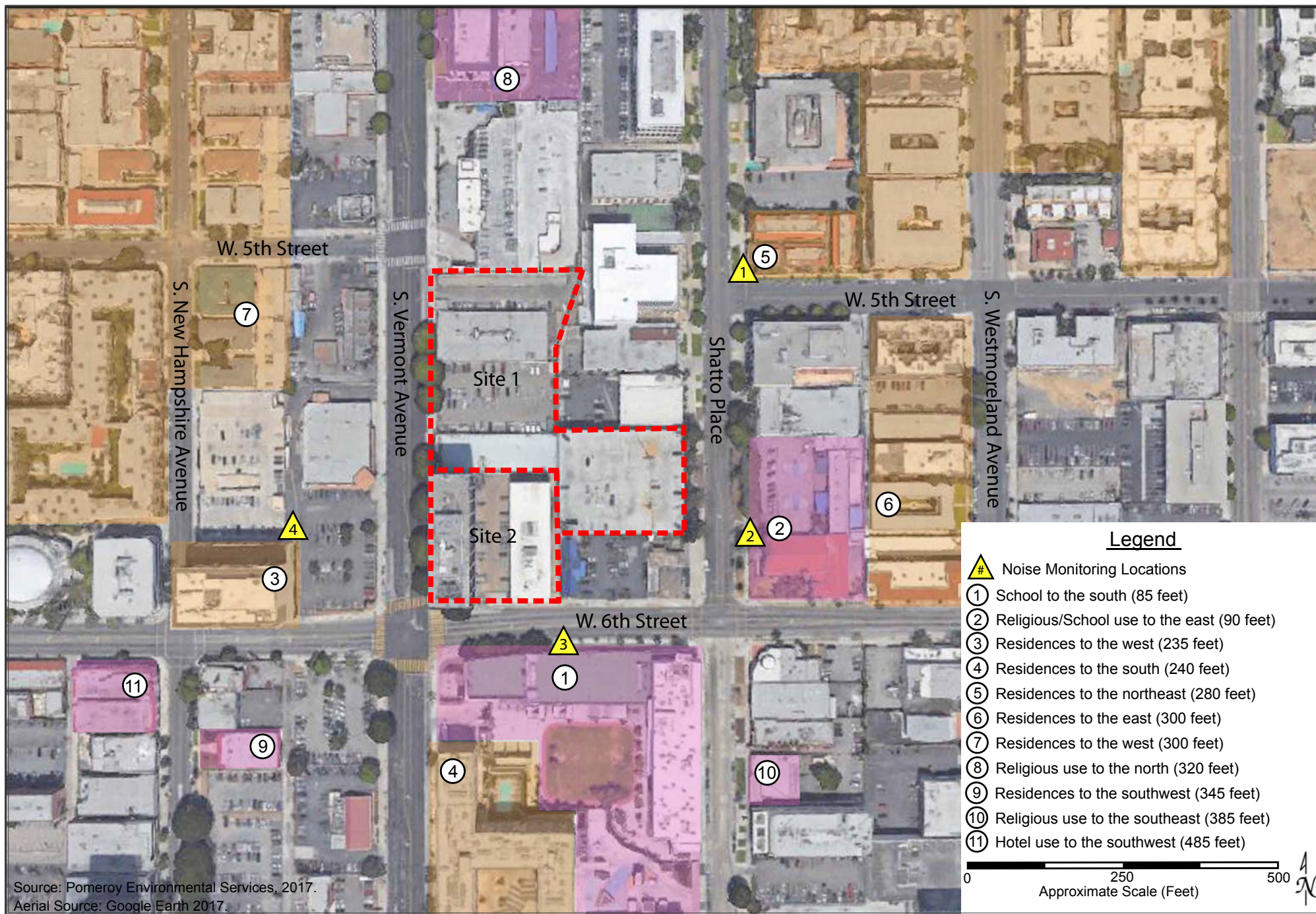
Existing Ambient Noise Levels

The Project Sites consist of Site 1, Site 2, and Site 3. Site 1 is an irregularly shaped, approximately 2.5-acre site, located on the east side of Vermont Avenue, north of 6th Street. Site 2 is a rectangular, approximately 1-acre site located at the northeast corner of the intersection of Vermont Avenue and 6th Street. Site 3 is a rectangular, approximately 0.5-acre site, located on the west side of Vermont Avenue, north of 5th Street. To establish baseline noise conditions, existing noise levels were monitored at locations near Sites 1, 2, and 3.

The locations of the noise measurements are shown in Figure 4.10-1, Sites 1 & 2 Noise Monitoring and Sensitive Receptor Location Map, and Figure 4.10-2, Site 3 Noise Monitoring and Sensitive Receptor Location Map.^{2 3} The results of the measurements are summarized in Table 4.10-3, Existing Ambient Noise Levels. The noise monitoring outputs are provided in Appendix 4.10-1 to this Draft EIR. As shown in Table 4.10-3, the ambient recorded noise levels (“Leq”) ranged from 55.4 dBA to 69.2 dBA near the Project Sites.

² The noise measurements were taken on May 10, 2017 using the 3M SoundPro SP DL-1 sound level meter, which conforms to industry standards set forth in ANSI S1.4-1983 (R2006) – Specification for Sound Level Meters/Type 1, and is consistent with the requirements specified in LAMC Section 111.01(l) that the instruments be “Type S2A” standard instruments or better. This instrument was calibrated and operated according to the manufacturer’s written specifications. At the measurement sites, the microphone was placed at a height of approximately five feet above the ground. The sound level meter was programmed to record the average sound level (Leq) over a period of 15 minutes in accordance with LAMC Section 111.01(a). Details regarding individual noise measurements are contained in Draft EIR Appendix 4.10-1.

³ Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Publication FTA-VA-90-1003-06, May, 2006.



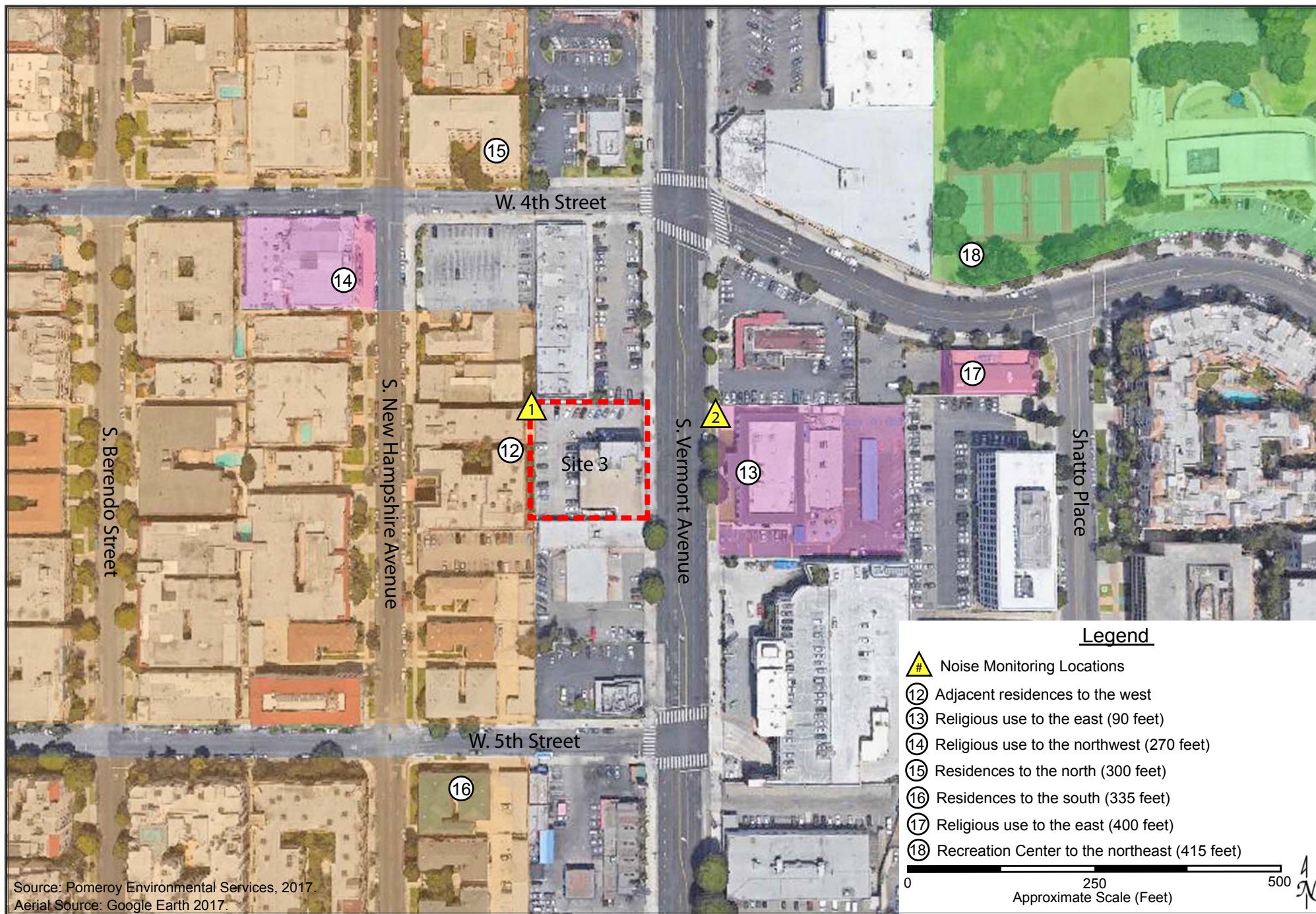


**Table 4.10-3
Existing Ambient Noise Levels**

Existing Ambient Noise Levels									
No.	Location	Primary Noise Sources	Noise Levels ^a						
			L _{eq}	L ₀₂	L ₀₈	L ₂₅	L ₅₀	L _{min}	L _{max}
Sites 1 & 2									
1	East of Site 1, northeast corner of the Shatto Place and W. 5 th Street intersection. Near residential sensitive receptor #5.	Traffic along Shatto Place and W. 5 th Street, pedestrian activity, and residential activity.	61.8	70.1	64.6	61.0	58.2	53.9	78.6
2	East of Site 1, across Shatto place. Near religious institution/school sensitive receptor #2 and residential sensitive receptor #6.	Traffic along Shatto Place and W. 6 th Street, pedestrian activity, school activity.	60.2	65.2	62.3	60.6	59.0	53.8	73.8
3	South of Site 2, across W. 6 th Street. Near school sensitive receptor #1 and residential sensitive receptor #4.	Traffic along W. 6 th Street, pedestrian activity, school activity.	69.2	75.8	72.9	70.1	67.0	58.6	80.4
4	West of Site 2 across S. Vermont Avenue. Within a surface parking lot and near commercial uses and residential sensitive receptor #3.	Parking activity, traffic along S. Vermont Avenue and W. 6 th Street.	60.1	64.9	62.9	60.6	58.8	54.0	73.1
Site 3									
1	Northwest corner of Site 3, near adjacent residential sensitive receptor #12.	Parking activity and traffic along S. Vermont Avenue.	55.4	58.9	56.8	54.8	53.5	49.4	75.4
2	East of Site 3 across S. Vermont Avenue, near religious institution sensitive receptor #13.	Traffic along S. Vermont Avenue and pedestrian activity.	68.7	74.2	71.9	69.9	67.3	55.0	78.9
^a Noise measurements were taken on May 10, 2017 at each location for a duration of 15 minutes. Source: Pomeroy Environmental Services, 2017. See Appendix 4.10-1 to this Draft EIR for noise data.									

Existing Roadway Noise Levels

Existing roadway noise levels were calculated for roadway segments that are expected to be most directly impacted by project-related traffic, which, for the purpose of this analysis, include the roadways that are nearest to the Project Sites and had the most Project-generated trips (see Section 4.14 [Transportation and Traffic]). These roadways, when compared to roadways located farther away from the Project Sites, would experience the greatest increase in traffic generated by the Project.

Calculation of the existing roadway noise levels was accomplished using the Federal Highway Administration Highway Noise Prediction Model ("FHWA-RD-77-108") and traffic volumes from the Project traffic analysis (Section 4.14 [Transportation and Traffic]). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA Model have been modified to reflect average vehicle noise rates identified for California by California Department of Transportation ("Caltrans"). The Caltrans data show that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along study area roadway segments are presented in Table 4.10-4, Existing Roadway Noise Levels. As shown in the Table 4.10-4, Vermont Avenue has an existing ambient

**Table 4.10-4
Existing Roadway Noise Levels**

Roadway	Roadway Segment ^a	Existing Land Uses	dBA CNEL
Vermont Ave.	Between 3 rd & 4 th Streets	Commercial/Residential	69.9
	Between 4 th & 5 th Streets	Commercial/Residential	69.5
	Between 5 th & 6 th Streets	Commercial/Residential	69.3
	Between 6 th St. & Wilshire Blvd.	Commercial/Residential	69.3
Shatto Pl.	Between 4 th & 6 th Streets	Commercial/Residential	61.8
4 th St.	West of Vermont Ave.	Commercial/Residential	62.8
	Between Vermont Ave. & Shatto Pl.	Commercial/Residential	64.0
5 th St.	West of Vermont Ave.	Commercial/Residential	61.0
6 th St.	West of Vermont Ave.	Commercial/Residential	70.2
	Between Vermont Ave. & Shatto Pl.	Commercial/Residential	70.4
^a Transportation Impact Study for the Vermont Corridor Development Plan, April 2017, Gibson Transportation Consulting Inc. Source: Pomeroy Environmental Services, 2017. Data sheets provided in Appendix 4.10-1 to this Draft EIR.			

noise level range of 69.3 to 69.5 CNEL, while 5th Street has the lowest existing noise level of 61.0 CNEL, and 6th Street has the highest existing noise level of 70.4 CNEL. These calculated levels are comparable to the measured levels in the area of the Project Sites, which range from 55.4 to 69.2 dBA L_{eq} (Table 4.10-3).

Existing Groundborne Vibration Levels

The main sources of groundborne vibration near the Project Sites are heavy-duty vehicle travel (e.g., refuse trucks, delivery trucks, and transit buses) on local roadways. Trucks and buses typically generate groundborne vibration velocity levels of around 63 VdB at 50 feet, and these levels could reach 72 VdB where they pass over bumps in the road.⁴ In terms of PPV levels, a heavy-duty vehicle traveling at a distance of 50 feet can result in a vibration level of approximately 0.001 inch per second.

Noise & Vibration Sensitive Land Uses

Noise-sensitive land uses (also called “sensitive receptors”) include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. In addition, for purposes of this analysis, vibration-sensitive uses include historical buildings or buildings that are extremely susceptible to vibration damages, and uses that may be sensitive in terms of human perception as sensitive receptor locations and operational interference resulting from vibration. As shown in Figures 4.10-1 and 4.10-2, there are 17 existing sensitive receptors within 500 feet that would have a direct line-of-sight to the Project Sites. The sensitive receptors nearest to Sites 1 and 2 are:

1. school to the south (85 feet);
2. religious/school use to the east (90 feet);

⁴ Federal Transit Administration, *Transit Noise and Vibration Impact Assessment*, May 2006.

3. residences to the west (235 feet);
4. residences to the south (240 feet);
5. residences to the northeast (280 feet);
6. residences to the east (300 feet);
7. residences to the west (300 feet);
8. religious use to the north (320 feet);
9. residences to the southwest (345 feet);
10. religious use to the southeast (385 feet); and,
11. hotel use to the southwest (485 feet).

The sensitive receptors nearest to Site 3 are:

12. adjacent residences to the west (50 feet);
13. religious use to the east (90 feet);
14. religious use to the northwest (270 feet)
15. residences to the north (300 feet);
16. residences to the south (335 feet);
17. religious use to the east (400 feet); and,
18. recreation center to the northeast (415 feet).

Regulatory Framework

Federal

Noise

There are no federal noise standards that directly regulate environmental noise related to the construction or operation of the Project. However, the Office of Safety and Health Administration (“OSHA”) regulations safeguard the hearing of workers exposed to occupational noise.

Vibration

The Federal Transit Administration (“FTA”) has adopted vibration standards that are used to evaluate potential building damage impacts related to construction activities. The vibration damage criteria adopted by the FTA are shown in Table 4.10-5, Construction Vibration Damage Criteria.

**Table 4.10-5
Construction Vibration Damage Criteria**

Building Category	PPV (in/sec)
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
<i>Source: Federal Transit Administration, Transit Noise and Vibration Impact Assessment, May 2006.</i>	

The FTA has also adopted standards associated with human annoyance for groundborne vibration impacts for the following three land-use categories:

- (1) Vibration Category 1 – High Sensitivity,
- (2) Vibration Category 2 – Residential, and

(3) Vibration Category 3 – Institutional.

The FTA defines Category 1 as buildings where vibration would interfere with operations within the building, including vibration-sensitive research and manufacturing facilities, hospitals with vibration-sensitive equipment, and university research operations. Vibration-sensitive equipment includes, but is not limited to, electron microscopes, high-resolution lithographic equipment, and normal optical microscopes. Category 2 refers to all residential land uses and any buildings where people sleep, such as hotels and hospitals. Category 3 refers to institutional land uses such as schools, churches, other institutions, and quiet offices that do not have vibration-sensitive equipment, but still have the potential for activity interference.

Under conditions where there are an infrequent number of events per day, the FTA has established standards of 65 VdB for Category 1 buildings, 80 VdB for Category 2 buildings, and 83 VdB for Category 3 buildings. Under conditions where there are an occasional number of events per day, the FTA has established thresholds of 65 VdB for Category 1 buildings, 75 VdB for Category 2 buildings, and 78 VdB for Category 3 buildings. Under conditions where there are a frequent number of events per day, the FTA has established thresholds of 65 VdB for Category 1 buildings, 72 VdB for Category 2 buildings, and 75 VdB for Category 3 buildings.⁵ No thresholds have been adopted or recommended for commercial or office uses. However, the FTA standards are intended to apply to projects under the purview of the FTA (i.e., transit project), and, as such, do not directly apply to the Project.

State

Noise

The California Department of Health Services (“DHS”) has established guidelines for evaluating the compatibility of various land uses as a function of community noise exposure. These guidelines for land use and noise exposure compatibility are shown in Table 4.10-6, Community Noise Exposure. In addition, Section 65302(f) of the California Government Code requires each county and city in the state to prepare and adopt a comprehensive long-range general plan for its physical development, with Section 65302(g) requiring a noise element to be included in the general plan. The noise element must: (1) identify and appraise noise problems in the community, (2) recognize Office of Noise Control guidelines, and (3) analyze and quantify current and projected noise levels. However, DHS guidelines are generalized for use throughout that state, and, as such, do not directly apply to the Project.

⁵ *Infrequent events are fewer than 30 vibration events of the same kind per day. Occasional events are between 30 and 70 vibration events of the same source per day. Frequent events are more than 70 vibration events of the same source per day.*

**Table 4.10-6
Community Noise Exposure (dBA CNEL)**

Land Use	Normally Acceptable^a	Conditionally Acceptable^b	Normally Unacceptable^c	Clearly Unacceptable^d
Single-Family, Duplex, Mobile Homes	50 - 60	55 - 70	70 - 75	above 75
Multi-Family Homes	50 - 65	60 - 70	70 - 75	above 75
Schools, Libraries, Churches, Hospitals, Nursing Homes	50 - 70	60 - 70	70 - 80	above 80
Transient Lodging – Motels, Hotels	50 - 65	60 - 70	70 - 80	above 75
Auditoriums, Concert Halls, Amphitheaters	---	50 - 70	---	above 70
Sports Arena, Outdoor Spectator Sports	---	50 - 75	---	above 75
Playgrounds, Neighborhood Parks	50 - 70	---	67 - 75	above 75
Golf Courses, Riding Stables, Water Recreation, Cemeteries	50 - 75	---	70 - 80	above 80
Office Buildings, Business and Professional Commercial	50 - 70	67 - 77	above 75	---
Industrial, Manufacturing, Utilities, Agriculture	50 - 75	70 - 80	above 75	---
^a <i>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.</i> ^b <i>Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.</i> ^c <i>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.</i> ^d <i>Clearly Unacceptable: New construction or development should generally not be undertaken.</i> <i>Source: Office of Planning and Research, State of California General Plan Guidelines, October 2003 in coordination with the DHS; City General Plan Noise Element, adopted February 1999.</i>				

Vibration

The California Department of Transportation published the Transportation and Construction Vibration Guidance Manual in September 2013. The manual provides practical guidance to Caltrans engineers, planners, and consultants who must address vibration issues associated with the construction, operation, and maintenance of Caltrans projects. The guidance and procedures provided in the manual should be treated as screening tools for assessing the potential for adverse effects related to human perception and structural damage. General information on the potential effects of vibration on vibration-sensitive research and advanced technology facilities is also provided, but a discussion of detailed assessment methods in this area is beyond the scope of this manual. The document is not an official policy, standard, specification, or regulation and should not be used as such. Its content is for informational purposes only. As such, this analysis includes the Caltrans standards for informational purposes. This manual provides guidelines for assessing vibration damage potential to various types of buildings, ranging from 0.08 to 0.12 inches per second for extremely fragile historic buildings, ruins, and ancient monuments, to 0.50 to 2.0 inches per second for modern industrial and commercial buildings.

Local**County of Los Angeles****Los Angeles County Code**

The County has established noise standards to control unnecessary, excessive and annoying noise. The standards are codified in Chapter 12.08 (Noise Control) of the Los Angeles County Code. The standards listed in Section 12.08.390 (Exterior Noise Standards) and are relevant to the Project. The County Code states that no person shall operate or cause to be operated, any source of sound at any location within the unincorporated county, or allow the creation of any noise on property owned, leased, occupied or otherwise controlled by such person which causes the noise level, when measured on any other property either incorporated or unincorporated, to exceed any of the noise standards listed in Table 4.10-7, County of Los Angeles Exterior Noise Standards.

Table 4.10-7
County of Los Angeles Exterior Noise Standards

Noise Zone	Designated Noise Zone Land Use (Receptor Property)	Time Interval	Exterior Noise Level (dBA)
I	Noise-Sensitive Area	Anytime	45
II	Residential Properties	10:00 p.m. to 7:00 a.m. (Night)	45
		7:00 a.m. to 10:00 p.m. (Day)	50
III	Commercial Properties	10:00 p.m. to 7:00 a.m. (Night)	55
		7:00 a.m. to 10:00 p.m. (Day)	60
IV	Industrial Properties	Anytime	70
<i>This table is used by the County to develop noise standards based on the duration of the noise source. These standards are described below.</i> <i>Standard No. 1 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 30 minutes in any hour. Standard No. 1 shall be the applicable noise level; or, if the ambient L50 exceeds the forgoing level, then the ambient L50 becomes the exterior noise level for Standard No. 1.</i> <i>Standard No. 2 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 15 minutes in any hour. Standard No. 2 shall be the applicable noise level from Standard 1 plus 5 dBA; or, if the ambient L25 exceeds the forgoing level, then the ambient L25 becomes the exterior noise level for Standard No. 2</i> <i>Standard No. 3 shall be the exterior noise level which may not be exceeded for a cumulative period of more than five minutes in any hour. Standard No. 3 shall be the applicable noise level from Standard 1 plus 10 dBA; or, if the ambient L8.3 exceeds the forgoing level, then the ambient L8.3 becomes the exterior noise level for Standard No. 3.</i> <i>Standard No. 4 shall be the exterior noise level which may not be exceeded for a cumulative period of more than 1 minute in any hour. Standard No. 4 shall be the applicable noise level from Standard 1 plus 15 dBA, or, if the ambient L1.7 exceeds the forgoing level, then the ambient L1.7 becomes the exterior noise level for Standard No. 4.</i> <i>Standard No. 5 shall be the exterior noise level which may not be exceeded for any period of time. Standard No. 4 shall be the applicable noise level from Standard 1 plus 20 dBA; or, if the ambient L0 exceeds the forgoing level, then the ambient L0 becomes the exterior noise level for Standard No. 4. County of Los Angeles Municipal Code, Section 12.08.390.</i> <i>Source: Pomeroy Environmental Services, 2017.</i>			

The following are applicable provisions of the Los Angeles County Code that relate to the prevention or mitigation of excessive noise.

Title 26 – Building Code, Section 1207 Sound Transmission

1207.1 Purpose and scope.

The purpose of this Section is to establish uniform minimum noise insulation performance standards to protect persons within hotels, motels, dormitories, long-term care facilities, apartment houses, dwellings, private schools, and places of worship from the effects of excessive noise, including, but not limited to, hearing loss or impairment and interference with speech and sleep. This Section shall apply to all buildings for which applications for building permits were made subsequent to August 22, 1974.

1207.11.1 Application.

Consistent with local land use standards, all structures identified in Section 1207.1 located in noise critical areas, such as proximity to highways, county roads, city streets, railroads, rapid transit lines, airports or industrial areas, shall be designed to prevent the intrusion of exterior noises beyond prescribed levels. Proper design shall include, but shall not be limited to, orientation of the structure, setbacks, shielding, and sound insulation of the building itself.

1207.11.2 Allowable interior noise levels.

Interior noise levels attributable to exterior sources shall not exceed 45 dBA in any habitable rooms, classrooms, and all rooms used in patient care and worship. The noise metric shall be either the day-night average sound level (“Ldn”) or the CNEL, consistent with the noise element of the local general plan.

1207.12 Compliance.

Evidence of compliance shall consist of submittal of an acoustical analysis report, prepared under the supervision of a person experienced in the field of acoustical engineering, with the application for a building permit for all structures identified in Section 1207 or the use of prescriptive standards. The report shall show topographical relationships of noise sources and dwelling sites, identification of noise sources and their characteristics, predicted noise spectra, and levels at the exterior of the proposed dwelling structure considering present and future land usage, basis for the prediction (measured or obtained from published data), noise attenuation measures to be applied, and an analysis of the noise insulation effectiveness of the proposed construction showing that the prescribed interior noise level requirements are met.

Title 12 – Environmental Protection, Section 12.08 - The County Noise Control Ordinance

The County Noise Control Ordinance provides standards for both interior and exterior noise standards and sets guidelines for a variety of activities.

County Code Section 12.08.390 identifies exterior noise standards for stationary and point noise sources, specific noise restrictions, exemptions and variances for exterior point or stationary noise sources. For Noise Zone II (Residential Properties), the County Noise Control Ordinance states that exterior noise levels

caused by stationary or point noise sources shall not exceed 45 dB from 10:00 p.m. to 7:00 a.m. and 50 dB from 7:00 a.m. to 10:00 p.m.

Section 12.08.400 of the County Code also states that interior noise levels (resulting from point or stationary sources) within residential units shall not exceed 45 dB between 7:00 a.m. and 10:00 p.m. and 40 dB between 10:00 p.m. and 7:00 a.m.

Section 12.08.440 of the County Code regulates noise from construction activities. Specifically, Section 12.08.440(A) states operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound therefrom creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited. Section 12.08.440(B) further states the contractor shall conduct construction activities in such a manner that the maximum noise levels at the affected buildings will not exceed those listed in Table 4.10-8, County of Los Angeles Construction Noise Restrictions.

Table 4.10-8
County of Los Angeles Construction Noise Restrictions

Time Period	At Single-Family Residential Uses	At Multi-Family Residential Uses	Semiresidential/Commercial Uses
For mobile equipment maximum noise level for nonscheduled, intermittent, short-term operation of mobile equipment.			
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	75 dBA	80 dBA	85 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	60 dBA	64 dBA	70 dBA
For stationary equipment maximum noise level for repetitively scheduled and relatively long-term operation of stationary equipment			
Daily, except Sundays and legal holidays, 7:00 a.m. to 8:00 p.m.	60 dBA	65 dBA	70 dBA
Daily, 8:00 p.m. to 7:00 a.m. and all day Sunday and legal holidays	50 dBA	55 dBA	60 dBA
<i>Note: At business structures, mobile equipment maximum noise level for nonscheduled, intermittent, short-term operation of mobile equipment operating daily, including Sunday and legal holidays, all hours: maximum of 85dBA.</i>			
<i>Source: Los Angeles County Code Section 12.08.440.</i>			

Los Angeles County General Plan

The Los Angeles County 2035 General Plan was adopted by the Los Angeles County Board of Supervisors on October 6, 2015. The Los Angeles County 2035 General Plan contains a number of elements that address specific issues and establish various goals, policies, and objectives that pertain to the County as a whole, including noise. The Noise Element includes a broad statement of policies that do not directly pertain to the Project. However, the Noise Element includes the following goals and policies to guide County decisions and activities:

Goal N 1: The reduction of excessive noise impacts

Policy N 1.1: Utilize land uses to buffer noise-sensitive uses from sources of adverse noise impacts.

Policy N 1.2: Reduce exposure to noise impacts by promoting land use compatibility

Policy N 1.3: Minimize impacts to noise-sensitive land uses by ensuring adequate site design, acoustical construction, and use of barriers, berms, or additional engineering controls through Best Available Technologies (“BAT”).

Policy N 1.4: Enhance and promote noise abatement programs in an effort to maintain acceptable levels of noise as defined by the Los Angeles County Exterior Noise Standards and other applicable noise standards.

Policy N 1.5: Ensure compliance with the jurisdictions of State Noise Insulation Standards (Title 24, California Code of Regulations and Chapter 35 of the Uniform Building Code), such as noise insulation of new multifamily dwellings constructed within the 60 dB (CNEL or Ldn) noise exposure contours.

Policy N 1.6: Ensure cumulative impacts related to noise do not exceed health-based safety margins.

Policy N 1.7: Utilize traffic management and noise suppression techniques to minimize noise from traffic and transportation systems.

Policy N 1.8: Minimize noise impacts to pedestrians and transit-riders in the design of transportation facilities and mobility networks.

Policy N 1.9: Require construction of suitable noise attenuation barriers on noise sensitive uses that would be exposed to exterior noise levels of 65 dBA CNEL and above, when unavoidable impacts are identified.

Policy N 1.10: Orient residential units away from major noise sources (in conjunction with applicable building codes).

Policy N 1.11: Maximize buffer distances and design and orient sensitive receptor structures (hospitals, residential, etc.) to prevent noise and vibration transfer from commercial/light industrial uses.

Policy N 1.12: Decisions on land adjacent to transportation facilities, such as the airports, freeways and other major highways, must consider both existing and future noise levels of these transportation facilities to assure the compatibility of proposed uses.

City of Los Angeles

City of Los Angeles Noise Regulations

The City has numerous ordinances and enforcement practices that apply to intrusive noise and that guide new construction. The City’s comprehensive noise ordinance, found in Chapter XI of the LAMC, sets forth sound measurement and criteria, minimum ambient noise levels for different land use zoning classifications, sound emission levels for specific uses, hours of operation for certain uses, standards for determining when noise is deemed to be a disturbance, and legal remedies for violations. Key provisions of Chapter XI of the LAMC are discussed below.

Section 112.05 of the LAMC prohibits the operation of any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet from the source of the noise between the hours of 7:00 A.M. and 10:00 P.M. when the source is located within 500 feet of a residential zone:

- 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 horsepower or less intended for infrequent use in residential areas, including chain saws, log chippers, and powered hand tools; or
- 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.

The noise limitations above do not apply where compliance is technically infeasible, which means that the 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. The limitations apply only to land uses in or within 500 feet of residential zones.

In accordance with the LAMC, a noise level increase of 5 dB over the existing average ambient noise level at an adjacent property line is considered a noise violation. This standard applies to: (1) radios, television sets, and similar devices defined in LAMC Section 112.01; (2) air conditioning, refrigeration, heating, pumping, and filtering equipment defined in LAMC Section 112.02; (3) powered equipment intended for repetitive use in residential areas and other machinery, equipment, and devices defined in LAMC Section 112.04; and (4) motor vehicles driven on-site as defined in LAMC Section 114.02.

Section 41.40 of the LAMC also prohibits construction activity (including demolition) and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. All such activities are also prohibited on Sundays and all federal holidays.

Furthermore, projects are subject to the following requirements:

- Compliance with the City's Noise Ordinance Nos. 144,331 and 161,574, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.
- Compliance with the City's Building Regulations Ordinance No. 178,048, which requires provision of a construction site notice 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 and approved by the City's Department of Building and Safety.
- Compliance with Section 91.1207.11.2 (Allowable Interior Noise Levels) of the LAMC, which states interior noise levels attributable to exterior sources shall not exceed 45 dbA CNEL in any habitable room.

City of Los Angeles General Plan Noise Element

As discussed previously, California Government Code Section 65302(g) requires that a noise element be included in the general plan of each county and city in the state. The City's General Plan Noise Element identifies sources of noise and provides objectives and policies that ensure that noise from various sources

does not create an unacceptable noise environment. The Noise Element describes the noise environment (including noise sources) in the City, addresses noise mitigation, regulations, strategies, and programs as well as delineating federal, state, and City jurisdiction relative to rail, automotive, aircraft, and nuisance noise.

The City's noise guidelines are correlated with land use zoning classifications in order to maintain identified ambient noise levels and to limit, mitigate, or eliminate intrusive noise that exceeds the ambient noise levels within a specified zone. The City has adopted local guidelines based, in part, on the community noise compatibility guidelines established by the DHS for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the Noise Element and the *L.A. CEQA Thresholds Guide* in terms of the CNEL. The noise/land use compatibility guidelines for land uses within the City are presented in Table 4.10-6.

City Groundborne Vibration

The City has not adopted quantitative thresholds for construction or operational groundborne vibration. However, as it relates to potential damages to adjacent buildings from project construction vibration, the Project would be subject to Section 91.3307 of the LAMC (Protection of Adjoining Property). Specifically, Section 91.3307.1 (Protection Required) states adjoining public and private property shall be protected from damage during construction, remodeling and demolition work. For purposes of impact analysis, the City has incorporated the FTA standards for building damage and human annoyance as discussed above. Protection must be provided for footings, foundations, party (i.e., shared) walls, chimneys, skylights, and roofs. Provisions shall be made to control water runoff and erosion during construction or demolition activities. For excavations, adjacent property shall be protected as set forth in Section 832 of the Civil Code of California. Prior to the issuance of any permit, which authorizes an excavation where the excavation is to be of a greater depth than are the walls or foundation of any adjoining building or structure and located closer to the property line than the depth of the excavation, the owner of the site shall provide the Department of Building and Safety with evidence that the adjacent property owner or owners have been given a 30-day written notice of the intent to excavate. This notice shall state the depth to which the excavation is intended to be made and when the excavation will commence. This notice shall be by certified mail, return receipt requested.

ENVIRONMENTAL IMPACTS

Methodology

The primary sources of noise associated with the Project would be construction activities at the Project Sites, Project-related traffic, and new stationary sources such as regularly used outdoor spaces, and heating, ventilation, and air conditioning units ("HVAC") associated with operation of the Project. The net increase in noise generated by activities at each of the Project Sites and other sources has been quantitatively estimated and compared to applicable noise standards and thresholds of significance.

In addition to noise, groundborne vibration would also be generated during the construction of the Project by various activities and equipment. The groundborne vibration levels generated during construction have also been quantitatively estimated and compared to the thresholds of significance.

Construction noise levels were estimated by data published by the U.S. EPA. Potential noise levels are identified for off-site locations that are sensitive to noise. These noise levels are then analyzed against

the construction noise standards established in the LAMC and *L.A. CEQA Thresholds Guide* to determine whether the allowable noise levels would be exceeded at off-site locations that are sensitive to noise.

Groundborne vibration levels resulting from construction activities are identified for off-site locations that are sensitive to vibration, and were estimated with data published for the FTA by Harris Miller Miller & Hanson Inc.

Project Design Elements

No specific design elements related to noise are included in the Project.

Thresholds of Significance

Appendix G to the State CEQA Guidelines

The potential for the Project to result in impacts associated with noise is based on Appendix G of the State CEQA Guidelines, which are addressed in this section. The significance thresholds are listed below. In accordance with Appendix G to the State CEQA Guidelines, significant impacts would occur in the event that any of the following conditions were to occur:

Would the project result in:

- a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
- e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airstrip, expose people residing or working in the project area to excessive noise levels? or
- f) For a project within the vicinity of a private airstrip, expose people residing or working in the project area to excessive noise levels?

An affirmative answer to any of these questions would represent a significant impact. As discussed in Section 6.5 (Effects Not Found to be Significant), the Project would have no impact with respect to Thresholds (e) and (f) listed above, because the Project Sites are not located in the vicinity of an airport or private airstrip.

County of Los Angeles Noise Thresholds

According to the County of Los Angeles General Plan Update EIR (June 2014), a project would normally have a significant effect on the environment if the project would result in:

- N-1 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.
- For noise compatibility, noise levels at noise-sensitive exterior areas exceed 65 dBA CNEL.
 - For noise compatibility, interior noise levels in habitable noise-sensitive areas exceed 45 dBA CNEL.
- N-2 Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels.
- N-3 A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project.
- Project-related traffic noise increase the ambient noise level at noise-sensitive locations by 3 dBA or more and the ambient noise levels under with-project conditions fall within the “Normally Unacceptable” or “Clearly Unacceptable” categories; OR
 - Project-related traffic noise increases the ambient noise level at noise-sensitive locations by 5 dBA or more.
- N-4 A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.
- N-5 For a project located within an airport land use plan or where such a plan has not been adopted, within two miles of a public airport or public use airport, expose people residing or working in the Project Area to excessive noise levels.
- N-6 For a project within the vicinity of a private airstrip, expose people residing or working the Project Area to excessive noise levels.

County Code Construction Standards

The County’s construction noise standards are listed in Section 12.08.440 (Construction Noise) of the County Code (see Table 4.10-8 provided previously). It states that, “operating or causing the operation of any tools or equipment used in construction, drilling, repair, alteration or demolition work between weekday hours of 7:00 p.m. and 7:00 a.m., or at any time on Sundays or holidays, such that the sound there from creates a noise disturbance across a residential or commercial real-property line, except for emergency work of public service utilities or by variance issued by the health officer is prohibited.”

Section 12.08.440 of the County Code includes construction noise limits based on the duration of equipment use (i.e., short- or long-term), type of land use, (i.e., single-family residential, multi-family residential, or semi-residential/commercial) and the time period (e.g., daytime or nighttime). As shown in Table 4.10-8 provided previously, the daytime construction noise limit is 75 dBA at single-family residences, 80 dBA at multi-family residences, and 85 dBA at semi-residential/commercial areas.

City of Los Angeles CEQA Thresholds Guide

As set forth in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on noise levels from construction if:

- a) Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;
- b) Construction activities lasting more than 10 days in a three-month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or
- c) Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or anytime on Sunday.⁶

In addition, a project would normally have a significant impact on noise levels from project operations if:

- d) The project causes the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category identified in Table 4.10-6 of this EIR, or any 5 dBA or greater noise increase.⁷

LAMC Construction Standards

Section 41.40 (Noise Due to Construction, Excavation Work – When Prohibited) of the Los Angeles Municipal Code (“LAMC”) is discussed above in the Local Regulatory Section.

Project Thresholds

Based on the information above, the following threshold questions have been identified as applicable and relevant for the Project impact analysis as they represent the more stringent/conservative thresholds as between the County and City thresholds:

Threshold 4.10-1:	Would Project construction activities lasting more than one day exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use?
Threshold 4.10-2:	Would Project construction activities lasting more than 10 days in a three-month period exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use?
Threshold 4.10-3:	Would Project 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?
Threshold 4.10-4:	Would the Project cause exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels (see FTA standards provided previously)?
Threshold 4.10-5:	Would the Project cause the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the “normally

⁶ City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.1-3.

⁷ City of Los Angeles L.A. CEQA Thresholds Guide, 2006, page I.2-3. This criterion incorporates the Community Noise Exposure guidelines of the Department of Health Services, which are also included in the City’s General Plan Noise Element.

unacceptable” or “clearly unacceptable” category identified in Table 4.10-6 of this EIR, or any 5 dBA or greater noise increase?

An affirmative answer to any of these questions would represent a significant impact.

Impact Analysis

Threshold 4.10-1: Would Project construction activities lasting more than one day exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use?

Threshold 4.10-2: Would Project construction activities lasting more than 10 days in a three-month period exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use?

Construction

Construction of the Project would require the use of heavy equipment for the demolition of existing uses, grading/excavation, renovation of existing uses, and new construction activities. Construction activities would also involve the use of smaller power tools, generators, and other sources of noise. During each stage of construction, several types of equipment could potentially be operating concurrently and noise levels would vary based on the amount of equipment in operation and the location of the activity.

The U.S. EPA has compiled data regarding the noise-generating characteristics of specific types of construction equipment and typical construction activities. The data pertaining to the types of construction equipment and activities that would occur at the Project Sites are presented in Table 4.10-9, Noise Range of Typical Construction Equipment, and Table 4.10-10, Typical Outdoor Construction Noise Levels, respectively.

Table 4.10-9
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet ^a
Front Loader	73-86
Trucks	82-95
Cranes (moveable)	75-88
Cranes (derrick)	86-89
Vibrator	68-82
Saws	72-82
Pneumatic Impact Equipment	83-88
Jackhammers	81-98
Pumps	68-72
Generators	71-83
Compressors	75-87
Concrete Mixers	75-88
Concrete Pumps	81-85
Back Hoe	73-95
Tractor	77-98
Scraper/Grader	80-93
Paver	85-88
^a Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.	

Table 4.10-9
Noise Range of Typical Construction Equipment

Construction Equipment	Noise Level in dBA L_{eq} at 50 Feet ^a
<i>Source: U.S. EPA, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971; L.A. CEQA Thresholds Guide, 2006.</i>	

Table 4.10-10
Typical Outdoor Construction Noise Levels

Construction Phase	Noise Levels at 50 Feet with Mufflers (dBA L_{eq})	Noise Levels at 100 Feet with Mufflers (dBA L_{eq})	Noise Levels at 200 Feet with Mufflers (dBA L_{eq})
Ground Clearing	82	76	70
Excavation, Grading	86	80	74
Foundations	77	71	65
Structural	83	77	71
Finishing	86	80	74
<i>Source: U.S. EPA, Noise from Construction Equipment and Operations, Building Equipment and Home Appliances, PB 206717, 1971; L.A. CEQA Thresholds Guide, 2006.</i>			

The noise levels shown in Table 4.10-10 represent composite noise levels associated with typical construction activities, which take into account both the number of pieces and spacing of heavy construction equipment that are typically used during each phase of construction. As shown in Table 4.10-10, construction noise during the heavier initial periods of construction is presented as 86 dBA L_{eq} when measured at a reference distance of 50 feet from the center of construction activity.⁸ These noise levels would diminish notably with distance from the construction site at a rate of about 6 dBA per doubling of distance (noise from stationary or point sources is reduced by about 6 dBA for every doubling of distance at acoustically hard locations). For example, a noise level of 86 dBA L_{eq} measured at 50 feet from the noise source to the receptor would decline to 80 dBA L_{eq} at 100 feet from the source to the receptor, and fall by another 6 dBA L_{eq} to 74 dBA L_{eq} at 200 feet from the source to the receptor. These noise attenuation rates assume a flat and unobstructed distance between the noise generator and the receptor. Intervening structures and vegetation would further attenuate noise.

As shown in Table 4.10-11, Estimated Exterior Construction Noise at Sensitive Receptors, the construction noise levels forecast for the proposed construction work would result in noise increases at sensitive receptors. However, any increase in noise levels at off-site receptors during construction would be temporary. Although occasional single-event disturbances from construction are possible, construction would not generate continuously high noise levels. In addition, construction noise during the initial periods of construction (i.e., demolition and grading work) would be typically reduced in the later construction periods (i.e., interior building construction at the proposed buildings) because the structures would break the line-of-sight noise transmission from the construction area to the nearby sensitive receptors. As discussed previously and illustrated in Table 4.10-10 above, typical construction noise levels

⁸ Although the peak noise levels generated by certain construction equipment may be greater than 86 dBA at a distance of 50 feet, the equivalent composite noise level would be approximately 86 dBA L_{eq} (i.e., the equipment does not operate at the peak noise level over the entire duration).

Table 4.10-11
Estimated Exterior Construction Noise at Sensitive Receptors

Sensitive Land Uses^a	Distance to Project Site (feet)	Existing Monitored Daytime Ambient Noise Levels (dBA Leq)	Estimated Peak Construction Noise Levels (dBA Leq)	Noise Level Increase	Potentially Significant Impact?
Nearest Sensitive Receptors to Sites 1 and 2					
1. School to the south	85	69.2	81.4	12.2	Yes
2. Religious/School use to the east	90	60.2	80.9	20.7	Yes
3. Residences to the west	235	60.1	72.6	12.5	Yes
4. Residences to the south	240	69.2	72.4	3.2	No
5. Residences to the northeast	280	61.8	71.0	9.2	Yes
6. Residences to the east	300	60.2	70.4	10.2	Yes
7. Residences to the west	300	60.1	70.4	10.3	Yes
8. Religious use to the north	320	60.1	69.9	9.8	Yes
9. Residences to the southwest	345	60.1	69.2	9.1	Yes
10. Religious use to the southeast	385	60.2	68.3	8.1	Yes
11. Hotel use to the southwest	485	60.1	66.3	6.2	Yes
Nearest Sensitive Receptors to Site 3					
12. Residences to the west	Adjacent	55.4	>86.0	>30.6	Yes
13. Religious use to the east	90	68.7	80.9	12.2	Yes
14. Religious use to the northwest	270	55.4	71.4	16.0	Yes
15. Residences to the north	300	55.4	70.4	15.0	Yes
16. Residences to the south	335	55.4	69.5	14.1	Yes
17. Religious use to the east	400	68.7	67.9	(0.8)	No
18. Recreation center to northeast	415	68.7	67.6	(1.1)	No
^a See Figures 4.10-1 and 4.10-2. Calculations based on Federal Transit Administration, <i>Transit Noise and Vibration Impact Assessment, Final Report, May 2006</i> . It should be noted that the peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period. Source: Pomeroy Environmental Services, 2017.					

associated with the Project could exceed 75 dBA at 50 feet from each of the Project Sites. As defined in the *L.A. CEQA Thresholds Guide*, a significant impact would occur if construction activities lasting more than one day increase the ambient noise levels by 10 dBA or more at any off-site noise-sensitive location. Furthermore, the *L.A. CEQA Thresholds Guide* also states that construction activities lasting more than 10 days in a three-month period, which would increase ambient exterior noise levels by 5 dBA or more at a noise-sensitive land use, would also normally result in a significant impact. Because construction activities would last for more than 10 days in a three-month period, the Project would cause a significant noise impact during construction if the ambient exterior noise levels at sensitive receptors increase by 5 dBA or more. Based on the results shown in Table 4.10-11, the ambient exterior noise levels could be exceeded by 5 dBA or more at Sensitive Receptor Nos. 1 through 3, and Sensitive Receptor Nos. 5 through 16.

Therefore, construction activities would last more than 10 days in a three-month period and would exceed existing ambient exterior noise levels by 5 dBA or more noise sensitive uses. And, Project construction activities would last more than one day and would exceed existing ambient exterior noise levels by 10 dBA or more at noise sensitive uses. Therefore, construction noise impacts would be potentially significant.

Threshold 4.10-3: Would Project 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?

As stated above, the Project would cause a significant noise impact during construction if the ambient exterior noise levels at sensitive receptors increase by 5 dBA or more. Based on the results shown in Table 4.10-11, the ambient exterior noise levels would be exceeded by 5 dBA or more at sensitive receptors. However, the Project would not result in construction activities 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. As such, the Project would be consistent with LAMC requirements and would not involve construction activities that would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or anytime on Sunday.

Threshold 4.10-4: Would the Project cause exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels (see FTA standards provided previously)?

Construction

Table 4.10-12, Vibration Source Levels for Construction Equipment, identifies various PPV and RMS velocity (in VdB) levels for the types of construction equipment that would operate during the construction of the Project. Based on the information presented in Table 4.10-12, vibration velocities could reach as high as approximately 0.089 inches per second PPV at 25 feet from the source activity, depending on the type of construction equipment in use. This corresponds to a RMS velocity level (in VdB) of 87 VdB at 25 feet from the source activity.

Table 4.10-12
Vibration Source Levels for Construction Equipment

Equipment	Approximate PPV (in/sec)				Approximate RMS (VdB)			
	25 Feet	50 Feet	75 Feet	100 Feet	25 Feet	50 Feet	75 Feet	100 Feet
Large Bulldozer	0.089	0.031	0.017	0.011	87	78	73	69
Caisson Drilling	0.089	0.031	0.017	0.011	87	78	73	69
Loaded Trucks	0.076	0.027	0.015	0.010	86	77	72	68
Jackhammer	0.035	0.012	0.007	0.004	79	70	65	61
Small Bulldozer	0.003	0.001	0.0006	0.0004	58	49	44	40
<i>Note: in/sec = inches per second.</i>								
<i>Source: FTA, Transit Noise and Vibration Impact Assessment, Final Report, 2006.</i>								

Based on the reference data provided in Table 4.10-12, Table 4.10-13 (Estimated Vibration Levels at Nearest Sensitive Receptors) has been prepared and provided below. With respect to construction

Table 4.10-13
Estimated Vibration Levels at Nearest Sensitive Receptors

Sensitive Land Uses	Distance to Project Site (feet)	Estimated Vibration Levels in VdB	Threshold in VdB	Significant Impact?	Estimated Vibration Levels in PPV (in/sec)	Threshold in PPV (in/sec)	Significant Impact?
Sensitive Receptors Nearest to Sites 1 and 2							
1. School to the south	85	71.1	72	No	0.01	0.20	No
2. Religious/School use to the east	90	70.3	72	No	0.01	0.20	No
3. Residences to the west	235	57.8	72	No	<0.01	0.20	No
4. Residences to the south	240	57.5	72	No	<0.01	0.20	No
5. Residences to the northeast	280	55.5	72	No	<0.01	0.20	No
6. Residences to the east	300	54.6	72	No	<0.01	0.20	No
7. Residences to the west	300	54.6	72	No	<0.01	0.20	No
8. Religious use to the north	320	53.8	72	No	<0.01	0.20	No
9. Residences to the southwest	345	52.8	72	No	<0.01	0.20	No
10. Religious use to the southeast	385	51.4	72	No	<0.01	0.20	No
11. Hotel use to the southwest	485	48.4	72	No	<0.01	0.20	No
Sensitive Receptors Nearest to Site 3							
12. Residences to the west	Adjacent	>87.0	72	Yes	>0.089	0.20	No
13. Religious use to the east	90	70.3	72	No	0.01	0.20	No
14. Religious use to the northwest	270	56.0	72	No	<0.01	0.20	No
15. Residences to the north	300	54.6	72	No	<0.01	0.20	No
16. Residences to the south	335	53.2	72	No	<0.01	0.20	No
17. Religious use to the east	400	50.9	72	No	<0.01	0.20	No
<i>Note: Calculations based on Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, May 2006. These vibration levels are estimates.</i> <i>Source: Pomeroy Environmental Services, 2017.</i>							

vibration impacts upon existing off-site structures, there are no known structures adjacent to the any of the three Project Sites that would be considered structurally fragile or susceptible to vibration damages.

The surrounding buildings consist primarily of engineered concrete and masonry buildings, and reinforced-concrete, steel, or timber buildings. As such, the potential for construction-related vibration damage to off-site structures would not exceed the threshold identified by the FTA (vibration levels in PPV) and used by the City. If the Project is approved for subterranean parking and excavation would occur, the Project would be subject to compliance with Section 91.3307 of the LAMC (Protection of Adjoining Property) and California Civil Code Section 832. Specifically, Section 91.3307.1 states that adjoining public and private property shall be protected from damage during construction, remodeling and demolition work. Protection must be provided for footings, foundations, party walls, chimneys, skylights and roofs. Provisions shall be made to control water runoff and erosion during construction or demolition activities. For excavations, adjacent property shall be protected as set forth in Section 832 of the Civil Code of California. Prior to the issuance of any permit, which authorizes an excavation where the excavation is to be of a greater depth than are the walls or foundation of any adjoining building or structure and located closer to the property line than the depth of the excavation, the owner of the site shall provide the Department of Building and Safety with evidence that the adjacent property owner or owners have been given a 30-day written notice of the intent to excavate. This notice shall state the depth to which the excavation is intended to be made and when the excavation will commence. This notice shall be by certified mail, return receipt requested. Therefore, impacts with respect to potential building damages from construction-related vibration would be less than significant.

Humans could perceive vibration generated during construction at the sensitive receptors located in the vicinity of Site 3 where the vibration level would exceed the threshold identified by the FTA and used by the City. However, vibration levels experienced would be temporary and intermittent, and would be reduced when the construction activities are located toward the center of the Site 3, further away from the sensitive receptor locations. Furthermore, consistent with the requirements of LAMC Section 41.40 of the LAMC, construction activity (including demolition) and repair work, where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence, would be prohibited between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, and between 6:00 P.M. and 8:00 A.M. on Saturday. All such activities are also prohibited on Sundays and all federal holidays. As such, impacts with respect to construction vibration related to human perception would be less than significant.

Operation

Sites 1 and 2

The Project on Sites 1 and 2 would involve urban uses that would not include any stationary equipment that would cause excessive vibration levels. Groundborne vibration at Sites 1 and 2 and in the immediate vicinity currently result from heavy-duty vehicle travel (e.g., refuse trucks and transit buses) on local roadways. While the Project would result in a slight increase in refuse truck activities to serve the proposed land uses at Sites 1 and 2 over existing conditions, these increases would be minor (once or twice a week) and would not result in perceptible changes to future vibration levels. Furthermore, while refuse trucks would be used for the disposal of solid waste generated at Sites 1 and 2, these truck trips are typical for urban areas, are already occurring within the neighborhood, and only occur a limited number of times per week. Similarly, as discussed in Section 4.14 Transportation and Traffic of the DEIR, the number of transit buses that travel along adjacent roadways would also not increase due to the Project because the Project's peak hour transit ridership of approximately 67 trips during the morning peak hour and 87 trips during the afternoon peak hour would be accommodated within the available capacity of the

system of 14,140 riders during the morning peak hour and 12,300 riders during the afternoon peak hour.⁹ Thus, vibration impacts from transit buses associated with operation of the Project not change and would be less than significant.

Site 3

The Project on Site 3 would involve urban uses that would not include any stationary equipment that would cause excessive vibration levels. Groundborne vibration at Site 3 and in the immediate vicinity currently results from heavy-duty vehicle travel (e.g., refuse trucks and transit buses) on local roadways. While the Project would result in a slight increase in refuse truck activities to serve the proposed land uses at Site 3 over existing conditions, these increases would be minor (once or twice a week) and would not result in perceptible changes to future vibration levels. Furthermore, while refuse trucks would be used for the disposal of solid waste generated at Site 3, these truck trips are typical for urban areas, are already occurring within the neighborhood, and only occur a limited number of times per week. Similarly, as discussed in Section 4.14 Transportation and Traffic of the DEIR, the number of transit buses that travel along adjacent roadways would also not increase due to the Project because the Project's peak hour transit ridership of approximately 67 trips during the morning peak hour and 87 trips during the afternoon peak hour that would be accommodated within the available capacity of the system of 14,140 riders during the morning peak hour and 12,300 riders during the afternoon peak hour.¹⁰ Thus, vibration impacts from transit buses associated with operation of the Project not change and would be less than significant.

Threshold 4.10-5: Would the Project cause the ambient noise level measured at the property line of affected uses to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category identified in Table 4.10-6 of this EIR, or any 5 dBA or greater noise increase?

Traffic Noise

The increase in traffic resulting from the Project would increase ambient noise levels. These increases were evaluated using the FHWA-RD-77-108 model, which calculates the CNEL noise level for a particular reference set of input conditions, based on site-specific traffic volumes, distances, speeds and/or noise barriers. Based on the *Transportation Impact Study*¹¹ prepared for the Project (included as Appendix 4.14-1 to this Draft EIR) in combination with an analysis of the surrounding land uses, roadway noise levels were forecast to determine if the Project's vehicle traffic would result in a significant noise impact at off-site locations. The increase in noise levels at roadway segments located near the Project Sites are identified in Table 4.10-14, Off-Site Roadway Noise Levels. Table 4.10-14 identifies the changes in future noise levels along the study-area roadway segments for the following scenarios:

- Existing;
- Existing With Project Phase I;
- Existing With Project Phase I and II;
- Future Without Project (2021);

⁹ *Transportation Impact Study for the Vermont Corridor Development Plan, June 2017, Gibson Transportation Consulting Inc. See Appendix 4.14-1 to this Draft EIR.*

¹⁰ *Ibid.*

¹¹ *Ibid.*

- Future With Project Phase I (2021);
- Future Without Project (2023); and
- Future With Project Phase I and II (2023).

As shown in Table 4.10-14, the Project would increase local noise levels by a maximum of 0.4 dBA CNEL for the roadway segment of Vermont Avenue between 5th & 6th Streets during the Existing With Project Phases I and II. This increase would not exceed either threshold of significance (i.e. 3 or 5 dBA increase). All other roadway segments during all scenarios would not experience noise level increases above 0.3 dBA CNEL. Because the increase in local noise levels at all of the roadway segments would be less than 3 dBA and 5 dBA CNEL, traffic noise impacts for all scenarios would be less than significant.

With respect to the placement of residences in elevated noise conditions, Table 4.10-14 indicates that future roadway noise levels fronting Vermont Avenue could reach up to 71.0 dBA CNEL, and up to 71.3 dBA CNEL along 6th Street. These calculations are based on the nearest ground-level location to the roadway centerline, or approximately 50 feet for Vermont Avenue and 40 feet for 6th Street. As required in LAMC Section 91.1207.14 (Exterior Sound Transmission Control), the Project would be designed and constructed to ensure interior noise levels attributable to exterior sources shall not exceed 45 dbA CNEL in any habitable room and this impact would be less than significant.

Parking Noise

Site 1

Site 1 would include two parking structures: (1) an eight-story podium parking structure (seven levels above grade and one level at grade that would be located under the County office building; and (2) a new 11-story building with two below grade levels parking structure on the site of the existing 7-story parking structure on Shatto Place. The podium parking structure would be accessed from Vermont Avenue and the Shatto Place parking structure would be accessed from Shatto Place. The proposed parking areas have the potential to generate noise due to cars entering and exiting, engines accelerating, braking, car alarms, squealing tires, and other general activities associated with people using the parking areas (i.e., talking, opening/closing doors, etc.). Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit. These noise levels would be approximately 66 dBA Leq near driveway locations.¹² Existing roadway noise levels are up to 69.9 dBA CNEL fronting Vermont Avenue. Thus, parking related noise levels would not exceed ambient noise levels on Vermont Avenue. Further, the existing Shatto Place parking garage on Site 1 includes parking noise sources and therefore the Project's parking uses would not be a new source of noise. Also, the proposed parking uses on Site 1 would be contained within above-ground parking structures, which would serve to reduce line-of-sight and block, at least partially, some of the parking related noise sources on-site to off-site sensitive receptors. Therefore, noise impacts associated with the parking structures on Site 1 would be less than significant.

¹² *Pomeroy Environmental Services, based on historical noise monitoring data for similar parking structures.*

PRELIMINARY WORKING DRAFT

Table 4.10-14
Off-Site Roadway Noise Levels

Roadway	Roadway Segment ^a	dBA CNEL										
		Existing [1]	Existing With Phase I [2]	Net Increase [2]-[1]	Existing With Phase I & II [3]	Net Increase [3]-[1]	Future Without Project (2021) [4]	Future With Phase I (2021) [5]	Net Increase [5]-[4]	Future Without Project (2023) [6]	Future With Phase I & II (2023) [7]	Net Increase [7]-[6]
Vermont Ave.	Between 3 rd & 4 th Streets	69.9	70.0	0.1	70.1	0.2	70.8	70.9	0.1	70.9	71.0	0.1
	Between 4 th & 5 th Streets	69.5	69.7	0.2	69.8	0.3	70.4	70.6	0.2	70.5	70.7	0.2
	Between 5 th & 6 th Streets	69.3	69.6	0.3	69.7	0.4	70.3	70.5	0.2	70.3	70.6	0.3
	Between 6 th St. & Wilshire Blvd.	69.3	69.5	0.2	69.6	0.3	70.2	70.3	0.1	70.2	70.4	0.2
Shatto Pl.	Between 4 th & 6 th Streets	61.8	61.7	0.0	62.0	0.2	62.0	61.9	0.0	62.0	62.2	0.2
4 th St.	West of Vermont Ave.	62.8	62.9	0.1	62.9	0.1	63.0	63.1	0.1	63.1	63.2	0.1
	Between Vermont Ave. & Shatto Pl.	64.0	64.0	0.0	64.1	0.1	64.7	64.6	0.0	64.7	64.8	0.1
5 th St.	West of Vermont Ave.	61.0	61.1	0.1	61.1	0.1	61.8	61.9	0.1	61.9	62.0	0.1
6 th St.	West of Vermont Ave.	70.2	70.2	0.0	70.2	0.0	70.7	70.7	0.0	70.8	70.8	0.0
	Between Vermont Ave. & Shatto Pl.	70.4	70.5	0.1	70.7	0.3	71.0	71.1	0.1	71.1	71.3	0.2
<i>Note: A significant impact on noise levels from project operations would occur if the project causes the ambient noise level at the property line of affected uses to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase (see Table 4.10-6, Community Noise Exposure (CNEL)).</i> ^a <i>Transportation Impact Study for the Vermont Corridor Development Plan, April 2017, Gibson Transportation Consulting Inc.</i> <i>Source: Pomeroy Environmental Services, 2017. Data sheets provided in Appendix 4.10-1 to this Draft EIR.</i>												

PRELIMINARY WORKING DRAFT

Site 2

Site 2 would include a new parking structure consisting of 1.5 underground levels and 3.5 above ground levels that would be accessed from 6th Street. This proposed parking area would have the potential to generate noise due to cars entering and exiting, engines accelerating, braking, car alarms, squealing tires, and other general activities associated with people using the parking areas (i.e., talking, opening/closing doors, etc.). Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit. These noise levels would be approximately 66 dBA Leq near driveway locations.¹³ Measured ambient noise levels along 6th Street near Vermont reach up to 69.2 dBA Leq. Thus, parking related noise levels would not exceed ambient noise levels in the urbanized location of Site 2. The proposed parking uses would also be contained within subterranean and above-ground parking structures which would serve to partially block the line-of-sight to off-site locations from the above ground parking structure to the parking related noise sources on-site, and completely block these site lines in the underground portion of the parking structure. Operational noise generated by motor vehicles at Site 2 would also be regulated under the LAMC. Section 114.02 of the LAMC prohibits the operation of any motor vehicles upon any property within the City such that the created noise would cause the noise level on the premises of any occupied residential property to exceed the ambient noise level by more than five decibels. Therefore, noise impacts associated with the parking structure on Site 2 would be less than significant.

Site 3

Vehicle parking for Site 3 would be provided in a three-level subterranean parking structure. The proposed parking areas have the potential to generate noise due to cars entering and exiting, engines accelerating, braking, car alarms, squealing tires, and other general activities associated with people using the parking areas (i.e., talking, opening/closing doors, etc.). Noise levels within the parking areas would fluctuate with the amount of automobile and human activity. Noise levels would be highest in the early morning and evening when the largest number of people would enter and exit. These noise levels would be approximately 66 dBA Leq near driveway locations.¹⁴ Existing roadway noise levels are up to 69.9 dBA CNEL on Vermont Avenue. Thus, parking related noise levels would not exceed ambient noise levels at Site 3. Furthermore, the proposed parking uses would be contained within a subterranean garage, which would serve to block the line-of-sight from off-site locations to the parking related noise sources on-site. Therefore, noise impacts associated with parking facilities on Site 3 would be less than significant.

Stationary Noise Sources

As part of the Project, new mechanical equipment, pool equipment, HVAC units, and exhaust fans would be installed for the proposed uses. Although the operation of this equipment would generate noise, the design of all mechanical equipment shall comply with Section 12.08.530 of the County Code (Sites 1 and 3) and Section 112.02 of the LAMC (Site 2), which prohibit noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 decibels. Thus, the on-site equipment would be designed such that it would be shielded, and appropriate noise-muffling devices would be installed on the equipment to

¹³ *Ibid.*

¹⁴ *Ibid.*

reduce noise. In addition, nighttime noise limits would apply to any equipment required to operate between the hours of 10:00 P.M. and 7:00 A.M (e.g., HVAC units, exhaust fans, refrigeration, heating, pumping, and filtering equipment, etc.). As such, with compliance with regulatory requirements, impacts related to stationary noise sources would be less than significant.

Outdoor Spaces

The Project includes outdoor spaces that would have the potential to generate outdoor noise. The following are the primary locations of outdoor spaces:

- Site 1 – County Office Building Landscaped Terrace between the office building and the parking structure;
- Site 2 – 7,500 square foot roof deck and pool amenity (13th Level);
- Site 3 – Landscaped courtyard located within the Site 3 building.

Site 1

Site 1 includes a landscaped terrace that connects the parking structure with the entrance to the County Office Building. This would not be a formal gathering place, rather it would accommodate pedestrians walking between the building and the parking structure, and may also be used as a break location for County employees to gather in small groups. Noise associated with this location would consist primarily of small groups of people talking which would be generally consistent with the existing pedestrian-oriented environment on this portion of Site 1. This activity would result in noise levels of approximately 60-65 dBA at three feet, as shown in Table 4.10-1, which would be below measured ambient noise levels and would be imperceptible at off-site locations. Based on these factors, the Site 1 landscaped terrace would not have the potential to cause ambient noise levels to increase by 3 dBA within the “normally unacceptable” or “clearly unacceptable” category identified in Table 4.10-6, or any 5 dBA or greater noise increase. Impacts from this source would be less than significant.

Site 2

Noise associated with the Site 2 roof deck and pool amenity (13th level) would consist primarily of people talking and use of amenities. These amenities would be open to residents only who would generate noise levels of approximately 60-65 dBA at three feet. This activity would not include live entertainment or amplified music, although ambient background music may be used at times (i.e., below the noise levels associated with normal speech). Thus, the outdoor noise levels would be substantially similar to existing ambient noise levels associated with the urbanized vicinity of the Project Sites. Based on these factors, the Site 2 roof deck and pool amenity would not have the potential to cause ambient noise levels to increase by 3 dBA within the “normally unacceptable” or “clearly unacceptable” category identified in Table 4.10-6, or any 5 dBA or greater noise increase. Impacts from this source would be less than significant.

Site 3

Noise associated with the Site 3 courtyard would consist primarily of people talking and use of amenities. It should be noted these amenities would be open to residents of the senior affordable housing units only, who would generate noise levels of approximately 60-65 dBA at three feet, would not include live entertainment or amplified music, and would be located in the interior of the proposed residential building. Thus, the outdoor noise levels would be substantially similar to existing ambient noise levels associated with the heavily urbanized area surrounding Site 3. Based on these factors, noise from the Site

3 courtyard would not be perceptible, and would not have the potential to cause ambient noise levels to increase by 3 dBA within the “normally unacceptable” or “clearly unacceptable” category identified in Table 4.10-6, or any 5 dBA or greater noise increase. Impacts from this source would be less than significant.

Furthermore, noise levels from Project operation would be regulated by LAMC Section 116.01 (Loud, Unnecessary and Unusual Noise), LAMC Section 115.02 (Amplified Sound), and LAMC Section 112.01 (Radios, Television Sets, and Similar Devices). Specifically, LAMC Section 116.01 prohibits all future users of a project to willfully make or continue, or cause to be made or continued, any loud, unnecessary, and unusual noise which disturbs the peace or quiet of any neighborhood or which causes discomfort or annoyance to any reasonable person of normal sensitiveness residing in the area. LAMC Section 115.02 regulates amplified sound for commercial purposes in or near residential zones, and prohibits the operation or use of sound amplifying equipment for commercial purposes between the hours of 9:00 p.m. and 8:00 a.m. of the following day in all other zones. LAMC Section 112.01 states, in part, that it shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area. As such, regulatory compliance would further ensure impacts due to the operation of outdoor spaces would be less than significant.

CUMULATIVE IMPACTS

This cumulative impact analysis considers development of the Project in combination with ambient growth and other development projects within the vicinity. As noise is a localized phenomenon and decreases in magnitude as distance from the source increases, only projects and ambient growth within 500 feet and having a direct line-of-sight to the Project Sites, or those that generate traffic on study roads, could combine with the Project to result in cumulatively considerable noise impacts.

Construction

Construction of the Project in combination with the related projects would result in an increase in construction noise in this heavily urbanized area of the City. Related Project No. 92 (631 S. Vermont Ave.) is located approximately 130 feet southwest of the Site 2. Construction of this related project and other unforeseen projects could potentially combine construction noise levels with the Project construction activities. However, all related projects would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. In addition, each of the related projects would 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. As previously discussed, construction noise levels for the Project could exceed existing ambient noise levels by more than 10 dBA for more than one day at noise-sensitive receptors and for more than 5 dBA for 10 days in a three-month period. Related Project No. 92 is located within 500 feet and may have a similar construction schedule. Therefore, because Project construction noise impacts would be considered significant, it is possible that Project construction activities could combine with construction activities associated with Related Project No. 92 to generate a cumulatively considerable noise impact during construction. As such, cumulative impacts with respect to construction noise are conservatively assessed to be significant.

With respect to construction vibration, the closest sensitive receptor to the Project and Related Project No. 92 would be the school located to the south of Site 2. This receptor is located approximately 200 feet from Related Project No. 92. As such, the maximum vibration level from construction activities on the site of Related Project No. 92 would be approximately 60 VdB, which would be below the threshold of human perception (65 VdB) at the school. Accordingly, the Project and Related Project No. 92 would not result in a cumulatively considerable vibration impact at the nearest sensitive receptor to both projects.

Operation

Cumulative mobile source noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project, ambient growth, and related projects.

As shown in Table 4.10-15 (Cumulative Off-Site Roadway Noise Levels), there would be an increase in cumulative roadway noise levels with the Project and related projects. Local noise levels would increase by a maximum of 1.3 dBA CNEL for the roadway segment of Vermont Avenue between 5th & 6th Streets during the Future With Project Phase I and II. This increase would not exceed either threshold of significance (i.e. 3 or 5 dBA increase). No other roadway segments during all scenarios would experience noise level increases above 1.2 dBA CNEL. Because the increase in roadway noise would not exceed the 3.0 dBA CNEL and 5.0 dBA CNEL thresholds at any of the study roadway segments, the cumulative operational noise impact would be less than significant.

Table 4.10-15
Cumulative Off-Site Roadway Noise Levels

Roadway	Roadway Segment ^a	dBA CNEL				
		Existing [1]	Future With Phase I (2021) [2]	Net Increase [2]-[1]	Future With Phase I & II (2023) [3]	Net Increase [3]-[1]
Vermont Ave.	Between 3 rd & 4 th Streets	69.9	70.9	1.0	71.0	1.1
	Between 4 th & 5 th Streets	69.5	70.6	1.1	70.7	1.2
	Between 5 th & 6 th Streets	69.3	70.5	1.2	70.6	1.3
	Between 6 th St. & Wilshire Blvd.	69.3	70.3	1.0	70.4	1.1
Shatto Pl.	Between 4 th & 6 th Streets	61.8	61.9	0.1	62.2	0.4
4 th St.	West of Vermont Ave.	62.8	63.1	0.3	63.2	0.4
	Between Vermont Ave. & Shatto Pl.	64.0	64.6	0.6	64.8	0.8
5 th St.	West of Vermont Ave.	61.0	61.9	0.9	62.0	1.0
6 th St.	West of Vermont Ave.	70.2	70.7	0.5	70.8	0.6
	Between Vermont Ave. & Shatto Pl.	70.4	71.1	0.7	71.3	0.9
<i>Note: A significant impact on noise levels from project operations would occur if the project causes the ambient noise level at the property line of affected uses to increase by 3 dBA in CNEL to or within the “normally unacceptable” or “clearly unacceptable” category, or any 5 dBA or greater noise increase (see Table 4.10-6, Community Noise Exposure (CNEL)).</i> ^a <i>Transportation Impact Study for the Vermont Corridor Development Plan, April 2017, Gibson Transportation Consulting Inc.</i> <i>Source: Pomeroy Environmental Services, 2017. Data sheets provided in Appendix 4.10-1 to this Draft EIR.</i>						

In addition to cumulative mobile source noise levels, operation of the Project in combination with the related projects could result in an increase in operational noise and vibration in this urbanized area of the City. Related projects could potentially combine operational noise and vibration levels with the Project. However, all of the related projects would be subject to the LAMC and potential project-specific mitigation related to the generation of on-site noise sources associated with mechanical equipment, parking, and outdoor spaces. As previously discussed, operational noise and vibration impacts would be less than significant for the Project, and on-site cumulative noise levels associated with the related projects would be regulated by the LAMC and associated project mitigation, as needed. As such, cumulative on-site operational noise impacts would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are proposed relevant to noise.

Regulatory Requirements

- RR NOI-1:** The Project shall comply with applicable provisions of the County and City Codes relating to the regulation of construction noise (i.e., Section 12.08.440 of the County Code (Sites 1 and 3), and Sections 41.40 and 112.05 of the LAMC (Site 2)).
- RR NOI-2:** The Project shall comply with Section 12.08.530 of the County Code (Sites 1 and 3) and Section 112.02 of the LAMC (Site 2) for all new mechanical equipment, which prohibits noise from air conditioning, refrigeration, heating, pumping, and filtering equipment from exceeding the ambient noise level on the premises of other occupied properties by more than 5 dB.
- RR NOI-3:** The Project shall comply with Section 12.07.11.2 of the County Code (Sites 1 and 3) and Section 91.1207.11.2 (Allowable Interior Noise Levels) of the LAMC (Site 2), which states interior noise levels attributable to exterior sources shall not exceed 45 dbA CNEL in any habitable room.

MITIGATION MEASURES

The following mitigation measures shall be incorporated to reduce construction noise levels to the maximum extent feasible.

- MM NOI-1:** Noise and groundborne vibration construction activities whose specific location on the Project Sites may be flexible (e.g., operation of compressors and generators, cement mixing, general truck idling) shall be conducted as far as possible from the nearest off-site land uses.
- MM NOI-2:** Flexible sound control curtains capable of reducing noise generation by at least 10 dBA shall be placed around all drilling apparatuses, drill rigs, and jackhammers when in use.
- MM NOI-3:** Noise-generating construction equipment operated at the Project Sites shall be equipped with effective noise control devices (i.e., mufflers, lagging, solar-powered generators, plug-in electrical generators, and/or motor enclosures) consistent with manufacturers' standards. All equipment shall be properly maintained to assure that no additional noise,

due to worn or improperly maintained parts, would be generated. Construction contractor shall keep documentation on-site demonstrating that the equipment has been maintained in accordance with the manufacturer's specifications.

- MM NOI-4:** Temporary noise control barriers such as plywood structures shall be erected at the perimeters of the Project Sites as follows: Site 1 – on the northern, eastern and southern edges of the Shatto Place parking structure site on the western edge along Vermont Avenue; and on the southern edge between Site 1 and Site 2; Site 2 - on the eastern edge of the Site and the southern edge of the Site between the existing County Office building and the edge of the Site, and on the southern edge between Site 1 and Site 2; Site 3 – on the northern, western and southern edges of the Site. The noise control barrier shall consist of K-rail with one-inch plywood fencing on top, at least 8 feet in height, which shall reduce construction-related noise levels at the adjacent uses by at least 10 dBA. Alternatively, sound control curtains at least 8 feet in height and capable of reducing construction-related noise levels at the adjacent uses by at least 10 dBA shall be installed on the identified edges of the Project Sites. The supporting structure shall be engineered and erected in order to comply with Los Angeles Municipal Code noise requirements, including those set forth in Chapter XI, Article 2 of the Los Angeles Municipal Code. The temporary barrier shall remain in place until all windows have been installed and all grading and excavation activities on the Project Sites are complete.
- MM NOI-5:** All construction truck traffic shall be restricted to truck routes approved by the City of Los Angeles Department of Building and Safety, which shall avoid residential areas and other sensitive receptors (in accordance with the L.A. CEQA Thresholds Guide, noise-sensitive receptors include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks) to the extent feasible.
- MM NOI-6:** Two weeks prior to the commencement of construction at the Project Sites, notification shall be provided to the immediate surrounding off-site properties that discloses the construction schedule, including the various types of activities and equipment that would be occurring throughout the duration of the construction period.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction noise levels would exceed ambient exterior noise levels at off-site sensitive receptors by 5 dBA or more. Regulatory compliance and mitigation measures listed above would reduce construction noise impacts to the maximum extent feasible, with a reduction of at least 10 dBA resulting from the installation of temporary noise barriers (MM NOI-4). Nonetheless, as shown in Table 4.10-16, construction noise impacts would be significant and unavoidable at four locations, which include Sensitive Receptor 2, the school/religious use located east of the Shatto Place parking structure; and Sensitive Receptors 12, 14 and 15, which are residential, religious, and residential uses, respectively, located in the vicinity of Site 3. The peak noise level increases that could be experienced at the nearby sensitive receptors during Project construction represent the highest composite noise level that would be generated periodically during a worst-case construction activity and do not represent continuous noise levels occurring throughout a construction day, or the construction period.

Construction and operational vibration impacts would be less than significant. Operational noise impacts would be less than significant.

Table 4.10-16
Estimated Exterior Construction Noise at Sensitive Receptors with Mitigation

Sensitive Land Uses ^a	Distance to Project Site (feet)	Existing Monitored Daytime Ambient Noise Levels (dBA Leq)	Estimated Peak Construction Noise Levels (dBA Leq)	Noise Level Increase	Increase after Mitigation	Significant Impact After Mitigation?
Nearest Sensitive Receptors to Sites 1 and 2						
1. School to the south	85	69.2	81.4	12.2	2.2	No
2. Religious/School use to the east	90	60.2	80.9	20.7	10.7	Yes
3. Residences to the west	235	60.1	72.6	12.5	2.5	No
4. Residences to the south	240	69.2	72.4	3.2	-	No
5. Residences to the northeast	280	61.8	71.0	9.2	-	No
6. Residences to the east	300	60.2	70.4	10.2	0.2	No
7. Residences to the west	300	60.1	70.4	10.3	0.3	No
8. Religious use to the north	320	60.1	69.9	9.8	-	No
9. Residences to the southwest	345	60.1	69.2	9.1	-	No
10. Religious use to the southeast	385	60.2	68.3	8.1	-	No
11. Hotel use to the southwest	485	60.1	66.3	6.2	-	No
Nearest Sensitive Receptors to Site 3						
12. Residences to the west	Adjacent	55.4	>86.0	>30.6	>20	Yes
13. Religious use to the east	90	68.7	80.9	12.2	2.2	No
14. Religious use to the northwest	270	55.4	71.4	16.0	6.0	Yes
15. Residences to the north	300	55.4	70.4	15.0	5.0	Yes
16. Residences to the south	335	55.4	69.5	14.1	4.1	No
17. Religious use to the east.	400	68.7	67.9	(0.8)	-	No
18. Recreation center to northeast	415	68.7	67.6	(1.1)	-	No
<i>Note: The peak noise level increase at the nearby sensitive receptors during project construction represents the highest composite noise level that would be generated periodically during a worst-case construction activity and does not represent continuous noise levels occurring throughout the construction day or period.</i> <i>Source: Pomeroy Environmental Services, 2017.</i>						

4.11 POPULATION, HOUSING, AND EMPLOYMENT

INTRODUCTION

This Section evaluates the Project in terms of the Southern California Association of Governments' ("SCAG") population, housing, and employment growth forecasts. It also evaluates whether the Project would cause growth exceeding that, which is projected or planned for the Project area through infrastructure development, and whether the Project would displace housing or people. This section utilizes information from the following sources: U.S. Census Bureau and the SCAG website.

ENVIRONMENTAL SETTING

Existing Conditions

Site 1

Site 1 is currently developed with a 30,788-square foot, two-story office building that is occupied by 93 employees from the Department of Parks and Recreation ("DPR") and a surface parking lot to the north of this building, an unoccupied 13,325 square foot one-story office building, a surface parking lot located between the two office buildings, and a seven-story, 235,248 square foot parking structure. Based on existing employee counts, estimated employment at Site 1 is approximately 93 people, as shown in Table 4.11-1 (Existing Project Sites Employment).

Site 2

Site 2 is currently developed with a 154,793-square foot, 12-story County office building that is occupied by 973 employees from the Department of Mental Health ("DMH"), an approximately 52,000 square foot, four-story office building that is occupied by 250 employees from Workforce Development, Aging and Community Services ("WDACS"), and a 14,010-square foot parking structure. Based on existing employee counts, estimated employment at Site 2 is approximately 1,223 people, as shown in Table 4.11-1 (Existing Project Sites Employment).

Site 3

Site 3 is currently developed with a 29,292-square foot, four-story office building and occupied by 112 employees from DPR, and an at-grade parking lot at the rear and north of the existing building. Based on existing employee counts, estimated employment at Site 3 is approximately 112 people, as shown in Table 4.11-1 (Existing Project Sites Employment).

**Table 4.11-1
Existing Project Sites Employment**

Type of Development	Size (sf)	Total Employees ^a
Site 1		
County Office (Occupied)	30,788 sf	93
County Office (Vacant)	13,325 sf	--
<i>Site 1 Subtotal Existing Employment</i>		<i>93</i>
Site 2		
County Office (Occupied)	154,793 sf	973
County Office (Occupied)	52,000 sf	250
<i>Site 2 Subtotal Existing Employment</i>		<i>1,223</i>
Site 3		
Office (Occupied)	29,292 sf	112
<i>Site 3 Subtotal Existing Employment</i>		<i>112</i>
Total Existing Employment		1,428
^a Employee counts provided by the County of Los Angeles. Source (table): EcoTierra Consulting, 2017.		

Regulatory Framework

Federal

No federal regulations are applicable to the Project.

State

California Department of Housing and Community Development

The State Housing Law (Government Code Section 65580) requires local government plans to address the existing and projected housing needs of all economic segments of the community through their Housing Elements. The Housing Element is 1 of 7 State-mandated elements that every General Plan must contain, and is required to be updated every 5 years and determined legally adequate by the State. The purpose of the Housing Element is to identify the community's housing needs, state the community's goals and objectives with regard to housing production, rehabilitation, and conservation to meet those needs, and define the policies and programs that the community would implement to achieve the stated goals and objectives.

Regional

Southern California Association of Governments

As part of its comprehensive planning process for the Southern California region, SCAG has divided the region into 15 subregions (see Figure 4.11-1 [SCAG Subregions]). The Project Sites are located in the City of Los Angeles subregion, which includes all areas within the boundaries of the City of Los Angeles. The City of Los Angeles subregion also includes the City of San Fernando and a portion of Los Angeles County unincorporated area. However, the numbers discussed herein pertain to the City of Los Angeles only. In 2012, SCAG estimated that the City of Los Angeles had a population of 3,845,500 persons, 1,325,500 households, and employment for 1,696,400 persons (see Table 4.11-2 [Population, Housing and Employment Forecasts for the City of Los Angeles]). SCAG forecasts that by the year 2020, the City of Los Angeles will have a total population of 4,017,000 persons (an increase of 4.4 percent from 2012),



Source: SCAG, February 2017.

Table 4.11-2
Population, Housing and Employment Forecasts for the City of Los Angeles

Area	Population	Households	Employment
City of Los Angeles			
SCAG Forecasts ^a			
2012	3,845,500	1,325,500	1,696,400
2020	4,017,000	1,441,400	1,899,500
2035	4,452,500	1,618,900	2,104,100
2040	4,609,400	1,690,300	2,169,100
Percent Change (%)			
2012 to 2020	+4.4	+8.7	+12.0
2020 to 2040	+14.7	+17.2	+14.2
^a Southern California Association of Governments, Adopted 2016 RTP/SCS Growth Forecast by City, http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf . Source: Southern California Association of Governments, 2017.			

1,441,400 households (an increase of 8.7 percent), and will provide employment for 1,899,500 persons (an increase of 12 percent). For the period of 2020 to 2040, growth in the City of Los Angeles is forecast to continue; the citywide population is expected to reach 4,609,400 persons (an increase of 14.7 percent between 2020 and 2040), households will total 1,690,300 (an increase of 17.2 percent), and employment will total 2,169,100 jobs (an increase of 14.2 percent).¹

2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future

On April 7, 2016, SCAG adopted the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future* ("RTP/SCS"). Federal guidelines require that all new regionally significant transportation projects be included in a *Regional Transportation Plan* ("RTP") before they can receive federal or State funds or approvals. The Los Angeles County Metropolitan Transportation Authority ("Metro") submits the program of Los Angeles County projects for inclusion in the Regional Transportation Improvement Program. The RTP must be updated and federally approved every three years. Federal approval requires a positive demonstration that the RTP projects would not generate travel emissions that exceed those assumed in the applicable *Air Quality Management Plan*; this requirement is known as "transportation conformity".

The RTP/SCS is a long-range plan that is intended to improve overall mobility, reduce greenhouse gases and enhance the quality of life for the region's residents. For the first time, SCAG has integrated land use, housing and environmental strategies with transportation planning to help meet emissions reduction targets set by the CARB, as required by SB 375. The RTP/SCS provides an alternative to "business as usual" development. It encourages community revitalization and neighborhoods that are bike and pedestrian friendly, with convenient access to transit. Approved by State and federal agencies in April 2016, the RTP/SCS includes approximately \$556.5 billion in projected funding for transportation projects for Los Angeles County.

¹ Southern California Association of Governments, Adopted 2016 RTP/SCS Growth Forecast by City, http://www.scag.ca.gov/Documents/2016_2040RTPSCS_FinalGrowthForecastbyJurisdiction.pdf, accessed: February 7, 2017.

The RTP/SCS contains a plan to provide adequate highway, transit, rail, aviation, and goods movement infrastructure to meet the region's needs through 2040. The RTP/SCS is linked to Los Angeles County transportation plans and models in the form of shared growth and travel projections. As such, the 2016-2040 RTP/SCS is guided by and incorporates all projects from Metro's own Long-Range Transportation Plan.

The RTP/SCS includes goals and policies applicable to transportation and, in some cases, land use projects. The RTP/SCS also provides projections of population, housing and employment growth, by jurisdiction, that are presented in Table 4.11-2 above. A consistency analysis of the goals and policies relevant to the Project is provided in Section 4.9 (Land Use and Planning) of this Draft EIR. The regional transportation impacts of the Project are analyzed in greater detail in Section 4.14 (Transportation and Traffic) of this Draft EIR.

2008 Regional Comprehensive Plan

SCAG prepared and issued the *2008 Regional Comprehensive Plan* ("RCP") in response to SCAG's Regional Council directive in the 2002 Strategic Plan to define solutions to inter-related housing, traffic, water, air quality, and other regional challenges.² The most recent RCP, adopted October 2, 2008, serves as a policy framework for implementation of short-term strategies and long-term initiatives to improve regional mobility and sustainability, while also directly addressing the interrelationships between natural resource sustainability, economic prosperity, and quality of life.³ The RCP includes nine chapter subjects: Land Use and Housing; Open Space and Habitat; Water; Energy; Air Quality; Solid Waste; Transportation; Security and Emergency Preparedness; and Economy. A comprehensive review and consistency analysis for each of the RCP goals is discussed in detail in Section 4.9 (Land Use and Planning) of this Draft EIR.

Southern California Compass Blueprint Growth Vision

The *Southern California Compass Blueprint Growth Vision Report* ("Compass Growth Vision"), published by SCAG in June 2004, presents a comprehensive vision for growth in the six-county SCAG region, as well as the means of achieving that growth vision. The Compass Growth Vision is intended to provide planning guidance and mechanisms for improved mobility, livability, prosperity, and sustainability for all Southern Californians by reorienting development around existing and planned transportation infrastructure on just two percent of the region's land area. The Compass Growth Vision concludes that the strategy of combining compact, mixed-use development with housing and jobs near major transportation infrastructure would prove to be of enormous benefit in accommodating future growth, while also recognizing that incremental and strategic changes in small parts of the region can yield great benefits to the region as a whole as well as to individual cities. A comprehensive review and consistency analysis for each of the Compass Growth Vision principles is discussed in detail and compared to the Project in Section 4.9 (Land Use and Planning) of this Draft EIR.

Regional Housing Needs Assessment Final Allocation Plan

The *Regional Housing Needs Assessment* ("RHNA") quantifies the need for housing within each jurisdiction between 2014 and 2021. The RHNA allows communities to anticipate growth, so that they can grow in ways that enhance quality of life, improve access to jobs, transportation and housing, and not adversely

² Los Angeles Department of City Planning, *Housing Element 2013-2021*, page c-xiii.

³ Los Angeles Department of City Planning, *Housing Element 2013-2021*, page c-xiii.

impact the environment. The RHNA is discussed in more detail below, under the subheading *Housing Element*.

Local

County of Los Angeles General Plan

The County's General Plan addresses population-related issues that affect the County. The current General Plan was adopted on October 6, 2015. The County adopted an update to the Housing Element (February 2014), which serves as a policy guide to address the provision of adequate and affordable housing, as well as the comprehensive housing needs of the unincorporated areas of the County. The purpose of the Housing Element is to determine the existing and project housing needs of residents of the unincorporated areas, establish goals and policies that guide decision-making to address housing needs, and implement actions that encourage the private sector to building housing. A consistency analysis of the proposed Project's specific goals and policies with the County's relevant plans, policies, and goals is provided in Section 4.9 (Land Use and Planning) of this Draft EIR.

City of Los Angeles General Plan

Site 1, which would be developed for County use, and Site 3, which is owned by the County and would be developed as a public benefit project (senior affordable housing and community recreation center), are not subject to the City of Los Angeles' land use regulations. Nevertheless, a consistency analysis with the City's General Plan is provided for Sites 1 and 3 in Section 4.9 (Land Use and Planning) of this Draft EIR. Land uses on Site 2 are guided by the City of Los Angeles General Plan ("General Plan") and the City's Zoning Ordinance. The General Plan sets forth goals, objectives, and programs to provide a guideline for day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating a range of state-mandated elements including a Housing Element.

Housing Element

The 2013-2021 Housing Element of the General Plan ("Housing Element") is the City's blueprint for meeting housing and growth challenges. The current Housing Element was adopted on December 3, 2013 and contains current population and housing projections for the City.

The Housing Element identifies a need for more housing, stating that the "City of Los Angeles continues to grow, and with that growth comes the need for more housing – not only more units, but a broader array of housing types to meet evolving household types and sizes, and a greater variety of housing price points that people at all income levels can afford."⁴ The Housing Element specifically identifies a need for low-income housing in order to meet the needs identified in the RHNA. Current housing projections indicate a shortage in new construction of low-income housing from 2013 to 2021. The Housing Element states that there is a substantial shortfall in new construction of housing, based on area median income ("AMI").

The City is projected to fall short at the affordable (below 120% AMI) income ranges, but exceed above moderate (market-rate) production levels. While the RHNA allocation suggests that more than 46,000 units affordable to households earning less than 120%

⁴ Los Angeles Department of City Planning, *Housing Element 2013-2021*, page c-xiii.

AMI will be needed, we are projecting that only approximately 11,559 affordable units will be constructed within the eight year RHNA period at this range (25% of the target).⁵

The RHNA is mandated by State Housing Law as part of the periodic process of updating local housing elements of the General Plan. The RHNA quantifies the need for housing within each jurisdiction during specified planning periods. For the RHNA cycle relevant to the current Housing Element Update (January 1, 2014 through September 30, 2021), the California Department of Housing and Community Development (“HCD”) determined that 412,721 additional housing units are needed for the six-county region covered by SCAG. Of the SCAG region allocation, the total assigned to the City of Los Angeles is 82,002 units. Of these units were divided into the following income levels:

- Extremely low income households: 10,213 (12.5 percent)
- Very low income households: 10,213 (12.5 percent)
- Low income households: 12,435 (15.2 percent)
- Moderate income households: 13,728 (16.8 percent)
- Above moderate income households: 35,412 (43.2 percent)

Communities use the RHNA in land use planning, prioritizing local resource allocation, and in deciding how to address identified existing and future housing needs resulting from population, employment and household growth. The RHNA does not necessarily encourage or promote growth, but rather allows communities to anticipate growth so that collectively the region and subregion can grow in ways that enhance quality of life, improve access to jobs, promotes transportation mobility, and addresses social equity, fair share housing needs.

Wilshire Community Plan

The City’s Community Plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The Community Plans are also intended to guide development in order to create a healthful and pleasing environment. The Community Plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Wilshire Community Plan guides land uses on the Project Sites and in the surrounding areas. The current plan (adopted September 19, 2001) sets forth planning goals and objectives to maintain the community's distinctive character.⁶

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Project with respect to population, housing, and employment are based on whether the Project would cause growth exceeding that which is projected or planned for the Project area through infrastructure development. Growth that is within adopted forecasts is not considered substantial.

⁵ *Ibid.*, page c-xxi.

⁶ *Los Angeles Department of City Planning, Wilshire Community Plan, page III-2.*

Thresholds of Significance

The potential for the Project to result in impacts associated with population, housing and employment is based on the thresholds specified by Appendix G to the *State CEQA Guidelines*, which are addressed in this section. These significance thresholds are listed below.

- Threshold 4.11-1:** 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)?
- Threshold 4.11-2:** Would the Project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?
- Threshold 4.11-3:** Would the Project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Affirmative answers to any of these questions would represent a significant impact. No Project impacts would occur with respect to displacement of housing or people (Thresholds 4.11-2 and 4.11-3) because the Project Sites currently do not include any housing or residents. These topics are addressed in Section 6.5, Effects Found Not to be Significant, of this Draft EIR.

Project Design Elements

The Project would include governmental offices, commercial retail, multi-family residential, community recreation center, and on-site parking. No specific design elements in regards to population, housing, and employment are proposed.

Impact Analysis

- Threshold 4.11-1:** 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)?

Site 1

Construction

Construction of Site 1 would result in temporary employment opportunities in the construction field. However, the employment patterns of construction workers in Southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with Site 1. The construction industry differs from most other industry sectors in several ways:

- There is no regular place of work. Construction workers regularly commute to job sites that change many times over the course of a year. Their sometimes lengthy daily commutes are facilitated by the off-peak starting and ending times of the typical construction workday;
- Many construction workers are highly specialized (e.g., crane operators, steelworkers, masons, etc.) and move from job site to job site as dictated by the demand for their skills; and

- The work requirements of most construction projects are highly specialized. Workers remain at a job site only for the time frame in which their specific skills are needed to complete a particular phase of the construction process.

It is likely that the skilled workers anticipated to work on Site 1 construction already reside in the Los Angeles region and would not need to relocate as a result of employment. As such, construction activity associated with Site 1 development would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of Project occupancy/buildout, and would result in an adverse physical change in the environment; or introduce unplanned infrastructure that was not previously evaluated in the County of Los Angeles General Plan, Wilshire Community Plan, or City of Los Angeles General Plan. Therefore, housing and population impacts associated with construction on Site 1 would be less than significant.

Operation

Employment

Proposed development on Site 1 would involve removal of the existing DPR office building, a vacant office building, surface parking lots, and a parking structure, and construction of a new County office building containing 471,000 square feet of office use and 10,000 square feet of ground floor retail over an eight-story parking structure. Current DPR employees on Site 1 will be relocated to offsite facilities prior to the commencement of construction on Site 1. When complete, the new office building would accommodate the relocation of the 973 DMH employees currently located in the existing office building on Site 2, the 250 WDACS employees currently located in the existing office building on Site 2, and 840 additional DMH and/or WDACS employees currently located in leased facilities within four miles of the new office building. Accordingly, a total of up to 2,063 County office employees would be located on Site 1 when the building opens in 2021. In order to provide the capability to meet the County's future needs, the new Site 1 office building would be designed to accommodate future growth, to a maximum of 2,166 County office employees, between 2021 and 2023. Table 4.11-3 (Estimated Permanent Employment Generation for the Project) shows the estimated employment after implementation the Project on Site 1. In addition, an estimated 27 new employees associated with the new retail uses would be located on Site 1.

As shown in Table 4.11-3, in all, Site 1 would accommodate approximately 2,193 employees at full occupancy (office and retail) by 2023, which would represent a net increase of approximately 2,100 employees on the Site. The majority of these employees would be relocated from existing County offices within the Project area. Because of the linkage between Sites 1 and 2 with respect to employment, the comparison of employment growth relative to regional growth forecasts is considered in a combined manner below. The increase in employees would be within SCAG's forecasts of 203,100 additional jobs in the City of Los Angeles between 2012 and 2020 and 269,600 additional jobs between 2020 and 2040 as it represents approximately 1.03 percent and 0.78 percent of the total jobs, respectively. The continued concentration of County employment in this area of the City that would occur as a result of the development of Site 1 would be consistent with the regional growth management policies discussed in detail in Section 4.9 (Land Use and Planning). These policies promote development activity in existing developed areas, especially near existing transit and transportation infrastructure, such as Site 1, which is served by served by Metro, DASH, and Foothill Transit bus lines. The Project Sites are also served by the Metro Rail Red and Purple Lines from the Metro Rail Wilshire/Vermont Station located at the northeast corner of Wilshire Boulevard and Vermont Avenue. The entrance to the Wilshire/Vermont Station is located approximately 1,000 feet south of Site 1. Therefore, projected employment growth associated with the development of Site 1 would be less than significant.

Table 4.11-3
Estimated Permanent Employment Generation for the Project

Type of Development	Size	Employee Generation Factor ^a	Total Employees
Site 1			
Office	471,000 sf	--	2,166 ^b
Retail	10,000 sf	2.71 employees/1,000 sf	27
<i>Site 1 Subtotal of Proposed Employment Generation</i>			2,193
<i>Site 1 Existing Employment</i>			93
Site 1 Net Employment Generation			2,100
Site 2			
Apartments	246 units	N/A	<10 ^c
Retail	7,500 sf	2.71 employees/1,000 sf	20
<i>Site 2 Subtotal of Proposed Employment Generation</i>			30
<i>Site 2 Existing Employment</i>			1,223
Site 2 Net Employment Generation			(1,193)
Sites 1 and 2 Net Employment Generation			907
Site 3			
Senior Affordable Housing	72 units	N/A	<10 ^c
Community Recreation Center	13,200 sf	2.71 employees/1,000 sf	36
<i>Site 3 Subtotal of Proposed Employment Generation</i>			46
<i>Site 3 Existing Employment</i>			112
Site 3 Net Employment Generation			(66)
<i>Subtotal Proposed Employment Generation</i>			2,269
<i>Existing Employment (Sites 1, 2, and 3)</i>			1,428
Total Net Increase in Employment Generation			841
^a Los Angeles Unified School District, Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, page 15, March 2017. ^b Employee counts provided by the Developer. ^c The School Fee Justification Studies for Los Angeles Unified School District do not include employee generation factors for multi-family residential uses. The small number of employees (estimated at less than 10) was assumed to be required to provide management and maintenance for the residential units. Source (table): EcoTierra Consulting, 2017.			

Housing

When complete, the new 21-story office building would accommodate up to 2,166 County office employees and up to 27 retail employees at full occupancy in 2023. Because the majority⁷ of employees on Site 1 would be relocated from existing facilities in the immediate Project vicinity, it is reasonable to expect that these employees are long-term residents of the City of Los Angeles or other communities in the region, and are unlikely to relocate as a result of the Project.

As shown in Table 4.11-3, Estimated Permanent Employment Generation for the Project, new development on Site 1 would create approximately 27 new retail jobs. It is reasonable to expect that most of these new employees would be drawn from the local labor force readily available in the Wilshire Community Plan Area and surrounding communities. Coupled with the limited increase in employment associated with the new retail uses on Site 1 and Site 2, any indirect housing demand associated with the

⁷ County employees who would be relocated to the new County office building on Site 1 are presently located within four miles of Site 1.

Project on Site 2 would be limited. Furthermore, most of the expected employees on Site 1 would be drawn from the existing County labor force and would not need to relocate, or have associated demand for new housing in the area. As such, impacts related to housing growth on Site 1 would be less than significant.

Population

As discussed previously, the Project involves the demolition of all on-site uses and the construction of a variety of uses including up to 471,000 square feet of office uses on Site 1. The construction on Site 1 would not include any residences and, therefore, would not introduce permanent residents to the area. Therefore, development on Site 1 would have no direct impact on population growth.

As shown in Table 4.11-3, Site 1 would generate approximately 2,166 County office employees and 27 retail employees at full occupancy in 2023, which would result in a net increase of approximately 2,100 employees on the Site. According to SCAG data, the City of Los Angeles subregion had a total population of 33,845,500 persons in 2012. Extrapolations of SCAG projections estimate that the subregional population is expected to increase by 171,500 between 2012 and 2020, and by 592,400 persons between 2020 and 2040. The addition of these new residents would be within the SCAG growth projection, representing approximately 1.22 percent of the Citywide total growth for the period of 2012 to 2020, and approximately 0.35 percent of the Citywide total growth for the period of 2020 to 2040. As discussed above, most of the expected employees on Site 1 would be drawn from the existing County labor force and would not need to relocate, or have associated demand for new housing in the area. It is possible that some of the future employees (of which only 103 are anticipated and could be accommodated) would be permanent residents to the area; however, it is unlikely that this indirect population growth would be substantial in the context of the growth forecast for the City of Los Angeles. Estimates extrapolated/taken from SCAG data projects the Citywide housing supply to increase by 115,900 units between 2012 and 2020, and by 248,900 units between 2020 and 2040 and the proposed development on Site 2 would involve the construction of 74 residential units (new construction), and the conversion of 154,793 square feet for the construction of 172 units by 2023. Thus, the Project's potential to induce growth from the increase in employees on Site 1 is not considered to be significant due to the readily available local labor force and the existing and forthcoming housing stock available within the area. Therefore, impacts related to population growth on Site 1 would be less than significant.

Site 2

Construction

Construction of Site 2 would result in temporary increased employment opportunities in the construction field. Construction of Site 2 development would occur after construction of Site 1 is completed and employees are relocated from the existing Site 2 buildings to the new Site 1 office building. However, the employment patterns of construction workers in Southern California are such that it is not likely that they would relocate their households as a consequence of the construction employment associated with Site 2 for the same reasons as discussed under Site 1 above. Therefore, housing and population impacts associated with the construction of Site 2 would be less than significant.

Operation

Employment

Proposed development on Site 2 would involve reuse and conversion of the existing 154,793 square foot, DMH building into 172 residential units, 4,100 square feet of ground floor retail, 1,375 square feet of ancillary space, and an approximately 7,500 square foot roof deck amenity. In addition, development of Site 2 would involve removal of the existing 52,000 square foot, WDACS office building and parking structure, and construction of a new 116,324 square foot, parking structure. Development of Site 2 would not take place until the Site 1 office building is complete and current Site 2 employees have been relocated to Site 1. A future option for the development of Site 2 would include the construction of a 66,935-square foot, mixed-use building with five residential levels containing 74 units, and 2,250 square feet of ancillary space, over the parking structure. In addition, 3,400 square feet of retail uses would be provided at the ground level of the new mixed-use building on 6th Street. Table 4.11-3 (Estimated Permanent Employment Generation for the Project) shows the estimated employment after implementation of the Project on Site 2.

As shown in Table 4.11-3 (Estimated Permanent Employment Generation for the Project), development on Site 2 would generate approximately 30 new employees, while the existing approximately 1,223 employees presently located on Site 2 would relocate to Site 1. Because of the linkage between Sites 1 and 2 with respect to employment, the comparison of employment growth relative to regional growth forecasts is considered in a combined manner below. The increase in 30 employees would be within SCAG's forecasts of 203,100 additional jobs in the City of Los Angeles between 2012 and 2020 and 269,600 additional jobs between 2020 and 2040 as it represents approximately 0.01 percent and 0.011 percent of the total jobs, respectively. The continued concentration of County employment in this area of the City that would occur under the Project would be consistent with the regional growth management policies discussed in detail in Section 4.9 (Land Use and Planning). These policies promote development activity in existing developed areas, especially ones near existing transit and transportation infrastructure, such as Site 2, which is served by served by Metro, DASH, and Foothill Transit bus lines. The Project Sites are also served by the Metro Rail Red and Purple Lines from the Metro Rail Wilshire/Vermont Station located at the northeast corner of Wilshire Boulevard and Vermont Avenue. The entrance to the Wilshire/Vermont Station is located approximately 700 feet south of Site 2. Therefore, this projected employment growth would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area, and that would result in an adverse physical change in the environment that was not previously evaluated in the adopted Community Plan. Therefore, projected employment growth associated with the development of Site 2 would be less than significant.

Housing

Proposed development on Site 2 would involve the construction of 74 residential units (new construction), and the conversion of 154,793 square feet for the construction of 172 units by 2023. SCAG projects the Citywide housing supply to increase by 248,900 units between 2020 and 2040. The additional 246 total units proposed to be developed on Site 2 would be within the SCAG's forecast growth, representing approximately 0.10 percent of the citywide total growth for the period of 2020 to 2040. Therefore, the residential development on Site 2 would be within the projections for housing growth. The City of Los Angeles General Plan Framework and Wilshire Community Plan policies encourage housing along mixed-use boulevards near major transportation centers. More specifically, the Community Plan encourages the development of projects with mixed-use commercial and residential development. The goal is to provide housing in close proximity to jobs, to reduce vehicular trips, to reduce congestion, and air pollution, to

assure adequate sites for housing, and to stimulate pedestrian-oriented areas to enhance the quality of life in the Plan area. As noted previously, new and reuse development on Site 2 would create approximately 30 new jobs. It is reasonable to expect that most of the new employees would be drawn from the local labor force readily available in the Community Plan Area and surrounding communities. Coupled with the limited increase in employment associated with the new uses on Site 2, any indirect housing demand associated with the Project on Site 2 would be limited. Therefore, impacts related to housing growth related to Site 2 would be less than significant.

Population

As previously discussed, proposed development on Site 2 would involve the construction of 74 residential units (new construction), and the conversion of 154,793 square feet for the construction of 172 residential units. The City estimates that there are approximately 2.51 persons per dwelling unit in the Wilshire Community Plan Area.⁸ At this average household size, the Project would be expected to accommodate approximately 618 new residents.

In 2012, SCAG estimates that the City of Los Angeles had a total population of 3,845,500 persons. According to SCAG, the City's population is expected to increase by 171,500 between 2012 and 2020, with additional growth of 592,400 persons between 2020 and 2040. Therefore, the addition of 618 new residents on Site 2 would be within the SCAG population growth projection, representing approximately 0.10 percent of the Citywide total growth for the period of 2020 to 2040. Because the population growth associated with Site 2 would be within the projected population growth for the City of Los Angeles, impacts related to population growth on Site 2 would be less than significant.

Combined Effects of Employment Changes on Site 1 and Site 2

As noted above, the Site 1 and Site 2 employment components of the Project are linked, in that the majority of employees that will be located on Site 1 after Project completion would be relocated from existing County facilities on Site 2. As shown in Table 4.11-3 (Estimated Permanent Employment Generation for the Project), the net increase in employment on Sites 1 and 2 as a result of the Project would be 907 employees by 2023. In 2012, SCAG estimates that the City of Los Angeles had a total employment of 1,696,400 persons. According to SCAG, citywide employment is expected to increase by 203,100 between 2012 and 2020, with additional growth of 472,700 employees between 2020 and 2040. The addition of new Project employees on Sites 1 and 2 would be within the SCAG employment growth forecast, representing approximately 0.19 percent of the Citywide total growth for the period of 2020 to 2040. Because the employment growth associated with Sites 1 and 2 together would be within the projected growth for the City of Los Angeles, impacts related to employment growth on Sites 1 and 2 would be less than significant.

Site 3

Construction

Construction of Site 3 would occur concurrently with construction on Site 1, and would result in increased employment opportunities in the construction field, which could potentially result in increased permanent population and demand for housing in the vicinity of the Project Sites. However, the employment patterns of construction workers in Southern California are such that it is not likely that they

⁸ City of Los Angeles, Department of City Planning, Wilshire Community Plan, September 19, 2001.

would relocate their households as a consequence of the construction employment associated with Site 3 for the same reasons as discussed above under Site 1. Therefore, housing and population impacts associated with the construction of Site 3 would be less than significant.

Operation

Employment

Proposed development on Site 3 would involve removal of the existing DPR building and construction of a new 80,837 square foot, senior affordable housing project containing 72 units, and a 13,200-square foot community recreation center, over a three-story underground parking structure. Current DPR employees on Site 3 will be relocated to offsite facilities prior to the commencement of construction on Site 3. Table 4.11-3 (Estimated Permanent Employment Generation for the Project) shows the estimated employment after implementation of Site 3.⁹

As shown in Table 4.11-3, Site 3 uses would generate approximately 46 employees, which would result in a net decrease of approximately 66 employees on the site. The location of employment in this area of the City that would occur under the Project would be consistent with the regional growth management policies discussed in detail in Section 4.9 (Land Use and Planning). These policies promote development activity in existing developed areas, especially ones near existing transit and transportation infrastructure, such as Site 3, which is served by served by Metro, DASH, and Foothill Transit bus lines. Site 3 is also served by the Metro Rail Red and Purple Lines from the Metro Rail Wilshire/Vermont Station located at the northeast corner of Wilshire Boulevard and Vermont Avenue. The entrance to the Wilshire/Vermont Station is located approximately one-third mile south of Site 3. The Wilshire Community Plan policies encourage housing along mixed-use boulevards near major transportation centers. More specifically, Policy 1-1.3 provides for adequate Multiple Family residential development, Policy 1-2.1, encourages higher density residential uses near major public transportation centers, and Policy 1-4.1 promotes greater individual choice in type, quality, price and location of housing. Furthermore, the Community Plan encourages the development of projects with mixed-use commercial and residential development. The goal is to provide housing in close proximity to jobs, to reduce vehicular trips, to reduce congestion, and air pollution, to assure adequate sites for housing, and to stimulate pedestrian-oriented areas to enhance the quality of life in the Plan area. Therefore, this projected employment growth would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels, and that would result in an adverse physical change in the environment that was not previously evaluated in the adopted Community Plan. Therefore, projected employment growth associated with the development of Site 3 would be less than significant.

Housing

Proposed development on Site 3 would involve the construction of 72 senior affordable housing units by 2020. SCAG projects the Citywide housing supply to increase by 115,900 units between 2012 and 2020, with additional growth of 248,900 units between 2020 and 2040. The additional 72 total units proposed to be developed on Site 3 would be within the SCAG's anticipated growth rate, representing approximately 0.03 percent of the citywide total growth for the period of 2020 to 2040. Therefore, the residential development on Site 3 would be within the projections for housing unit growth. The City of Los Angeles General Plan Framework and Wilshire Community Plan policies encourage housing along mixed-use boulevards near major transportation centers. More specifically, Policy 1-1.3 provides for

⁹ Employment generation on Site 3 is conservatively estimated using the rate for commercial uses.

adequate Multiple Family residential development, Policy 1-2.1, encourages higher density residential uses near major public transportation centers, and Policy 1-4.1 promotes greater individual choice in type, quality, price and location of housing. The goal is to provide housing in close proximity to jobs, to reduce vehicular trips, to reduce congestion, and air pollution, to assure adequate sites for housing, and to stimulate pedestrian-oriented areas to enhance the quality of life in the Plan area. As discussed previously, Site 3 development would create 46 new jobs. It is reasonable to expect that most of the new employees would be drawn from the local labor force readily available in the Community Plan Area and surrounding communities. Coupled with the limited increase in employment associated with the new uses on Site 3, any indirect housing demand associated with the Project on Site 3 would be limited. Therefore, impacts related to housing growth on Site 3 would be less than significant.

Population

As discussed previously, development of Site 3 involves the demolition of all on-site uses and the construction of a variety of uses including up to 72 senior affordable housing units. The City estimates that there are approximately 2.51 persons per dwelling unit in the Wilshire Community Plan Area.¹⁰ Based on this average household size, the Project would be expected to accommodate approximately 181 new residents on Site 3.

In 2012, SCAG estimates that the City of Los Angeles had a total population of 3,845,500 persons. According to SCAG, the City's population is expected to increase by 171,500 between 2012 and 2020, with additional growth of 592,400 persons between 2020 and 2040. The addition of 181 new residents on Site 3 would be within the SCAG population growth projection, representing approximately 0.03 percent of the Citywide total growth for the period of 2020 to 2040. Since the population growth associated with Site 3 would be within the projected growth for the City of Los Angeles, impacts related to population growth on Site 3 would be less than significant.

CUMULATIVE IMPACTS

Employment

The geographic scope of the cumulative employment analysis is the City of Los Angeles. The Project would result in a net increase in employment on the Project Sites of up to approximately 841 employees. Employment projections contained in the SCAG forecasts are based upon land uses designated in the General Plan. The related projects identified in Section 3.0, Project Description and Environmental Setting, of this EIR and other potential development projects that may occur throughout the City of Los Angeles are expected to be largely consistent with their respective General Plan land use designations. There are a total of 115 related projects within an approximate two-mile radius of the Project Sites, as identified by LADOT. The related projects consist of multifamily residential, schools, hotels, theaters, and commercial uses. The total increase in employment for the related projects is approximately 6,772. Combined with the Project, the net increase in employment is approximately 7,613, as shown in Table 4.11-4 (Related Projects Employment, Housing, and Population Generation) for a breakdown of the related projects and associated employment growth.

¹⁰ City of Los Angeles, Department of City Planning, Wilshire Community Plan, September 19, 2001.

Table 4.11-4
Related Projects Employment, Housing, and Population Generation

Land Use	Size	Emply. Gen. Factor ^a	Total Employ.	Total Housing	Pop. Gen. Factor ^b (per unit)	Total Pop.
Multi-Family Residential	24,645 units	--	--	24,645	2.51	61,859
School: University/College	500 students	0.2249 students per employee	112	--	--	--
School: High School	480 students	0.2249 students per employee	108	--	--	--
School: Elementary/Jr. High	3,516 students	0.2249 students per employee	791	--	--	--
Hotels	1,414 rooms (565,600 sf) ^c	1.13 per 1,000 sf	639	--	--	--
Theater	850 seats (6,800 sf) ^d	2.71 per 1,000 sf	18	--	--	--
Commercial	1,883,573 sf	2.71 per 1,000 sf	5,104	--	--	--
<i>Subtotal Cumulative Generation</i>			6,772	24,645	--	61,859
Project Total Net Generation			841	318	--	799
Total Cumulative Generation			7,613	24,963	--	62,658
<i>Note: sf = square feet</i> ^a Los Angeles Unified School District Justification Study Residential Development School Fee Justification Study, March 2017. ^b City of Los Angeles, Department of City Planning, Wilshire Community Plan, September 19, 2001. ^c Based on an estimate of 400 sf/room. ^d Based on an estimate of 8 sf/seat. Source: EcoTierra Consulting, 2017.						

According to SCAG the City is projected to increase employment opportunities by approximately 203,100 jobs from 2012 to 2020 (12.0 percent growth) and increase by approximately 269,600 jobs from 2020 to 2040 (14.2 percent growth). The Project, in combination with the related projects with institutional, retail, and commercial components, would be part of this anticipated growth projection for employment opportunities representing approximately 3.75 percent of the projected employment increase from 2012 to 2020 and approximately 2.82 percent of the projected employment increase from 2020 to 2040.

Furthermore, SCAG periodically updates its employment projections for the SCAG region, which allows these projections to be revised to reflect land use and planning changes that have occurred since previous updates. Accordingly, the effects of cumulative employment growth associated with the Project and other development within the City of Los Angeles would not contribute to a cumulatively considerable effect with respect to employment growth (i.e., would not result in employment opportunity at a rate not already anticipated at the regional and local level).

Housing

The geographic scope of the cumulative housing analysis is the City of Los Angeles. The Project would result in a total increase of 318 residences. Housing projections contained in the SCAG forecasts are based upon land uses designated in the General Plan. The related projects identified in Section 3.0, Project

Description and Environmental Setting, of this EIR and other potential development projects that may occur throughout the City of Los Angeles are expected to be largely consistent with their respective General Plan land use designations. There are a total of 115 related projects within an approximate two-mile radius of the Project Sites, as identified by LADOT. The related projects consist of multifamily residential, schools, hotels, theaters, and commercial uses. The total increase in housing for the related projects is approximately 24,645 units. Combined with the Project, the net increase in housing is approximately 24,963 units. Refer to Table 4.11-4 (Related Projects Employment, Housing, and Population Generation) for a breakdown of the related projects and associated housing growth.

According to projections extrapolated from SCAG, the City is projected to increase in housing by approximately 115,900 households from 2012 to 2020 (8.7 percent growth) and increase by approximately 248,900 households from 2020 to 2040 (17.2 percent growth). The Project, in combination with the related projects with residential components, would be part of this anticipated growth projection for households representing approximately 21.54 percent of the projected household increase from 2012 to 2020 and approximately 10.03 percent of the projected household increase from 2020 to 2040.

Furthermore, SCAG periodically updates its housing projections for the SCAG region, which allows these projections to be revised to reflect land use and planning changes that have occurred since previous updates. Accordingly, the effects of cumulative housing growth associated with the Project and other development within the City of Los Angeles would not contribute to a cumulatively considerable effect with respect to housing growth (i.e., would not result in housing growth at a rate not already anticipated at the regional and local level).

Population

The geographic scope of the cumulative population analysis is the City of Los Angeles. The Project would be expected to accommodate approximately 799 new residents on Sites 2 and 3. Population projections contained in the SCAG forecasts are based upon land uses designated in the General Plan. The related projects identified in Section 3.0, Project Description and Environmental Setting, of this EIR and other potential development projects that may occur throughout the City of Los Angeles are expected to be largely consistent with their respective General Plan land use designations. There are a total of 115 related projects within an approximate two-mile radius of the Project Sites, as identified by LADOT. The related projects consist of multifamily residential, schools, hotels, theaters, and commercial uses. The total increase in population for the related projects is approximately 61,859 persons. Combined with the Project, the net increase in population is approximately 62,658 persons. Refer to Table 4.11-4 (Related Projects Employment, Housing, and Population Generation) for a breakdown of the related projects and associated population growth.

According to projections extrapolated from SCAG, the City is projected to increase in population by approximately 171,500 from 2012 to 2020 (4.4 percent growth) and increase by approximately 592,400 households from 2020 to 2040 (14.7 percent growth). The Project, in combination with the related projects with institutional, retail, and commercial components, would be part of this anticipated growth projection for population representing approximately 36.54 percent of the projected increase from 2012 to 2020 and approximately 10.58 percent of the projected increase from 2020 to 2040.

Furthermore, SCAG periodically updates its population projections for the SCAG region, which allows these projections to be revised to reflect land use and planning changes that have occurred since previous updates. Accordingly, the effects of cumulative population growth associated with the Project and other development within the City of Los Angeles would not contribute to a cumulatively considerable effect

with respect to population growth (i.e., would not result in population growth at a rate not already anticipated at the regional and local level).

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are relevant to population, housing, and employment.

Regulatory Requirements

No significant impacts related to population, housing, and employment have been identified; and no regulatory compliance measures are required.

MITIGATION MEASURES

No significant impacts related to population, housing, and employment have been identified; and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts related to population, housing, and employment would be less than significant.

Cumulative impacts related to population, housing, and employment would be less than significant.

4.12 PUBLIC SERVICES

This section describes public services and evaluates the construction and operational impacts associated with the Project. Topics addressed include fire protection, police protection, school services, and library services.

The three Project Sites are all owned by the County and located in the City of Los Angeles. Development of Site 2 would be subject to the zoning and building requirements of the City of Los Angeles. However, Sites 1 and 3 are not subject to City of Los Angeles regulatory controls. All public services would be provided by the City of Los Angeles to all three Sites, and therefore, policies of the City's General Plan related to public services are addressed below.

FIRE PROTECTION AND EMERGENCY SERVICE

INTRODUCTION

This subsection describes the potential impacts of the Project on fire protection services in the Project area. Fire protection services would be provided by the City given the Project Sites' location in the City.¹ As such, this section uses information from the following resources: the Los Angeles Fire Department ("LAFD") website, a written correspondence from the Los Angeles County Fire Department, the Fire Code chapter of the Los Angeles Municipal Code ("LAMC"), the Los Angeles General Plan Framework, and the Los Angeles General Plan Safety Element.

Furthermore, the courts have held that significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate.

ENVIRONMENTAL SETTING

Existing Facilities and Services

Fire prevention, fire suppression, and life safety services in the City are provided by the LAFD. The LAFD has 3,246 uniformed personnel and 353 non-uniformed professional support staff.² Services of the LAFD include fire prevention, firefighting, emergency medical care, technical rescue, hazardous materials mitigation, disaster response, public education, and community service. As of March 2017, a professionally trained staff of 1,018 firefighters (including 270 paramedic-trained personnel) is on duty at all times at 106 neighborhood fire stations located across the LAFD's 471 square-mile jurisdiction.³

¹ Written correspondence from the Los Angeles County Fire Department, in response to the NOP (see Appendix 1-2 to this Draft EIR), confirmed that the Project Sites would be serviced by LAFD, rather than County Fire.

² Los Angeles Fire Department website: <http://lafd.org/about/lafd-overview>, accessed March 2017.

³ Ibid.

The Project Sites are located in LAFD's Central Bureau. The Central Bureau is further broken down into three battalions (Battalions 1, 2, 5, 7, 9, 11).

Site 1

Site 1 is served by Fire Station 6 located at 326 North Vigil Avenue, which is located approximately 1.3 miles northeast of Site 1.⁴ Fire Station 6 has a single-engine company and a paramedic rescue ambulance.⁵ Site 1 would be secondarily served by Fire Station 52 located at 4957 Melrose Avenue, which is approximately 2.3 miles northwest; and by Fire Station 20 located at 2144 W. Sunset Boulevard, which is approximately 2.6 miles.⁶ Fire Station 52 has an assessment engine and a paramedic rescue ambulance. Fire Station 20 has an assessment light force, a paramedic rescue ambulance, and a BLS rescue ambulance.⁷

Site 2

Site 2 is served by Fire Station 6 located at 326 North Vigil Avenue, which is located approximately 1.3 miles northeast of Site 2.⁸ Fire Station 6 has a single-engine company and a paramedic rescue ambulance.⁹ Site 2 would be secondarily served by Fire Station 52 located at 4957 Melrose Avenue, which is approximately 2.3 miles northwest; and by Fire Station 20 located at 2144 W. Sunset Boulevard, which is approximately 2.6 miles northeast.¹⁰ Fire Station 52 has an assessment engine and a paramedic rescue ambulance. Fire Station 20 has an assessment light force, a paramedic rescue ambulance, and a BLS rescue ambulance.¹¹

Site 3

Site 3 is served by Fire Station 6 located at 326 North Vigil Avenue, which is located approximately 1.1 miles northeast of Site 3.¹² Fire Station 6 has a single-engine company and a paramedic rescue ambulance.¹³ Site 3 would be secondarily served by Fire Station 52 located at 4957 Melrose Avenue, which is approximately 2.1 miles northwest; and by Fire Station 20 located at 2144 W. Sunset Boulevard,

⁴ Los Angeles Fire Department, Find Your Station website: <http://www.lafd.org/fire-stations/station-results?st=291&address=433%20South%20Vermont%20Avenue>, accessed March 2017.

⁵ City of Los Angeles Fire Department, Fire Station Directory, March 2014, updated November 29, 2016, <https://data.lacity.org/dataset/Fire-Station-Directory/6crp-krrn>, accessed March 2017.

⁶ Los Angeles Fire Department, Find Your Station website: <http://www.lafd.org/fire-stations/station-results?st=291&address=433%20South%20Vermont%20Avenue>, accessed March 2017.

⁷ Ibid.

⁸ Los Angeles Fire Department, Find Your Station website: <http://www.lafd.org/fire-stations/station-results?st=291&address=433%20South%20Vermont%20Avenue>, accessed March 2017.

⁹ City of Los Angeles Fire Department, Fire Station Directory, March 2014, updated November 29, 2016, <https://data.lacity.org/dataset/Fire-Station-Directory/6crp-krrn>, accessed March 2017.

¹⁰ Los Angeles Fire Department, Find Your Station website: <http://www.lafd.org/fire-stations/station-results?st=291&address=433%20South%20Vermont%20Avenue>, accessed March 2017.

¹¹ Ibid.

¹² Los Angeles Fire Department, Find Your Station website: <http://www.lafd.org/fire-stations/station-results?st=291&address=433%20South%20Vermont%20Avenue>, accessed March 2017.

¹³ City of Los Angeles Fire Department, Fire Station Directory, March 2014, updated November 29, 2016, <https://data.lacity.org/dataset/Fire-Station-Directory/6crp-krrn>, accessed March 2017.

which is approximately 2.5 miles northeast.¹⁴ Fire Station 52 has an assessment engine and a paramedic rescue ambulance. Fire Station 20 has an assessment light force, a paramedic rescue ambulance, and a BLS rescue ambulance.¹⁵

Response Distance and Times

The LAFD created FireStatLA in 2014 to track and evaluate data in order to improve response times citywide. FireStatLA and the online publication of LAFD response data formally launched on October 23, 2014. FireStatLA is aimed at increasing accountability, improving decision making and better allocating resources, with the primary goal of improving response times to better fulfill the mission of saving lives and protecting property.¹⁶ The data includes information on turnout time, travel time, and the number of incidences. Based on response metrics from January through February 2017, Fire Station No. 6 had an average response time for non-EMS calls of 3 minutes and 29 seconds and 3 minutes and 58 seconds for EMS calls.¹⁷ Under national standards set forth by the National Fire Protection Association, which have been adopted by LAFD, the response time goal is six minutes to nearly all medical emergencies.¹⁸ The travel time for Fire Station 6 is over two minutes faster than the national standard of six minutes.

Fire Flow

The City of Los Angeles Department of Water and Power (“LADWP”) currently provides water for fire flow to the Project Sites. Fire flows are supplied by the same water mains as the domestic water systems including the lines in local streets and major roadways. In general, fire flow requirements are closely related to land use as the quantity of water necessary for fire protection varies with the type of development, life hazard, type and level of occupancy, and degree of fire hazard (based on such factors as building age or type of construction). 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 all cases, a minimum residual water pressure of 20 pounds per square inch (“PSI”) is to remain in the water system while the required gpm of water is flowing.¹⁹

Requirements for fire hydrant spacing and type of hydrant also vary by type of land development. Pursuant to Fire Code Section 57.09.06 of the LAMC, hydrants in commercial locations, such as the Project Sites, must serve a net land area of 80,000 square feet. Additionally, there must be a distance of 300 feet between hydrants on roads and fire lanes and 2.5-inch by 4.0-inch double fire hydrants must be used.

¹⁴ Los Angeles Fire Department, Find Your Station website: <http://www.lafd.org/fire-stations/station-results?st=291&address=433%20South%20Vermont%20Avenue>, accessed March 2017.

¹⁵ Ibid.

¹⁶ Los Angeles, Fire Department, LAFD.org, website: <http://www.lafd.org/news/lafd-chief-terrazas-announces-launch-firestatla-and-online-publication-response-data>, accessed: March 2017.

¹⁷ City of Los Angeles Fire Department, Fire Stat LA, website: <http://www.lafd.org/fsla/stations-map>, accessed March 2017.

¹⁸ National Fire Protection Association, NFPA 1710: Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, website: <http://www.nfpa.org/codes-and-standards/document-information-pages?mode=code&code=1710&DocNum=1710>, accessed: March 2017.

¹⁹ Los Angeles Municipal Code, Chapter V, Fire Service Features, Division 9, Fire Protection Water Supplies, Section 57.507.3.2.

Site 1

All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. Site 1 is currently served by existing LADWP water mains via a 30-inch-diameter water main beneath S. Vermont Street.²⁰ Refer to Section 4.14 (Utilities and Service Systems – Water) for further discussion of water service infrastructure in the Project area.

Site 2

All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. Site 2 is currently served by existing LADWP water mains via a 24-inch water main beneath 6th Street.²¹ Refer to Section 4.14 (Utilities and Service Systems – Water) for further discussion of water service infrastructure in the Project area.

Site 3

All water mains and lines that are designed and sized according to LADWP standards take into account fire flow and pressure requirements. Site 3 is currently served by existing LADWP water mains via a 30-inch-diameter water main beneath S. Vermont Street.²² Refer to Section 4.14 (Utilities and Service Systems – Water) for further discussion of water service infrastructure in the Project area.

Regulatory Framework***Federal***

No federal regulations are applicable to the Project.

State**California Fire Code**

Title 24, Part 9 of the California Code of Regulations (“CCR”) is the California Fire Code and it sets forth regulations regarding building standards, fire protection and notification systems, fire protection devices such as fire extinguishers and smoke alarms, high-rise building standards, and fire suppression training. It contains regulations relating to construction, maintenance, and use of buildings. Topics addressed in the code also include emergency preparedness, fire service features, building services and systems, fire and smoke protection features, interior finishes, fire protection systems, means of egress, construction requirements, and use of hazardous and flammable materials. The 2016 California Fire Code incorporates the 2015 International Fire Code of the International Code Council with necessary California amendments.

Title 8 California Code of Regulations Sections 1270 and 6773

Title 8 Sections 1270 “Fire Prevention” and 6773 “Fire Protection and Fire Equipment,” of the CCR established minimum standards for fire suppression and emergency medical services. The standards

²⁰ Vermont Corridor Development Project Utility Infrastructure Technical Report prepared by KPFF Consulting Engineers, January 2016. The Infrastructure Technical Report is included as Appendix 4.16-1 to this Draft EIR.

²¹ Vermont Corridor Development Project Utility Infrastructure Technical Report prepared by KPFF Consulting Engineers, January 2016. The Infrastructure Technical Report is included as Appendix 4.16-1 to this Draft EIR.

²² Vermont Corridor Development Project Utility Infrastructure Technical Report prepared by KPFF Consulting Engineers, January 2016. The Infrastructure Technical Report is included as Appendix 4.16-1 to this Draft EIR.

include, but are not limited to, guidelines on the handling of highly combustible materials, fire hosing sizing requirements, restrictions on the use of compressed air, access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

California Health and Safety Code

Sections 13000 of the California Health and Safety Code define fire regulations, which include regulations for building standards (as set forth in the California Building Code), fire protection and notification systems, fire protection devices, and fire suppression training.

Local

County of Los Angeles

Los Angeles County Fire Code ("Title 32") and Building Code ("Title 26")

The County's Fire Code and Building Code establish standards for the construction, design, and distribution of fire suppression facilities to ensure new developments comply with criteria required fire flow, minimum distance to fire stations, public and private fire hydrants, and access provisions for firefighting units. However, because the Project Sites are located in the City, the County would seek to comply with City requirements to ensure adequate fire protection, given that the City fire protection services would be provided for the Project Sites.

City of Los Angeles

City of Los Angeles General Plan Framework Element

The General Plan Framework Element was adopted by the Council on December 11, 1996, and includes nine chapters; which establish framework elements for; land use, housing, urban form and neighborhood design, open space and conservation, economic development, transportation and infrastructure and public services. Chapter 9, Infrastructure and Public Services, of the City of Los Angeles General Plan Framework Element, establishes goals, objectives and policies for the provision of infrastructure and public services within the City. The Framework Element also outlines the necessary actions that the City must implement in order for the provision of public services and infrastructure to remain viable, sustainable and able to support the public services needs associated with the growth of the population and economy.

Specifically, Goal 9J of the General Plan Framework Element establishes the primary goal that "every neighborhood has the necessary level of fire protection services, EMS and infrastructure."

Chapter 9 further establishes four objectives for the provision of fire services within the City to ensure that Goal 9J is met. These objectives and the applicable policies for each objective are as follows:

- **Objective 9.16:** Monitor and forecast demand for existing and projected fire facilities and services.
 - **Policy 9.16.1:** Collect appropriate fire and population development statistics for the purpose of evaluating fire services needs based on existing and future conditions.
- **Objective 9.17:** Assure that all areas of the City have the highest level of fire protection and EMS, at the lowest possible cost, to meet existing and future demand.

- o **Policy 9.17.4:** Consider the Fire Department’s concerns and, where feasible adhere to them, regarding the quality of the area’s fire protection and EMS when developing general plan amendments and zone changes, or considering discretionary land use permits.
- **Objective 9.18:** Phase the development of new fire facilities with growth.
- **Objective 9.19:** Maintain the LAFD’s ability to assure public safety in emergency situations.

City of Los Angeles General Plan Safety Element

The City Council adopted the Safety Element of the General Plan on November 26, 1996. The Safety Element replaced three previously adopted elements of the General Plan: the 1975 Safety Element, the 1979 Fire Protection and Prevention Element, and 1974 Seismic Safety Element. The Safety Element, relative to the provision of fire services, outlines a history of fire rescue and the establishment of the Fire Department in the City of Los Angeles. Furthermore, the Safety Element establishes goals and policies regarding emergency response time and minimum standards for LAFD facilities. Specifically, Policy 2.1.6 (Standards/Fire) requires the LAFD to “continue to maintain, enforce and upgrade requirements, procedures and standards to facilitate more effective fire suppression.” Policy 2.1.6 is implemented through the components, requirements and standards of the LAMC Fire Code, which is discussed in detail below, such as peak load water requirements, and other standard code requirements including road widths, access, clearances around structures, and other standards or procedures relative to fire suppression. Additionally, Policy 2.1.6 forms the basis for the LAMC requirements regulating the minimum standards for the location and expansion of fire facilities based upon fire flow requirements, intensity and type of land use, life hazard, occupancy and degree of hazard so as to provide adequate fire and emergency medical response within the City.

Los Angeles Fire Code

The Los Angeles Fire Code is set forth in the LAMC. Chapter V, Public Safety and Protection, Article 7 of the LAMC establishes the Fire Protection and Prevention Code for the City of Los Angeles. Article 7 consists of 141 Divisions that govern and concern fire protection and prevention. According to Article 7, its purpose is to “prescribe laws for the safeguarding of life and property from fire explosion, panic, or other hazardous conditions which may arise in the use or occupancy of buildings, structures, or premises; and to prescribe such other laws as it may be the duty of the Fire Department to enforce.” Specifically, Division 9 establishes access, hydrant and fire flow requirements; and Division 118 outlines standards and requirements for new high-rise buildings and incorporates State of California Title 24 requirements. All construction in the City must comply with the applicable divisions within Chapter V, Article 7 of the LAMC.

Division 118 of the LAMC, Fire Code, is comprised of 12 sections that provide fire protection and suppression design guidelines for all new high-rise buildings in the City. These sections include the following requirements and design incorporations: fire control room requirements; building communication requirements; LAFD communication systems; elevator system requirements; fire protective signaling systems; emergency smoke control systems; standby and emergency power systems; stair shaft doors; pressurized shaft doors; automatic sprinkler systems and emergency helicopter landing facilities. As of September 24, 2014, the LAFD has revised the mandatory policy for high-rise buildings over 75 feet in height to have a required helipad. New buildings shall be required to have a separate elevator for firefighters with communication systems inside, cameras, additional wider stairwells, state of

the art smoke detectors, and alarm systems.²³ If the new building incorporates these measures, a helipad is not required.

ENVIRONMENTAL IMPACTS

Methodology

In accordance with standard LAFD methodology, adequate fire protection is determined based on the required fire flows for the land uses proposed, distance to the nearest fire station for the land uses proposed, and hydrant and access improvements. The following discussion addresses the Project's potential impacts on fire protection services based on fire flows, response distance, and LAFD review of hydrants and access.

Thresholds of Significance

The potential for the proposed Project to result in impacts associated with fire protection services is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. The applicable significance threshold is listed below.

Threshold 4.12-1: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?

An affirmative answer to this question would represent a significant impact.

Project Design Elements

The Project would implement a staging and traffic plan for each of the Project Sites that would provide for on-site security, and ensure adequate routing and access for vehicles and pedestrians during construction periods.

Impact Analysis

Threshold 4.12-1: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection?

Site 1

Construction

Construction on Site 1 would temporarily create the potential for accidental fires from such sources as mechanical equipment and flammable construction materials. In most cases, implementation of "good

²³ Los Angeles Fire Department Requirement No. 10, Emergency Helicopter Landing Facilities Requirements.

housekeeping” procedures by construction contractors and work crews would minimize these hazards. Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. These impacts are considered to be less than significant for the following reasons:

- Emergency access would be maintained to Site 1 during construction through marked emergency access points approved by the LAFD (see PDFs, below);
- Construction impacts are temporary in nature and do not cause lasting effects to impact LAFD fire protection services;
- Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding Site 1, flagmen would be used to facilitate the traffic flow until construction is complete (see PDFs, below); and
- The Developer would be required to prepare a Construction Staging and Traffic Management Plan (see PDFs, below) that would address traffic and access control during construction.

Accordingly, Site 1 construction would not affect firefighting and emergency services to the extent that new, expanded, consolidated, or relocated fire facilities would be needed in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, construction-related impacts on fire protection services would be less than significant.

Operation

The increase in employees and visitors to Site 1 during operation could increase demand for fire protection services. The following discussion considers the LAFD’s primary criteria for determining the development on Site 1’s impacts on fire protection services, including fire flows, response distance and time, and LAFD review of hydrants and access.

Fire Flows

In accordance with the Fire Code, the Site 1 development would be reviewed as an office use. The minimum fire flow requirement for Site 1 would be 6,000 gpm to 9,000 gpm flowing from four to six hydrants at the same time;²⁴ however, this amount is subject to a field inspection of the general area as well as the Site 1 development, and could increase. A minimum residual water pressure of 20 pounds PSI is to remain in the water system while the required gpm of water is flowing. The final fire flow required for the Site 1 development would be established by the County during its review of the Site 1 plot plan, prior to the issuance of building permits. The plot plan would be required to identify the minimum fire flow requirements and the location of fire hydrants. Approval of this plot plan and implementation of the applicable regulatory requirements would ensure the requisite fire flow for the Site 1. Therefore, impacts related to fire flow would be less than significant.

²⁴ Los Angeles Fire Department Fire Code, Section 57.09.06.

Response Distances and Times

As discussed in Section 4.14 (Transportation and Traffic), after implementation of mitigation measures, including a Transportation Demand Management (“TDM”) program, the Project would result in 10 significant peak hour impacts at seven intersections at Project buildout. Response times would not be greatly affected because emergency vehicles normally have a variety of options for avoiding traffic such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. As such, emergency response times would not be greatly affected. In addition, upon completion of Site 1 construction, the LAFD would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate LAFD response to the Site 1.

A project site should be within the one-mile fire response distance for an engine company and 1.5-mile response distance for a truck company. When response distances exceed these recommendations, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems.). Site 1 is located approximately 1.3 miles from Fire Station 6, which houses an engine company, but does not contain a truck company. The nearest truck company would be provided from Fire Station 20, which is approximately 2.6 miles from Site 1. Because the response times for non-EMS and EMS calls at Fire Station 6 and Fire Station 52 are within the required 6 minutes and the travel time is faster than the citywide average, Site 1 is adequately served by existing fire protection services.²⁵ Regardless, and in keeping with guidance that sprinklers be installed for sites located greater than 1.0 from an engine company and 1.5 miles from a truck company, Site 1 development would be equipped with a sprinkler system, safety features, and an emergency helistop as required by the County Fire Code. Conformance with applicable Fire Code and County building requirements, as identified in Regulatory Requirements RR-PS-1 through RR-PS-3, would provide adequate on-site fire protection. In addition, as required by the County Code, Site 1 would include an Emergency Helicopter Landing Facility (“EHLF”). The EHLF consists of a clear area on the roof of the building capable of accommodating a helicopter engaged in firefighting and/or emergency evacuation operations. Because Site 1 development would not have a significant impact on fire protection with regards to response distances and times, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, impacts would be less than significant.

Emergency Access

Emergency vehicle access to Site 1 would continue to be provided from major roadways adjacent to the Site 1 including Vermont Avenue and Shatto Place. Vehicular and pedestrian access to the new Site 1 office building would be provided from Vermont Avenue. Two driveways, located immediately north and south of the proposed new building, would lead to the parking levels. Ingress would be provided from the south driveway, and egress would be provided from the north driveway. Access to the new Shatto Place parking structure would be from two driveways on Shatto Place. Ingress and egress would be provided from both the north driveway and south driveways. In addition, Site 1 would include an emergency helistop on the roof of the proposed office building for emergency access. All circulation improvements, described in Section 4.14 (Transportation and Traffic) of this EIR, that are proposed for

²⁵ City of Los Angeles Fire Department, Fire Stat LA, website: <http://www.lafd.org/fsla/stations-map>, accessed March 2017.

Site 1 would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Site 1 would be maintained at all times.

While development on Site 1 would affect the level of service of roadways in the vicinity, the increases in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Site 1 proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls within the established response time. Because the Project would not have a significant impact on fire protection with regards to emergency access, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, impacts would be less than significant.

Site 2

Construction

The construction impacts for Site 2 would be less than significant for the same reasons described under Site 1, above. Accordingly, Site 2 construction would not affect firefighting and emergency services to the extent that new, expanded, consolidated, or relocated fire facilities would be needed in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, construction-related impacts on fire protection services would be less than significant.

Operation

Fire Flows

In accordance with the Fire Code, the Site 2 development would be reviewed as a mixed-use. The minimum fire flow requirement for Site 2 would be 4,000 gpm flowing from four hydrants at the same time;²⁶ however, this amount is subject to a field inspection of the general area as well as the Site 2 development, and could increase. The impacts related to fire flow for Site 2 would be less than significant for the reasons described under Site 1, above. Therefore, Site 2 impacts related to fire flow would be less than significant.

Response Distances and Times

The impacts related to response times for Site 2 would be less than significant for the reasons described under Site 1, above. Therefore, Site 2 Project impacts related to response times would be less than significant.

As described previously, a project site should be within the one-mile fire response distance for an engine company and 1.5-mile response distance for a truck company. Site 2 is located approximately 1.3 miles from Fire Station 6, which houses an engine company, however it does not contain a truck company. The nearest truck company would be provided from Fire Station 20, which is approximately 2.6 miles from Site 2. The turnout time for non-EMS and EMS calls at Fire Station 6 and Fire Station 52 are within the required 6 minutes and the travel time is faster than the citywide average, Site 2 is adequately served by

²⁶ Los Angeles Fire Department Fire Code, Section 57.09.06.

existing fire protection services.²⁷ Regardless, and in keeping with guidance that sprinklers be installed for sites located greater than 1.0 from an engine company and 1.5 miles from a truck company, the Site 2 Project would be equipped with a sprinkler system and the safety features as required by the Fire Code. Conformance with applicable Fire Code and LAFD building requirements, as identified in Regulatory Requirements RR-PS-1 through RR-PS-3, would provide adequate on-site fire protection. Therefore, Site 2 Project impacts related to response times would be less than significant.

Emergency Access

Emergency vehicle access to Site 2 would continue to be provided from major roadways adjacent to the Site 2 including Vermont Avenue and W. 6th Street. Vehicular and pedestrian access to the Site 2 residential building would be provided from W. 6th Street. All circulation improvements, described in Section 4.14 (Transportation and Traffic) of this EIR, that are proposed for Site 2 would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Site 2 would be maintained at all times.

While development on Site 2 is anticipated to affect the level of service of roadways in the Project vicinity, the increases in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Project's proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls within the established response time. Therefore, Site 2 Project impacts related to emergency access would be less than significant.

Because the Site 2 development would not have a significant impact on fire protection with regards to fire flow, response times, or emergency access, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, impacts would be less than significant.

Site 3

Construction

The construction impacts for Site 3 would be less than significant for the reasons described under Site 1, above. Accordingly, Project construction would not affect firefighting and emergency services to the extent that new, expanded, consolidated, or relocated fire facilities would be needed in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Therefore, construction-related impacts on fire protection services would be less than significant.

Operation

Fire Flows

In accordance with the Fire Code, the Site 3 development would be reviewed as a mixed-use. The minimum fire flow requirement for Site 3 would be 4,000 gpm flowing from four hydrants at the same

²⁷ City of Los Angeles Fire Department, Fire Stat LA, website: <http://www.lafd.org/fsla/stations-map>, accessed March 2017.

time;²⁸ however, this amount is subject to a field inspection of the general area as well as the Project, and could increase. The impacts related to fire flow for Site 3 would be less than significant for the reasons described under Site 1, above. Therefore, Site 3 Project impacts related to fire flow would be less than significant.

Response Distances and Times

The impacts related to response times for Site 3 would be less than significant for the reasons described under Site 1, above. Therefore, project impacts related to response times would be less than significant.

As described previously, a project site should be within the one-mile fire response distance for an engine company and 1.5-mile response distance for a truck company. When response distances exceed these recommendations, all structures must be equipped with automatic fire sprinkler systems and any other fire protection devices deemed necessary by the Fire Chief (e.g., fire signaling systems, fire extinguishers, smoke removal systems.). The Site 3 is located approximately 1.1 miles from Fire Station 6, which houses an engine company, however it does not contain a truck company. The nearest truck company would be provided from Fire Station 20, which is approximately 2.6 miles from Site 3. The turnout time for non-EMS and EMS calls at Fire Station 6 and Fire Station 52 are within the required 6 minutes and the travel time is faster than the citywide average, Site 3 is adequately served by existing fire protection services.²⁹ Regardless, and in keeping with guidance that sprinklers be installed for sites located greater than 1.0 from an engine company and 1.5 miles from a truck company, the Site 3 development would be equipped with a sprinkler system and the safety features listed under the PDFs, above. Conformance with applicable Fire Code and County building requirements, as identified in Regulatory Requirements RR-PS-1 through RR-PS-3, would provide adequate on-site fire protection. Therefore, impacts related to response times would be less than significant.

Emergency Access

Emergency vehicle access to Site 3 would continue to be provided from major roadways adjacent to Site 3 including Vermont Avenue. The entrance to the proposed community recreation center would be provided on Vermont Avenue. A separate entrance to the proposed residential units, and vehicular access to the below ground parking structure that would serve the residential and community recreation center uses would be also provided from Vermont Avenue. All circulation improvements, described in Section 4.14 (Transportation and Traffic) of this EIR, that are proposed for Site 3 would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to Site 3 would be maintained at all times.

While development on Site 3 is anticipated to affect the level of service of roadways in the vicinity, the increases in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Based on the Site 3 proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls within the established response time. Therefore, impacts related to emergency access would be less than significant.

²⁸ Los Angeles Fire Department Fire Code, Section 57.09.06.

²⁹ City of Los Angeles Fire Department, Fire Stat LA, website: <http://www.lafd.org/fsla/stations-map>, accessed March 2017.

Because the Site 3 development would not have a significant impact on fire protection with regards to fire flow, response times, or emergency access, it would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Therefore, impacts would be less than significant.

CUMULATIVE IMPACTS

The geographic scope of the cumulative fire protection analysis encompasses the service area for the LAFD in general, and Fire Station 6 in particular. The Project, in combination with the construction and operation of the 115 related projects, would result in additional residents and commercial land uses within these service areas. It is anticipated that the additional population and commercial activity would increase the demand for fire protection in the service areas for LAFD Fire Station 6. Specifically, there would be increased demand for additional LAFD staffing, equipment, and facilities over time.

The LAFD determines adequate fire protection based on fire flows, response distance, and LAFD review of hydrants and access. As discussed previously, any related project that exceeds the maximum applicable response distance standards of LAMC Fire Code Section 57.507.3.3 or are considered high-rise structures exceeding 75 feet in height under Fire Code Section 57.4705, would be required to install automatic fire sprinkler systems. In addition, each of the related projects would be subject to LAFD review of site plans, hydrant locations, and fire flow requirements.

In addition to the capabilities of the local fire stations serving the Project Sites and surrounding areas, including the related projects, growth in residential population and commercial development throughout the City could increase demand for LAFD staffing, equipment, and facilities. These demands are met by LAFD within the constraints of available resources, as well as through the allocation of resources between LAFD and other City departments, which is accomplished through the City's annual programming and budgeting processes. Through implementation of the existing management and regulatory requirements, the cumulative demand for fire protection is identified and addressed to the satisfaction of the City's elected leadership. Therefore, the Project, in combination with demand for fire protection services citywide, would not result in cumulatively considerable effects and would not require the addition of a new fire station or expansion, or consolidation or relocation of an existing facility to maintain service. Further, the Project impact analysis determined the impact on fire protection would be less than significant; thus, Project impacts would not be cumulatively considerable. Based on the above analysis, cumulative impacts related to fire protection would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

The following Project Design Features ("PDFs") would be incorporated into the Project via entitlements and would work to address Project impacts. These are not required mitigations but are inherent Project components.

PDF PS-1: The Developer shall implement a Construction Staging and Traffic Management Plan ("CSTMP") addressing construction activity on each of the three sites that would outline provisions for on-site security during construction, which could include, but are not limited to, temporary security fencing (e.g., chain-link fencing), low-level security lighting, and locked-entry (e.g., padlock gates or guard-restricted access) to limit access by the general public, and providing security personnel to man and patrol the site outside of

active construction hours. Additionally, the Construction Staging and Traffic Management Plan shall ensure that routine and emergency access to and around each Site for vehicles and pedestrians is maintained at all times during construction through well-marked entrances.

Regulatory Requirements

RR PS-1: The Project shall comply with all State and local building codes relative to fire protection, safety, and suppression. Specifically, the Project design shall incorporate the standards and requirements as set forth by California Code of Regulations (“CCR”) Title 24 standards, the City of Los Angeles Safety Element, and the County Fire Code (Sites 1 and 3) and LAMC Fire Code (Site 2).

RR PS-2: The Project Developer shall submit a plot plan for approval of access and hydrants by the County Fire Department for Sites 1 and 3, or LAFD for Site 2, prior to the issuance of building permits. The County Fire Department shall coordinate its findings with respect to Sites 1 and 3 with LAFD. The plot plan shall include fire prevention and access features to the satisfaction of the County or LAFD, including the following standard requirements:

- o Access for Fire Department apparatus and personnel to and into all structures shall be required.
- o Any required Fire Annunciator panel or Fire Control Room shall be located as required by the Fire Code.
- o Any required fire hydrants to be installed shall be fully operational and accepted by the LAFD prior to any building occupation.
- o All water systems and roadways are to be improved to the satisfaction of the LAFD prior to any building occupation.
- o All structures shall be fully sprinklered pursuant to the Fire Code.
- o No building or portion of a building shall be constructed more than 150 feet from the edge of a designated fire lane.
- o No building or portion of a building shall be constructed more than 300 feet from an approved fire hydrant. Distance shall be computed along the path of travel.

RR PS-3: The Project on Sites 1 and 2 would be built in compliance with the high-rise provisions in the Fire Code and Building Code pertaining to fire-resistant building materials and smoke control. The following safety measures would be implemented.

- o Building Design: Fire resistant doors and materials, as well as walkways, wider stairwells and elevator systems (including emergency and fire control elevators with communication systems inside) that meet code requirements.
- o Fire Safety Features: Installation of automatic sprinkler systems, smoke detectors, and appropriate signage and internal exit routes to facilitate a building evacuation; as well as a fire alarm system, building emergency communication system, and a state of the art smoke control system.
- o Emergency Safety Provisions: Implementation of an Emergency Plan in accordance with the Fire Code. The Emergency Plan would establish dedicated personnel and emergency procedures to assist the LAFD during an emergency incident; establish a drill procedure to prepare for emergency incidents; establish on-site Emergency Assistance Center; and establish procedures to be followed during an emergency incident. There would also be provision of on-site emergency equipment and

emergency training for personnel to reduce the impacts on the need for emergency medical services.

- o LAFD Access: Access for LAFD apparatus and personnel to each Site would be in accordance with the LAFD requirements.

MITIGATION MEASURES

No significant impacts related to fire services have been identified; therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction and operational impacts related to fire protection and emergency services would be less than significant.

POLICE PROTECTION SERVICES

INTRODUCTION

This subsection evaluates the potential impacts of the Project on police protection services and facilities in the Project area. Police protection services will be provided by the City given the Project Sites' location in the City. As such, this section uses information from the following resources: the Los Angeles Police Department ("LAPD") website, Los Angeles General Plan, and written correspondence with Officer Christopher Gibson, Community Relationship Division, LAPD (Appendix 4.12-1 to the Draft EIR).

Furthermore, the courts have held that significant impacts under CEQA consist of adverse changes in any of the physical conditions within the area of a project, and potential impacts on public safety services are not an environmental impact that CEQA requires a project applicant to mitigate.

ENVIRONMENTAL SETTING

Existing Police Service

Police protection services in the City are provided by the LAPD. The LAPD is divided into four bureaus: Central Bureau, South Bureau, Valley Bureau, and West Bureau. Each of the bureaus encompasses several community police stations.

Existing Police Stations

The Project Sites are located within the LAPD West Bureau. The Project Sites would be served by the Olympic Community Police Station located at 1130 South Vermont, approximately 0.5 mile south of the Project Sites, and in Reporting District 2029 within the Olympic area.³⁰ The Olympic Community Police Station covers 6.2 square miles. For the purposes of the LAPD, the Olympic Community boundaries are defined as: Melrose Avenue and Beverly Boulevard to the north, Santa Monica Freeway to the south,

³⁰ Correspondence from Officer Christopher Gibson, Community Relationship Division, Los Angeles Police Department, dated February 15, 2017.

Hoover Street and Normandie Avenue to the east, and Arlington Avenue, Crenshaw Boulevard, Plymouth Boulevard, and Gower Street to the west. The station currently has 235 sworn officers and 14 civilian staff, representing an officer to population ratio of one officer per approximately 851 residents.³¹ Additionally, there are special service teams available in the LAPD to service the Olympic Area. The City has not set an official standard with respect to officer to population ratio.

Response Times

Response time represents the period of time elapsed from the initiation of an assistance call to the appearance of a police unit at the scene. Calls for police assistance are prioritized based on the nature of the call. Unlike fire protection services (as discussed in Section 4.12 [Public Services – Fire Protection] above), police units are most often in a mobile state; therefore, the distance between a police station and a project site is of little relevance. Instead, the number of deployed police officers is more directly related to the response time. The average response time to emergency calls for service for the Olympic Community Station in 2016 was approximately 3.1 minutes.³² The average response time to non-emergency calls for service for the Olympic Community Station in 2016 was approximately 21.4 minutes.³³

LAPD Review

The LAPD recommends that developers of large-scale projects contact them for advice with regard to crime prevention features that may be incorporated into the project design. With incorporation of standard project design features, the Project would comply with LAPD's "Design Out Crime" program that encourages project design that incorporates strategies from Crime Prevention through Environmental Design ("CPTED"). CPTED is a method of reducing the amount of police officers required by addressing public safety through a series of strategies and design recommendations. Design recommendations use location of activities within a project site to enhance safety, including, the use of designated walkways, security lighting, entryways, and other security features (locks/gates/signs). These design recommendations reduce crime by providing a natural surveillance and discouraging criminal activity.³⁴

Regulatory Framework

Federal

No federal regulations apply to the Project.

State

California Penal Code

All law enforcement agencies in the State of California are organized and operated in accordance with the applicable provisions of the California Penal Code. This code sets forth the authority, rules of conduct,

³¹ *Ibid.*

³² *Ibid.*

³³ *Ibid.*

³⁴ Los Angeles Police Department, website: http://www.lapdonline.org/crime_prevention/content_basic_view/8852#1, accessed: March 2017.

and training for peace officers. Under State law, all sworn municipal and County's officers are State peace officers.

Local

County of Los Angeles

Because the Project Sites are located in the City, the County would seek to comply with City requirements to ensure there is adequate police protection, given that City services would provide police protection services for the Project Sites.

City of Los Angeles

City Charter

Under the City Charter, the Board of Police Commissioners (Police Commission) oversees the LAPD. The Police Commission sets overall policy while the Chief of Police manages the daily operations of the LAPD and implements the Commission's policies.

Los Angeles General Plan Framework Element

The General Plan Framework Element, Chapter 9 Infrastructure and Public Services, contains policies and objectives, which address the provision of police services within the City. These policies and objectives ensure that there is adequate service infrastructure as population growth occurs, by monitoring services, supporting the provision of additional police, and pursuing funding for additional officers. The applicable goals, objectives and policies in the Framework regarding Infrastructure and Public Services are:

- **Goal 9.1:** Every neighborhood in the City has the necessary police services, facilities, equipment, and manpower required to provide for the public safety needs of that neighborhood.
 - **Objective 9.13:** Monitor and forecast demand for existing and projected police service and facilities.
 - **Policy 9.13.1:** Monitor and report police statistics and population projections for the purpose of evaluating existing and future police needs.
 - **Objective 9.14:** Protect the public and provide adequate police services, facilities, equipment and personnel to meet existing and future needs.
 - **Policy 9.14.7:** Participate fully in the planning of activities that assist in defensible space design and utilize the most current law enforcement technology affecting physical development
 - **Objective 9.15:** Provide for adequate public safety in emergency situations.

In addition, the Safety Element of the Los Angeles General Plan addresses natural hazard issues related to LAPD resources (e.g., traffic safety during or following a disaster) and recognizes that most jurisdictions rely on emergency personnel (police, fire, gas, and water) to respond to emergencies. The Safety Element objectives are broadly stated to reflect the comprehensive scope of the Emergency Operations Organization, including the LAPD. The Safety Element's policies outline administrative considerations that are addressed by Emergency Operations Organization procedures, including:

- **Objective 2.1:** Develop and implement comprehensive emergency response plans and programs that are integrated with each other and with the City’s comprehensive hazard mitigation and recovery plans and programs.
- **Objective 3.1:** Develop and implement comprehensive disaster recovery plans which are integrated with each other and with the City’s comprehensive hazard mitigation and emergency response plans and programs.

LAPD Guidelines and Plan Review

Prior to the issuance of a certificate of occupancy for each construction phase and ongoing during operations, projects subject to review by the City are required to develop an Emergency Procedures Plan to address emergency concerns and practices. The plan is subject to review by LAPD. Additionally, projects are to comply with the design guidelines outlined in the LAPD *Design Out Crime Guidelines*, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. Specifically, projects are recommended to:

- Provide on-site security personnel whose duties shall include but not be limited to the following:
 - Monitoring entrances and exits;
 - Managing and monitoring fire/life/safety systems;
 - Controlling and monitoring activities in parking facilities;
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points, loading docks, public plazas and parking areas;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries, pedestrian walkways, and public open spaces to provide pedestrian orientation and to clearly identify a secure route between parking areas and points of entry into buildings;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from buildings, open spaces around buildings, and pedestrian walkways to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed “dead zones.”

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Project with respect to police protection are determined based on a project’s need for a new or physically altered police station. While current response times, crime statistics, and the LOS at surrounding intersections are relevant background information, these data are not used to determine police protection impacts under CEQA. The adequacy of police protection is evaluated using the existing number of police officers in the project’s police service area, the number of persons currently served in the area, the adequacy of the existing officer-to-population ratio in the area, and the number of persons that the project would introduce to the area. Using these statistics, it is possible to estimate the future officer-to-population ratio in the area at project buildout and the number of officers that would be necessary to maintain the existing level of police protection (or, if the existing

level is not considered adequate, the number required to obtain an adequate level of police protection). The need for additional officers can be reduced through on-site security design features. The increase in officers is then determined to be either accommodated within the existing police station(s) in the area, or may require the construction of a new or expansion of an existing police station, which in turn would cause environmental impacts.

Thresholds of Significance

The potential for the proposed Project to result in impacts associated with police protection services is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. The applicable significance threshold is listed below.

Threshold 4.12-2: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection?

An affirmative answer to this question would represent a significant impact.

Project Design Elements

The Project would implement a staging and traffic plan for each of the Project Sites that would provide for on-site security, and ensure adequate routing and access for vehicles and pedestrians during construction periods. The Project would implement the Project Design Features (“PDF”) representing state-of-the-art design principles that are intended to enhance the security of project buildings through design, and minimize the potential for impacts during operation. The PDFs would be incorporated into the Project and are considered a part of the Project for purposes of the impact analysis.

Impact Analysis

Threshold 4.12-2: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection?

Site 1

Construction

Construction sites can be sources of attracting nuisances, creating hazards, and inviting theft and vandalism. When not properly secured, construction sites can become a distraction for local law enforcement from more pressing matters. Consequently, developers typically take precautions to prevent trespassing through construction sites. Most commonly, temporary fencing is installed around the construction site, which would be part of the Project as a design feature (see PDF PS-1, above). Deployment of on-site security guards is also an effective strategy in preventing crime during a project’s construction, and providing security personnel to man and patrol the site outside of active construction hours for the duration of the construction period would be part of the Project as a design feature (see PDF PS-1). While there is the potential for the construction on Site 1 to increase the demand for police

protection services, Site 1 would provide security fencing and personnel to the Site during construction. When such precautions are taken, there is generally less need for local law enforcement service at the construction site, thereby reducing the demand for LAPD services.³⁵ Accordingly, Site 1 construction would not affect police services to the extent that new, expanded, consolidated, or relocated police facilities would be needed in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. Therefore, construction-related impacts on police protection services would be less than significant.

Traffic generated by construction workers and trucks would occur primarily during off-peak hours. Emergency access would be maintained to the Site 1 during construction through marked emergency access points approved by the LAPD, and the Project would implement a Construction Staging and Traffic Management Plan (CSTMP, see PDF-PS-1, above). Therefore, as traffic impacts (as they relate to response times) would not result in the need for expanded, consolidated, or relocated police facilities during construction of Site 1 Project impacts would be less than significant.

Operation

Although there is no direct proportional relationship between increases in land use activity and increases in demand for police protection services, the number of calls for police response to residential, commercial and vehicle burglaries, damage to vehicles, traffic-related incidents, and crimes against persons could increase with the increase in on-site activity and increased traffic on adjacent streets and arterials. Such calls are typical of problems experienced in nearby neighborhoods and do not represent unique law enforcement issues specific to Site 1. Design features that deter crime, including adequate and strategically positioned functional lighting to enhance public safety, minimizing visually obstructed and infrequently accessed “dead zones,” and limiting public access to properly patrolled public areas, reduce the demand for police services. The design of Site 1 would also include crime prevention features, such as nighttime security lighting, secured parking facilities, and on-site security cameras incorporated as a project design feature, as described in PDF-PS-2, below. Further, as a County building, on-site security personnel are provided at all times the building is in operation, and would be responsible for controlling access and responding to on-site incidents as required, with the LAPD serving only as backup. Therefore, with implementation of these design features and the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Site 1 development would result in a less-than-significant operational impact on police protection services.

Officer-to-Population Ratio

Implementation of the Project would result in an increase of employees and site visitors within Site 1, thereby generating a potential increase in the number of service calls from Site 1. As discussed in Section 4.11 (Population, Housing and Employment), the Site 1 and Site 2 employment components of the Project are linked, in that the majority of employees that will be located on Site 1 after Project completion would be relocated from existing County facilities on Site 2. As shown in Table 4.11-3 (Estimated Permanent Employment Generation for the Project), the net increase in employment on Sites 1 and 2 as a result of the Project would be 907 employees by 2023. Since the current officer to population ratio within the Olympic Community Station service area is one officer per approximately 851 residents (200,000 division

³⁵ Los Angeles Police Department, website: http://www.lapdonline.org/crime_prevention/content_basic_view/8852#1, accessed: October 2017.

population ÷ 235 officers = approximately 851),³⁶ the addition of up to 907 employees could create demand for one additional officer.

However, the County would provide on-site security personnel for the County office building on Site 1, which would reduce the need for police services. In addition, the development on Site 1 would incorporate crime prevention measures into project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety. The measures are incorporated into the Project as Project Design Features, listed below. Visually obstructed and infrequently accessed “dead zones” would be limited and, where possible, security controlled to limit public access. The buildings and layout design of Site 1 would also include crime prevention features, such as nighttime security lighting and a secure parking structure. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In sum, any minimal effect which the development of Site 1 would have on officer staffing levels would not cause service levels to decline within the Olympic Community station area or require the need for provision of new or physically altered police facilities, and impacts would be less than significant.

Using the existing officer to population ratio for the Olympic Community Station, the development on Site 1 could warrant the addition of one new officer to maintain the existing office to population ratio in the Olympic Community Police Station service area, if the LAPD chooses to pursue additional staffing at this station. Since the Olympic Community Police Station currently accommodates approximately 250 personnel, it is not anticipated that this level of additional staffing would require the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. Therefore, impacts would be less than significant.

Response Times

As discussed in Section 4.14 (Transportation and Traffic), after implementation of mitigation measures, including a TDM program, the Project would result in up to 10 peak hour impacts at seven intersections, depending upon the phase of Project completion. As previously discussed, police units are most often in a mobile state; therefore, it is unknown precisely which route the LAPD would use to access Site 1 when responding to an emergency call. Response times would not be substantially affected, given that there would be significant traffic impacts at limited locations and given the availability of alternative routes within the street pattern in the area surrounding Site 1. In addition, the police have a variety of options to avoid traffic, such as using sirens to clear a path of travel for driving in the lanes of opposing traffic. Furthermore, upon completion of construction on Site 1, the Olympic Area Commanding Officer would be provided with a diagram of each portion of the Site 1 property, and this diagram would include access routes and any additional information that may facilitate police response to Site 1. Therefore, with the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Site 1 development impacts related to response times would be less than significant.

Emergency Access

Emergency access to Site 1 would be provided by the existing street system, as currently occurs. Site 1 would be designed and constructed in accordance with County requirements to ensure proper emergency access. The Project would result in up to 10 peak hour impacts at seven intersections, depending upon

³⁶ Written Correspondence from Officer Christopher Gibson, Community Relations Division, Los Angeles Police Department, dated February 15, 2017. See Appendix 4.12-1 to this Draft EIR.

the phase of Project completion. Increases in traffic would not greatly affect police vehicles for the reasons discussed under Response Times, above. Therefore, as traffic impacts would not result in the need for expanded, consolidated, or relocated police facilities during operation of Site 1, impacts would be less than significant.

Site 2

Construction

Construction sites can be sources of attracting nuisances, providing hazards, and inviting theft and vandalism. The construction impacts for Site 2 would be less than significant for the reasons described under Site 1, above. Therefore, construction impacts as they relate to increased demand for police services during construction of the Project would be less than significant.

Traffic generated by construction workers and trucks would occur primarily during off-peak hours. Emergency access would be maintained to Site 2 during construction through marked emergency access points approved by the LAPD, and the Project would implement a CSTMP. Therefore, as traffic impacts (as they relate to response times) would not result in the need for expanded, consolidated, or relocated police facilities during construction on Site 2 impacts would be less than significant.

Operation

The operational impacts for Site 2 would be less than significant for the reasons described under Site 1, above. Therefore, with implementation of these design features and the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Site 2 development would result in a less-than-significant operational impact on police protection services.

Officer-to-Population Ratio

Implementation of the development on Site 2 would result in an increase of residents and site visitors within the Site, thereby potentially generating a potential increase in the number of service calls from Site 2. Site 2 development involves the construction of a variety of uses including 246 residential units. As discussed in Section 4.11 (Population, Housing, and Employment) of this EIR, the Project would be expected to generate 618 new residents and operation of the Project would generate approximately 30 new employees on Site 2. Since the current officer to population ratio within the Olympic Community Station service area is one officer per approximately 851 residents, it is assumed that the addition of 618 new residents on Site 2 could create the demand for additional officers. With the addition of Site 2's residential population, the resident/officer ratio in the West Bureau would be diminished. Specifically, the Project would increase the existing service population from 200,000 persons to 200,618 (200,000 + 618) persons. The officer-per-resident ratio would increase in the current level of one officer per approximately 851 residents up to one officer per approximately 854 residents ($200,643 \div 235 \text{ officers} = 854$). This is only a slight increase and therefore, the development on Site 2 would not represent a significant change in the officer-per-resident ratio of the service area.

In addition, the development on Site 2 would incorporate crime prevention measures into project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety. The measures are incorporated into the Project as Project Design Features, listed below. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The buildings and layout design of Site 2 would also include crime prevention features, such as nighttime security lighting

and a secure parking structure. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In sum, any minimal effect which the development of Site 2 would have on officer staffing levels would not cause service levels to decline within the Olympic Community station area, or require the need for provision of new or physically altered police facilities and impacts would be less than significant.

Using the existing officer to population ratio for the Olympic Community Station, the development on Site 2 could warrant the need for one additional officer to maintain the existing officer to population ratio in the Olympic Community Police Station service area, if the LAPD chooses to pursue additional staffing at this station. Since the Olympic Community Police Station currently accommodates approximately 250 personnel, there would be no need for the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. Therefore, impacts would be less than significant.

Additionally, on Site 2, the LAPD would review the Project design and provide guidance on design features that would minimize the opportunity for crime, which would minimize demand police protection services. Overall, no reduction in service levels, or provision of a new or expanded police station is anticipated to be needed as a result of the development on Site 2. The Project's impact would be less than significant.

Response Times

The impacts related to response times for Site 2 would be less than significant for the reasons described under Site 1, above. Furthermore, upon completion of development on Site 2, the Olympic Area Commanding Officer would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate police response to Site 2. Therefore, with the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Project impacts related to response times would be less than significant.

Emergency Access

Emergency access to Site 2 would be provided by the existing street system, as currently occurs. Site 2 would be designed and constructed in accordance with LAMC requirements to ensure continued proper emergency access. The Project would result in up to 10 peak hour impacts at seven intersections, depending upon the phase of Project completion. Increases in traffic would not greatly affect police vehicles for the reasons discussed under Response Times, above. Therefore, as traffic impacts would not result in the need for expanded, consolidated, or relocated police facilities during operation of the Site 2 development impacts would be less than significant.

Site 3

Construction

Construction sites can be sources of attracting nuisances, providing hazards, and inviting theft and vandalism. The construction impacts for Site 3 would be less than significant for the reasons described under Site 1, above. Therefore, construction impacts as they relate to increased demand for police services during construction of the Project would be less than significant.

Traffic generated by construction workers and trucks would occur primarily during off-peak hours. Emergency access would be maintained to Site 3 during construction through marked emergency access

points approved by the LAPD, and the Project would implement a CSTMP. Therefore, as traffic impacts (as they relate to response times) would not result in the need for expanded, consolidated, or relocated police facilities during construction on Site 3 impacts would be less than significant.

Operation

The operational impacts for Site 3 would be less than significant for the reasons described under Site 1, above. Therefore, with implementation of these design features and the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and the Site 3 development would result in a less-than-significant operational impact on police protection services.

Officer-to-Population Ratio

Implementation of the development on Site 3 would result in an increase of residents, site visitors, and employees within the Site, thereby generating a potential increase in the number of service calls from Site 3. With the addition of Site 3's residential population, the resident/officer ratio in the West Bureau would be reduced. The Project involves the construction of a variety of uses including 72 residential units. As discussed in Section 4.11 (Population, Housing, and Employment) of this EIR, the Project would be expected to generate 181 new residents and operation of the Project would generate approximately 46 new employees, which would result in a net decrease of approximately 66 employees on Site 3. Since the current officer to population ratio within the Olympic Community Station service area is one officer per approximately 851 residents, it is assumed that the addition of 181 new residents could create the demand for additional officers. Specifically, the Project would increase the existing service population from 200,000 persons to 200,181 ($200,000 + 181 \text{ persons} = 200,181 \text{ persons}$). The officer-per-resident ratio would increase in the current level of one officer per approximately 851 residents up to one officer per approximately 852 residents ($200,181 \div 235 \text{ officers} = 851.8$). This is only a slight increase and therefore, the development on Site 3 would not represent a significant change in the officer-per-resident ratio of the service area.

In addition, the development on Site 3 would incorporate crime prevention measures into project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional and thematic lighting to enhance public safety. The measures are incorporated into the Project as Project Design Features, listed below. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The buildings and layout design of Site 3 would also include crime prevention features, such as nighttime security lighting and a secure parking structure. These preventative and proactive security measures would decrease the amount of service calls the LAPD would receive. In sum, any minimal effect which the development of Site 3 would have on officer staffing levels would not cause service levels to decline within the Olympic Community station area, or require the need for provision of new or physically altered police facilities and impacts would be less than significant.

Using the existing officer to population ratio for the Olympic Community Station, the development on Site 3 could warrant the need for one additional officer to maintain the existing officer to population ratio in the Olympic Community Police Station service area, if the LAPD chooses to pursue additional staffing at this station. Since the Olympic Community Police Station currently accommodates approximately 250 personnel, there would be no need for the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. Therefore, impacts would be less than significant.

Response Times

The impacts related to response times for Site 3 would be less than significant for the reasons described under Site 1, above. Furthermore, upon completion of development on Site 3, the Olympic Area Commanding Officer would be provided with a diagram of each portion of the property, and this diagram would include access routes and any additional information that may facilitate police response to Site 3. Therefore, with the current adequate level of LAPD service, there would be no need for provision of new or physically altered police facilities and Project impacts related to response times would be less than significant.

Emergency Access

Emergency access to Site 3 would be provided by the existing street system, as currently occurs. Site 3 would be designed and constructed in accordance with County requirements to ensure continued proper emergency access. The Project would result in up to 10 peak hour impacts at seven intersections, depending upon the phase of Project completion. Increases in traffic would not greatly affect police vehicles for the reasons discussed under Response Times, above. Therefore, as traffic impacts would not result in the need for expanded, consolidated, or relocated police facilities during operation of the Site 3 development impacts would be less than significant.

CUMULATIVE IMPACTS

The geographic scope of the cumulative police protection analysis encompasses the service area for the LAPD in general, and the Olympic Community Police Station service area specifically. The Project, in combination with the construction and operation of the related projects located within the service area of the Olympic Community Station, would add residents and commercial land uses to the service area. It is anticipated that the additional population and commercial land uses would increase the demand for police protection services in the Olympic Community Police Station service area. Specifically, there would be increased demand for additional LAPD staffing, equipment, and facilities over time.

The LAPD determines the adequacy of police protection using the existing number of police officers in the Project's police service area, the number of persons currently served in the area, the adequacy of the existing officer-to-population ratio in the area, and the number of persons that the Project would introduce to the area, within the context of crime rates, the types of crime, and the geographic distribution of crimes within a given police station service area. LAPD works with developers of projects to minimize demand for police services through review and coordination of project design, provision of adequate light, and on-site security measures, as warranted. The related projects are expected to have access to the expertise of the LAPD to benefit their design and operational planning, and each of the related projects would be subject to LAPD review of site plans, and security measures. Through this process, cumulative demand for police services within the Olympic Station area would be managed, and the Project, in combination with related projects, would not result in a cumulatively considerable impact.

In addition to the capabilities of the Olympic Station to serve the Project Sites and surrounding areas, including the related projects, growth in residential population and development throughout the City could increase demand for LAPD staffing, equipment, and facilities Citywide. These demands are met by LAPD through the allocation of available resources by LAPD management to meet varying needs throughout the LAPD's Bureaus and Community Police Stations, as well as through the allocation of City resources between LAPD and other City departments, which is accomplished through the City's annual programming and budgeting processes. Through implementation of these existing management and

regulatory processes, the cumulative demand for police protection is identified and addressed to the satisfaction of the City's elected leadership and, thus, the Project, in combination with growth in demand for police protection services would not require the addition of a new police station or expansion, or consolidation or relocation of an existing facility to maintain service. Further, the Project impact analysis determined the impact on police protection would be less than significant not result in the need for expanded, consolidated, or relocated police facilities; thus, Project impacts would not be cumulatively considerable. Based on the above analysis, cumulative impacts related to police protection would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

The following PDFs will be incorporated into the Project and will work to address project impacts. These are not required mitigation but are inherent project components:

PDF PS-2: The Project shall incorporate the design guidelines outlined in the LAPD Design Out Crime Guidelines, which recommend using natural surveillance to maximize visibility, natural access control that restricts or encourages appropriate site and building access, and territorial reinforcement to define ownership and separate public and private space. Specifically, the Project would:

- Provide on-site security personnel whose duties shall include but not be limited to the following:
 - Monitoring entrances and exits;
 - Managing and monitoring fire/life/safety systems; and
 - Controlling and monitoring activities in the parking facilities.
- Install security industry standard security lighting at recommended locations including parking structures, pathway options, and curbside queuing areas;
- Install closed-circuit television at select locations including (but not limited to) entry and exit points and parking areas;
- Provide adequate lighting of parking structures, elevators, and lobbies to reduce areas of concealment;
- Provide lighting of building entries and open spaces to provide pedestrian orientation and to clearly identify a secure route between the parking area and access points;
- Design public spaces to be easily patrolled and accessed by safety personnel;
- Design entrances to, and exits from the building, to be open and in view of surrounding sites; and
- Limit visually obstructed and infrequently accessed "dead zones."

PDF PS-3: Prior to the issuance of a certificate of occupancy for each construction phase and ongoing during operations, the Developer shall develop an Emergency Procedures Plan to address emergency concerns and practices. The Plan will be reviewed by the County for Sites 1 and 3, and by LAPD for Site 2. The County shall share the Plan for Sites 1 and 3 with LAPD.

Regulatory Requirements

No specific Regulatory Requirements are relevant to police services.

MITIGATION MEASURES

No significant impacts related to police have been identified; therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction and operational impacts related to police protection would be less than significant.

SCHOOLS

INTRODUCTION

This subsection describes the impacts of the Project on school services in the Project area, which are provided by the Los Angeles Unified School District (“LAUSD”) in this area of the City of Los Angeles. This section utilizes information from the following resources: the LAUSD website, *School Facilities Needs Analysis 2014* LAUSD, the Employment Development Department website, and written correspondence with Rena Perez, Director of Master Planning & Demographics of the LAUSD (Appendix 4.12-1 to the Draft EIR).

ENVIRONMENTAL SETTING

Existing Public Schools

The LAUSD provides public education services for the residents of Los Angeles. The LAUSD jurisdiction encompasses an area of 720 square miles, serves approximately 640,000 students, and operates over 900 schools and 187 public charter schools.³⁷ The LAUSD is divided into six local districts and all three Project Sites are located within Central District. The Project Sites are located in an Elementary, Middle, and High School attendance choice/option area.

LAUSD schools that would serve the Project Sites are the following: UCLA Community School, New Open World, Academy, and the Ambassador School-Global Education.³⁸ Table 4.12-1 (LAUSD School Capacity and Enrollment) lists the location, enrollment capacities, 2015 to 2016 enrollments, and number of students above or below capacity for the schools. As shown in Table 4.12-1, the three schools serving the area are operating under capacity.

³⁷ Los Angeles Unified School District website: <http://achieve.lausd.net/about>, accessed: March 2017.

³⁸ Letter Correspondence with Rena Perez, Director, Master Planning and Demographics, LAUSD, March 2, 2017.

Table 4.12-1
2015-2016 LAUSD School Capacity and Enrollment

School Type (Grade)	School Name	Location	Capacity	2015-2016 Resident Enrollment	(-)Under / (+)Over Capacity
Community School (Grades K-12)	UCLA Community School	700 S. Mariposa Avenue	4,591	4,495	-96
Community School (Grades K-12)	New Open World Academy	3201 W. 8 th Street, Los Angeles, CA			
Community School (Grades K-12)	Ambassador School - Global Education	701 S. Catalina Street			
Source: Written correspondence with Rena Perez, Director of Master Planning & Demographics, LAUSD, March 2 2017.					

Regulatory Framework

Federal

No federal regulations apply to the Project.

State

Open Enrollment Policy

Pursuant to Assembly Bill (“AB”) 149 and AB 2071, the State of California mandates an open enrollment policy that enables students anywhere in the LAUSD to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal’s knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school’s attendance area are not displaced by a student requesting an open enrollment transfer to that school.³⁹

School Facilities Fees

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 requirement against any construction within the boundaries of the district, for the purpose of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan supports the school district’s levy of the fees authorized by California Education Code Section 17620.⁴⁰

The Leroy F. Greene School Facilities Act of 1998 (“SB 50”) made amendments to existing State law governing school fees. In particular, SB 50 amended prior Government Code Section 65995(a) to prohibit State or local agencies from imposing school impact mitigation fees, dedications, or other requirements in excess of those provided in the statute in connection with “any legislative or adjudicative act...by any State or local agency involving...the planning, use, or development of real property....” The legislation also amended Government Code Section 65996(b) to prohibit local agencies from using the inadequacy of

³⁹ News Release, Los Angeles Unified School District, Office of Communications, April 17, 2000.

⁴⁰ Level 1 -Developer Fee Justification Study for Los Angeles Unified School District, March 2017.

school facilities as a basis for denying or conditioning approvals of any “legislative or adjudicative act [involving] the planning, use, or development real property.” Further, SB 50 established the base amount of allowable developer fees. These base amounts are commonly called “Level 1 fees” and are the same caps that were in place at the time SB 50 was enacted. Level 1 fees are subject to inflation adjustment every two years.

In certain circumstances, for residential construction, school district can impose fees that are higher than Level 1 fees. School districts can impose Level 2 fees, which are equal to 50 percent of land and construction costs if they: (1) prepare and adopt a school needs analysis for facilities; (2) are determined by the State Allocation Board to be eligible to impose these fees; and (3) meet at least two of the following four conditions:

- At least 30 percent of the district’s students are on a multi-track year-round schedule.
- The district has placed on the ballot within the previous four years a local school bond that received at least 50 percent of the votes cast.
- The district has passed bonds equal to 30 percent of its bonding capacity.
- Or, at least 20 percent of the district’s teaching stations are relocatable classrooms.

Additionally, if the State’s bond funds are exhausted, a school district that is eligible to impose Level 2 fees is authorized to impose even higher fees. Commonly referred to as “Level 3 fees,” these fees are equal to 100 percent of land and construction costs of new schools required as a result of new developments.

Development fees are required to be paid pursuant to development conditions of approval. Pursuant to SB 50, the payment of these school fee amounts provided for in Government Code Sections 65995, 65995.5, and 65995.7 would constitute full and complete mitigation for school facilities. That is to say, SB 50 states that the exclusive method of mitigating the impact of school facilities according to CEQA is to pay the maximum school fees and that such fees are “deemed to provide full and complete school facilities mitigation” related to the adequacy of school facilities when considering approval or the establishment of conditions for the approval of a development project (Government Code 65996[a] and [b]).

Pursuant to California Government Code Section 65995.5-7, the LAUSD has Level 1 Fees on residential and commercial development at a rate of \$3.39 per square foot of new residential construction and \$0.55 per square foot of new commercial construction within the boundaries of the LAUSD.⁴¹ It should be noted that LAUSD last assessed a Level 2 Fee in 2012-2013, but is not currently eligible to assess Level 2 Fees due to excess facility capacity issues at the elementary level. Accordingly, project developer(s) are required to pay school fees to LAUSD to offset the impact of additional student enrollment at schools serving the project area.

As a governmental entity, the County is not subject to the requirements for payment of school fees on new development. Accordingly, proposed development on Sites 1 and 3 is not subject to school fees. Proposed development on Site 2 would be subject to payment of school fees.

⁴¹ *School Works, News Release: Level 1 Rate Increased By 1.05 Percent at SAM Meeting, January 27, 2016.*

Local**County of Los Angeles**

No County regulations apply to school facilities with regard to the Project.

City of Los Angeles**Los Angeles General Plan Framework Element**

The General Plan Framework Element, Chapter 9 Infrastructure and Public Services, contains policies and objectives which address school services within the City. These policies and objectives ensure that there is adequate school service demand as the population grows by monitoring services and pursuing funding for additional schools and expansion of existing schools. Specifically, Goal 9N of the General Plan Framework Element establishes the primary goal that schools provide “a quality education for all of the City's children, including those with special needs, and adequate school facilities to serve every neighborhood in the City so that students have an opportunity to attend school in their neighborhoods.” The applicable objectives and policies in the Framework regarding schools are:

- **Objective 9.31:** Work constructively with the Los Angeles Unified School District to monitor and forecast school service demand based upon actual and predicted growth.
 - **Policy 9.31.1:** Participate in the development of, and share demographic information about, population estimates.
- **Objective 9.32:** Work constructively with LAUSD to promote the siting and construction of adequate school facilities phased with growth.
 - **Policy 9.32.1:** Work with the Los Angeles Unified School District to ensure that school facilities and programs are expanded commensurate with the City's population growth and development.
 - **Policy 9.32.3:** Work with LAUSD to explore incentives and funding mechanisms to provide school facilities in areas where there is a deficiency in classroom seats.
- **Objective 9.33:** Maximize the use of local schools for community use and local open space and parks for school use.

ENVIRONMENTAL IMPACTS**Methodology**

The environmental impacts of a project with respect to schools are determined based on the enrollment and capacity of existing and reasonably foreseeable proposed schools in a project area, and the number of students that a project would generate upon occupancy of the Project. Based on these projections, it is determined whether a project would exceed the capacity of any existing or proposed schools such that a new or expanded school would be needed.

Thresholds of Significance

The potential for the proposed Project to result in impacts associated with schools is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. The applicable significance threshold is listed below.

Threshold 4.12-3: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives of the school district?

An affirmative answer to this question would represent a significant impact.

Project Design Elements

The Project would include governmental offices, commercial retail, multi-family residential, community recreation center, and on-site parking. No specific design elements in regards to schools are included.

Impact Analysis

Threshold 4.12-3: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities, or the need for new or physically altered school facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives of the school district?

Site 1

Construction

Construction traffic has the potential to interfere with pedestrian routes for the LAUSD schools that are in the Project area. Construction of Site 1 would include temporary lane and sidewalk closures on the east side of Vermont Avenue and the west side of Shatto Place. Construction staging and construction-related parking would primarily be confined to Site 1 and would not significantly interfere with school traffic.

The Developer would be required to develop and implement a construction traffic management plan that would include consideration of safe routes to schools, in accordance with PDF PS-1 above. The construction traffic management plan would identify potential interim construction impacts and routes as needed to ensure that safe routes to schools are maintained.

Operation

When complete, the new Site 1 office building would be designed to accommodate a maximum of 2,166 employees in 2023. As discussed in Section 4.11 (Population, Housing and Employment), the Site 1 and Site 2 employment components of the Project are linked, in that the majority of employees that will be located on Site 1 after Project completion would be relocated from existing County facilities on Site 2. Table 4.12-2 (Project Student Generation) shows the student generation that would be associated with the change in employment on Sites 1 and 2 under the Project. As shown, the net student generation associated with Sites 1 and 2 office development would be approximately 197 students (472 from Site 1

Table 4.12-2
Project Student Generation

Land Use	Size	Employees per Square Foot ^a	Students per Employee ^a	Total ^d
Existing Uses				
Site 1				
County Office (Occupied)	30,788 sf	93 ^b	0.2247	21
County Office (Vacant)	13,325 sf	--	--	--
<i>Site 1 Subtotal Existing Students</i>				21
Site 2				
County Office (Occupied)	154,793 sf	973 ^b	0.2247	219
County Office (Occupied)	52,000 sf	250 ^b	0.2247	56
<i>Site 2 Subtotal Existing Students</i>				275
Site 3				
Office	29,292 sf	112 ^b	0.2247	25
<i>Site 3 Subtotal Existing Students</i>				25
Total Existing Students				321
Proposed Uses				
Site 1				
Office	471,000 sf	2,166 ^b	0.2247	487
Retail	10,000 sf	2.71 employees/1,000 sf	0.2247	6
<i>Site 1 Subtotal of Proposed Student Generation</i>				493
<i>Site 1 & Relocation of County Employees from Site 2 Existing Students</i>				296
Site 1 Net Student Generation				197
Site 2				
Apartments	256 units	N/A	0.7 ^c	179
Retail	7,500 sf	2.71 employees/1,000 sf	0.2247	5
Site 2 Student Generation				184
Site 3				
Senior Affordable Housing	72 units	N/A	N/A	--
Community Recreation Center	13,200 sf	2.71 employees/1,000 sf	0.2247	8
<i>Site 3 Subtotal of Proposed Student Generation</i>				8
<i>Site 3 Existing Students</i>				25
Site 3 Net Student Generation				(17)
<i>Subtotal Proposed Student Generation</i>				685
Existing Student Generation				321
Total Net Increase in Student Generation				364
<i>Note: sf = square feet</i> ^a Los Angeles Unified School District, Residential Development School Fee Justification Study, March 2014. ^b Employee counts provided by the Developer. ^c Students per household. ^d Rounded the numbers to whole numbers. Source (table): EcoTierra Consulting, 2017.				

office uses less, 275 associated with existing County employees on Site 2), as calculated using the LAUSD School Fee Justification Study. A State-mandated open enrollment policy enables students anywhere in LAUSD to apply to any regular, grade-appropriate LAUSD school with designated “open enrollment” seats. The number of open enrollment seats is determined annually. Each individual school is assessed based

on the principal's knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school.

While new employment opportunities would be created with the development on Site 1, most of the expected employees would be drawn from the existing County labor force in the immediate area and would not need to relocate. Therefore, it is likely that most of the students generated by the development on Site 1 would already be enrolled in LAUSD schools, or elsewhere, and would not transfer into LAUSD. Accordingly, the calculated student generation presented in this section would represent a conservative estimate.

The County is not subject to school fees. The projected level of student generation on Site 1 would exceed the available capacity of area schools as shown in Table 4.12-1. However, the low levels of student generation associated with the Project uses on Site 1, coupled with the fact that most of the employees on Site 1 would be County employees already working in the area, would represent a minimal potential increase in enrollment in LAUSD schools, and the impact on school services generated by Site 1 would be less than significant.

Site 2

Construction

Construction traffic has the potential to interfere with pedestrian routes for the LAUSD schools that are within the Project area. Construction of Site 2 would include temporary lane and sidewalk closures on the east side of Vermont Avenue and the north side of 6th Street. Construction staging and construction-related parking would primarily be confined to Site 2 and would not significantly interfere with school traffic.

The Developer would be required to develop and implement a construction traffic management plan that would include consideration of safe routes to schools, in accordance with PDF PS-1 above. The construction traffic management plan would identify potential interim construction impacts and routes as needed to ensure that safe routes to schools are maintained.

Operation

As shown in Table 4.12-2 (Project Student Generation), residential and retail uses on Site 2 would generate an increase of approximately 184 students. For a conservative analysis, it is assumed that all 184 new students generated by the new and reuse development on Site 2 would be new to the school district.

A State-mandated open enrollment policy enables students anywhere in LAUSD to apply to any regular, grade-appropriate LAUSD school with designated "open enrollment" seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal's knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school. As previously discussed, the schools serving Site 2 are operating under capacity. Although the development of Site 2 could potentially result in these schools surpassing their capacity for students, pursuant to SB50, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would,

by law, minimize the Project's direct and indirect impacts on schools with regards to CEQA. Government Code Section 65997(b) states that:

A public agency may not, pursuant to Division 13 (commencing with Section 21000) of the Public Resources Code or Division 2 (commencing with Section 66410) of this code, deny approval of a project on the basis of the adequacy of school facilities.

Therefore, payment of the applicable school fees to LAUSD would offset the impact of additional student enrollment at schools serving the Project area. With payment of the applicable school fees per SB 50, impacts on the schools identified to serve the Project would be less than significant.

Site 3

Construction

Construction traffic has the potential to interfere with pedestrian routes for the LAUSD schools that are within the Project area. Construction of Site 3 would include temporary lane and sidewalk closures on the west side of Vermont Avenue. Construction staging and construction-related parking would primarily be confined to Site 3 and would not significantly interfere with school traffic.

The Developer would be required to develop and implement a construction traffic management plan that would include consideration of safe routes to schools, subject to LADOT approval. The construction traffic management plan would identify potential interim construction impacts and routes as needed to ensure that safe routes to schools are maintained.

Operation

Site 3 would be developed with senior affordable housing units, and a community recreation center. No student generation would be associated with this use. As shown in Table 4.12-2 (Project Student Generation), Site 3 would generate a net decrease of approximately 17 students. No impact on school services would result from the development of Site 3. As noted above, the County is not subject to school fees for new development.

CUMULATIVE IMPACTS

As previously discussed, pursuant to AB 149 and AB 2071, LAUSD has an open enrollment policy. The number of open enrollment seats is determined annually and, thereby, changes year to year. Thus, it cannot be determined, at the time of the preparation of this EIR, which schools in LAUSD will be available in the future for open enrollment. Therefore, for this EIR, the geographic scope of the cumulative school analysis is the service area of the local LAUSD schools that would serve the Project residents. The Project, in combination with the related and other future projects, would increase the cumulative demand for schools in LAUSD. As discussed previously, pursuant to SB 50 and California Government Code Section 65995, the Project and related projects would be required to pay development impact fees to the LAUSD Developer Fee office. Payment of these development fees would offset any potential cumulative impacts that could occur to LAUSD from development of the Project and related projects within the LAUSD service area. Therefore, the full payment of all applicable school fees would reduce potential cumulative impacts to schools and cumulative impacts would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are relevant to schools.

Regulatory Requirements

The following standards would be imposed by existing laws and regulations and would work to address Project impacts. These are not required mitigation but are inherent Project components.

RR PS-4: Development on Site 2 will be required to pay to the LAUSD the prevailing LAUSD fee. School fees exacted from residential and commercial uses would help fund necessary school service and facilities improvements to accommodate anticipated population and school enrollment within the LAUSD service area.

MITIGATION MEASURES

No significant impacts to schools have been identified; therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction and operational impacts related to schools would be less than significant.

RECREATION

The reader is referred to section 4.13 of this Draft EIR, for a discussion related to the potential impacts of the Project on parks and recreation services in the Project area.

LIBRARIES

INTRODUCTION

This subsection describes the potential impacts of the Project on library services, which would be provided by the Los Angeles Public Library (“LAPL”) because of the location of the Project Sites in the City of Los Angeles. This section utilizes information from the following resources: the LAPL website, the Los Angeles Citywide General Plan Framework EIR, and written correspondence with Tom Jung, Management Analyst II of the LAPL (Appendix 4.12-1 to the Draft EIR).

ENVIRONMENTAL SETTING

Library Services

The LAPL provides library services throughout the City, which includes the Central Library, eight regional branch libraries, and 72 community branches.⁴² According to the *L.A. CEQA Thresholds Guide* (2006), approximately six million books and other materials comprise the LAPL collection. According to the

⁴² Los Angeles Public Library, *Location & Hours*, website: <http://www.lapl.org/branches>, accessed: March 2017.

Citywide General Plan Framework EIR, Chapter 9 (Infrastructure and Public Services), libraries in the City are mandated to include certain facility sizes based on service population and have a maximum service radius of two miles.⁴³ The library that serves the Project Sites is the Felipe de Neve Branch Library located at 2820 W. 6th Street. Other libraries that may serve the Project include the Memorial Branch Library located at 4625 W. Olympic Boulevard and the Pico Union Branch Library located at 1030 S. Alvarado Street.⁴⁴ The Goldwyn-Hollywood, Durant, and Fremont Libraries include resources for children, Spanish language speakers, and teenagers, as well as free access to computer workstations.

The Felipe de Neve Branch Library would serve the Project. It is located at 2820 W. 6th Street, approximately 1.2 miles east of the Project Sites. At 9,273 square feet, the Felipe de Neve Branch Library does not meet the standard of 14,500 square feet for a service population in excess of 45,000.⁴⁵ The Felipe de Neve Branch Library is open six days and four nights a week. Currently, the Felipe de Neve Branch Library houses approximately 37,598 volumes and has nine staff positions. It presently has resources for children, teens, adults, and Spanish speakers. The Felipe de Neve Branch Library also provides free wireless Internet access and wireless printing. Similar to every branch of the LAPL, the Felipe de Neve Branch Library offers free use of computer workstations that provide access to the LAPL's information network. These workstations also provide Internet access, the ability to search the LAPL online catalog, subscription databases, word processing and language learning tools, access to an historic document and photograph collection, and access to specially designed websites for children, teens, and Spanish speakers.⁴⁶

Regulatory Framework

Federal

No federal regulations apply to the Project.

State

No State regulations apply to the Project.

Local

County of Los Angeles

No County regulations are applicable to the Project.

City of Los Angeles

The LAPL Branch Facilities Plan (the "LAPL Plan"), adopted in 1988, sets standards for site selection of libraries and identified a list of projects in which existing branch libraries are to be renovated or new facilities constructed in order to bring library resources to the residents of the City in accordance with the standards in the LAPL Plan.⁴⁷ The goals of the LAPL Plan were implemented with money received by two

⁴³ *City of Los Angeles, Los Angeles Citywide General Plan Framework EIR, Figure L-1, page 2.13-8, January 1995.*

⁴⁴ *Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.*

⁴⁵ *Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.*

⁴⁶ *Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.*

⁴⁷ *Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015-2020.*

bond programs: Phase I of the LAPL Plan was implemented with funds from the 1989 Bond Program and Phase II by the 1998 Bond Program. Under the two bond programs, 64 library facilities have been renovated or built.⁴⁸ All of the projects identified under the Plan were completed by October, 2008.⁴⁹ At present, the Plan is going through a process of revision in which the list of projects for the LAPL through the year 2030 will be updated.

The City's library policy is guided by the LAPL Plan, which is composed of two elements: (1) the Criteria for New Libraries; and (2) the Proposed Project List. The Board of Library Commissioners adopted a fully revised Plan on February 8, 2007. This LAPL Plan includes guidelines for the construction of branch libraries and specifies standards in defining facility size. According to the current Plan, service criteria are based on floor area required to serve varying amounts of residential population. Current LAPL branch building size standards are presented in Table 4.12-3 (LAPL Branch Facilities Site Selection Criteria).

Table 4.12-3
LAPL Branch Facilities Site Selection Criteria

Population Served	Size of Facility (square feet)
Above 45,000	14,500
Below 45,000	12,500
Regional Branch	20,000

Source: Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.

Additionally, the *General Plan Framework EIR* recommends use of the State of California standards of 0.5 square feet of facility space per capita and two volumes of collection per resident.⁵⁰

The LAPL Strategic Plan 2015-2020 (the "LAPL Strategic Plan"), adopted in 2015, is the most current Plan that sets goals for increasing the number of people who use library services, increase the number of library card holders, and actively promote and market programs and services to increase overall engagement with the library.⁵¹ With the passage of Measure L, the LAPL is offering enhanced programs, increased collections, additional technology, an expanded digital presence and increased opportunities for connection within and between communities. Measure L, approved by City voters on March 8, 2011, amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increase LAPL's responsibility for its direct and indirect costs until it pays for all of its costs. The LAPL Strategic Plan is comprised of the following six goals to achieve the increased use of local libraries:

- **Goal 1:** Cultivate and Inspire Young Readers;
- **Goal 2:** Nurture Student Success;
- **Goal 3:** Champion Literacy and Lifelong Learning;
- **Goal 4:** Contribute to L.A.'s Economic Growth;

⁴⁸ *Ibid.*

⁴⁹ *Ibid.*

⁵⁰ *City of Los Angeles, Los Angeles Citywide General Plan Framework EIR, Section 2.13, Libraries, January 1995.*

⁵¹ *Los Angeles Public Library, Los Angeles Public Library Strategic Plan 2015-2020.*

- **Goal 5:** Stimulate the Imagination; and
- **Goal 6:** Strengthen Community Connections and Celebrate L.A.

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of a project with respect to libraries are determined based on the population of the serving libraries service area and ability for existing libraries to serve the project vicinity based on the number of patrons and residents that a project would generate upon project buildout. Based on these projections, it is determined whether a project would exceed the capacity of any existing or proposed libraries such that a new or expanded library or libraries would be needed.

Thresholds of Significance

The potential for the proposed Project to result in impacts associated with library services is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. The applicable significance threshold is listed below.

Threshold 4.12-4: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or the 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?

An affirmative answer to this question would represent a significant impact.

Project Design Elements

The Project would include governmental offices, commercial retail, multi-family residential, community recreation center, and on-site parking. No specific design elements in regards to libraries are included.

Impact Analysis

Threshold 4.12-4: Would the Project result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities, or the 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?

Site 1

Construction

The Project would result in a temporary increase of construction workers on Site 1. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, though, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, Project-related construction workers would not result

in a notable increase in resident population or a corresponding demand for library services in the vicinity of Site 1.

In addition, it is unlikely that construction workers would visit Project area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts related to library facilities during Site 1 construction would be less than significant.

Operation

The Project would be served by the Felipe de Neve Branch Library located at 2820 W. 6th Street. Measuring 9,273 square feet in size, the Felipe de Neve Branch Library does not meet the proposed community branch building size criteria defining a regional branch as up to 14,500 square feet in size.⁵² As discussed in Section 4.11 (Population, Housing, and Employment), of this EIR, development on Site 1 would generate approximately 907 additional (net) County office and retail employees and would not result in the generation of permanent residents. In order to provide the capability to meet the County's future needs, the new Site 1 office building would be designed to accommodate future growth, to a maximum of 2,166 employees, between 2021 and 2023. While new employment opportunities would be created with the development on Site 1, the majority of employees are coming from Site 2 and from other county locations in the immediate area, these are not new jobs but existing jobs, and would not require the need to relocate. In addition, the type of jobs associated with office developments are typically filled by persons already residing in the vicinity of or within commuting distance of the workplace and not likely to relocate their households due to such employment opportunities. Further, the current labor force would already be users of the LAPL system to the extent that local libraries are patronized during the work day, and not new to the system. In addition, during non-work hours, employees would use their local libraries. As a result, the increase in employees from the development on Site 1 would not generate the need for new or expanded facilities and would have a less than significant impact on library services.

Site 2

Construction

The Project would result in a temporary increase of construction workers on Site 2. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, though, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, Project-related construction workers would not result in a notable increase in resident population or a corresponding demand for library services in the vicinity of Site 2.

In addition, it is unlikely that construction workers would visit Project area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is

⁵² Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.

also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of the libraries by construction workers is anticipated to be negligible. As such, impacts related to library facilities during Site 2 construction would be less than significant.

Operation

The Project would be served by the Felipe de Neve Branch Library located at 2820 W. 6th Street. Measuring 9,273 square feet in size, the Felipe de Neve Branch Library does not meet the proposed community branch building size criteria defining a regional branch as up to 14,500 square feet in size.⁵³ As discussed in Section 4.11 (Population, Housing, and Employment), of this EIR, development on Site 2 would be expected to generate 618 new residents. These new residents would be within the growth forecast for the City. However, according to correspondence from LAPL, the Felipe de Neve Branch Library is not adequately meeting the current demand and completion of the Project could create an impact on library services.⁵⁴ Under Measure L, library funding is now mandated under the City Charter to be funded from property taxes, including those assessed against the residential and retail components of the Project on Site 2, which would increase with the new development and would be used for additional staff, books, computers, and other library materials. Libraries are required to pay for their own direct and indirect costs as of July 2014 with this source of revenue. To the extent any new or expanded facilities are determined to be required, LAPL would develop these facilities contingent upon the availability of land and resources to provide library facilities. In addition, any new library facilities would typically generate less than significant impacts because they would be expansions of existing facilities or new buildings in already urban areas that are not environmentally sensitive. However, in the unlikely event a new library facility may have significant effects, any such action on the part of LAPL would be a discretionary action that would be subject to project level CEQA review. As a result, the increase in residential population associated with the Project would represent a less than significant impact on libraries.

Site 3

Construction

The Project would result in a temporary increase of construction workers on Site 3. Due to the employment patterns of construction workers in Southern California, and the operation of the market for construction labor, though, construction workers are not likely to relocate their households as a consequence of Project construction. Therefore, Project-related construction workers would not result in a notable increase in resident population or a corresponding demand for library services in the vicinity of Site 3.

In addition, it is unlikely that construction workers would visit Project area libraries on their way to/from work or during their lunch hours. Construction workers would likely use library facilities near their places of residence because lunch break times are typically not long enough (30 to 60 minutes) for construction workers to take advantage of library facilities, eat lunch, and return to work within the allotted time. It is also unlikely that construction workers would utilize library facilities on their way to work as the start of their work day generally occurs before the libraries open for service. Therefore, any increase in usage of

⁵³ Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.

⁵⁴ *Ibid.*

the libraries by construction workers is anticipated to be negligible. As such, impacts related to library facilities during Site 3 construction would be less than significant.

Operation

The Project would be served by the Felipe de Neve Branch Library located at 2820 W. 6th Street. Measuring 9,273 square feet in size, the Felipe de Neve Branch Library does not meet the proposed community branch building size criteria defining a regional branch as up to 14,500 square feet in size.⁵⁵ As discussed in Section 4.11 (Population, Housing, and Employment), of this EIR, development on Site 3 would be expected to generate 181 new residents. The addition of these new residents would be within the growth projection for the City and less than significant. However, according to correspondence from LAPL, the Felipe de Neve Branch Library is not adequately meeting the current demand and completion of the Project would create an impact on library services.⁵⁶ Under Measure L, library funding is now mandated under the City Charter to be funded from property taxes, including those assessed against the residential component of the Project on Site 3, which would increase with the new development and would be used for additional staff, books, computers, and other library materials. Libraries are required to pay for their own direct and indirect costs as of July 2014 with this source of revenue. To the extent any new or expanded facilities are determined to be required, LAPL would develop these facilities contingent upon the availability of land and resources to provide library facilities. In addition, any new library facilities would typically generate less than significant impacts because they would be expansions of existing facilities or new buildings in already urban areas that are not environmentally sensitive. However, in the unlikely event a new library facility may have significant effects, any such action on the part of LAPL would be a discretionary action that would be subject to project level CEQA review. As a result, the increase in residential population associated with the Project would represent a less than significant impact on libraries.

CUMULATIVE IMPACTS

Implementation of the Project, in combination with the 115 related projects identified in Section 3.0 (Project Description and Environmental Setting), would increase demand for library services in the Project vicinity. However, the geographic scope for the cumulative impact analysis is the extent of the related projects that would be served by Felipe de Neve Branch Library. Similar to the Project, each related project would generate revenues to the LAPL in the form of property taxes that could be applied toward the provision of new library facilities, staffing, and materials for any one of the libraries serving the Project area, as deemed appropriate. These revenues would help offset the increase in demand for library services as a result of the Project and the related projects. Under Measure L, library funding is now mandated under the City Charter to be funded from property taxes, including those assessed against the Project and related projects, which would increase with the new development and would be used for additional staff, books, computers, and other library materials. Libraries are required to pay for their own direct and indirect costs as of July 2014 with this source of revenue.⁵⁷ This dedicated funding source is intended to address cumulative demand for library services throughout the City. To the extent any new or expanded facilities are determined to be required to address cumulative demand for library services,

⁵⁵ Letter correspondence with Tom Jung, Management Analyst II, LAPL, February 27, 2017.

⁵⁶ *Ibid.*

⁵⁷ Ballotpedia, *Los Angeles Reassignment of Funds for Library System, Measure L (March 2011)*, website: [http://ballotpedia.org/wiki/index.php/Los_Angeles_Reassignment_of_Funds_for_Library_System,_Measure_L_\(March_2011\)](http://ballotpedia.org/wiki/index.php/Los_Angeles_Reassignment_of_Funds_for_Library_System,_Measure_L_(March_2011)), accessed March 2017.

LAPL would develop these facilities contingent upon the availability of land and resources to provide library facilities. In addition, any new library facilities would typically generate less than significant impacts because they would be expansions of existing facilities or new buildings in already urban areas that are not environmentally sensitive. However, in the unlikely event a new library facility may have significant effects any such action on the part of LAPL would be a discretionary action that would be subject to CEQA review.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are proposed with respect to library facilities.

Regulatory Requirements

No specific regulatory requirements are applicable with respect to library facilities.

MITIGATION MEASURES

No significant impacts to libraries have been identified, and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts on library services would be less than significant.

4.13 RECREATION

INTRODUCTION

This section describes the potential impacts of the Project on parks and recreation services in the Project area. This section utilizes information from the following resources: the City of Los Angeles Department of Recreation and Parks (“LADRP”) website and written correspondence with Darry Ford, Senior Management Analyst, LADRP (Appendix 4.12-1 to the Draft EIR).

All three Project Sites are all owned by the County, however, they are all located within the jurisdictional boundary of the City of Los Angeles. Site 1 would be developed for County use, and thus, is not subject to the City of Los Angeles' land use regulations. Development on Site 2 would include mixed residential and commercial uses under a ground lease, and would be subject to City of Los Angeles zoning and building regulations. Development on Site 3 would consist of an affordable housing project, comprised of senior affordable housing units, and a community recreation center, to be operated under a ground lease. As a public benefit project located on County land (and operated by a non-profit service providers), the proposed Site 3 development would be exempt from City of Los Angeles zoning and building regulations. However, as all three Sites are located within the jurisdictional boundary of the City of Los Angeles, they would utilize LADRP parks and facilities. Accordingly, impacts related to recreational facilities are addressed using City criteria.

ENVIRONMENTAL SETTING

LADRP manages all municipally owned and operated recreation and park facilities within the City, which includes over 16,000 acres of parkland between 444 neighborhood and regional parks, 13 lakes, 184 recreation centers, 13 municipal golf courses, nine dog parks, 62 swimming pools, 26 skate parks, more than a dozen museums and historic sites, tennis courts, child care facilities, senior centers, two beaches, and an urban forest.¹ The Wilshire Community Plan area provides approximately 0.23 acres of open space and recreation per 1,000 people.² The following LADRP facilities are classified as neighborhood parks and are located within a two-mile radius of the Project Sites:³

- Alvarado Terrace Park, located at 1342 South Alvarado Terrace;
- Harold A. Henry Park, located at 2909 Francis Avenue;
- Hope and Peace Park, located at 843 S. Bonnie Brae Street;
- Madison West Park, located at 464 N. Madison Avenue;
- Patton Street Pocket Park, located at 317-327 Patton Street;
- Pico Union Park, located at 1827 S. Hoover Street;
- Robert L. Burns Park, located at 4900 Beverly Boulevard;
- Rockwood Community Park, located at 1571 Rockwood Street;
- Unidad Park, located at 1644-48 Beverly Boulevard; and

¹ Los Angeles Department of Recreation and Parks website, *Who We Are*, website: <http://www.laparks.org/departments/who-we-are>, accessed: March 2017.

² Letter correspondence with Darry Ford, Senior Management Analyst I, LADRP, March 8, 2017 (see Appendix 4.12-1 to the Draft EIR).

³ *Ibid.*

- Wilton Place Park, located at 1015 S. Wilton Place.

The following LADRP facilities are classified as community parks and are located within a five-mile radius of the Project Sites:⁴

- Aliso-Pico Recreation Center, located at 370 S. Clarence Street;
- Alpine Recreation Center, located at 817 Yale Street;
- Baldwin Hills Recreation Center, located at 5401 Highlight Place;
- Bellevue Recreation Center, located at 826 Lucille Avenue;
- Boyle Heights Sports Center, located at 933 S. Mott Street;
- Central Recreation Center, located at 1357 E. 22nd Street;
- Chevy Chase Park, located at 4165 Chevy Chase Drive;
- Cypress Recreation Center, located at 2630 Pepper Avenue;
- Denker Recreation Center, located at 1550 W. 35th Place;
- Downey Recreation Center and Pool, located at 1775 N. Spring Street;
- Echo Park, Boys & Girls Club, and Pool, located at 751 Echo Park Boulevard;
- Eleanor Green Roberts Aquatic Center, located at 4526 W. Pico Boulevard;
- Elysian Valley Recreation Center, located at 1811 Ripple Street;
- EXPO Center, located at 3980 S. Menlo Avenue;
- Fairfax Senior Citizens Center, located at 7929 Melrose Avenue;
- Gilbert W. Lindsay Community Center, located at 429 E. 42nd Street;
- Glassell Park, located at 3650 Verdugo Road;
- Hollenbeck Park, located at 415 S. St. Louis Street;
- Hollywood Recreation Center, located at 1122 Cole Avenue;
- Hoover Recreation Center, located at 1010 W. 25th Street;
- Jim Gilliam Recreation Center, located at 4000 S. La Brea Avenue;
- Juntos Park, located at 3135 Drew Street;
- Lafayette Park, located at 2830 W. 6th Street;
- Lake Street Park, located at 227 N. Lake Street;
- Las Palmas Senior Citizen Center, located at 1820 N. Las Palmas Avenue;
- Lemon Grove Recreation Center, located at 4959 Lemon Grove Avenue;
- Lincoln Heights Recreation Center, located at 2303 Workman Avenue;
- Lincoln Heights Youth Center, located at 2500 Griffin Avenue;
- Loren Miller Recreation Center, located at 2717 Halldale Avenue;
- Los Angeles Center for Enriched Studies, located at Airdome Street between Stearns Drive and Hayworth Avenue;
- MacArthur Park, located at 2230 W. 6th Street;
- Martin Luther King Jr. Park, located at 3934 S. Western Avenue;
- Migeul Contreras Learning Center Pool, located at 322 S. Lucas Avenue;
- Normandie Recreation Center, located at 1550 S. Normandie Avenue;
- North Atwater Park, located at 3900 Chevy Chase Drive;
- Pan Pacific Park, located at 7600 Beverly Boulevard;
- Parkview Photo Center, located at 2332 W. 4th Street;
- Pecan Recreation Center, located at 127 S. Pecan Street;

⁴ *Ibid.*

- Pershing Square, located at 525 S. Olive Street;
- Poinsettia Recreation Center, located at 7431 Willoughby Avenue;
- Queen Anne Recreation Center, located at 1240 West Boulevard;
- Rancho Cienega Sports Complex, located at 5001 Rodeo Road;
- Rio de Los Angeles State Park, located at 1900 N. San Fernando Road;
- Roosevelt High School Pool, located at 456 S. Mathews Street;
- Ross Synder Recreation Center, located at 1501 E. 41st Street;
- Seoul International Park, located at 3250 San Marino Street;
- Shatto Recreation Center, located at 3191 W. 4th Street;
- Silverlake Recreation Center and Dog Park, located at 1850 W. Silverlake Boulevard;
- South Park Recreation Center, located at 345 E. 51st Street;
- South Seas House Park, located at 2301 W. 24th Street;
- State Street Recreation Center, located at 716 N. State Street;
- Toberman Recreation Center, located at 1725 Toberman Street;
- Tommy Lasorda Field of Dreams, located at 1901 Waterloo Street;
- Trinity Recreation Center, located at 2415 Trinity Street;
- Vineyard Recreation Center, located at 2942 Vineyard Avenue;
- Vista Hermosa Soccer Field, located at 1301 W. 1st Street; and
- Yucca Community Center, located at 6671 W. Yucca Street.

The following LADRP facilities are classified as regional parks and are located within a ten-mile radius of the Project Sites:⁵

- Armand Hammer Golf Course, located at 601 Club View Drive;
- Arroyo Seco Park, located at 5568 Via Marisol;
- Ascot Hills Park, located at 4371 Multnomah Street;
- Barnsdall Park, located at 4800 Hollywood Boulevard;
- Bronson Canyon, located at 3200 Canyon Drive;
- Cahuenga Peak Phase I and Phase II, located at 3698 W. Wonderview Road;
- Campo de Cahuenga, located at 3919 Lankershim Boulevard;
- Caplow Property, located at 20856 Mulholland Drive;
- Cheviot Hills Park, located at 2551 Motor Avenue;
- Coldwater Canyon Park, located at 12601 Mulholland Drive;
- Elysian Park, located at 1800 Riverside Drive;
- Ernest E. Debs Regional Park, located at 1010 Everett Street;
- Exposition Park Rose Garden, located at 7929 Melrose Avenue;
- Griffith Park, located at 4730 Crystal Springs Drive;
- Harding Golf Course, located at 4730 Crystal Springs Drive;
- Holmby Park, located at 601 Club View Drive;
- Los Feliz Golf Course, located at 3207 Los Feliz Boulevard;
- Rancho Park Golf Course, located at 10460 Pico Boulevard;
- Roosevelt Golf Course, located at 2650 N. Vermont Avenue;
- Runyon Canyon Park, located at 2000 N. Fuller Avenue;
- South L.A. Wetlands Park, located at 5413 S. Avalon Boulevard;

⁵ *Ibid.*

- Wattles Garden Park, located at 1824 N. Curson Avenue; and
- Wilson Golf Course, located at 4730 Crystal Springs Drive.

The parks serving the Project Sites include facilities such as auditoriums, aquatic recreation facilities, baseball diamonds (lighted and unlighted), outdoor fitness areas, walking paths, children's areas, lakes, and picnic areas. The recreation centers serving the Project Sites provide facilities including auditoriums, barbeque areas, baseball diamonds (lighted and unlighted), lighted indoor/outdoor basketball courts, unlighted soccer fields, jogging paths, and community rooms.

According to LADRP, the Project is located in an area of the City that is below the City's standard for neighborhood and community park acreage of 4 acres per 1,000 people. The Wilshire Community Plan area, which includes the Project Sites, has 0.23 acres of neighborhood and community park acreage per 1,000 people, and the facilities in this area with active recreational features are very heavily used.⁶ However, as noted, residents of this area have access to nearby large regional park facilities, including Griffith Park and Elysian Park.

Regulatory Framework

Federal

National Recreation and Parks Association

The National Recreation and Parks Association ("NRPA") publishes standards for parks and specialized facilities. A commonly accepted minimum is three acres per 1,000 persons.

State

Quimby Act

The Quimby Act (Section 66477 of the California Government Code) was enacted in 1965 to promote the availability of parks and open space in response to the need to preserve open space and provide parks and recreation facilities to accommodate residential growth in California. The Quimby Act gives cities and counties the authority to enact ordinances to require the dedication of land and/or payment of fees for parks and recreational facilities by developers of residential subdivisions as a condition of approval of a tentative tract map. The Los Angeles County Code ("LACC") 21.24.340 and the Los Angeles Municipal Code ("LAMC") Section 17.12 support compliance with the Quimby Act and provide a mechanism for supporting park and recreational facilities to serve County and City residents. The Quimby Act would not be applicable to the Project because the proposed uses on Site 1 (County office), and Site 3 (senior affordable housing and community recreation center, not including a subdivision map) do not require a subdivision map and are therefore not subject to the Quimby Act, and the proposed uses on Site 2 would be subject to the City of Los Angeles Park Fees, which supersede the City's former Quimby Act fee program, as discussed below.

⁶ *Ibid.*

Local

County of Los Angeles

County of Los Angeles General Plan

The County's General Plan addresses parks and recreational issues that affect the County. The current General Plan was adopted on October 6, 2015. The County adopted an update to the Parks and Recreation Element (February 2014), which serves as a policy guide to address the maintenance and expansion of the County's parks and recreation system. The purpose of the Parks and Recreation Element is to plan and provide for an integrated parks and recreation system that meets the needs of residents through establishing goals and policies that address the growing and diverse recreation needs of communities served by the County. A consistency analysis of the Project's specific goals and policies with the County's relevant plans, policies, and goals is provided in Section 4.9, Land Use and Planning.

City of Los Angeles

City Charter

Per City Charter Article V, Section 590, the LADRP was formed to establish, construct, maintain, operate and control all parks, recreational facilities, museums, observatories, sports centers, and land utilized for public recreation in the City of Los Angeles. The LADRP was established to promote public recreation and cooperate with other public agencies and organizations for that purpose.⁷

General Plan Framework Element and Open Space Element

The General Plan Framework Element (the "Framework"), Chapter 9 Infrastructure and Public Services, contains policies and objectives that address the provision of parks and open space within the City. These standards are addressed in the following three areas: (1) sufficient land area reserved for parks and recreation; (2) appropriate distribution of park and recreational facilities throughout the City; and (3) a full complement of park and recreational facility types to accommodate a wide variety of users.⁸

The Open Space and Conservation element of the General Plan calls for the use of open space to enhance community and neighborhood character. The policies of this element recognize that there are communities where open space and recreation resources are currently in short supply and, therefore, suggest that vacated railroad lines, drainage channels, planned transit routes, and utility rights-of-way, or pedestrian-oriented streets and small parks, where feasible, might serve as important resources for serving the open space and recreation needs of residents.⁹

⁷ City of Los Angeles Charter, Volume 1 Governance, website: [http://www.amlegal.com/nxt/gateway.dll/California/laac/administrativecode?f=templates\\$fn=default.htm\\$3.0\\$vid=amlegal:losangeles_ca_mc](http://www.amlegal.com/nxt/gateway.dll/California/laac/administrativecode?f=templates$fn=default.htm$3.0$vid=amlegal:losangeles_ca_mc), accessed: March 2017.

⁸ City of Los Angeles, The Citywide General Plan Framework Element, Chapter 9 Infrastructure and Public Services, website: <http://cityplanning.lacity.org/cwd/framwk/contents.htm>, accessed: March 2017.

⁹ City of Los Angeles, General Plan Elements, Open Space and Conservation Element, website: http://planning.lacity.org/GP_elements.html, accessed: March 2017.

Public Recreation Plan

The City's *Public Recreation Plan* notes that the long-range standards under the Framework may not be reached during the life of the plan and, therefore, include more attainable short-term and intermediate-range standards of one acre per 1,000 residents for neighborhood and community parks, or two acres per 1,000 residents combined.

Citywide Community Needs Assessment

In 2009, LADRP completed a report to provide an inventory of the existing park facilities, define geographic areas of need, and recommend facilities to serve specific populations. The report provided a more current assessment of existing conditions and future needs than the PRP. Based on the existing supply of park and recreational facilities, the *Citywide Community Needs Assessment* recommended a service level of 10.60 acres of park land per 1,000 persons Citywide, including 0.10 acre of mini parks (i.e., parks less than one acre in size), 1.50 acres of neighborhood parks, two acres of community parks, and six acres of regional and large urban parks.¹⁰ The *Citywide Community Needs Assessment* serves as the facilities plan for use by DRP to address Citywide needs, and is not directly applicable to individual development projects.

Park Fees

Ordinance 184,505 (Parks Dedication and Fee Update ordinance) was passed by City Council on September 7, 2016 with an effective date of January 11, 2017. The purpose of this Section is to enable the acquisition of land and the collection of fees to be used for the purpose of developing new or rehabilitating existing recreational facilities in order to create a healthy and sustainable city. Payment of fees or dedication of land by development projects are intended to address the increased demand for park facilities associated with new residential development. The ordinance requires most residential projects that create new dwelling units or joint living and work quarters to dedicate land or to pay a fee for the purpose of developing park and recreational facilities. Residential projects that propose one or more additional dwelling units will be subject to the new Park Fee unless they meet one of the exceptions listed in LAMC Section 12.33 C.3. LAMC Section 12.33 C.3(d) provides that affordable housing pursuant to LAMC Section 12.33 G shall not be required to pay a park fee.

Per LAMC Section 12.33 G, new residential dwelling units which are rented or sold to persons or household of very-low, low, or moderate income shall receive an affordable housing exemption for the park fee and land dedication requirement. In projects with a mix of market-rate and affordable housing units, only the affordable housing units are eligible to receive this exemption.

Required Open Space

The LAMC provides minimum standards for the amount of "open space" that residential development projects should provide on-site. Open space includes both common and private greenspace and recreational amenities that meet specific standards, and is taken into account by the City in assessing

¹⁰ City of Los Angeles Department of Recreation and Parks, 2009 Citywide Community Needs Assessment, Executive Summary.
<http://www.laparks.org/sites/default/files/projects/2009%20Community%20Needs%20Assessment%20-%20Final.pdf>, accessed: March 2017.

demand for park and recreation facilities. However, not all areas designated as open space in the LAMC would be classified as park or recreational facilities under the City's parkland fee programs (discussed previously), under the Framework, or the LADRP.

Pursuant to LAMC Section 12.21G, new construction in the City of six or more dwelling units on a lot is required to provide at a minimum 100 square feet of usable open space for each dwelling unit having fewer than three habitable rooms, 125 square feet for each dwelling unit having three habitable rooms, and 175 square feet for each dwelling unit having more than three habitable rooms. Usable open space is defined as area that is designed and is intended for active or passive recreation. Usable open space may consist of private and/or common area open space; however, common open space areas must be a minimum of 400 square feet, be open to the sky, have no structures that project into the common open space area, and be readily accessible to all residents of the site and must constitute at least 50 percent of the total open space provided. Open space does not generally include parking areas, driveways, or required front and side yards. A minimum of 25 percent of the common open space area is required to be planted with ground cover, shrubs, or trees, and at least one 24-inch box tree is required for every four dwelling units.

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of a project with respect to parks and recreational facilities are determined based on the ability of existing parks and recreational facilities in a project area to accommodate a project's needs for such facilities. This is calculated based on the City's recommended ratios for parkland to population as well as project-specific recommendations of the LADRP. Based on this evaluation, a determination is made whether a project would create substantial demands on existing parks and recreational facilities such that new or expanded parks and recreational facilities would be needed either on-site or off-site.

Thresholds of Significance

In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Project could have a significant impact if it were to:

- Threshold 4.13-1:** 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?
- Threshold 4.13-2:** 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?

An affirmative answer to any of these questions would represent a significant impact.

Project Design Elements

The Project would include governmental offices, commercial retail, multi-family residential, senior affordable housing, community recreation center, and on-site parking. The design of each of the Project Sites includes open space, and public and private recreation facilities are provided with the residential

uses on Sites 2 and 3. Site 1 design includes passive open space areas that are available for use by employees.

Impact Analysis

Threshold 4.13-1: 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?

Site 1

Development on Site 1 would not be subject to City of Los Angeles zoning and building regulations. Proposed development on Site 1 would involve removal of the existing DPR office building, vacant office building, surface parking lots, and parking structure, and construction of a new County office building containing 471,000 square feet of office use over a 390,000-square foot parking structure and 10,000 square feet of ground floor retail. In addition, a new 380,000-square foot parking structure would be constructed on the site of the existing 7-story parking structure on Shatto Place.

In general, employees of office development are less likely to patronize parks during working hours as they are more likely to use parks and recreational facilities near their homes during non-work hours. Furthermore, the development on Site 1 would not introduce permanent residents to the Project area. Therefore, development on Site 1 would not substantially increase the use or deterioration of parks and recreational facilities in the vicinity, and impacts would be less than significant with respect to the deterioration of park or recreational facilities. City of Los Angeles Park Fees would not apply to Site 1 both because it is not subject to City zoning and building requirements and because no residential development is included in Site 1.

Site 1 would include an approximately 18,600 square foot landscaped terrace on the second floor that creates an inviting open space for employees to utilize. The Project would include an additional 9,221 square feet of open space throughout floors three through nine for employees to utilize. Table 4.13-1 shows these open space areas. Because Site 1 is not subject to City zoning and building requirements, open space requirements established by the City of Los Angeles would not apply to Site 1.

Table 4.13-1
Project Open Space for Site 1

Open Space Type	Amount (square feet)
Open Courtyard	18,600 sf
Passive Open Spaces	9,221 sf
Total Common Open Space Provided	27,821 sf
<i>Source: Gensler 2017.</i>	

Site 2

Development on Site 2 would be subject to City of Los Angeles zoning and building regulations. Proposed development on Site 2 would involve reuse and conversion of the existing 154,793 square foot, 12-story DMH building into a maximum of 172 residential units (82 studio, 46 one-bedroom, 44 two-bedroom), 4,100 square feet of ground floor retail, 1,375 square feet of ancillary space (office, common area, etc.), and an approximately 7,500 square foot roof deck amenity. In addition, the development of Site 2 would involve removal of the existing four-story, approximately 52,000 square foot, WDACS office building and two-story parking structure, and construction of a new 116,324 square foot, five-level parking structure

(3.5 levels above grade and 1.5 levels below grade). A future option for the development of Site 2 would include construction of a new 66,935 square foot, mixed-use building above the parking structure, containing five residential levels and 74 units (28 studio, 38 one-bedroom, and 8 two-bedroom), and 2,250 square feet of ancillary space. In addition, 3,400 square feet of retail uses would be provided at the ground level of the new mixed-use building on 6th Street.

In accordance with Regulatory Requirement RR-REC-1, open space shall be provided in accordance with LAMC Section 12.21-G.2, which requires at minimum 100 square feet for each unit having less than three habitable rooms, 125 square feet for each unit having three habitable rooms, and 175 square feet for each unit having more than three habitable rooms.¹¹ Usable open space is defined as area that is designed and intended for active or passive recreation. Usable open space may consist of private and/or common area open space. However, common open space areas must be a minimum of 400 square feet, be open to the sky, and must constitute at least 50 percent of the total open space provided. Open space does not generally include parking areas, driveways, or required front and side yards. A minimum of 25 percent of the common open space area shall be planted with ground cover, shrubs or trees and at least one, 24-inch box tree is required for every four dwelling units. Open space to be provided by the development on Site 2 is shown in Table 4.13-2.

Table 4.13-2
Project Open Space for Site 2

Open Space Type	Amount (square feet)
Pool Amenity	7,000 sf
Interior Amenity Space	1,900 sf
Public Plaza	1,500 sf
Rooftop Amenity	7,500 sf
Total Common Open Space Provided	17,900 sf
Total Common Open Space Required	7,600 sf
<i>Source: Steinberg, 2017.</i>	

The standard minimum parkland-to-resident ratio provided in the City's *Public Recreation Plan* is two acres per 1,000 residents. Within the Wilshire Community Plan area, in which Site 2 is located, the average household size is 2.51 persons per household.¹² At this average household size, Site 2 would be expected to accommodate approximately 618 new residents within the Wilshire Community Plan area. Based on the parkland-to-resident ratio, the Project would generate a need for approximately 1.24 additional acres of public parkland. The Project would include open space and recreational facilities to serve Project residents that would reduce demand for public parks. However, as noted above, Site 2 is located in an area that is underserved by neighborhood and community parks, and the Site 2 development would increase demand on these facilities. As development on Site 2 would be subject to City of Los Angeles land use regulations, to alleviate the demand on City parks and recreational facilities, the Developer on Site 2 would be required to pay Park Fees in accordance with Regulatory Requirement RR-REC-2. With the payment of Park Fees to the City, new or expanded City park development would offset demand from the proposed uses on Site 2, and impacts to parks and recreational facilities would be less than significant.

¹¹ Kitchen and dining areas are not counted towards habitable space, LAMC Sections 12.21(G)(2) and 12.03.

¹² City of Los Angeles, Department of City Planning, Wilshire Community Plan, September 19, 2001.

Site 3

As a public benefit project located on County land (and operated by a non-profit service providers), the proposed Site 3 development would be exempt from City of Los Angeles zoning and building regulations. Proposed development on Site 3 would involve removal of the existing DPR building, and construction of a new 80,837 square foot, six-story, senior affordable housing project containing 72 units, and a 13,200-square foot community recreation center, over a three-story, 51,591 square foot underground parking structure. A landscaped courtyard, open to the sky, would be provided on the second level of the Project to serve the Project residents, and would be surrounded by the upper floor units.

The residential component of the development on Site 3 includes 72 residential units and would have amenities, including an open courtyard and community rooms. As shown in Table 4.13-3 (Project Open Space for Site 3), the Project on Site 3 would provide approximately 4,990 square feet of open space. In addition, the Project on Site 3 would include a 13,200-square foot community recreation center that would serve the Project and the surrounding community.

Table 4.13-3
Project Open Space for Site 3

Open Space Type	Amount (square feet)
Open Courtyard	3,580 sf
Interior Amenity Space	1,410 sf
Total Common Open Space Provided	4,990 sf
<i>Source: Y & M Architects, 2017.</i>	

The Project on Site 3 would include open space to serve Project residents that would reduce demand for public parks. In addition, as noted above, the Project on Site 3 would include a community recreation center to provide additional recreational opportunities for the community. Development on Site 3 would not be responsible for paying Park fees to the City because it is not subject to City zoning and building requirements. However, even if the Project on Site 3 were not exempt by virtue of its characteristics of a public benefit project located on County land (and operated by a non-profit service providers), it would be exempt from the City's Park Fee because it includes 100 percent affordable housing. Inclusion of open space and the community recreation center would offset any increased demand associated with the residential units that would be developed on Site 3. Therefore, impacts to parks and recreational facilities would be less than significant.

Threshold 4.13-2: 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?

Site 1

Proposed development on Site 1 would include the construction of a new County office building containing 471,000 square feet of office use and 10,000 square feet of ground floor retail over parking structure. As such, the development on Site 1 would not introduce permanent residents to the project area and would not increase the demand for park and recreational facilities in the vicinity. Therefore, no impact would occur with respect to the construction or expansion of recreational facilities.

Site 2

Proposed development on Site 2 would include permanent residents that would increase demand for park facilities in the Wilshire Community Plan Area. The Project would provide Park Fees to the City to develop new park facilities to meet demand throughout the Community Plan Area. The development on Site 2 does not directly include a park or public recreational facility component. Rather, LADRP would develop these facilities contingent upon the availability of land and resources to provide park facilities, and any such action on the part of LADRP would be a discretionary action that would be subject to CEQA review. Therefore, impacts of the Project on Site 2 in this regard would be less than significant.

Site 3

Proposed development on Site 3 would include permanent residents that would increase demand for park facilities in the Wilshire Community Plan Area. The development on Site 3 includes an approximately 13,000 square foot community recreation center and approximately 5,000 square feet of private open space, the environmental effects of which are addressed in this Draft EIR as part of the overall Project (development on all Project Sites). The inclusion of the community recreation center on Site 3 would not result in significant environmental effects in and of itself. Therefore, impacts of the Project on Site 3 in this regard would be less than significant.

CUMULATIVE IMPACTS

Implementation of the Project in combination with the related projects identified in Section 3.0 (Project Description and Environmental Setting) would further increase demand for park and recreational facilities. Employees generated by the commercial projects would not typically experience long periods of time during the workday to visit parks and/or recreational facilities and would not, therefore, contribute to the future demand on parks. However, the increase in residential population from the Project and related projects would increase the demand for parks and recreation facilities and further impact the shortage of park/recreational space in the Wilshire Community Plan area. As noted above, proposed development of Site 1 would not contribute to cumulative impacts on park facilities by virtue of its proposed use, and development of Site 3 would not contribute to cumulative impacts on park facilities because it would include the development of a community recreation center. Future impacts on park facilities from Site 2 development and the related projects would be offset through the collection of Park Fees on new development and/or the provision of parkland by individual development projects. In accordance with *State CEQA Guidelines* Section 15130(a)(3), the Project's contribution to the cumulative impact would be rendered less than cumulatively considerable through adherence to the City's Park Fee programs for new development. Adherence to the requirements of this program would constitute implementation or funding of the Project's fair share of measures designed to alleviate the cumulative impact and impacts would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are relevant to parks and recreational facilities.

Regulatory Requirements

RR REC-1: Open space shall be provided on Site 2 in accordance with LAMC Section 12.21-G.2.

RR REC-2: The Developer of Site 2 shall pay Park Fees to the City of Los Angeles in accordance with the requirements of LAMC Section 12.33.

MITIGATION MEASURES

No significant impacts related to parks and recreational facilities have been identified; and no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Project impacts related to parks and recreational facilities would be less than significant.

Cumulative impacts related to parks and recreational facilities would be less than significant.

4.14 TRANSPORTATION AND TRAFFIC

INTRODUCTION

The purpose of this section is to address potential transportation and circulation impacts resulting from the Project. This section summarizes the *Transportation Impact Study for the Vermont Corridor Development Plan* (“Traffic Study”) prepared by Gibson Transportation Consulting, Inc., June 2017, which is included as Appendix 4.14-1 to this Draft EIR.

The Project Sites are located in the City, and the County, as Lead Agency, agreed to use City of Los Angeles Department of Transportation (“LADOT”) methodology and criteria in the Project traffic analysis. The base assumptions and technical methodologies (i.e., trip generation, study locations, analysis methodology, etc.) were identified as part of the study approach and were outlined in a *Memorandum of Understanding* (“MOU”) dated May 2017, which was reviewed and approved by LADOT. A copy of the signed MOU is provided in Appendix A of the Traffic Report. The Traffic Study was reviewed and approved by LADOT (Appendix 4.14-2 to the Draft EIR).

As discussed in Section 3.0, Project Description and Environmental Setting, of this Draft EIR, construction on Site 1 and relocation of existing County employees to the new office building on Site 1 is required before the conversion of the existing building and construction of the new mixed-use building on Site 2 may commence. Site 3 construction would be independent of the Site 1 and Site 2 construction activities, but will occur during the construction on Site 1. Accordingly, the Project is evaluated in this Draft EIR as a two-phased project. Phase I of the Project would include construction of the new County office building, retail uses, and parking structure on Site 1, and construction of new senior affordable housing and a community recreation center on Site 3. Phase II of the Project would include the reuse and conversion of the existing twelve-story building for residential and retail use, and construction of new residential and retail uses and parking structure on Site 2.

The Project’s Study Area includes a geographic area approximately 3.5 miles (north-south) by two miles (east-west), bounded by US 101 to the north, Alvarado Street to the east, Adams Boulevard to the south, and Western Avenue to the west. This study analyzes the potential Project-generated traffic impacts on the street system within the Study Area under the following conditions:

- Existing Conditions (2017) plus Phase I;
- Existing Conditions (2017) plus Phases I and II;
- Projected Interim Conditions (2021) plus Phase I; and
- Projected Buildout Conditions (2023) plus Phases I and II.

Potential intersection impacts were evaluated for typical weekday morning (7:00 AM to 10:00 AM) and afternoon (3:00 PM to 6:00 PM) peak periods. As shown in Table 4.14-1, List of Analyzed Intersections, and Figure 4.14-1, Study Intersections, a total of 38 signalized intersections in the vicinity of the Project Sites were selected for detailed traffic analysis.

Table 4.14-1
List of Analyzed Intersections

No.	North/South Street	East/West Street
1	Vermont Avenue	US 101 Northbound On-ramp
2	Vermont Avenue	US 101 Northbound Off-ramp

Table 4.14-1
List of Analyzed Intersections

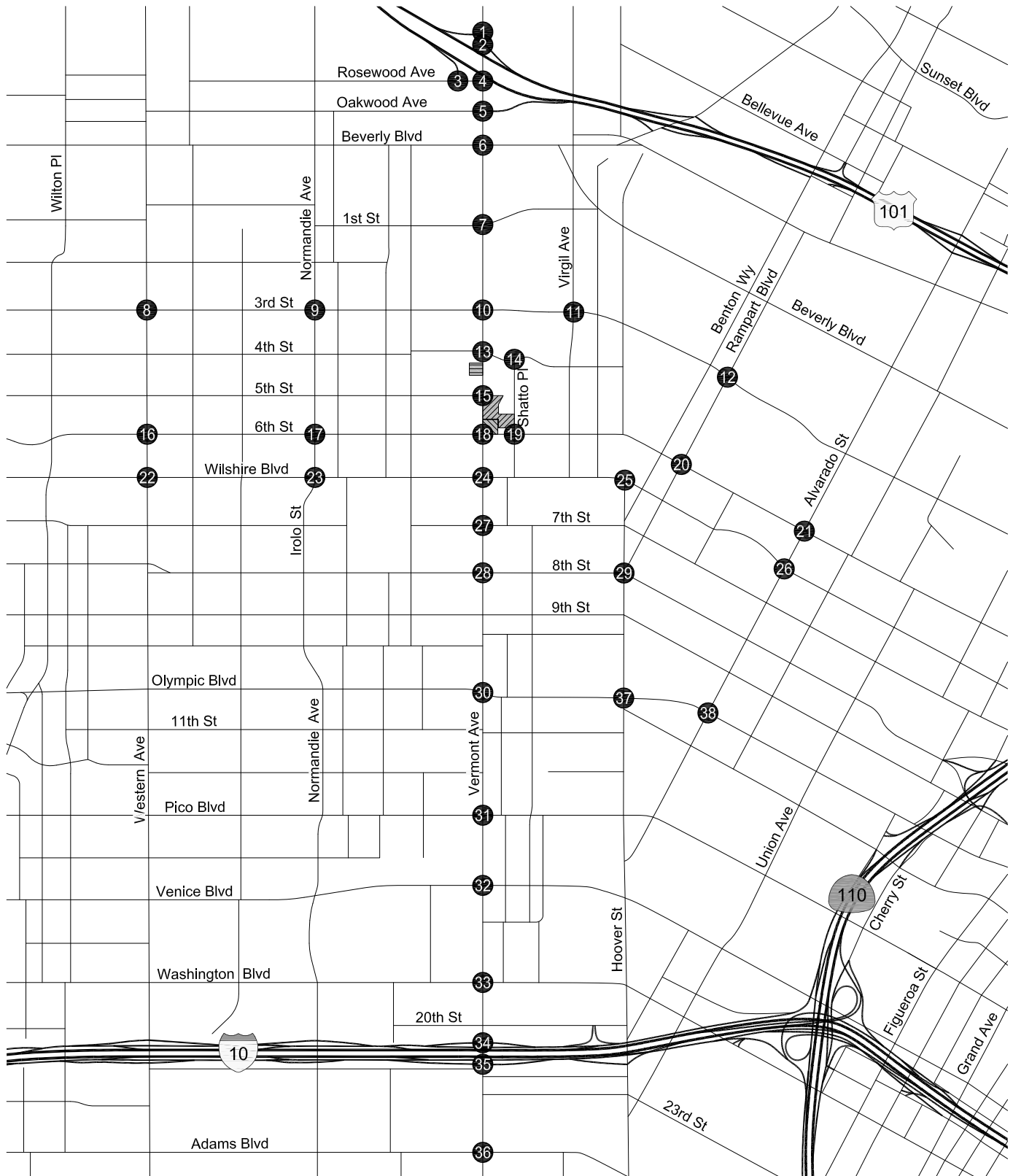
No.	North/South Street	East/West Street
3	US 101 SB Off-ramp / New Hampshire Avenue	Rosewood Avenue
4	Vermont Avenue	Rosewood Avenue
5	Vermont Avenue	Oakwood Avenue / US 101 SB On-ramp
6	Vermont Avenue	Beverly Boulevard
7	Vermont Avenue	1st Street
8	Western Avenue	3rd Street
9	Normandie Avenue	3rd Street
10	Vermont Avenue	3rd Street
11	Virgil Avenue	3rd Street
12	Rampart Boulevard	3rd Street
13	Vermont Avenue	4th Street
14	Shatto Place	4th Street
15	Vermont Avenue	5th Street
16	Western Avenue	6th Street
17	Normandie Avenue	6th Street
18	Vermont Avenue	6th Street
19	Shatto Place	6th Street
20	Rampart Boulevard	6th Street
21	Alvarado Street	6th Street
22	Western Ave	Wilshire Boulevard
23	Normandie Avenue	Wilshire Boulevard
24	Vermont Avenue	Wilshire Boulevard
25	Hoover Street	Wilshire Boulevard
26	Alvarado Street	Wilshire Boulevard
27	Vermont Avenue	7th Street
28	Vermont Avenue	8th Street
29	Hoover Street	8th Street
30	Vermont Ave	Olympic Boulevard
31	Vermont Ave	Pico Ave
32	Vermont Avenue	Venice Boulevard
33	Vermont Avenue	Washington Boulevard
34	Vermont Avenue	I-10 Westbound Ramps
35	Vermont Avenue	I-10 Eastbound Ramps
36	Vermont Avenue	Adams Boulevard
37	Hoover Street	Olympic Boulevard
38	Alvarado Street	Olympic Boulevard

Source: Gibson Transportation Consulting, Inc., June 2017.

ENVIRONMENTAL SETTING

Existing Street System

The existing street system in the Study Area consists of a regional roadway system including Freeways, Avenues, Collector Streets and Local Streets which provide regional, sub-regional, or local access and



LEGEND

 Project Site  Analyzed Intersection



Source: Gibson Transportation Consulting, Inc., April 2017.

circulation within the Study Area. These transportation facilities generally provide two to six travel lanes and usually allow parking on either side of the street. Typically, the speed limits range between 25 and 45 miles per hour (“mph”) on the streets and between 55 and 65 mph on freeways.

Street classifications are designated in the *Mobility Plan 2035: An Element of the General Plan* (“Mobility Plan 2035”). The available facilities in the Study Area are defined by the following:

- Freeways are high-volume, high-speed roadways with limited access provided by interchanges that carry regional traffic through and do not provide local access to adjacent land uses.
- Boulevards are arterial streets that provide primary through traffic routes with limited access to adjacent properties. Boulevards are divided into two categories:
 - Boulevard I typically provides 100 feet of paved width within 136 feet of right-of-way.
 - Boulevard II typically provides 80 feet of paved width within 110 feet of right-of-way.
- Avenues are arterial streets that serve through traffic, as well as provide access to major commercial activity centers. Avenues are divided into three categories:
 - Avenue I typically provides 70 feet of paved width within 100 feet of right-of-way.
 - Avenue II typically provides 56 feet of paved width within 86 feet of right.
 - Avenue III typically provides 46 feet of paved width within 72 feet of right-of-way.
- Collector Streets are intended to assist local traffic flow to Avenues and are typically located at quarter-mile intervals in a grid system.
- Local Streets provide circulation for local adjacent neighborhoods and do not typically serve commercial uses. Local streets provide connections to collector streets, which in turn, connect to the arterial street network.

The following is a brief description of the major roadways in the Project area, including their classifications under Mobility Plan 2035:

Freeways

US 101 – US 101 runs along the northern border of the Study Area in a northwest and southeast orientation. It provides four lanes in each direction. Access to and from US 101 is available via interchanges at Vermont Avenue, Normandie Avenue / Melrose Avenue, Silver Lake Boulevard, Benton Way / Rampart Boulevard, and Alvarado Street within or near the Study Area.

I-10 – I-10 runs east and west near the southern border of the Study Area approximately 2 miles south of the Project Sites. It provides four lanes in each direction along with auxiliary lanes between interchanges. Access to and from I-10 is provided at Vermont Avenue nearest the Project Site, and also at Western Avenue, Normandie Avenue, and Hoover Street within the Study Area.

Roadways

Rosewood Avenue – Rosewood Avenue is a designated Collector Street between Vermont Avenue and Normandie Avenue and a Local Street west of Normandie Avenue. It runs east-west one mile north of 6th Street. It provides one lane in each direction and on-street parking on both sides. The total paved width is 48 feet with a centerline between Vermont Avenue and Normandie Avenue. The total paved width is 36 feet with a solid double yellow centerline west of Normandie Avenue.

Oakwood Avenue – Oakwood Avenue is a designated Local Street running east-west one mile north of 6th Street. It provides one lane in each direction, with left-turn pockets at most intersections and on-street parking on both sides. The total paved width is 36 feet with a solid double yellow centerline.

Beverly Boulevard – Beverly Boulevard is a designated Avenue II running east-west 0.9 miles north of 6th Street. It provides two lanes in each direction and on-street metered parking. There is no center left-turn lane, but there are left-turn pockets at most intersections. Inside lanes are generally 10 feet wide and the total paved width is typically 56 feet.

3rd Street – 3rd Street is a designated Avenue II running east-west about 0.33 miles north of 6th Street. It provides two lanes in each direction and on-street metered parking. There is generally no center left-turn lane, but there are left-turn pockets at most intersections. Inside lanes are generally 10 feet wide and the total paved width is typically 66 feet.

4th Street – 4th Street is a designated Collector Street running east-west 0.25 miles north of 6th Street. It provides one lane in each direction and on-street unmetered parking. There is a center left-turn lane between Vermont Avenue and Westmoreland Avenue, where the total paved width is 56 feet. Elsewhere, there is no center left-turn lane and the total paved width is 36 feet.

5th Street – 5th Street is a designated Collector Street west of Vermont Avenue and local street running east-west one block north of 6th Street. It provides one lane in each direction and on-street parking on both sides. The total paved width is 36 feet.

6th Street – 6th Street is a designated Avenue II running east-west adjacent to the Project Sites. It provides two lanes in each direction and on-street metered parking with peak hour restrictions on the north side of the street. There is no center left-turn lane, but there are left-turn pockets at most intersections. Inside lanes are generally 10 feet wide and the total paved width is 56 feet.

Wilshire Boulevard – Wilshire Boulevard is a designated Avenue I running east-west one block south of 6th Street. It generally provides four travel lanes, left-turn lanes at intersections, and an exclusive bus rapid transit lane in each direction. Metered parking with peak hour restrictions is generally available on both sides of the street. Inside lanes are generally 10 feet wide and the total paved width is 70 feet.

7th Street – 7th Street is a designated Avenue II running east-west 0.25 miles south of 6th Street. It provides one lane in each direction and Class II bike lanes east of Catalina Street. On-street metered and unmetered parking is available on both sides of the street. There are left-turn pockets at most intersections. Inner lanes are generally 10 feet wide, while bike lanes are five feet wide and the total paved width is 56 feet.

8th Street – 8th Street is a designated Avenue II running east-west 0.4 miles south of 6th Street. It provides two lanes in each direction and on-street metered parking. There is no center left-turn lane, but there are left-turn pockets at some intersections. Inside lanes are generally 10 feet wide and the total paved width is 56 feet.

Olympic Boulevard – Olympic Boulevard is a designated Boulevard II running east-west 0.75 miles south of 6th Street. It provides three lanes in each direction, with left-turn lanes at intersections and on-street unmetered parking with peak hour restrictions on both sides of the street. Inside lanes are generally 10 feet wide and the total paved width is approximately 72 feet.

Pico Boulevard – Pico Boulevard is a designated Avenue II running east-west approximately one mile south of 6th Street. It provides two lanes in each direction with left-turn lanes at intersections and metered on-

street parking with afternoon peak hour restrictions on the north side of the street and morning peak hour restrictions on the south side of the street. Inside lanes are generally 10 feet wide and the total paved width is 56 feet.

Venice Boulevard – Venice Boulevard is a designated Avenue II running east-west 1.3 miles south of 6th Street. It generally provides four travel lanes, with left-turn lanes at intersections. There is one-hour unmetered parking with afternoon peak hour restrictions on the north side of the street. There is no center left-turn lane, but there are left-turn pockets at most intersections. Inside lanes are generally 10 feet wide and the total paved width is 56 feet.

Washington Boulevard – Washington Boulevard is a designated Avenue I west of Hoover Street and Boulevard II east of Hoover Street running east-west 1.6 miles south of 6th Street. It provides two lanes in each direction with left-turn lanes at intersections. On-street unmetered parking is generally available, with afternoon peak hour restrictions on the north side of the street and morning peak hour restrictions on the south side of the street. Inside lanes are generally 10 feet wide and the total paved width is 72 feet.

Adams Boulevard – Adams Boulevard is a designated Avenue I running east-west two miles south of 6th Street. It provides two lanes in each direction with left-turn lanes at intersections. On-street unmetered parking is generally available on both sides of the street. Inside lanes are generally 10 feet wide and the total paved width is 60 feet.

Western Avenue – Western Avenue is a designated Avenue II running north-south one mile west of Vermont Avenue. It provides two lanes in each direction and on-street metered parking. There is no center left-turn lane, but there are left-turn pockets at most intersections. Inside lanes are generally 10 feet wide and the total paved width is 56 feet.

Normandie Avenue – Normandie Avenue is a designated Avenue III north of Pico Boulevard and Avenue II south of Pico Boulevard running north-south 0.5 miles west of Vermont Avenue. It diverges from Irolo Street north of Olympic Boulevard and continues from Irolo Street north of Wilshire Boulevard. It provides four travel lanes, with left-turn lanes at intersections, north of Wilshire Boulevard and south of Olympic Boulevard. North of Wilshire Boulevard metered and unmetered parking is generally available, with morning peak hour restrictions on the west side of the street and afternoon peak hour restrictions on the east side of the street. South of Olympic Boulevard, free parking is generally available with morning peak hour restrictions on the east side of the street and afternoon peak hour restrictions on the west side of the street. Inside lanes are generally 10 feet wide and the total paved width is 40 feet north of Pico Boulevard and 60 feet south of Pico Boulevard.

Berendo Street – Berendo Street is a Local Street running north-south two blocks west of Vermont Avenue. It provides one lane in each direction and on-street parking on both sides. The total paved width is 28 feet.

New Hampshire Avenue – New Hampshire Avenue is a Local Street running north-south one block west of Vermont Avenue. It provides one lane in each direction and on-street parking on both sides. The total paved width is 36 feet with a dashed centerline.

Vermont Avenue – Vermont Avenue is a designated Avenue I running north-south adjacent to the Project Sites. It provides two lanes in each direction and left-turn lanes at intersections. Metered parking with peak hour restrictions is generally available on the west side of the street and metered and unmetered parking with peak hour restrictions is generally available on the east side of the street. Inside lanes are

generally 10 feet wide and the total paved width is 60 feet south of Wilshire Boulevard and 70 feet north of Wilshire Boulevard.

Shatto Place – Shatto Place is a designated Local Street running north-south one block east of Vermont Avenue. It provides one lane in each direction and on-street unmetered parking. There is a center left-turn lane, and left-turn pockets at most intersections. The total paved width is 50 feet.

Westmoreland Avenue – Westmoreland Avenue is a designated Collector Street running north-south two blocks east of Vermont Avenue. It provides one lane in each direction and on-street unmetered parking on both sides. The total paved width is 50 feet with a dashed centerline.

Virgil Avenue – Virgil Avenue is a designated Avenue II running north-south 0.25 miles east of Vermont Avenue. It provides two lanes in each direction and on-street unmetered parking. There is no center left-turn lane, but there are left-turn pockets at most intersections. Inside lanes are generally 10 feet wide and the total paved width is 60 feet.

Hoover Street – Hoover Street is a designated Local Street north of Wilshire Boulevard and Avenue II running north-south 0.4 miles east of Vermont Avenue. It provides two lanes in each direction, with left-turn lanes at intersections. Unmetered parking is generally available on both sides of the street. Inside lanes are generally 10 feet wide and the total paved width is 60 feet.

Rampart Boulevard – Rampart Boulevard is a designated Avenue I between Beverly Boulevard and 6th Street and Avenue II south of 6th Street running northeast-southwest approximately 0.5 miles east of Vermont Avenue. It provides two lanes in each direction, with left-turn lanes at intersections and Class II bike lanes between Beverly Boulevard and 6th Street. On-street unmetered parking is available on both sides of the street. Inside lanes are generally 10 feet wide and the total paved width is 40 feet south of 6th Street and 76 feet north of 6th Street.

Alvarado Street – Alvarado Street is a designated Avenue II running northeast-southwest approximately 0.5 miles east of Vermont Avenue. It provides two lanes in each direction, with left-turn lanes at intersections. Metered parking is generally available on both sides of the street with morning peak hour restrictions north of Olympic Boulevard on the west side of the street and afternoon peak hour restrictions north of Olympic Boulevard on the east side of the street. Inside lanes are generally 10 feet wide and the total paved width varies between 60 feet and 72 feet.

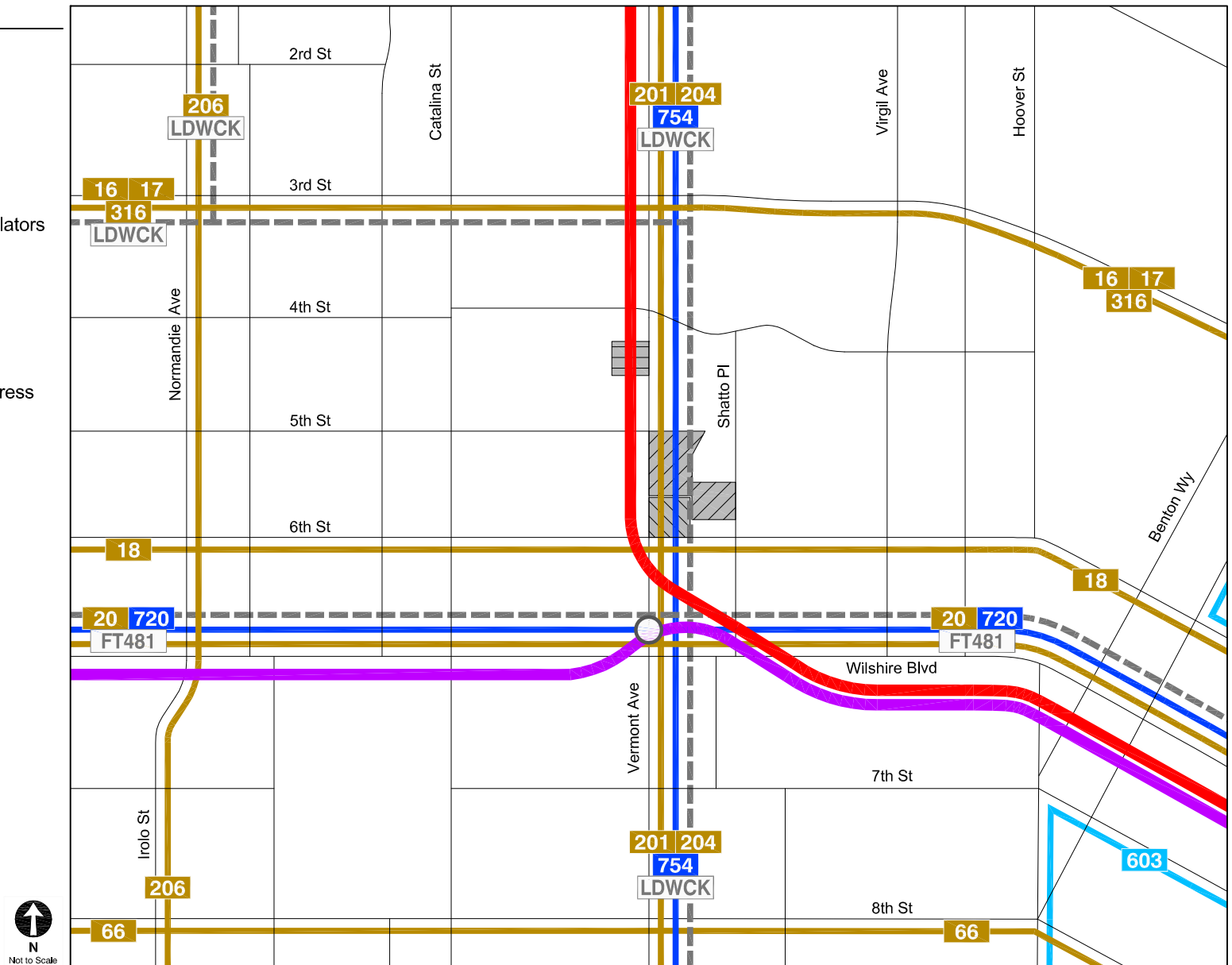
Existing Transit System

The Project vicinity is served by bus and rail lines operated by Metro, DASH, and Foothill Transit. Figure 4.14-2, Public Transit Serving the Project Site, illustrates the existing transit service in the Study Area. The following provides a brief description of each route that passes near enough to the Project Sites to be usable by Project residents, employees, and visitors (generally within 0.25-mile):

- Metro Local Line 16 – Route 16 is a local bus line that travels from Downtown Los Angeles to Century City via 3rd Street and provides service to Koreatown, Beverly Grove, and Beverly Hills. It provides a stop at 3rd Street & Vermont Avenue in the vicinity of the Project Sites. It has headways of five minutes during the weekday morning and afternoon peak hours.
- Metro Local Line 17 – Route 17 is a local bus line that travels from Downtown Los Angeles to Culver City via 3rd Street and provides service to Koreatown, Beverly Grove, and Palms. It provides

LEGEND

-  Project Site
-  Metro Rail Station
-  Metro Red Line
-  Metro Purple Line
-  Metro Local & Limited
-  Metro Shuttles & Circulators
-  Metro Rapid
-  Municipal Bus Lines
- LD - LADOT DASH
- FT - Foothill Transit
- CE - Commuter Express



Source: Gibson Transportation Consulting, Inc., April 2017.

a stop at 3rd Street & Vermont Avenue in the vicinity of the Project Sites. It has headways of five minutes during the weekday morning and afternoon peak hours.

- Metro Local 18 – Route 18 is a local bus line that travels from Wilshire Center (at Western Avenue & Wilshire Boulevard) to the Montebello Metrolink station. It provides service through Downtown Los Angeles, Boyle Heights, and East Los Angeles. It provides a stop at Vermont Avenue & 6th Street adjacent to the Project Site. It has headways of between five and 12 minutes during the peak periods, depending on direction.
- Metro Local Line 20 – Route 20 is a local bus line that travels from Downtown Los Angeles to Santa Monica via Wilshire Boulevard and provides service to Koreatown, Westwood, and the Metro Purple Line. It provides a stop at Vermont Avenue & Wilshire Boulevard in the vicinity of the Project Sites. It has headways of 6 to 15 minutes during the weekday morning and afternoon peak hours.
- Metro Local 66 – Route 66 is a local bus line that travels from Montebello to the Wilshire Center via 6th Street and Olympic Boulevard. This line provides service to Koreatown, Downtown Los Angeles, West Lake, Boyle Heights, East Los Angeles, the city of Commerce and Montebello, and travels along Olympic Boulevard with a stop at Vermont Avenue and 8th Street south of the Project Sites. It has average headways of 5 to 15 minutes during the weekday morning and afternoon peak hours.
- Metro Local 201 – Route 201 is a local line that travels from Glendale to Koreatown via Vermont Avenue and provides service to Koreatown, Silver Lake, and Atwater Village. It provides a stop at Vermont Avenue & 6th Street adjacent to the Project Sites. It travels once per hour during the weekday morning and afternoon peak hours.
- Metro Local 204 – Route 204 is a local line that travels from Hollywood to Athens via Vermont Avenue and provides service to Koreatown, Exposition Park, and Westmont. It provides a stop at Vermont Avenue & 6th Street adjacent to the Project Sites. It has average headways of 10 minutes during the weekday morning and afternoon peak hours.
- Metro Local 206 – Route 206 is a local line that travels from Hollywood to Athens via Normandie Avenue and provides service to Koreatown and Westmont. It provides a stop at Normandie Avenue & 6th Street in the vicinity of the Project Sites. It has average headways of 10 minutes during the weekday morning and afternoon peak hours.
- Metro Local Line 316 – Route 316 is a local bus line that travels from Downtown Los Angeles to Century City via 3rd Street and provides service to Koreatown, Beverly Grove, and Beverly Hills. It provides a stop at 3rd Street & Vermont Avenue in the vicinity of the Project Sites. It has headways of 5 minutes during the weekday morning and afternoon peak hours.
- Metro Rapid 603 – Route 603 is a shuttle bus line that travels from Downtown Los Angeles to Glendale, providing service through Echo Park and Westlake on the way. It provides a stop at Hoover Street & 8th Street in the vicinity of the Project Sites. It has headways of between 10 and 12 minutes during the peak periods, depending on direction.
- Metro Rapid 720 – Route 720 is a limited-stop bus line that travels from Santa Monica to Commerce, providing service through Westwood and Los Angeles on the way. It provides a stop

at Vermont Avenue & Wilshire Boulevard in the vicinity of the Project Sites. It has headways of between 3 and 10 minutes during the peak periods, depending on direction.

- **Metro Rapid 754** – Route 754 is a rapid line that travels from Hollywood to Athens via Vermont Avenue and provides service to Vermont Knolls and Koreatown. It provides a stop at Vermont Avenue & Wilshire Boulevard in the vicinity of the Project Sites. It has average headways of 6 minutes during the weekday morning and afternoon peak hours.
- **LADOT DASH Wilshire Center / Koreatown** – DASH Wilshire Center/Koreatown is a local line that travels in a loop through Wilshire Center / Koreatown. It generally travels on 3rd Street and 1st Street, Vermont Avenue, 9th Street / James M. Wood Boulevard, and Western Avenue, with average headways of 20 minutes during the weekday morning and afternoon peak hours. It provides a direct connection to the Metro Purple Line Wilshire / Western Station and Metro Purple Line and Red Line Wilshire / Vermont Station.
- **Foothill Transit 481** – Route 481 is a local line that travels from El Monte to Downtown Los Angeles and provides service to Monterey Park, Downtown Los Angeles, and Koreatown. It provides a stop at Vermont Avenue & Wilshire Boulevard near the Project Sites. It has average headways of 15 minutes in the westbound direction during the weekday morning peak hour and in the eastbound direction during the afternoon peak hour.
- **Metro Red Line and Purple Line Subways** – The Red Line and Purple Line subways stop at the Wilshire / Vermont Metro Station one block south of the Project Site. The Red Line travels between North Hollywood and Union Station in Downtown Los Angeles. The Purple Line travels between the Wilshire / Western Station and Union Station. Each has headways of 10 minutes in each direction throughout the day; therefore, there is subway service to and from Downtown Los Angeles every five minutes, and to or from North Hollywood or the Wilshire / Western Metro Station every 10 minutes. The Metro Red and Purple Lines provide access to the regional rail transit system, including the Metro Blue, Gold, Orange and Exposition Lines, and to regional and commuter rail lines, including Metrolink and Amtrak, through Union Station.

Table 4.14-2, Existing Transit Serving Project Site, summarizes the transit lines operating in the vicinity of the Project Site. It shows the routes organized by the service provider, the type of service (peak vs. off-peak, rapid vs. local), and frequency of service, as described above. The average headways during the peak hour were estimated using detailed trip and ridership data from October 2016 provided by Metro.

Table 4.14-2
Existing Transit Serving Project Site

Provider, Route, and Service Area		Service Type	Hours of Operation in Study Area	Approximate Headway (minutes) ^a			
				Morning Peak Hour		Afternoon Peak Hour	
				NB/EB	SB/WB	NB/EB	SB/WB
Metro Bus Service							
16/17/316	Downtown Los Angeles - Century City/Culver City via 3rd Street	Local	4:00 A.M. - 1:00 A.M.	5	5	5	5
18	Downtown Los Angeles - Montebello/Wilshire/Western Station via 6th Street & Whittier Boulevard	Local	4:30 A.M. - 12:30 A.M.	5	10	8	12

Table 4.14-2
Existing Transit Serving Project Site

Provider, Route, and Service Area		Service Type	Hours of Operation in Study Area	Approximate Headway (minutes) ^a			
				Morning Peak Hour		Afternoon Peak Hour	
				NB/EB	SB/WB	NB/EB	SB/WB
20	Downtown Los Angeles - Downtown LA/Santa Monica via Wilshire Boulevard	Local	24 - Hour	15	8	6	10
66	Downtown Los Angeles - Montebello/Wilshire Center via 8th Street & Olympic Boulevard	Local	4:30 A.M. - 1:30 A.M.	5	15	15	6
201	Glendale to Koreatown via Vermont Avenue & Silver Lake Boulevard	Local	6:00 A.M. - 9:00 P.M.	60	60	60	60
204	Hollywood - Athens via Vermont Ave	Local	24 - Hour	10	10	10	10
206	Hollywood - Athens via Normandie Ave	Local	4:30 A.M. - 1:30 A.M.	10	10	10	10
603	Glendale Galleria - Grand Station via Hoover Street, Rampart Boulevard & San Fernando Rd	Shuttle	5:00 A.M. - 11:00 P.M.	10	12	10	10
720	LA/Commerce - Santa Monica via Wilshire Boulevard & Whittier Boulevard	Express	4:00 A.M. - 1:00 A.M.	10	3	3	10
754	Hollywood - Athens via Vermont Ave	Express	5:00 A.M. - 9:00 P.M.	6	6	6	6
Foothill Transit							
481	Downtown Los Angeles - El Monte	Express	6:00 A.M. - 6:00 P.M.	15	15	15	15
LADOT DASH Bus Service							
WCK	Wilshire Center/Koreatown	Local	7:00 A.M. - 7:30 P.M.	20	20	20	20
Metro Rail Service							
Red Line	Downtown Los Angeles - North Hollywood	Subway	4:00 A.M. - 1:00 A.M.	10	10	10	10
Purple Line	Downtown Los Angeles - Western & Wilshire	Subway	4:00 A.M. - 1:00 A.M.	10	10	10	10
Metro: Los Angeles County Metropolitan Transportation Authority LADOT DASH: Los Angeles Department of Transportation Downtown Area Shuttle ^a Headway information based on operating and ridership data from Metro for October, 2016. Source: Gibson Transportation Consulting, Inc., June 2017.							

Tables 4.14-3 and 4.14-4 summarize the total available capacity of the Metro transit system, the primary transit service provider in the area, (no data was readily available for the LADOT DASH or Foothill Transit bus systems) near the Project Sites during the morning and afternoon peak hours, respectively, based on the frequency of service of each line, the standing capacity of each bus or train, and the average peak hour load in each direction. As shown in Tables 4.14-3 and 4.14-4, the Metro bus and rail lines within the Study Area have available capacity for approximately 14,140 additional riders during the morning peak hour and approximately 12,300 riders during the afternoon peak hour.

Table 4.14-3
Transit System Capacity Serving Project Site-Morning Peak Hour

Provider, Route, and Service Area			Capacity Per Trip ^a	Peak Hour Ridership ^b				Average Remaining Capacity per Trip		Remaining Peak Hour Capacity	
				Peak Load		Average Load					
				NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB
Metro Bus Service											
16/17/316	Vermont Avenue at 3rd Street	50	37	35	27	26	23	24	276	288	
18	Vermont Avenue at 6th Street	50	25	12	16	10	34	40	238	200	
20	Vermont Avenue at Wilshire Boulevard	50	34	34	30	31	20	19	200	114	
66	Vermont Avenue at 8th Street	50	31	20	26	15	24	35	96	350	
201	Vermont Avenue at 6th Street	50	16	5	16	4	34	46	34	46	
204	Vermont Avenue at 6th Street	50	45	25	37	21	13	29	78	174	
206	Normandie Avenue at 6th Street	50	29	36	25	29	25	21	150	126	
603	Hoover Street at 8th Street	50	24	21	17	17	33	33	198	198	
720	Vermont Avenue at Wilshire Boulevard	75	41	59	30	38	45	37	900	222	
754	Vermont Avenue at Wilshire Boulevard	75	51	46	34	29	41	46	410	460	
LADOT DASH Bus Service											
WCK	Wilshire Center/Koreatown	30	No data provided								
Foothill Transit											
481	Downtown Los Angeles - El Monte	50	No data provided								
Metro Rail Service											
Red Line	Wilshire / Vermont	750	n/a	n/a	405	328	345	422	2,070	2,532	
Purple Line	Wilshire / Vermont	500	n/a	n/a	101	102	399	398	2,394	2,388	
Total Bus Service Capacity									4,758		
Total Rail Service Capacity									9,384		
Total Transit Service Capacity									14,142		
Metro: Los Angeles County Metropolitan Transportation Authority LADOT DASH: Los Angeles Department of Transportation Downtown Area Shuttle ^a Capacity Assumptions: Metro Regular Bus - 40 seated / 50 standing. Metro Articulated Bus - 66 seated / 75 standing. Metro Red Line - 55 seats / car, 6 cars / run during peak periods. Metro assumes a maximum capacity of 230 percent of seated capacity, or approximately 125 / car. LADOT DASH - 25 seated / 30 standing. ^b Ridership information based on data from Metro for October 2016. Source: Gibson Transportation Consulting, Inc., June 2017.											

Table 4.14-4
Transit System Capacity Serving Project Site-Afternoon Peak Hour

Provider, Route, and Service Area			Capacity Per Trip ^a	Peak Hour Ridership ^b				Average Remaining Capacity per Trip		Remaining Peak Hour Capacity	
				Peak Load		Average Load					
				NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB	NB/EB	SB/WB
Metro Bus Service											
16/17/316	Vermont Avenue at 3rd Street	50	43	40	33	28	17	22	204	264	
18	Vermont Avenue at 6th Street	50	26	18	16	14	34	36	238	180	
20	Vermont Avenue at Wilshire Boulevard	50	34	37	23	31	27	19	270	114	
66	Vermont Avenue at 8th Street	50	35	33	28	29	22	21	88	210	
201	Vermont Avenue at 6th Street	50	18	3	18	3	32	47	32	47	
204	Vermont Avenue at 6th Street	50	44	46	35	35	15	15	90	90	
206	Normandie Avenue at 6th Street	50	37	36	30	27	20	23	120	138	
603	Hoover Street at 8th Street	50	19	22	15	18	35	32	210	192	
720	Vermont Avenue at Wilshire Boulevard	75	46	51	26	43	49	32	980	192	
754	Vermont Avenue at Wilshire Boulevard	75	45	52	37	44	38	31	380	310	
LADOT DASH Bus Service											
WCK	Wilshire Center/Koreatown	30	No data provided								
Foothill Transit											
481	Downtown Los Angeles - El Monte	50	No data provided								
Metro Rail Service											
Red Line	Wilshire / Vermont	750	n/a	n/a	392	520	358	230	2,148	1,380	
Purple Line	Wilshire / Vermont	500	n/a	n/a	163	100	337	400	2,022	2,400	
Total Bus Service Capacity									4,349		
Total Rail Service Capacity									7,950		
Total Transit Service Capacity									12,299		
Metro: Los Angeles County Metropolitan Transportation Authority LADOT DASH: Los Angeles Department of Transportation Downtown Area Shuttle ^a Capacity Assumptions: Metro Regular Bus - 40 seated / 50 standing. Metro Articulated Bus - 66 seated / 75 standing. Metro Red Line - 55 seats / car, 6 cars / run during peak periods. Metro assumes a maximum capacity of 230 percent of seated capacity, or approximately 125 / car. LADOT DASH - 25 seated / 30 standing. ^b Ridership information based on data from Metro for October 2016. Source: Gibson Transportation Consulting, Inc., June 2017.											

Bicycle and Pedestrian Network

Within the Study Area, there are various bicycle facilities, including on-street bicycle lanes and sharrows (shared lanes between bicycles and vehicles). There are on-street bicycle lanes in the following locations:

- 1st Street between Vermont Avenue and Beverly Boulevard
- 7th Street between Catalina Street (three blocks west of Vermont Avenue) to Downtown Los Angeles.
- 11th Street between Hoover Street and Alvarado Street
- Oxford Avenue between Beverly Boulevard and 3rd Street
- Hoover Street south of Venice Boulevard
- Rampart Boulevard between Beverly Boulevard and 6th Street

Additionally, there are sharrows on the following streets:

- 4th Street west of Hoover Street
- Adams Boulevard east of Vermont Avenue
- New Hampshire Avenue north of 6th Street (and extending north of US 101 via a jog on Rosewood Avenue to Heliotrope Drive)
- Rampart Boulevard south of 6th Street and north of Beverly Boulevard

The walkability of existing facilities for pedestrians is based on the availability of pedestrian routes necessary to accomplish daily tasks without the use of an automobile. These attributes are quantified by WalkScore.com and assigned a score out of 100 points. The walkability of the vicinity of the Project Sites is rated at 97 points compared with a citywide score of 66 points. There are wide sidewalks lining the streets, crosswalks available at the intersections, and many shops, restaurants, and other services within walking distance of the Project Site.

Vision Zero

As described in *Vision Zero: Eliminating Traffic Deaths in Los Angeles by 2025* (City of Los Angeles, August 2015), Vision Zero is a traffic safety policy that promotes strategies to eliminate collisions that result in severe injury or death. Vision Zero has identified the High Injury Network, a network of streets based on the collision data from the last five years, where strategic investments will have the biggest impact in reducing death and severe injury. Within the Study Area, nearly all of the arterial streets (Avenues and Boulevards), many of the collector streets, and some of the local streets have been identified in the High Injury Network (“HIN”). Both Vermont Avenue and 6th Street have been identified along their entire lengths through the Study Area.

Existing Traffic Volumes and Levels of Services

Intersection turning movement counts were conducted at the 38 study intersections during the weekday morning (7:00 AM to 10:00 AM) and afternoon (3:00 PM to 6:00 PM) peak periods in November 2016 (except for three locations that were counted in November 2015 and one counted in December 2016) and represent Existing Year 2017 conditions for the purposes of this analysis. Traffic count worksheets are provided in Appendix B of the Traffic Study (included as Appendix 4.14.1 to this Draft EIR). Intersection operating conditions were analyzed by calculating the volume-to-capacity (“V/C”) ratio, which is used to determine the intersection level of service (“LOS”). LOS definitions are provided in Table 4.14-5.

Table 4.14-5
Level of Service (LOS) Definitions for Intersections

Level of Service	Signalized V/C Ratio ^a	Signalized Delay ^b	Unsignalized Delay (seconds) ^b	Definition
A	0.000-0.600	0.0-10.0	0.0-10.0	EXCELLENT. No Vehicle waits longer than one red light and no approach phase is fully used.
B	0.601-0.700	10.1-20.0	10.1-15.0	Very GOOD. An occasional approach phase is fully utilized; many drivers begin to feel somewhat restricted within groups of vehicles.
C	0.701-0.800	20.1-35.0	15.1-25.0	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801-0.900	35.1-55.0	25.1-35.0	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	0.901-1.000	55.1-80.0	35.1-50.0	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several signal cycles.
F	>1.000	>80.0	>50.0	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.
^a Transportation Research Circular No. 212, Interim Materials on Highway Capacity, Transportation Board, 1980. ^b 2010 Highway Capacity Manual, Transportation Research Board, 2010. Source: Gibson Transportation Consulting, Inc., June 2017.				

Existing Intersection Levels of Service – Signalized Intersections

Table 4.14-6 summarizes the weekday morning and afternoon peak hour LOS results for each of the study intersections under Existing Year 2017 Conditions. As shown, all of the study intersections currently operate at LOS D or better during both the morning and afternoon peak hours.

Table 4.14-6
Signalized Intersection Levels of Service Existing Conditions (Year 2017)

No.	Intersection	Peak Hour	Existing	
			V/C	LOS
1	Vermont Avenue & US 101 NB On-ramp	A.M.	0.509	A
		P.M.	0.476	A
2	Vermont Avenue & US 101 NB Off-ramp	A.M.	0.417	A
		P.M.	0.464	A
3	US 101 SB Off-ramp/New Hampshire Street & Rosewood Avenue	A.M.	0.269	A
		P.M.	0.290	A
4	Vermont Avenue & Rosewood Avenue	A.M.	0.536	A
		P.M.	0.577	A
5	Vermont Avenue & Oakwood Avenue/US 101 SB On-ramp	A.M.	0.571	A
		P.M.	0.558	A

Table 4.14-6
Signalized Intersection Levels of Service Existing Conditions (Year 2017)

No.	Intersection	Peak Hour	Existing	
			V/C	LOS
6	Vermont Avenue & Beverly Boulevard	A.M.	0.678	B
		P.M.	0.744	C
7	Vermont Avenue & 1 st Street	A.M.	0.540	A
		P.M.	0.660	B
8	Western Avenue & 3 rd Street	A.M.	0.749	C
		P.M.	0.744	C
9	Normandie Avenue & 3 rd Street	A.M.	0.641	B
		P.M.	0.618	B
10	Vermont Avenue & 3 rd Street	A.M.	0.784	C
		P.M.	0.752	C
11	Virgil Avenue & 3 rd Street	A.M.	0.734	C
		P.M.	0.735	C
12	Rampart Boulevard & 3 rd Street	A.M.	0.622	B
		P.M.	0.707	C
13	Vermont Avenue & 4 th Street	A.M.	0.579	A
		P.M.	0.573	A
14	Shatto Place & 4 th Street	A.M.	0.431	A
		P.M.	0.388	A
15	Vermont Avenue & 5 th Street	A.M.	0.424	A
		P.M.	0.437	A
16	Western Avenue & 6 th Street	A.M.	0.501	A
		P.M.	0.537	A
17	Normandie Avenue & 6 th Street	A.M.	0.590	A
		P.M.	0.585	A
18	Vermont Avenue & 6 th Street	A.M.	0.701	C
		P.M.	0.655	B
19	Shatto Place & 6 th Street	A.M.	0.519	A
		P.M.	0.527	A
20	Rampart Boulevard & 6 th Street	A.M.	0.651	B
		P.M.	0.771	C
21	Alvarado Street & 6 th Street	A.M.	0.577	A
		P.M.	0.512	A
22	Western Avenue & Wilshire Boulevard	A.M.	0.836	D
		P.M.	0.882	D
23	Normandie Avenue & Wilshire Boulevard	A.M.	0.588	A
		P.M.	0.678	B
24	Vermont Avenue & Wilshire Boulevard	A.M.	0.828	D
		P.M.	0.791	C
25	Hoover Street & Wilshire Boulevard	A.M.	0.632	B
		P.M.	0.607	B
26	Alvarado Street & Wilshire Boulevard	A.M.	0.599	A
		P.M.	0.581	A
27	Vermont Avenue & 7 th Street	A.M.	0.627	B

Table 4.14-6
Signalized Intersection Levels of Service Existing Conditions (Year 2017)

No.	Intersection	Peak Hour	Existing	
			V/C	LOS
		P.M.	0.669	B
28	Vermont Avenue & 8 th Street	A.M.	0.656	B
		P.M.	0.673	B
29	Hoover Street & 8 th Street	A.M.	0.763	C
		P.M.	0.810	D
30	Vermont Avenue & Olympic Boulevard	A.M.	0.866	D
		P.M.	0.841	D
31	Vermont Avenue & Pico Boulevard	A.M.	0.734	C
		P.M.	0.689	B
32	Vermont Avenue & Venice Boulevard	A.M.	0.770	C
		P.M.	0.778	C
33	Vermont Avenue & Washing Boulevard	A.M.	0.771	C
		P.M.	0.880	D
34	Vermont Avenue & I-10 WB Ramps	A.M.	0.706	C
		P.M.	0.573	A
35	Vermont Avenue & I-10 EB Ramps	A.M.	0.711	C
		P.M.	0.802	D
36	Vermont Avenue & Adams Boulevard	A.M.	0.784	C
		P.M.	0.726	C
37	Hoover Street & Olympic Boulevard	A.M.	0.834	D
		P.M.	0.831	D
38	Alvarado Street & Olympic Boulevard	A.M.	0.763	C
		P.M.	0.832	D
Source: Gibson Transportation Consulting, Inc., June 2017.				

Regulatory Framework

Regional Plans and Regulations

2008 Regional Comprehensive Plan

In response to the Southern California Association of Governments (“SCAG”) Regional Council’s 2002 directive in the 2002 Strategic Plan to develop a regional, holistic, strategic plan for defining and solving the region’s inter-related housing, traffic, water, air quality, and other challenges, the *2008 Regional Comprehensive Plan* (“RCP”) was drafted by SCAG and other key stakeholders.¹ The RCP was designed to consider additional steps required to further promote policies that would assist in greening the region, thereby laying the framework for the 2012 update of the *Regional Transportation Plan* (“RTP”). The 2008 RCP is closely linked to SCAG’s *Compass Blueprint* and the RTP. The RCP recommends goals, policies, and objectives designed to further integrate resource planning, and is designed to assist local governments with General Plan updates, municipal code amendments, design guidelines, incentive programs, and other actions. The RCP features nine chapters that focus on specific areas of planning and resource

¹ Southern California Association of Governments, *Regional Comprehensive Plan, 2008*.

management: Land Use and Housing; Open Space and Habitat; Water, Energy; Air Quality, Solid Waste; Transportation; Security and Emergency Preparedness; and Economy. Additional information regarding Project compliance with the RCP can be found in Section 4.1 (Land Use and Planning) of this Draft EIR.

2016-2040 Regional Transportation Plan/Sustainable Communities Strategy

On April 7, 2016, the Regional Council of SCAG adopted the *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS"): Towards a Sustainable Future*.² The RTP/SCS is a long-range plan that is intended to improve overall mobility, reduce greenhouse gases and enhance the quality of life for the region's residents. The RTP/SCS integrates land use, housing and environmental strategies with transportation planning to help meet emissions reduction targets set by the California Air Resources Board, as required by SB 375. The RTP/SCS provides an alternative to "business as usual" development. It encourages community revitalization and neighborhoods that are bike and pedestrian friendly, with convenient access to transit. Approved by State and federal agencies in April 2016, the RTP/SCS includes approximately \$556.5 billion in projected funding for transportation projects for Los Angeles County.

The RTP/SCS contains a plan to provide adequate highway, transit, rail, aviation, and goods movement infrastructure to meet the region's needs through 2040. The RTP/SCS is linked to Los Angeles County transportation plans and models in the form of shared growth and travel projections. As such, the 2016-2040 RTP/SCS is guided by and incorporates all projects from Metro's own Long-Range Transportation Plan. The RTP/SCS includes goals and policies applicable to transportation and, in some cases, land use projects. Additional information regarding Project compliance with the RTP/SCS can be found in Section 4.9 (Land Use and Planning) of this Draft EIR.

Congestion Management Program (CMP)

To address the increasing public concern that traffic congestion was impacting the quality of life and economic vitality of the State of California, the Congestion Management Program ("CMP") was enacted by Proposition 111 in 1991. The intent of the CMP is to provide the analytical basis for transportation decisions through the State Transportation Improvement Program ("STIP") process. A countywide approach has been established by Metro, the local CMP agency, designating a highway network that includes all state highways and principal arterials within the County. The Level of Service at each CMP monitoring station is supervised by local jurisdictions in order to implement the statutory requirements of the CMP. If Level of Service standards deteriorate, then local jurisdictions must prepare a deficiency plan to meet conformance standards outlined by the countywide plan.

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. The Project's potential impacts with respect to the CMP are analyzed later in this section.

² Southern California Association of Governments, *2016-2040 Regional Transportation Plan/Sustainable Communities Strategy: Towards a Sustainable Future*, website: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>, accessed May 2017.

Local Plans and Regulations

City of Los Angeles General Plan

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. The City of Los Angeles General Plan ("General Plan") addresses community development goals and policies relative to the distribution of public and private land use. The General Plan integrates the citywide elements and community plans, and gives policy direction to the planning regulatory and implementation programs.

Mobility Plan 2035

Mobility Plan 2035 ("Mobility Plan") provides a roadmap for achieving a transportation system that balances the needs of all road users. The Mobility Plan was adopted on August 11, 2015. As an update to the City's General Plan Transportation Element (last adopted in 1999), the Mobility Plan incorporates "Complete Streets" principles and lays the policy foundation for how future generations of Angelinos interact with their streets. In 2008, the California State Legislature adopted AB 1358, The Complete Streets Act, which requires local jurisdictions to, "plan for a balanced, multimodal transportation network that meets the needs of all users of streets, roads, and highways, defined to include motorists, pedestrians, bicyclists, children, persons with disabilities, seniors, movers of commercial goods, and users of public transportation, in a manner that is suitable to the rural, suburban or urban context."

The Plan is both a working guide and a reference document that serves as guiding tool for making sound transportation decisions as the City matures and evolves. It is intended to help the City and other agencies contemplate future actions such as transportation infrastructure improvements or open street events.

General Plan Framework Element

The City of Los Angeles General Plan Framework Element (the "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. Chapter 8, Transportation, of the Framework Element has a vision that includes a multimodal transportation system that provides choices and accessibility to everyone in Los Angeles. This chapter identifies transportation issues; transportation goals, objectives, and policies, as well as related implementation programs are set forth in the Transportation Element. As previously mentioned, the Transportation Element has been replaced with the Mobility Plan 2035.

ENVIRONMENTAL IMPACTS

Thresholds of Significance

Appendix G to the State CEQA Guidelines

The potential for the Project to result in impacts associated with transportation is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. In accordance with guidance provided in Appendix G to the *State CEQA Guidelines*, the Project would have a significant impact if it were to:

- a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation

- including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit;
- b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways;
 - c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks;
 - d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment);
 - e) Result in inadequate emergency access; or
 - f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

An affirmative answer to either of these questions would represent a significant impact. As discussed in Section 6.5 (Effects Not Found to be Significant), the Project would have no impact with respect to Threshold (c) listed above because it does not include an air traffic component.

City of Los Angeles CEQA Thresholds Guide

Although the Project Sites are owned by Los Angeles County, the Sites and study intersections are located within the City. Therefore, the Project's potential traffic impact was evaluated according to the thresholds of significance established in the City's *L.A. CEQA Thresholds Guide*, and in compliance with LADOT policies and procedures. As set forth in the *L.A. CEQA Thresholds Guide*, the determination of significance levels of impacts of the Project related to transportation and traffic are determined on a case-by-case basis considering the factors discussed below.

- g) Intersection Capacity - 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.

Signalized Intersection Analysis

Intersection capacity has been analyzed using the *Critical Movement Analysis (CMA) – Planning* methodology in accordance with the Transportation Impact Study Guidelines. The CMA methodology was implemented using LADOT's Calcadb Lite spreadsheet application to analyze intersection operating conditions. The methodology calculates the volume-to-capacity (V/C) ratio, which is used to determine the intersection level of service (LOS) according to the LOS definitions provided in Table 4.14-5, Level of Service Definitions for Intersections, above. LOS worksheets for each scenario are provided in Appendix D of the Traffic Study (included as Appendix 4.14-1 to this Draft EIR).

The significance of the potential impacts of Project generated traffic at the signalized study intersections was determined using criteria identified in *Transportation Impact Study Guidelines*. As shown in Table 4.14-7, LADOT Criteria for Significant Intersection Traffic Impact, LADOT guidelines indicate that a project

Table 4.14-7
LADOT Criteria for Significant Intersection Traffic Impact

LOS	V/C Ratio	Project-Related Increase in V/C Ratio
C	$> 0.701 \leq 0.800$	Equal or greater than 0.040
D	$> 0.801 \leq 0.900$	Equal or greater than 0.020
E, F	> 0.900	Equal or greater than 0.010
<i>Source: LADOT, 2017.</i>		

is considered to have a significant traffic impact on a signalized intersection if the increase in the V/C ratio attributable to the project exceeds a specific threshold depending on the final intersection LOS. LADOT has developed a sliding scale methodology in which the minimum allowable increase in the V/C ratio attributable to a project decreases as the V/C ratio of the intersection increases.

The relative impact of the added traffic volumes to be generated by the Project was evaluated based on analysis of existing and future operating conditions at the study intersections, with and without the Project.

Congestion Management Program

- h) Congestion Management Plan/Regional Transportation System – A project would have a significant impact at a Congestion Management Plan intersection if it were to add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic.

The Los Angeles County Congestion Management Plan (CMP) requires that new development projects analyze potential project impacts on CMP monitoring locations if an EIR is prepared for the project. The CMP requires that the Traffic Study analyze traffic conditions at all CMP arterial monitoring intersections where the Project will add 50 or more trips during either the AM or PM weekday peak hours of adjacent street traffic. A project would normally have a significant CMP intersection impact if project traffic causes an increase in V/C ratio on a CMP intersection of two percent or more capacity (V/C increase > 0.02), which causes or worsens LOS F conditions (V/C > 1.00).

- i) CMP Freeway Monitoring - A Project would normally have a significant freeway capacity impact if Project traffic causes an increase in the demand-to-capacity (D/C) ratio on a freeway segment or freeway on- or off-ramp of two percent or more capacity (D/C increase > 0.02), which causes or worsens LOS F conditions to 100 percent of capacity (D/C > 1.00)

The CMP requires that traffic studies analyze mainline freeway monitoring locations where the project will add 150 or more trips in either direction during either AM or PM weekday peak hours. If, based on these criteria, the Traffic Study identifies no facilities for study, then no further traffic analysis is required. A project would normally have a significant freeway capacity impact if project traffic causes an increase in the demand-to-capacity (D/C) ratio on a freeway segment or freeway on- or off-ramp of two percent or more capacity (D/C increase > 0.02), which causes or worsens LOS F conditions (D/C > 1.00).

Access and Circulation

- j) Project Access – A project would have a significant impact on project access if the design features/physical configurations of the project would affect the visibility of pedestrians and

bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists so as to create a hazardous condition.

Transit System

- k) Transit System Capacity – A project would have a significant impact on the existing transit system if the capacity of the transit system serving the Project area would be substantially exceeded as a result of the Project.

Bicycle, Pedestrian, and Vehicular Safety

- l) Bicycle, Pedestrian, and Vehicular Safety Impacts - The determination of potential impacts related to bicycle, pedestrian, and vehicular safety shall be on a case-by-case basis considering the following factors:
- The amount of pedestrian activity at project access points;
 - Design features/physical configurations that affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site, and the visibility of cars to pedestrians and bicyclists;
 - The type of bicycle facility the project driveway(s) crosses and the level of utilization; and
 - The physical conditions of the site and surrounding area, such as curves, slopes, walls, landscaping or other barriers, that could result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle impacts.

Parking

As discussed in Section 3.0, Project Description and Environmental Setting, of this Draft EIR, proposed development of Project Sites 1, 2 and 3 would represent residential, mixed-use residential, and/or employment center projects on infill sites in a transit priority area. As such, the Project's parking impacts shall not be considered significant impacts on the environment pursuant to SB 743 and Public Resources Code Section 21099(d)(1).³

Methodology

This impact analysis evaluates the potential for impacts caused by the Project on the street system surrounding the Project Site. Consistent with Transportation Impact Study Guidelines (LADOT, December 2016), the following traffic conditions were developed and analyzed as part of this analysis:

³ The Project Sites are all located in a "Transit Priority Area" as defined by California Public Resources Code ("PRC") Section 21099 because they are located within one-half mile of an existing rail transit station (Wilshire/Vermont Metro Rail Red/Purple Line Station). All three Project Sites are located in an area that is developed with urban uses, and have each been previously developed with urban uses. Accordingly, the Project Sites are infill sites as defined in PRC Section 21099. The Project is an infill development comprised of a new County office building and parking structure on Site 1, redevelopment of the existing County office building on Site 2 into residential units, along with a new mixed-use building and parking structure on Site 2, and a new senior affordable housing project

- Existing Year 2017 Conditions – The analysis of existing traffic conditions provides a basis for the assessment of future traffic conditions. The Existing Conditions analysis includes a description of key area streets and highways, traffic volumes and current operating conditions, and transit service in the Study Area. Intersection turning movement counts were collected in November 2016 (except for three locations that were counted in November 2015 and one that was counted in December 2016), and for the purposes of this analysis are considered to represent year 2017 conditions. Lane configurations and signal phasing for the analyzed intersections were also collected in November 2016. Intersection lane configurations and traffic count worksheets are provided in Appendix B and Appendix C, respectively, of the traffic study (included as Appendix 4.414-1 of this Draft EIR).
- Existing Year 2017 with Project Phase I Conditions – This analysis condition projects the potential intersection operating conditions that could be expected if Phase I of the Project were built under existing conditions. This analysis evaluates the potential Project-related traffic impacts as compared to Existing Conditions.
- Existing Year 2017 with Project Phase I and II Conditions – This analysis condition projects the potential intersection operating conditions that could be expected if Phase I and II of the Project were built under existing conditions. This analysis evaluates the potential Project-related traffic impacts as compared to Existing Conditions.
- Interim Year 2021 without Project Conditions – This analysis projects the future traffic growth and intersection operating conditions that could be expected as a result of regional growth and related project traffic in the Study Area by Year 2021, corresponding to the anticipated completion of Phase I of the Project. The Interim Year 2021 without Project traffic conditions are projected by adding ambient traffic growth and traffic from related projects to Existing Conditions. This analysis provides the conditions by which the Phase I Project impacts are evaluated in the future.
- Interim Year 2021 with Project Phase I Conditions – This analysis projects the potential intersection operating conditions that could be expected if Phase I of the Project were completed in year 2021 as anticipated. The analysis identifies the potential incremental impacts of the Project, prior to mitigation, by adding the Project-generated traffic to the Interim Year 2021 without Project traffic forecasts.
- Buildout Year 2023 without Project Conditions – This analysis projects the future traffic growth and intersection operating conditions that could be expected as a result of regional growth and related project traffic in the Study Area by Year 2023, corresponding to the anticipated completion of Phase II of the Project. Like the Interim Year 2021 without Project Conditions, the Buildout Year 2023 without Project traffic conditions are projected by adding ambient traffic growth and traffic from related projects to Existing Conditions. This analysis provides the conditions by which the full Project (Phase I and II) impacts are evaluated in the future.
- Buildout Year 2023 with Project Phase I and II Conditions – This analysis projects the potential intersection operating conditions that could be expected if Phase II of the Project were completed in year 2023 as anticipated. The analysis identifies the potential incremental impacts of the

and community recreation center on Site 3. The Site 1 office building and associated parking structure is proposed on a property zoned for commercial uses with a floor area ratio (FAR) that exceeds 0.75 to 1 and, therefore, qualifies as an "Employment Center Project" as defined by PRC Section 21099(a)(1).

Project, prior to mitigation, by adding the Project-generated traffic to the Buildout Year 2023 without Project traffic forecasts. These conditions assume completion of both Phase I and II as a single combined development.

In addition to these conditions, additional analysis was conducted to show the effects of the Project's transportation mitigation program on the study intersections. These scenarios are referred to as follows:

- Existing Year 2017 with Project Phase I with Mitigation Conditions
- Existing Year 2017 with Project Phase I and II with Mitigation Conditions
- Interim Year 2021 with Project Phase I with Mitigation Conditions
- Buildout Year 2023 with Project Phase I and II with Mitigation Conditions

Traffic Signal Automation

The CMA analysis for signalized study intersections accounts for the use of advanced automation in the traffic signal controllers. Each signalized intersection in Los Angeles is equipped with the Automated Traffic Surveillance and Control ("ATSAC") system and the Adaptive Traffic Control System ("ATCS"), which together provide a computer-based traffic signal control program that automatically and continually adjusts and optimizes traffic signal timing based on real-time traffic conditions. The automation system seeks to minimize the amount of delay and the number of vehicle stops throughout the transportation network. It also provides real-time video monitoring capabilities to LADOT engineers. LADOT estimates that this system improves intersection capacity by 10 percent over a traffic signal without the ATSAC and ATCS system. This capacity increase is applied to each intersection within the Calcadb Lite software and, therefore, is inherent in the analysis results.

California Department of Transportation (Caltrans) Facilities

Caltrans facilities were evaluated according to the guidelines found in *Guide for the Preparation of Traffic Impact Studies* (Caltrans, 2002) ("Caltrans TIS Guide"). The analysis included selected freeway mainline segments, on-ramps, off-ramps, and ramp terminus intersections within the Study Area.

Residential Street Impacts

An analysis of nearby residential streets that could potentially experience cut-through traffic as a result of the Project was also conducted. As outlined in *Transportation Impact Study Guidelines*, a local residential street shall be deemed significantly impacted based on an increase in the projected average daily traffic ("ADT") volumes as follows in Table 4.14-8:

Table 4.14-8
Caltrans Criteria for Significant Residential Street Impacts

Projected ADT with Project (Final ADT)	Project-Related Increase in ADT
0 to 999	120 trips 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
<i>Source: Caltrans, 2002.</i>	

Congestion Management Program

An analysis also was conducted according to 2010 Los Angeles County Congestion Management Program (“CMP”) guidelines. The CMP is a State-mandated program that serves as the monitoring and analytical basis for transportation funding decisions in the County made through the Regional Transportation Improvement Program and State Transportation Improvement Program processes. The CMP requires that a traffic impact analysis be performed (1) for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the morning or afternoon weekday peak hours and (2) all mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the morning or afternoon weekday peak hours. In addition, it requires a review of potential impacts to the regional transit system. The required CMP analyses were performed in accordance with the guidelines referenced in the CMP.

Future Baseline Conditions

Estimates of future traffic conditions without the Project were developed to represent a baseline against which to evaluate the potential impacts of the Project on the local street system. This discussion details the assumptions used to develop the Interim Year 2021 without Project Conditions and the Buildout Year 2023 without Project Conditions, which corresponds to the anticipated completion of Phase I (year 2021) and Phase II (year 2023).

The existing traffic volumes were factored by an annual ambient growth rate to approximate regional growth and development. In addition to the ambient growth, for purposes of providing a conservative analysis of potential cumulative traffic impacts, the traffic generated by proposed, approved, and under construction projects in and around the Study Area was also added to estimate Interim Year 2021 and Buildout Year 2023 without Project traffic conditions.

Ambient Traffic Growth

Traffic levels are expected to increase over time as a result of regional growth and development in and around the Study Area. Based on discussions with LADOT through the MOU process, an ambient growth factor of 1 percent per year compounded annually was used to adjust the existing traffic volumes to reflect the effects of the regional growth and development. The total adjustment applied over the four-year period from year 2017 to year 2021 was 4.06 percent. The total adjustment over the six-year period from year 2017 to year 2023 was 6.15 percent. These growth factors account for increases in traffic due to potential projects not yet proposed or projects outside the Study Area.

Related Projects

This study also considers growth in traffic due to other projects proposed, approved, or under construction in and around the Study Area, known as the related projects. The list of related projects is based on information provided by LADOT, as well as recent studies of projects in the area, and includes all projects within a one-mile radius of any study intersection, which includes the areas located within approximately two miles of the Project Site.

The development of estimated traffic volumes added to the Study Area as a result of related projects involves the use of a three-step process: trip generation, trip distribution, and trip assignment.

Trip Generation

Trip generation estimates for the related projects were provided by LADOT, and are generally based on previous study findings and the trip generation rates contained in *Trip Generation, 9th Edition* (Institute of Transportation Engineers [ITE], 2012) (“ITE Trip Generation Report”). These projections are very conservative in that they do not in every case account for either the trips generated by the existing uses to be removed or the likely use of other travel modes (transit, bicycle, walk, etc.)

Trip Distribution

The geographic distribution of the traffic generated by the related projects is dependent on several factors. These include the type and density of the proposed land uses, the geographic distribution of the population from which the employees/residents and potential patrons of the proposed developments are drawn, and the location of these projects in relation to the surrounding street system. These factors are considered along with logical travel routes through the street system to develop a reasonable pattern of trip distribution.

Trip Assignment

The trip generation estimates for the related projects were assigned to the local street system using the trip distribution pattern described above. These volumes were then added to the existing traffic volumes after adjustment for ambient growth through the future analysis years of 2021 and 2023. Overall, this results in a conservative forecast of future traffic growth when compared to regional growth forecasts. The total growth estimate to year 2021 is approximately 18.1 percent and the total growth estimate to year 2023 is approximately 20.2 percent. However, the CMP forecasts regional growth of approximately 0.7 percent between years 2015 and 2020 and 1.7 percent between years 2015 and 2025 for West/Central Los Angeles. The growth assumptions therefore contribute to a conservative analysis of the potential impacts of Project traffic.

Future Infrastructure Improvements

The roadway network for the Interim Year 2021 without Project Conditions and Buildout Year 2023 without Project Conditions within the Study Area could also be affected by regional improvement plans, local specific plans, and programmed improvements. In particular, Mobility Plan 2035 and *2010 Bicycle Plan, A Component of the City of Los Angeles Transportation Element* (Los Angeles Department of City Planning, adopted March 1, 2011) (“2010 Bicycle Plan”) provide guidelines for long-range improvements to streets within the Study Area. Also, Metro’s long-range planning includes the potential for exclusive rapid transit – by bus or by rail – on Vermont Avenue.

Mobility Plan 2035

In the Mobility Plan, the City identifies key corridors as components of various “mobility-enhanced networks.” Each network is intended to focus on improving a particular aspect of urban mobility, including transit, neighborhood connectivity, bicycles, pedestrians, and vehicles. The specific improvements that may be implemented in those networks have not yet been identified and there is no schedule for implementation. The following mobility-enhanced networks include corridors within the Study Area:

- Transit Enhanced Network. 3rd Street was identified as a Moderate Transit-Enhanced Street. Beverly Boulevard, Western Avenue, and Alvarado Street were identified as Moderate Plus Transit-Enhanced Streets. Wilshire Boulevard, Washington Boulevard, and Vermont Avenue were

identified as Comprehensive Transit-Enhanced Streets. Each of these designations denotes an escalating level of priority for future transit service.

- Neighborhood Enhanced Network. Portions of numerous smaller streets within the Study Area were identified as part of the Priority Neighborhood Enhanced Network. These streets are intended to provide a calm and safe environment for walking, biking, and slower travel modes. Nearest the Project Sites, these include: 6th Street east of Virgil Avenue, New Hampshire Avenue, Westmoreland Avenue south of 8th Street, Hoover Street south of 8th Street, Commonwealth Avenue north of 6th Street, 4th Street, and Reno Street.
- Bicycle Enhanced Network / Bicycle Lane Network. Near the Project Sites, New Hampshire Avenue and 4th Street are designated bicycle-enhanced segments from the Neighborhood Enhanced Network (and are equipped with sharrows) and 7th Street (east of New Hampshire Avenue) and Rampart Boulevard have Tier 1 bicycle lanes installed. 7th Street west of Alvarado Street, Hoover Street, and Virgil Avenue are designated for Tier 2 bicycle lanes and Vermont Avenue and Alvarado Street are designated for Tier 3 bicycle lanes.
- Vehicle Enhanced Network. Olympic Boulevard was identified as part of the Vehicle Enhanced Network.
- Pedestrian. All of the major streets in the immediate vicinity of the Project Sites were identified for pedestrian analysis, which are intended to lead to pedestrian safety improvements on arterial corridors. The identified streets include Normandie Avenue, Vermont Avenue, Virgil Avenue, Hoover Street, Rampart Boulevard, Alvarado Street, 3rd Street, 6th Street, Wilshire Boulevard, 7th Street, 8th Street, and Olympic Boulevard.

The goals of Mobility Plan 2035 within the Study Area would not generally affect the physical configuration of the streets or intersections.

2010 Bicycle Plan

The 2010 Bicycle Plan identifies the City's vision for a more integrated bicycle network throughout the City, including within the Study Area. It proposes bicycle lanes on Beverly Boulevard, 6th Street east of Virgil Avenue, Wilshire Boulevard west of Alvarado Street, 7th Street east of New Hampshire Avenue, Pico Boulevard, Venice Boulevard, Washington Boulevard, Vermont Avenue, Hoover Street, Rampart Boulevard, and Alvarado Street. It also proposes a bicycle route on Adams Boulevard and that the following streets would be configured as bicycle friendly streets (lower-volume residential or collector streets that receive traffic-calming features, signage, and shared-lane markings indicating that bicycles and vehicles should share the road) near the Project Sites: 4th Street, New Hampshire Avenue, and Commonwealth Avenue north of 6th Street.

High-Capacity Transit on Vermont

Metro is exploring the possibility of accelerating long-range plans to bring high-capacity transit to Vermont Avenue. The current proposal under study is to incorporate bus rapid transit – likely through exclusively designated bus lanes – up and down Vermont Avenue, including within the Study Area. The design process is temporarily delayed due to the need for additional study to support the potential ultimate conversion of the route into a rail line in the future. Prior to the delay, the earliest construction may begin is estimated to be year 2024, with operation of designated bus lanes beginning in year 2028 – well after completion of the proposed Project. A potential conversion to rail would not occur for many years

following the bus route. Therefore, this potential future project is not included in the Project's traffic analysis.

Project Design Elements

The Project would include a complimentary mix of uses (office, retail, residential) on sites located near an existing rail transit station that would work to reduce automobile trips and traffic congestion. The Project would implement a staging and traffic plan for each of the three Project Sites that would provide for on-site security, and ensure adequate routing and access for vehicles and pedestrians during construction periods. The Project would also include financial contributions to various City transportation initiatives to advance the City's policies and goals relating to overall mobility for all travel modes.

Impact Analysis

Threshold 4.14-1: Would the project 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?

Construction

Construction of the Project is anticipated to occur over an approximately five-year period between years 2018 and 2023. Phase I would begin in 2018 and last approximately three years, during which Sites 1 and 3 would be redeveloped. The Site 1 construction, including construction of the Replacement Shatto Structure, would last throughout that period. The Site 3 construction would last approximately 20 months beginning in 2019 and concluding in 2020. Phase II construction, which is the reuse and redevelopment of Site 2, would begin in year 2021 after completion of Phase I and conclude in year 2023. Typical construction activity would occur between 7:00 AM and 3:30 PM on weekdays, along with occasional Saturday activity during the same hours. Some staging activities would occur outside of these hours, including from 5:00 AM to 7:00 AM or in the evening. Generally, construction workers would arrive to the Project Sites prior to 7:00 AM, and therefore would arrive prior to the morning peak hour. While the traffic counts collected for this study were between 3:00 PM and 6:00 PM in the afternoon, the peak hour within that period began at 4:30 PM or later at almost every intersection. Because worker shifts would generally end at 3:30 PM, workers would depart prior to the afternoon peak hour. Construction haul truck and delivery truck trips would typically arrive and depart throughout the workday, including during the morning peak hours. Site 1, as the largest of the three Project Sites and proposed for the most demolition and redevelopment, would require the most workers and trucks, and therefore would have the highest effect on traffic on surrounding streets during construction. Therefore, this analysis focuses on Site 1 trips.

Based on construction plans prepared for the Project, there could be a maximum of 225 construction workers at Site 1 at the peak when finishing of the Site 1 Tower overlaps with the construction of the Replacement Shatto Structure. There could also be a maximum of 75 daily truck trips on major concrete pour days. These trips would occur regularly throughout the workday, for an average of approximately 10 per hour. On concrete pour days, other truck trips (i.e., deliveries) would be restricted. On days without concrete pouring, the number of daily delivery trucks is expected to average between 20 and 30, the majority of which would arrive prior to 7:00 AM or between 10:00 AM and 2:00 PM. Haul trucks would

travel north and south on Vermont Avenue to US 101 or I-10 (depending on the location of the dump site or landfill accepting the excavated material). Concrete and delivery trucks would also likely follow the same routes, depending on their points of origin.

Increases in hauling and delivery truck traffic and worker automobile commute traffic could lessen the capacities of access streets and haul routes while hauling trucks could impede traffic due to slower movements and larger turning radii of trucks. However, as noted above, construction worker trips would occur almost exclusively outside of the morning and afternoon peak hours, and therefore would not cause peak hour traffic impacts. Additionally, the numbers of hourly truck trips would be substantially lower than the peak hour trip generation estimates for the Project and their effects would be temporary. Therefore, the temporary increase in truck and worker traffic during construction would not result in a significant traffic impact on nearby intersections. Furthermore, a Construction Management Plan (described below under RR TR-1) would contain measures to further reduce the effects of construction traffic on nearby intersections.

Most construction activities will be primarily contained within the Project Site boundaries. However, it is possible that construction fences could temporarily encroach into the public right-of-way (e.g., sidewalk and roadways) adjacent to the Project Sites on Vermont Avenue, Shatto Place, and 6th Street. These encroachments could require temporary closure of the curb lanes on northbound Vermont Avenue (adjacent to Sites 1 and 2), southbound Vermont Avenue (adjacent to Site 3), and westbound 6th Street (adjacent to Site 2). Additionally, during construction of the Replacement Shatto Structure, construction could potentially encroach onto Shatto Place, though this would only result in a loss of on-street parking, and not restrict traffic flow. On certain rare occasions, such as during major concrete pours, additional encroachment into those streets may be necessary for short periods. All encroachment onto the street would require a corresponding closure of the pedestrian sidewalks, requiring pedestrian detours to the opposite sides of streets or the provision of pedestrian pathways around the construction fences. The temporary closure of a lane on westbound 6th Street would also require the temporary relocation of an existing Metro bus stop on the northeast corner of Vermont Avenue & 6th Street. Construction work may also reduce the amount of on-street parking from temporary lane closures necessary for the construction of roadway improvements, utility relocation, and drainage facilities.

Construction worker parking would be provided in nearby surface lots or parking structures, or in remote lots with shuttle transportation provide to the construction site, until parking facilities constructed as part of the Project are available for use on-site. Temporary traffic controls, including signage and flag men as necessary, would be provided to direct traffic around any closures as required in the Construction Management Plan. No traffic movements would be restricted in the vicinity of the Project Sites at any time during Project construction, with the possible exception of a very brief duration on Shatto Place, such as during a major concrete pour, if allowed by LADOT. Therefore, Project construction would not be expected to create hazards for roadway travelers, bus riders, or pedestrians, so long as commonly practiced safety procedures for construction are followed. Such procedures and other measures (e.g., to address temporary traffic control, lane closures, sidewalk closures, etc.) have been incorporated into the Construction Management Plan. The construction-related impacts associated with access and transit would be less than significant, and the implementation of the Construction Management Plan described below in RR TR-1 would further reduce those impacts.

Operation**Phase I****Project Trip Generation**

To estimate the traffic that would be removed and added to the Project Sites with the Project, trip generation rates were applied to the number of office employees for each office building, the number of residential units for each residential building, and the square footage of each community-serving or commercial use. Parking lots and structures do not generate traffic and, thus, were not considered in the trip generation estimates. Trip generation rates used are presented in Table 4.14-9.

**Table 4.14-9
Project Trip Generation Rates**

Land Use	Rate or Size	Daily	Morning Peak Hour			Afternoon Peak Hour		
			In	Out	Total	In	Out	Total
Office ^a	per employee	1.46	98%	2%	0.24	2%	98%	0.30
Apartments (ITE 220)	per unit	6.65	20%	80%	0.51	65%	35%	0.62
Senior Affordable Housing ^b	per unit	1.70	38%	62%	0.12	52%	48%	0.15
Recreational Community Center (ITE 495)	per 1,000 square feet	33.82	66%	34%	2.05	49%	51%	2.74
Retail (ITE 820)	per 1,000 square feet	42.94	61%	39%	1.00	49%	51%	3.73
Notes: <i>Rates source: Trip Generation, 9th Edition (Institute of Transportation Engineers [ITE], 2012), except as noted.</i> ^a Empirical office trip generation rate as shown in Table 10 of the Traffic Study included as Appendix 4.14-1 of this Draft EIR. ^b Rate provided by LADOT based on empirical trip count data collected at affordable housing sites in the City of Los Angeles in 2016. Per LADOT policy, no additional trip generation credit is to be applied to this rate. <i>Source: Gibson Transportation Consulting, Inc., 2017.</i>								

Phase I includes the redevelopment of Sites 1 and 3. Upon completion, the Site 1 Office Tower would host 2,063 employees (including 1,223 employees moving from Site 2) and 10,000 square-feet of ground-floor commercial space. It would include a total of 840 employees that are new to the Project Sites and, therefore, the net office trip generation estimate is based on the increase from 1,223 to 2,063 employees. A total of 93 employees would be removed from Site 1 with the demolition of the existing structures on Site 1. Site 3 would be developed with a 72-unit senior affordable housing complex, in which would be located an approximately 13,200 square foot community recreation center. A total of 112 employees would be removed from Site 3 with the demolition of the existing office building on Site 3. The trip generation estimates for Phase I are summarized in Table 4.14-10. As shown, Phase I would generate a net total of 1,553 daily trips, including 186 during the morning peak hour (168 inbound and 18 outbound) and 243 during the afternoon peak hour (31 inbound and 212 outbound).

Table 4.14-10
Project Trip Generation Estimates
Phase I

Land Use	ITE Land Use	Size	Daily	Morning Peak Hour			Afternoon Peak Hour		
				In	Out	Total	In	Out	Total
Proposed									
Site 1									
471,000 sf office building	a	2,063 employees	3,012	485	10	495	12	607	619
10,000 sf ground-floor retail	820	10,000 sf	429	6	4	10	18	19	37
Internal Capture Adjustment - 10%			-43	-1	0	-1	-2	-2	-4
Transit/HOV Adjustment - 15%			-58	-1	0	-1	-2	-3	-5
Pass-by Trip Adjustment - 50%			-164	-2	-2	-4	-7	-7	-14
Site 3									
72-unit senior affordable housing	252	72 units	122	3	6	9	6	5	11
13,200 sf community recreation center	495	13,200 sf	446	18	9	27	18	18	36
Transit/HOV Adjustment - 15%			-67	-3	-1	-4	-2	-3	-5
Walk-In Adjustment - 10%			-38	-1	-1	-2	-1	-2	-3
Proposed Total			3,639	504	25	529	40	632	672
Removed									
Site 1									
510 S Vermont Avenue (30,788 sf)	a	93 employees	136	22	0	22	1	27	28
523 S Vermont Avenue (13,325 sf)	a	(vacant)	0	0	0	0	0	0	0
Site 2 (employees moved to Site 1)									
550 S Vermont Avenue (154,793 sf)	a	973 employees	1,421	229	5	234	6	286	292
3175 W 6th Street (52,000 sf)	a	250 employees	365	59	1	60	1	74	75
Site 3									
433 S Vermont Avenue (29,292 sf)	a	112 employees	164	26	1	27	1	33	34
Removed Total			2,086	336	7	343	9	420	429
Net Phase I Trip Generation			1,553	168	18	186	31	212	243
sf square-feet									
a Empirical office trip generation rate as shown in Table 10 of the Traffic Study included as Appendix 4.14-1 of this Draft EIR.									
Source: Gibson Transportation Consulting, Inc., 2017.									

Project Trip Distribution

The geographic distribution of traffic to and from the Project Site is based on locations where office employees live and where residents at the Project Site may be employed. Trips associated with the ground floor commercial space at Sites 1 and 2 are assumed to follow the same distribution pattern as

the office or residential trips that make up the heavy majority of each Site's trip generation. Trips to and from the community recreation center proposed at Site 3 are also assumed to follow the residential trip distribution pattern.

Office Employee Trip Distribution

Because the County has identified the specific divisions of DMH employees that would move to Site 1, it was possible to estimate trip distribution using residential zip code data for those employees. Zip code data was obtained for over 1,700 employees who would work at Site 1, and this data was used to prepare much more precise regional distribution estimates than would otherwise be possible. Based on this data, the local office trip distribution pattern used in this analysis is generally:

- 10% to/from the north on US 101
- 23% to/from the south on US 101
- 3% to/from the west on I-10
- 10% to/from the east on I-10
- 8% to/from the north on local streets
- 23% to/from the east on local streets
- 9% to/from the south on local streets
- 8% to/from the west on local streets
- 6% internal to the Study Area

Residential Trip Distribution

The residential distribution was based primarily on the assumption that many of the peak hour trips are home-to-work or work-to-home trips and, therefore, was based on the locations of employment centers in the region. The residential trip distribution pattern used in this analysis is generally:

- 12% to/from the north on US 101
- 13% to/from the south on US 101
- 4% to/from the west on I-10
- 8% to/from the east on I-10
- 9% to/from the north on local streets
- 19% to/from the east on local streets
- 8% to/from the south on local streets
- 19% to/from the west on local streets
- 8% internal to the Study Area

Existing Year 2017 with Project Phase I Impacts

The Project Phase I morning and afternoon peak hour traffic volumes were added to the Existing Year 2017 traffic volumes presented in Table 4.14-6 in the Existing Conditions section above to project the

Existing Year 2017 with Project Phase I Conditions. Table 4.14-11 summarizes the results of the corresponding LOS analysis for the 38 study intersections. As shown, all 38 study intersections would

Table 4.14-11
Existing Year 2017 With Project Phase I Conditions
Intersection Levels of Service and Significant Impact

No.	Intersection	Peak Hour	Existing Conditions		Existing with Phase I Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
1.	Vermont Avenue & US 101 Northbound On-ramp	A.M.	0.509	A	0.511	A	0.002	NO
		P.M.	0.476	A	0.491	A	0.015	NO
2.	Vermont Avenue & US 101 Northbound Off-ramp	A.M.	0.417	A	0.424	A	0.007	NO
		P.M.	0.464	A	0.465	A	0.001	NO
3.	US 101 Southbound Off-ramp / New Hampshire Street & Rosewood Avenue	A.M.	0.269	A	0.274	A	0.005	NO
		P.M.	0.290	A	0.291	A	0.001	NO
4.	Vermont Avenue & Rosewood Avenue	A.M.	0.536	A	0.548	A	0.012	NO
		P.M.	0.577	A	0.580	A	0.003	NO
5.	Vermont Avenue & Oakwood Avenue / US 101 Southbound On-ramp	A.M.	0.571	A	0.581	A	0.010	NO
		P.M.	0.558	A	0.560	A	0.002	NO
6.	Vermont Avenue & Beverly Boulevard	A.M.	0.678	B	0.689	B	0.011	NO
		P.M.	0.744	C	0.757	C	0.013	NO
7.	Vermont Avenue & 1st Street	A.M.	0.540	A	0.551	A	0.011	NO
		P.M.	0.660	B	0.663	B	0.003	NO
8.	Western Avenue & 3rd Street	A.M.	0.749	C	0.750	C	0.001	NO
		P.M.	0.744	C	0.745	C	0.001	NO
9.	Normandie Avenue & 3rd Street	A.M.	0.641	B	0.643	B	0.002	NO
		P.M.	0.618	B	0.620	B	0.002	NO
10.	Vermont Avenue & 3rd Street	A.M.	0.784	C	0.791	C	0.007	NO
		P.M.	0.752	C	0.776	C	0.024	NO
11.	Virgil Avenue & 3rd Street	A.M.	0.734	C	0.737	C	0.003	NO
		P.M.	0.735	C	0.738	C	0.003	NO
12.	Rampart Boulevard & 3rd Street	A.M.	0.622	B	0.623	B	0.001	NO
		P.M.	0.707	C	0.715	C	0.008	NO
13.	Vermont Avenue & 4th Street	A.M.	0.579	A	0.580	A	0.001	NO
		P.M.	0.573	A	0.599	A	0.026	NO
14.	Shatto Place & 4th Street	A.M.	0.431	A	0.424	A	-0.007	NO
		P.M.	0.388	A	0.393	A	0.005	NO
15.	Vermont Avenue & 5th Street	A.M.	0.424	A	0.443	A	0.019	NO
		P.M.	0.437	A	0.459	A	0.022	NO
16.	Western Avenue & 6th Street	A.M.	0.501	A	0.502	A	0.001	NO
		P.M.	0.537	A	0.537	A	0.000	NO
17.	Normandie Avenue & 6th Street	A.M.	0.590	A	0.593	A	0.003	NO
		P.M.	0.585	A	0.586	A	0.001	NO
18.	Vermont Avenue & 6th Street	A.M.	0.701	C	0.718	C	0.017	NO
		P.M.	0.655	B	0.683	B	0.028	NO
19.	Shatto Place & 6th Street	A.M.	0.519	A	0.525	A	0.006	NO
		P.M.	0.527	A	0.554	A	0.027	NO

Table 4.14-11
Existing Year 2017 With Project Phase I Conditions
Intersection Levels of Service and Significant Impact

No.	Intersection	Peak Hour	Existing Conditions		Existing with Phase I Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
20.	Rampart Boulevard & 6th Street	A.M.	0.651	B	0.657	B	0.006	NO
		P.M.	0.771	C	0.772	C	0.001	NO
21.	Alvarado Street & 6th Street	A.M.	0.577	A	0.578	A	0.001	NO
		P.M.	0.512	A	0.513	A	0.001	NO
22.	Western Avenue & Wilshire Boulevard	A.M.	0.836	D	0.837	D	0.001	NO
		P.M.	0.882	D	0.884	D	0.002	NO
23.	Normandie Avenue & Wilshire Boulevard	A.M.	0.588	A	0.590	A	0.002	NO
		P.M.	0.678	B	0.680	B	0.002	NO
24.	Vermont Avenue & Wilshire Boulevard	A.M.	0.828	D	0.835	D	0.007	NO
		P.M.	0.791	C	0.814	D	0.023	YES
25.	Hoover Street & Wilshire Boulevard	A.M.	0.632	B	0.633	B	0.001	NO
		P.M.	0.607	B	0.609	B	0.002	NO
26.	Alvarado Street & Wilshire Boulevard	A.M.	0.599	A	0.599	A	0.000	NO
		P.M.	0.581	A	0.581	A	0.000	NO
27.	Vermont Avenue & 7th Street	A.M.	0.627	B	0.641	B	0.014	NO
		P.M.	0.669	B	0.671	B	0.002	NO
28.	Vermont Avenue & 8th Street	A.M.	0.656	B	0.671	B	0.015	NO
		P.M.	0.673	B	0.692	B	0.019	NO
29.	Hoover Street & 8th Street	A.M.	0.763	C	0.764	C	0.001	NO
		P.M.	0.810	D	0.810	D	0.000	NO
30.	Vermont Avenue & Olympic Boulevard	A.M.	0.866	D	0.877	D	0.011	NO
		P.M.	0.841	D	0.849	D	0.008	NO
31.	Vermont Avenue & Pico Boulevard	A.M.	0.734	C	0.743	C	0.009	NO
		P.M.	0.689	B	0.691	B	0.002	NO
32.	Vermont Avenue & Venice Boulevard	A.M.	0.770	C	0.779	C	0.009	NO
		P.M.	0.778	C	0.779	C	0.001	NO
33.	Vermont Avenue & Washington Boulevard	A.M.	0.771	C	0.781	C	0.010	NO
		P.M.	0.880	D	0.883	D	0.003	NO
34.	Vermont Avenue & I-10 Westbound Ramps	A.M.	0.706	C	0.720	C	0.014	NO
		P.M.	0.573	A	0.584	A	0.011	NO
35.	Vermont Avenue & I-10 Eastbound Ramps	A.M.	0.711	C	0.717	C	0.006	NO
		P.M.	0.802	D	0.809	D	0.007	NO
36.	Vermont Avenue & Adams Boulevard	A.M.	0.784	C	0.787	C	0.003	NO
		P.M.	0.726	C	0.726	C	0.000	NO
37.	Hoover Street & Olympic Boulevard	A.M.	0.834	D	0.835	D	0.001	NO
		P.M.	0.831	D	0.833	D	0.002	NO
38.	Alvarado Street & Olympic Boulevard	A.M.	0.763	C	0.763	C	0.000	NO
		P.M.	0.832	D	0.832	D	0.000	NO

Source: Gibson Transportation Consulting, Inc., 2017.

continue to operate at LOS D or better with the addition of Phase I traffic, however, Phase I development would significantly impact the V/C ratio at Intersection #24, Vermont Avenue & Wilshire Boulevard, during the afternoon peak hour (shown in **bold**).

Future Baseline Conditions

As discussed under Methodology above, in order to determine Project-related impacts to the Study Area, the baseline future conditions of the Study Area without the Project must be determined. In order to do this, the ambient growth (4.06% to year 2021 and 6.15% to year 2023) and related projects traffic were added to the Existing peak hour traffic volumes to estimate the Interim Year 2021 and Buildout Year 2023 without Project peak hour traffic volumes.

Table 4.14-12 summarizes these results for each of the study intersections under Interim Year 2021 without Project Conditions. As shown, 15 study intersections (shown in **bold**) are projected to operate at LOS E or F during one or both peak hours.

Table 4.14-12
Interim Year 2021 Without Project Conditions
Intersection Levels of Service

No.	Intersection	Peak Hour	Interim without Project Conditions	
			V/C	LOS
1.	Vermont Avenue & US 101 Northbound On-ramp	A.M.	0.738	C
		P.M.	0.641	B
2.	Vermont Avenue & US 101 Northbound Off-ramp	A.M.	0.491	A
		P.M.	0.541	A
3.	US 101 Southbound Off-ramp / New Hampshire Street & Rosewood Avenue	A.M.	0.348	A
		P.M.	0.423	A
4.	Vermont Avenue & Rosewood Avenue	A.M.	0.623	B
		P.M.	0.746	C
5.	Vermont Avenue & Oakwood Avenue / US 101 Southbound On-ramp	A.M.	0.696	B
		P.M.	0.740	C
6.	Vermont Avenue & Beverly Boulevard	A.M.	0.845	D
		P.M.	0.917	E
7.	Vermont Avenue & 1st Street	A.M.	0.642	B
		P.M.	0.777	C
8.	Western Avenue & 3rd Street	A.M.	0.836	D
		P.M.	0.863	D
9.	Normandie Avenue & 3rd Street	A.M.	0.757	C
		P.M.	0.754	C
10.	Vermont Avenue & 3rd Street	A.M.	0.929	E
		P.M.	0.880	D
11.	Virgil Avenue & 3rd Street	A.M.	0.813	D
		P.M.	0.840	D
12.	Rampart Boulevard & 3rd Street	A.M.	0.737	C
		P.M.	0.816	D
13.	Vermont Avenue & 4th Street	A.M.	0.693	B
		P.M.	0.681	B
14.	Shatto Place &	A.M.	0.479	A

Table 4.14-12
Interim Year 2021 Without Project Conditions
Intersection Levels of Service

No.	Intersection	Peak Hour	Interim without Project Conditions	
			V/C	LOS
	4th Street	P.M.	0.435	A
15.	Vermont Avenue & 5th Street	A.M. P.M.	0.498 0.577	A A
16.	Western Avenue & 6th Street	A.M. P.M.	0.603 0.641	B B
17.	Normandie Avenue & 6th Street	A.M. P.M.	0.775 0.721	C C
18.	Vermont Avenue & 6th Street	A.M. P.M.	0.835 0.804	D D
19.	Shatto Place & 6th Street	A.M. P.M.	0.580 0.599	A A
20.	Rampart Boulevard & 6th Street	A.M. P.M.	0.845 0.943	D E
21.	Alvarado Street & 6th Street	A.M. P.M.	0.858 0.767	D C
22.	Western Avenue & Wilshire Boulevard	A.M. P.M.	1.032 1.141	F F
23.	Normandie Avenue & Wilshire Boulevard	A.M. P.M.	0.896 1.003	D F
24.	Vermont Avenue & Wilshire Boulevard	A.M. P.M.	1.064 1.051	F F
25.	Hoover Street & Wilshire Boulevard	A.M. P.M.	0.828 0.806	D D
26.	Alvarado Street & Wilshire Boulevard	A.M. P.M.	0.891 0.911	D E
27.	Vermont Avenue & 7th Street	A.M. P.M.	0.723 0.792	C C
28.	Vermont Avenue & 8th Street	A.M. P.M.	0.764 0.805	C D
29.	Hoover Street & 8th Street	A.M. P.M.	0.938 0.993	E E
30.	Vermont Avenue & Olympic Boulevard	A.M. P.M.	0.987 1.035	E F
31.	Vermont Avenue & Pico Boulevard	A.M. P.M.	0.870 0.860	D D
32.	Vermont Avenue & Venice Boulevard	A.M. P.M.	0.879 0.925	D E
33.	Vermont Avenue & Washington Boulevard	A.M. P.M.	0.953 1.067	E F
34.	Vermont Avenue & I-10 Westbound Ramps	A.M. P.M.	0.845 0.778	D C

Table 4.14-12
Interim Year 2021 Without Project Conditions
Intersection Levels of Service

No.	Intersection	Peak Hour	Interim without Project Conditions	
			V/C	LOS
35.	Vermont Avenue & I-10 Eastbound Ramps	A.M.	0.868	D
		P.M.	0.984	E
36.	Vermont Avenue & Adams Boulevard	A.M.	0.982	E
		P.M.	0.829	D
37.	Hoover Street & Olympic Boulevard	A.M.	1.022	F
		P.M.	1.059	F
38.	Alvarado Street & Olympic Boulevard	A.M.	0.824	D
		P.M.	0.910	E
Bold denotes intersection operating at LOS E or F during either the a.m. or p.m. peak hour. Source: Gibson Transportation Consulting, Inc., 2017.				

Interim Year 2021 with Project Phase I Impacts

The Project Phase I morning and afternoon peak hour traffic volumes were added to the interim Year 2021 without Project traffic volumes to project the interim Year 2021 with Project Phase I Conditions. Table 4.14-13 summarizes the results of the corresponding LOS analysis for the 38 study intersections. As shown, Phase I would cause the intersection operating condition to worsen from LOS D to LOS E at Intersection #10, Vermont Avenue & 3rd Street, during the afternoon peak hour. Additionally, Phase I would result in significant impacts at six intersections based on the magnitude of change to V/C ratios (shown in **bold**):

- 6. Vermont Avenue & Beverly Boulevard (afternoon peak hour)
- 10. Vermont Avenue & 3rd Street (afternoon peak hour)
- 18. Vermont Avenue & 6th Street (afternoon peak hour)
- 24. Vermont Avenue & Wilshire Boulevard (afternoon peak hour)
- 30. Vermont Avenue & Olympic Boulevard (morning peak hour)
- 33. Vermont Avenue & Washington Boulevard (afternoon peak hour)

Table 4.14-13
Interim Year 2021 With Project Phase I Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Interim without Project Conditions		Interim with Phase I Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
1.	Vermont Avenue & US 101 Northbound On-ramp	A.M. P.M.	0.738 0.641	C B	0.741 0.657	C B	0.003 0.016	NO NO
2.	Vermont Avenue & US 101 Northbound Off-ramp	A.M. P.M.	0.491 0.541	A A	0.497 0.541	A A	0.006 0.000	NO NO
3.	US 101 Southbound Off-ramp / New Hampshire Street & Rosewood Avenue	A.M. P.M.	0.348 0.423	A A	0.353 0.425	A A	0.005 0.002	NO NO
4.	Vermont Avenue & Rosewood Avenue	A.M. P.M.	0.623 0.746	B C	0.635 0.749	B C	0.012 0.003	NO NO
5.	Vermont Avenue & Oakwood Avenue / US 101 Southbound On-ramp	A.M. P.M.	0.696 0.740	B C	0.701 0.741	C C	0.005 0.001	NO NO
6.	Vermont Avenue & Beverly Boulevard	A.M. P.M.	0.845 0.917	D E	0.847 0.930	D E	0.002 0.013	NO YES
7.	Vermont Avenue & 1st Street	A.M. P.M.	0.642 0.777	B C	0.643 0.779	B C	0.001 0.002	NO NO
8.	Western Avenue & 3rd Street	A.M. P.M.	0.836 0.863	D D	0.837 0.864	D D	0.001 0.001	NO NO
9.	Normandie Avenue & 3rd Street	A.M. P.M.	0.757 0.754	C C	0.759 0.754	C C	0.002 0.000	NO NO
10.	Vermont Avenue & 3rd Street	A.M. P.M.	0.929 0.880	E D	0.937 0.904	E E	0.008 0.024	NO YES
11.	Virgil Avenue & 3rd Street	A.M. P.M.	0.813 0.840	D D	0.816 0.851	D D	0.003 0.011	NO NO
12.	Rampart Boulevard & 3rd Street	A.M. P.M.	0.737 0.816	C D	0.737 0.825	C D	0.000 0.009	NO NO
13.	Vermont Avenue & 4th Street	A.M. P.M.	0.693 0.681	B B	0.693 0.708	B C	0.000 0.027	NO NO
14.	Shatto Place & 4th Street	A.M. P.M.	0.479 0.435	A A	0.472 0.440	A A	-0.007 0.005	NO NO
15.	Vermont Avenue & 5th Street	A.M. P.M.	0.498 0.577	A A	0.517 0.593	A A	0.019 0.016	NO NO
16.	Western Avenue & 6th Street	A.M. P.M.	0.603 0.641	B B	0.603 0.642	B B	0.000 0.001	NO NO
17.	Normandie Avenue & 6th Street	A.M. P.M.	0.775 0.721	C C	0.780 0.722	C C	0.005 0.001	NO NO
18.	Vermont Avenue & 6th Street	A.M. P.M.	0.835 0.804	D D	0.852 0.832	D D	0.017 0.028	NO YES

Table 4.14-13
Interim Year 2021 With Project Phase I Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Interim without Project Conditions		Interim with Phase I Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
19.	Shatto Place & 6th Street	A.M. P.M.	0.580 0.599	A A	0.586 0.626	A B	0.006 0.027	NO NO
20.	Rampart Boulevard & 6th Street	A.M. P.M.	0.845 0.943	D E	0.851 0.944	D E	0.006 0.001	NO NO
21.	Alvarado Street & 6th Street	A.M. P.M.	0.858 0.767	D C	0.858 0.768	D C	0.000 0.001	NO NO
22.	Western Avenue & Wilshire Boulevard	A.M. P.M.	1.032 1.141	F F	1.033 1.143	F F	0.001 0.002	NO NO
23.	Normandie Avenue & Wilshire Boulevard	A.M. P.M.	0.896 1.003	D F	0.896 1.005	D F	0.000 0.002	NO NO
24.	Vermont Avenue & Wilshire Boulevard	A.M. P.M.	1.064 1.051	F F	1.072 1.074	F F	0.008 0.023	NO YES
25.	Hoover Street & Wilshire Boulevard	A.M. P.M.	0.828 0.806	D D	0.830 0.809	D D	0.002 0.003	NO NO
26.	Alvarado Street & Wilshire Boulevard	A.M. P.M.	0.891 0.911	D E	0.891 0.912	D E	0.000 0.001	NO NO
27.	Vermont Avenue & 7th Street	A.M. P.M.	0.723 0.792	C C	0.729 0.795	C C	0.006 0.003	NO NO
28.	Vermont Avenue & 8th Street	A.M. P.M.	0.764 0.805	C D	0.779 0.825	C D	0.015 0.020	NO NO
29.	Hoover Street & 8th Street	A.M. P.M.	0.938 0.993	E E	0.939 0.993	E E	0.001 0.000	NO NO
30.	Vermont Avenue & Olympic Boulevard	A.M. P.M.	0.987 1.035	E F	0.999 1.043	E F	0.012 0.008	YES NO
31.	Vermont Avenue & Pico Boulevard	A.M. P.M.	0.870 0.860	D D	0.879 0.862	D D	0.009 0.002	NO NO
32.	Vermont Avenue & Venice Boulevard	A.M. P.M.	0.879 0.925	D E	0.887 0.927	D E	0.008 0.002	NO NO
33.	Vermont Avenue & Washington Boulevard	A.M. P.M.	0.953 1.067	E F	0.955 1.080	E F	0.002 0.013	NO YES
34.	Vermont Avenue & I-10 Westbound Ramps	A.M. P.M.	0.845 0.778	D C	0.859 0.789	D C	0.014 0.011	NO NO
35.	Vermont Avenue & I-10 Eastbound Ramps	A.M. P.M.	0.868 0.984	D E	0.875 0.993	D E	0.007 0.009	NO NO
36.	Vermont Avenue & Adams Boulevard	A.M. P.M.	0.982 0.829	E D	0.985 0.830	E D	0.003 0.001	NO NO

Table 4.14-13
Interim Year 2021 With Project Phase I Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Interim without Project Conditions		Interim with Phase I Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
37.	Hoover Street & Olympic Boulevard	A.M.	1.022	F	1.023	F	0.001	NO
		P.M.	1.059	F	1.061	F	0.002	NO
38.	Alvarado Street & Olympic Boulevard	A.M.	0.824	D	0.824	D	0.000	NO
		P.M.	0.910	E	0.910	E	0.000	NO
Bold denotes significant impact.								
Source: Gibson Transportation Consulting, Inc., 2017.								

Phase II

Phase II includes the redevelopment and reuse of Site 2 and an assumed increase in employees at Site 1. The Site 1 Office Tower would increase from 2,063 employees to 2,166 employees, an increase of 103 employees. At Site 2, the Site 2 Tower would be adapted for use as a 172-unit apartment building with 4,100 square-feet of ground-floor commercial retail space. Also, a 74-unit apartment building would be constructed with 3,400 square-feet of ground-floor commercial retail space. All of the employees currently working at Site 2 would have moved to Site 1 upon completion of Phase I. The trip generation estimates for Phase II are summarized in Table 4.14-14. As shown, Phase II would generate a net total of 1,662 daily trips, including 134 trips during the morning peak hour (48 inbound and 86 outbound) and 171 trips during the afternoon peak hour (90 inbound and 81 outbound). In total, between Phase I and II, the Project would generate a net total of 3,215 daily trips, including 320 during the morning peak hour (216 inbound and 104 outbound) and 414 trips during the afternoon peak hour (121 inbound and 293 outbound).

Table 4.14-14
Project Trip Generation Estimates
Phase I and II

Land Use	ITE Land Use	Size	Daily	Morning Peak Hour			Afternoon Peak Hour		
				In	Out	Total	In	Out	Total
Proposed									
Site 1	a	103 employees	150	25	0	25	1	30	31
Additional employees at office building									
Site 2	220	172 units	1,144	18	70	88	70	37	107
172-unit apartment (adapted from office)									
Transit/HOV Adjustment - 15%									
4,100 sf ground-floor retail									
Internal Capture Adjustment - 10%									
Transit/HOV Adjustment - 15%	820	4,100 sf	176	2	2	4	7	8	15
Internal Capture Adjustment - 10%									
Transit/HOV Adjustment - 15%									

<i>Pass-by Trip Adjustment - 50%</i>			-67	-1	-1	-2	-3	-3	-6
74-unit apartment building	220	74 units	492	8	30	38	30	16	46
<i>Transit/HOV Adjustment - 15%</i>			-74	-1	-5	-6	-5	-2	-7
3,400 sf ground-floor retail	820	3,400 sf	146	2	1	3	6	7	13
<i>Internal Capture Adjustment - 10%</i>			-15	0	0	0	0	-1	-1
<i>Transit/HOV Adjustment - 15%</i>			-20	0	0	0	-1	-1	-2
<i>Pass-by Trip Adjustment - 50%</i>			-56	-1	-1	-2	-2	-3	-5
Phase II Net Trip Generation			1,662	48	86	134	90	81	171
Phase I Net Trip Generation			1,553	168	18	186	31	212	243
Total Project Net Trip Generation			3,215	216	104	320	121	293	414
<i>sf square-feet</i>									
^a Empirical office trip generation rate as shown in Table 10 of the Traffic Study included as Appendix 4.14-1 of this Draft EIR.									
Source: Gibson Transportation Consulting, Inc., 2017.									

Existing Year 2017 with Project Phase I and II Impacts

The Project Phase I and II morning and afternoon peak hour traffic volumes were added to the Existing Year 2017 traffic volumes presented in Table 4.14-6 in the Existing Conditions section above to project the Existing Year 2017 with Project Phase I and II Conditions. Table 4.14-15 summarizes the results of the corresponding LOS analysis for the 38 study intersections. As shown, all 38 study intersections would continue to operate at LOS D or better with the addition of Phase I and 2 traffic, however, Phase I and II would significantly impact the V/C ratio at Intersection #18, Vermont Avenue & 6th Street, during both the morning and afternoon peak hours and Intersection #24, Vermont Avenue & Wilshire Boulevard, during the afternoon peak hour (shown in **bold**).

Table 4.14-15
Existing Year 2017 With Project Phase I and II Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Existing Conditions		Existing with Phase I and II Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
1.	Vermont Avenue & US 101 Northbound On-ramp	A.M. P.M.	0.509 0.476	A A	0.518 0.497	A A	0.009 0.021	NO NO
2.	Vermont Avenue & US 101 Northbound Off-ramp	A.M. P.M.	0.417 0.464	A A	0.425 0.467	A A	0.008 0.003	NO NO
3.	US 101 Southbound Off-ramp / New Hampshire Street & Rosewood Avenue	A.M. P.M.	0.269 0.290	A A	0.276 0.295	A A	0.007 0.005	NO NO
4.	Vermont Avenue & Rosewood Avenue	A.M. P.M.	0.536 0.577	A A	0.551 0.586	A A	0.015 0.009	NO NO
5.	Vermont Avenue & Oakwood Avenue / US 101 Southbound On-ramp	A.M. P.M.	0.571 0.558	A A	0.584 0.565	A A	0.013 0.007	NO NO
6.	Vermont Avenue & Beverly Boulevard	A.M. P.M.	0.678 0.744	B C	0.693 0.762	B C	0.015 0.018	NO NO
7.	Vermont Avenue & 1st Street	A.M. P.M.	0.540 0.660	A B	0.555 0.670	A B	0.015 0.010	NO NO
8.	Western Avenue & 3rd Street	A.M. P.M.	0.749 0.744	C C	0.750 0.747	C C	0.001 0.003	NO NO

Table 4.14-15
Existing Year 2017 With Project Phase I and II Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Existing Conditions		Existing with Phase I and II Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
9.	Normandie Avenue & 3rd Street	A.M. P.M.	0.641 0.618	B B	0.643 0.621	B B	0.002 0.003	NO NO
10.	Vermont Avenue & 3rd Street	A.M. P.M.	0.784 0.752	C C	0.799 0.784	C C	0.015 0.032	NO NO
11.	Virgil Avenue & 3rd Street	A.M. P.M.	0.734 0.735	C C	0.737 0.744	C C	0.003 0.009	NO NO
12.	Rampart Boulevard & 3rd Street	A.M. P.M.	0.622 0.707	B C	0.624 0.719	B C	0.002 0.012	NO NO
13.	Vermont Avenue & 4th Street	A.M. P.M.	0.579 0.573	A A	0.597 0.626	A B	0.018 0.053	NO NO
14.	Shatto Place & 4th Street	A.M. P.M.	0.431 0.388	A A	0.436 0.417	A A	0.005 0.029	NO NO
15.	Vermont Avenue & 5th Street	A.M. P.M.	0.424 0.437	A A	0.443 0.467	A A	0.019 0.030	NO NO
16.	Western Avenue & 6th Street	A.M. P.M.	0.501 0.537	A A	0.503 0.539	A A	0.002 0.002	NO NO
17.	Normandie Avenue & 6th Street	A.M. P.M.	0.590 0.585	A A	0.595 0.587	A A	0.005 0.002	NO NO
18.	Vermont Avenue & 6th Street	A.M. P.M.	0.701 0.655	C B	0.748 0.710	C C	0.047 0.055	YES YES
19.	Shatto Place & 6th Street	A.M. P.M.	0.519 0.527	A A	0.543 0.598	A A	0.024 0.071	NO NO
20.	Rampart Boulevard & 6th Street	A.M. P.M.	0.651 0.771	B C	0.657 0.774	B C	0.006 0.003	NO NO
21.	Alvarado Street & 6th Street	A.M. P.M.	0.577 0.512	A A	0.579 0.514	A A	0.002 0.002	NO NO
22.	Western Avenue & Wilshire Boulevard	A.M. P.M.	0.836 0.882	D D	0.839 0.888	D D	0.003 0.006	NO NO
23.	Normandie Avenue & Wilshire Boulevard	A.M. P.M.	0.588 0.678	A B	0.591 0.682	A B	0.003 0.004	NO NO
24.	Vermont Avenue & Wilshire Boulevard	A.M. P.M.	0.828 0.791	D C	0.845 0.828	D D	0.017 0.037	NO YES
25.	Hoover Street & Wilshire Boulevard	A.M. P.M.	0.632 0.607	B B	0.635 0.613	B B	0.003 0.006	NO NO
26.	Alvarado Street & Wilshire Boulevard	A.M. P.M.	0.599 0.581	A A	0.601 0.583	B A	0.002 0.002	NO NO
27.	Vermont Avenue & 7th Street	A.M. P.M.	0.627 0.669	B B	0.645 0.677	B B	0.018 0.008	NO NO
28.	Vermont Avenue & 8th Street	A.M. P.M.	0.656 0.673	B B	0.674 0.698	B B	0.018 0.025	NO NO
29.	Hoover Street &	A.M.	0.763	C	0.765	C	0.002	NO

Table 4.14-15
Existing Year 2017 With Project Phase I and II Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Existing Conditions		Existing with Phase I and II Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
	8th Street	P.M.	0.810	D	0.811	D	0.001	NO
30.	Vermont Avenue & Olympic Boulevard	A.M. P.M.	0.866 0.841	D D	0.880 0.856	D D	0.014 0.015	NO NO
31.	Vermont Avenue & Pico Boulevard	A.M. P.M.	0.734 0.689	C B	0.745 0.696	C B	0.011 0.007	NO NO
32.	Vermont Avenue & Venice Boulevard	A.M. P.M.	0.770 0.778	C C	0.781 0.783	C C	0.011 0.005	NO NO
33.	Vermont Avenue & Washington Boulevard	A.M. P.M.	0.771 0.880	C D	0.783 0.888	C D	0.012 0.008	NO NO
34.	Vermont Avenue & I-10 Westbound Ramps	A.M. P.M.	0.706 0.573	C A	0.723 0.591	C A	0.017 0.018	NO NO
35.	Vermont Avenue & I-10 Eastbound Ramps	A.M. P.M.	0.711 0.802	C D	0.721 0.815	C D	0.010 0.013	NO NO
36.	Vermont Avenue & Adams Boulevard	A.M. P.M.	0.784 0.726	C C	0.788 0.728	C C	0.004 0.002	NO NO
37.	Hoover Street & Olympic Boulevard	A.M. P.M.	0.834 0.831	D D	0.837 0.835	D D	0.003 0.004	NO NO
38.	Alvarado Street & Olympic Boulevard	A.M. P.M.	0.763 0.832	C D	0.763 0.832	C D	0.000 0.000	NO NO

Bold denotes significant impact.
Source: Gibson Transportation Consulting, Inc., 2017.

Buildout Year 2023 with Project Phase I and II Conditions Impacts

Table 4.14-16 summarizes these results for each of the study intersections under Buildout Year 2023 without Project Conditions. As shown, 15 study intersections (shown in **bold**) are projected to operate at LOS E or F during one or both peak hours.

Table 4.14-16
Buildout Year 2023 Without Project Conditions
Intersection Levels of Service

No.	Intersection	Peak Hour	Buildout without Project Conditions	
			V/C	LOS
1.	Vermont Avenue & US 101 Northbound On-ramp	A.M. P.M.	0.751 0.653	C B
2.	Vermont Avenue & US 101 Northbound Off-ramp	A.M. P.M.	0.502 0.552	A A
3.	US 101 Southbound Off-ramp / New Hampshire Street & Rosewood Avenue	A.M. P.M.	0.356 0.431	A A
4.	Vermont Avenue & Rosewood Avenue	A.M. P.M.	0.636 0.761	B C

Table 4.14-16
Buildout Year 2023 Without Project Conditions
Intersection Levels of Service

No.	Intersection	Peak Hour	Buildout without Project Conditions	
			V/C	LOS
5.	Vermont Avenue & Oakwood Avenue / US 101 Southbound On-ramp	A.M. P.M.	0.709 0.753	C C
6.	Vermont Avenue & Beverly Boulevard	A.M. P.M.	0.862 0.935	D E
7.	Vermont Avenue & 1st Street	A.M. P.M.	0.654 0.793	B C
8.	Western Avenue & 3rd Street	A.M. P.M.	0.853 0.880	D D
9.	Normandie Avenue & 3rd Street	A.M. P.M.	0.772 0.769	C C
10.	Vermont Avenue & 3rd Street	A.M. P.M.	0.948 0.898	E D
11.	Virgil Avenue & 3rd Street	A.M. P.M.	0.831 0.858	D D
12.	Rampart Boulevard & 3rd Street	A.M. P.M.	0.752 0.833	C D
13.	Vermont Avenue & 4th Street	A.M. P.M.	0.707 0.695	C B
14.	Shatto Place & 4th Street	A.M. P.M.	0.489 0.445	A A
15.	Vermont Avenue & 5th Street	A.M. P.M.	0.510 0.589	A A
16.	Western Avenue & 6th Street	A.M. P.M.	0.615 0.654	B B
17.	Normandie Avenue & 6th Street	A.M. P.M.	0.793 0.735	C C
18.	Vermont Avenue & 6th Street	A.M. P.M.	0.851 0.820	D D
19.	Shatto Place & 6th Street	A.M. P.M.	0.593 0.611	A B
20.	Rampart Boulevard & 6th Street	A.M. P.M.	0.861 0.962	D E
21.	Alvarado Street & 6th Street	A.M. P.M.	0.877 0.782	D C
22.	Western Avenue & Wilshire Boulevard	A.M. P.M.	1.052 1.161	F F
23.	Normandie Avenue & Wilshire Boulevard	A.M. P.M.	0.912 1.019	E F

Table 4.14-16
Buildout Year 2023 Without Project Conditions
Intersection Levels of Service

No.	Intersection	Peak Hour	Buildout without Project Conditions	
			V/C	LOS
24.	Vermont Avenue & Wilshire Boulevard	A.M. P.M.	1.083 1.069	F F
25.	Hoover Street & Wilshire Boulevard	A.M. P.M.	0.844 0.821	D D
26.	Alvarado Street & Wilshire Boulevard	A.M. P.M.	0.909 0.929	E E
27.	Vermont Avenue & 7th Street	A.M. P.M.	0.737 0.809	C D
28.	Vermont Avenue & 8th Street	A.M. P.M.	0.781 0.822	C D
29.	Hoover Street & 8th Street	A.M. P.M.	0.956 1.012	E F
30.	Vermont Avenue & Olympic Boulevard	A.M. P.M.	1.006 1.053	F F
31.	Vermont Avenue & Pico Boulevard	A.M. P.M.	0.888 0.875	D D
32.	Vermont Avenue & Venice Boulevard	A.M. P.M.	0.897 0.944	D E
33.	Vermont Avenue & Washington Boulevard	A.M. P.M.	0.971 1.088	E F
34.	Vermont Avenue & I-10 Westbound Ramps	A.M. P.M.	0.862 0.793	D C
35.	Vermont Avenue & I-10 Eastbound Ramps	A.M. P.M.	0.885 1.002	D F
36.	Vermont Avenue & Adams Boulevard	A.M. P.M.	1.000 0.847	E D
37.	Hoover Street & Olympic Boulevard	A.M. P.M.	1.041 1.079	F F
38.	Alvarado Street & Olympic Boulevard	A.M. P.M.	0.843 0.930	D E
Bold denotes intersection operating at LOS E or F during either a.m. or p.m. peak hour. Source: Gibson Transportation Consulting, Inc., 2017.				

The Project Phase I and II morning and afternoon peak hour traffic volumes were added to the Buildout Year 2023 without Project traffic volumes to project the Buildout Year 2023 with Project Phase I and II Conditions. Table 4.14-17 summarizes the results of the corresponding LOS analysis for the 38 study intersections. As shown, Phase I and II would cause the intersection operating condition to worsen to LOS E or F at three locations:

10. Vermont Avenue & 3rd Street (LOS D to LOS E during the afternoon peak hour)

Table 4.14-17
Buildout Year 2023 With Project Phase I and II Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Buildout without Project Conditions		Buildout with Phase I and II Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
1.	Vermont Avenue & US 101 Northbound On-ramp	A.M. P.M.	0.751 0.653	C B	0.760 0.675	C B	0.009 0.022	NO NO
2.	Vermont Avenue & US 101 Northbound Off-ramp	A.M. P.M.	0.502 0.552	A A	0.511 0.555	A A	0.009 0.003	NO NO
3.	US 101 Southbound Off-ramp / New Hampshire Street & Rosewood Avenue	A.M. P.M.	0.356 0.431	A A	0.363 0.436	A A	0.007 0.005	NO NO
4.	Vermont Avenue & Rosewood Avenue	A.M. P.M.	0.636 0.761	B C	0.652 0.769	B C	0.016 0.008	NO NO
5.	Vermont Avenue & Oakwood Avenue / US 101 Southbound On-ramp	A.M. P.M.	0.709 0.753	C C	0.718 0.760	C C	0.009 0.007	NO NO
6.	Vermont Avenue & Beverly Boulevard	A.M. P.M.	0.862 0.935	D E	0.868 0.953	D E	0.006 0.018	NO YES
7.	Vermont Avenue & 1st Street	A.M. P.M.	0.654 0.793	B C	0.660 0.802	B D	0.006 0.009	NO NO
8.	Western Avenue & 3rd Street	A.M. P.M.	0.853 0.880	D D	0.854 0.882	D D	0.001 0.002	NO NO
9.	Normandie Avenue & 3rd Street	A.M. P.M.	0.772 0.769	C C	0.775 0.771	C C	0.003 0.002	NO NO
10.	Vermont Avenue & 3rd Street	A.M. P.M.	0.948 0.898	E D	0.962 0.929	E E	0.014 0.031	YES YES
11.	Virgil Avenue & 3rd Street	A.M. P.M.	0.831 0.858	D D	0.834 0.874	D D	0.003 0.016	NO NO
12.	Rampart Boulevard & 3rd Street	A.M. P.M.	0.752 0.833	C D	0.754 0.845	C D	0.002 0.012	NO NO
13.	Vermont Avenue & 4th Street	A.M. P.M.	0.707 0.695	C B	0.724 0.749	C C	0.017 0.054	NO YES
14.	Shatto Place & 4th Street	A.M. P.M.	0.489 0.445	A A	0.495 0.475	A A	0.006 0.030	NO NO
15.	Vermont Avenue & 5th Street	A.M. P.M.	0.510 0.589	A A	0.529 0.606	A B	0.019 0.017	NO NO
16.	Western Avenue & 6th Street	A.M. P.M.	0.615 0.654	B B	0.617 0.655	B B	0.002 0.001	NO NO
17.	Normandie Avenue & 6th Street	A.M. P.M.	0.793 0.735	C C	0.799 0.737	C C	0.006 0.002	NO NO
18.	Vermont Avenue & 6th Street	A.M. P.M.	0.851 0.820	D D	0.899 0.876	D D	0.048 0.056	YES YES
19.	Shatto Place &	A.M.	0.593	A	0.618	B	0.025	NO

Table 4.14-17
Buildout Year 2023 With Project Phase I and II Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Buildout without Project Conditions		Buildout with Phase I and II Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
	6th Street	P.M.	0.611	B	0.673	B	0.062	NO
20.	Rampart Boulevard & 6th Street	A.M. P.M.	0.861 0.962	D E	0.867 0.965	D E	0.006 0.003	NO NO
21.	Alvarado Street & 6th Street	A.M. P.M.	0.877 0.782	D C	0.879 0.785	D C	0.002 0.003	NO NO
22.	Western Avenue & Wilshire Boulevard	A.M. P.M.	1.052 1.161	F F	1.055 1.166	F F	0.003 0.005	NO NO
23.	Normandie Avenue & Wilshire Boulevard	A.M. P.M.	0.912 1.019	E F	0.914 1.022	E F	0.002 0.003	NO NO
24.	Vermont Avenue & Wilshire Boulevard	A.M. P.M.	1.083 1.069	F F	1.101 1.105	F F	0.018 0.036	YES YES
25.	Hoover Street & Wilshire Boulevard	A.M. P.M.	0.844 0.821	D D	0.849 0.828	D D	0.005 0.007	NO NO
26.	Alvarado Street & Wilshire Boulevard	A.M. P.M.	0.909 0.929	E E	0.912 0.933	E E	0.003 0.004	NO NO
27.	Vermont Avenue & 7th Street	A.M. P.M.	0.737 0.809	C D	0.747 0.817	C D	0.010 0.008	NO NO
28.	Vermont Avenue & 8th Street	A.M. P.M.	0.781 0.822	C D	0.799 0.847	C D	0.018 0.025	NO YES
29.	Hoover Street & 8th Street	A.M. P.M.	0.956 1.012	E F	0.958 1.014	E F	0.002 0.002	NO NO
30.	Vermont Avenue & Olympic Boulevard	A.M. P.M.	1.006 1.053	F F	1.020 1.069	F F	0.014 0.016	YES YES
31.	Vermont Avenue & Pico Boulevard	A.M. P.M.	0.888 0.875	D D	0.899 0.883	D D	0.011 0.008	NO NO
32.	Vermont Avenue & Venice Boulevard	A.M. P.M.	0.897 0.944	D E	0.908 0.950	E E	0.011 0.006	YES NO
33.	Vermont Avenue & Washington Boulevard	A.M. P.M.	0.971 1.088	E F	0.976 1.104	E F	0.005 0.016	NO YES
34.	Vermont Avenue & I-10 Westbound Ramps	A.M. P.M.	0.862 0.793	D C	0.879 0.810	D D	0.017 0.017	NO NO
35.	Vermont Avenue & I-10 Eastbound Ramps	A.M. P.M.	0.885 1.002	D F	0.896 1.017	D F	0.011 0.015	NO YES
36.	Vermont Avenue & Adams Boulevard	A.M. P.M.	1.000 0.847	E D	1.004 0.848	F D	0.004 0.001	NO NO
37.	Hoover Street &	A.M.	1.041	F	1.044	F	0.003	NO

Table 4.14-17
Buildout Year 2023 With Project Phase I and II Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Buildout without Project Conditions		Buildout with Phase I and II Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact
	Olympic Boulevard	P.M.	1.079	F	1.083	F	0.004	NO
38.	Alvarado Street & Olympic Boulevard	A.M.	0.843	D	0.843	D	0.000	NO
		P.M.	0.930	E	0.931	E	0.001	NO

Source: Gibson Transportation Consulting, Inc., 2017.

32. Vermont Avenue & Venice Boulevard (LOS D to LOS E during the morning peak hour)

36. Vermont Avenue & Adams Boulevard (LOS E to LOS F during the morning peak hour)

Additionally, Phase I and II would result in significant impacts based on the magnitude of change to V/C ratios at 10 intersections (shown in **bold**):

- 6. Vermont Avenue & Beverly Boulevard (afternoon peak hour)
- 10. Vermont Avenue & 3rd Street (morning and afternoon peak hours)
- 13. Vermont Avenue & 4th Street (afternoon peak hour)
- 18. Vermont Avenue & 6th Street (morning and afternoon peak hours)
- 24. Vermont Avenue & Wilshire Boulevard (morning and afternoon peak hours)
- 28. Vermont Avenue & 8th Street (afternoon peak hour)
- 30. Vermont Avenue & Olympic Boulevard (morning and afternoon peak hours)
- 32. Vermont Avenue & Venice Boulevard (morning peak hour)
- 33. Vermont Avenue & Washington Boulevard (afternoon peak hour)
- 35. Vermont Avenue & I-10 Eastbound Ramps (afternoon peak hour)

Traffic Volumes Significant Impact Summary

A summary of which intersections are impacted, under each analysis scenario is provided in Table 4.14-18. Intersections beyond those analyzed in this traffic study would not be significantly impacted by Project traffic. Intersections of minor streets with major streets, such as Vermont Avenue & San Marino Street located just north of Intersection #30, Vermont Avenue & Olympic Boulevard, would not be impacted because the relatively low volume of minor street traffic results in better intersection operating condition than the intersection of two major streets (as most of the analyzed intersections are). Some major intersections east and west of impacted locations on Vermont Avenue (such as the intersection of Normandie Avenue & Beverly Boulevard, which is approximately one half mile west of Intersection #6,

Table 4.14-18
Summary of Significant Intersection Impacts

No.	Intersection	Significant Peak Hour Traffic Impact			
		Existing with Phase I Conditions ^a	Existing with Phase I and II Conditions ^b	Interim with Phase I Conditions ^c	Buildout with Phase I and II Conditions ^d
6.	Vermont Avenue & Beverly Boulevard			P.M.	P.M.
10.	Vermont Avenue & 3rd Street			P.M.	A.M. & P.M.
13.	Vermont Avenue & 4th Street				P.M.
18.	Vermont Avenue & 6th Street		A.M. & P.M.	P.M.	A.M. & P.M.
24.	Vermont Avenue & Wilshire Boulevard	P.M.	P.M.	P.M.	A.M. & P.M.
28.	Vermont Avenue & 8th Street				P.M.
30.	Vermont Avenue & Olympic Boulevard			A.M.	A.M. & P.M.
32.	Vermont Avenue & Venice Boulevard				A.M.
33.	Vermont Avenue & Washington Boulevard			P.M.	P.M.
35.	Vermont Avenue & I-10 Eastbound Ramps				P.M.
^a See Table 4.14-11. ^b See Table 4.14-15. ^c See Table 4.14-13. ^d See Table 4.14-17. Source: Gibson Transportation Consulting, Inc., 2017.					

Vermont Avenue & Beverly Boulevard) would not be impacted because the amount of Project traffic headed in that direction at the nearest analyzed intersections would be too low to possibly result in a significant impact.

Residential Street Analysis

As described in *Transportation Impact Study Guidelines*, a local residential street that provides a viable alternative to a congested arterial street would be potentially impacted by Project traffic if ADT traffic volumes exceed the thresholds identified in Table 4.14-8 under Section Methodology, above. Analysis is required at residential street segments if all of the following conditions are met:

1. The proposed project is a non-residential development and not a school.
2. The arterial that would normally be used for project access is sufficiently congested, such that motorists traveling on the arterial may opt to divert to a parallel route through a residential street. The congestion level of the arterial can be determined based on the estimated LOS under project conditions of the study intersection(s); LOS E and F are considered to represent congested conditions.

3. The project is projected to add a significant amount of traffic to the congested arterial that can potentially shift to an alternative route. Project traffic on a local residential street would need to exceed the daily minimum significance thresholds listed in the following Section under “Project-Related Increase in ADT”
4. The local residential street(s) provides motorists with a viable alternative route.

The Project would primarily include office and residential uses, along with ground-floor commercial space and a community recreation center. Based on the Project trip generation estimates, the non-residential uses would represent approximately 1,750 daily trips, which is about 50 percent of the total daily Project trip generation. Based on historical guidance from LADOT, up to 10 percent of Project traffic traveling on congested segments could be assumed to use a viable alternative route.

To the west of the Project Sites, all of the east-west streets are designated Collector or higher and, therefore, do not qualify for this analysis. East of the Project Sites, 5th Street is classified as a Local Street. Many of the north-south streets in the vicinity are Local Streets, including Berendo Street and New Hampshire Avenue to the west of Vermont Avenue and Shatto Place and Westmoreland Avenue to the east of Vermont Avenue. Because Shatto Place provides direct access to the Replacement Shatto Structure and is primarily non-residential, it was not selected as a candidate for this analysis. The other four Local Streets, however, were selected for analysis.

Existing ADT data was collected on Wednesday, February 1, 2017 at seven specific locations along the four streets. These locations include:

1. Berendo Street between 4th Street and 5th Street
2. New Hampshire Avenue north of 3rd Street
3. New Hampshire Avenue between 4th Street and 5th Street
4. New Hampshire Avenue south of 8th Street
5. Westmoreland Avenue between 4th Street and 5th Street
6. Westmoreland Avenue south of 8th Street
7. 5th Street between Westmoreland Avenue and Virgil Avenue

Table 4.14-19 summarizes the Project traffic (cut-through or directly distributed) at each of the analyzed street segments. It also shows the existing traffic volumes on each street and the Project traffic thresholds that would be required to result in a significant impact. As shown, none of the streets would be significantly impacted by Project cut-through traffic. Therefore, impacts would be less than significant and no mitigation is required.

Table 4.14-19
Residential Street Cut-Through Traffic Analysis

ID	Freeway Segment	Existing Daily Volume	Percentage Increase for Significant Impact	Volume Increase for Significant Impact	Project Traffic			Significant Impact
					Distributed	Cut-Through	Total	
1.	Berendo Street between 4th Street and 5th Street	4,064	8%	325	41	-	41	NO
2.	New Hampshire Avenue north of 5th Street	6,677	8%	534	-	43	43	NO
3.	New Hampshire Avenue between 4th Street and 5th Street	6,427	8%	514	41	-	41	NO
4.	New Hampshire Avenue south of 8th Street	4,387	8%	351	-	12	12	NO
5.	Westmoreland Avenue between 4th Street and 5th Street	3,420	8%	274	-	4	4	NO
6.	Westmoreland Avenue south of 8th Street	7,448	8%	596	-	12	12	NO
7.	5th Street between Westmoreland Avenue and Virgil Avenue	1,950	12%	234	-	4	4	NO
Source: Gibson Transportation Consulting, Inc., 2017.								

Threshold 4.14-2: Would the project conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

The CMP requires that Traffic Impact Assessments be performed on three types of facilities:

- Arterial intersections
- Mainline freeway segments
- The public transit system

Arterial Intersections

The CMP requires that a Traffic Impact Assessment be performed for all CMP arterial monitoring intersections where a project would add 50 or more trips during either the weekday morning or afternoon

peak hours. A detailed analysis is not required if the project adds fewer than 50 trips to an arterial monitoring intersection. The CMP identifies three arterial monitoring intersections where the Project could potentially add 50 or more trips during either the weekday morning or afternoon peak hours. This includes two study intersections which are within the Project Traffic Study Area:

- Intersection #22: Western Avenue & Wilshire Boulevard
- Intersection #26: Alvarado Street & Wilshire Boulevard
- Western Avenue & 9th Street

Based on the trip distribution patterns and Project trips generation discussed previously in Impact 4.14-1, Phase I and II combined would generate 17 AM peak hour trips and 22 PM peak hour trips at Intersection 22, Western Avenue & Wilshire Boulevard, and 24 AM peak hour trips and 32 PM peak hour trips at Intersection 26, Alvarado Street & Wilshire Boulevard.⁴ The intersection of Western Avenue & 9th Street would have even less Project traffic than either of the two study intersections. Because the Project would not generate 50 peak hour trips at any of the arterial monitoring intersections during either the morning or afternoon peak hour, no further analysis is required. Impacts to CMP arterial monitoring intersections would be less than significant.

Mainline Freeway Segments

The CMP requires that a TIA be performed for all CMP mainline freeway monitoring locations where a project would add 150 or more trips (in either direction) during the weekday AM or PM peak hours. A detailed analysis is not required if the project adds fewer than 150 trips to a mainline freeway monitoring location (in either direction) during either the weekday AM or PM peak hour. The CMP analysis uses a demand-to-capacity (D/C) ratio to determine facility LOS based on capacity identified in Appendix A of the CMP. Similar to arterial monitoring intersections, a significant impact requiring mitigation occurs if project traffic causes an incremental increase in freeway segment D/C ratio of 0.02 or greater to a facility projected to operate at LOS F ($D/C > 1.00$) after the addition of project traffic.

The CMP identifies one mainline freeway monitoring location where the Project could potentially add 150 or more trips (in either direction) during the weekday AM or PM peak hours within the Project Traffic Study Area. The CMP also identifies three other freeway monitoring locations within three miles of the Project Site:

- I-10 at Budlong Avenue (0.25 miles west of Vermont Avenue)
- US 101 south of Santa Monica Boulevard (0.8 miles northwest of Vermont Avenue)
- I-110 south of US 101 (2.25 miles east of the Project Sites)
- I-110 at Alpine Street (2.8 miles east of the Project Sites)

Based on the Project-only traffic volumes, the Project would not add 150 trips in a single direction to any freeway segment during either peak hour. Therefore, impacts to CMP mainline freeway segments would be less than significant and no further analysis is required.

⁴ Gibson Transportation Consulting, Inc., *Transportation Impact Study for the Vermont Corridor Development Plan*, April 2017, Figure 13, pages 99-103.

Public Transit System

The CMP requires that a transit system analysis be performed to determine whether a project would increase transit ridership beyond the current capacity of the transit system.

The CMP prescribes a methodology for estimating the number of transit trips to be generated by a development Project. First, the Project's trip generation is converted to person-trips by multiplying by a factor of 1.4 persons per vehicle. Second, for a primarily commercial project within 1/4-mile of a transit center (including the Wilshire / Vermont station of the Metro Red Line), 15 percent of the person-trips are assumed to be made by transit. Table 48 summarizes this calculation based on the vehicle trip generation estimates in Table 13. As shown, the Project would generate approximately 67 transit person-trips during the morning peak hour and 87 transit person-trips during the afternoon peak hour.

The Project Sites are well-served by numerous established transit routes. Based on Metro ridership data from October 2016, there is capacity within the system to accommodate an additional 14,140 riders during the morning peak hour and 12,300 riders during the afternoon peak hour. Even with potential growth in transit ridership by year 2023, the Project's peak hour transit ridership of approximately 67 trips during the morning peak hour and 87 trips during the afternoon peak hour. An increase in riders resulting from the Project would only use up to 0.47 percent of the additional morning peak hour capacity available and 0.71 percent of the additional evening peak hour capacity available, which would be easily accommodated. Therefore, impacts to transit system capacity resulting from the Project would be less-than-significant.

Because the Project would not significantly impact arterial intersections, mainline arterial segments, or transit systems, no conflict with an applicable CMP would occur. Therefore, impacts would be less than significant.

Threshold 4.14-3: 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)?

The Project would not include hazardous design features such as sharp curves or incompatible uses. Proposed Project intersections are discussed below.

Site 1

Vehicular access to Site 1 would be provided at two driveways on Vermont Avenue to the Site 1 Podium Structure and two driveways on Shatto Place to the Replacement Shatto Structure. On Vermont Avenue, a driveway at the northern edge of Site 1 would provide right-turn-out egress only (left-turn egress would be restricted because it would require crossing the northbound left-turn pocket from Vermont Avenue to 5th Street). A driveway at the southern edge of Site 1 would allow left-turns and right-turns into the Site. Once in Site 1, vehicles could circulate up to the various parking levels using internal ramps. Access to the Replacement Shatto Structure would be essentially unchanged from current access to the Existing Shatto Structure. Two one-way driveways (one ingress and one egress) would be provided to Shatto Place. Each would allow both left-turns and right-turns in or out. There would also be an internal vehicular connection between the Site 1 Podium Structure on the west side of Site 1 and the Replacement Shatto Structure on the east side of Site 1. Therefore, drivers could enter on Shatto Place and exit on Vermont Avenue or vice versa, and in the event that parking is at capacity in one or the other structure, drivers could travel to the other structure without driving on public roads.

Access to Site 1 was designed to help accommodate the goals of the City's Vision Zero program. Vermont Avenue is part of the High Injury Network (HIN), and it is preferable to limit access on HIN streets. Therefore, the egress driveway onto Vermont Avenue is limited to right-turns only rather than allowing unsafe left turns across a turn pocket. Additionally, the design emphasizes the use of Shatto Place (which is not a HIN street) as the primary access point in three ways. First, the Replacement Shatto Structure provides a substantial slightly higher percentage of the overall Site 1 parking supply (768 spaces out of 1,733 total spaces). Second, an internal connection allows vehicles to pass between the Replacement Shatto Structure and the Site 1 Podium Structure. Third, the driveways on Shatto Place allow left-turns and right-turns, whereas egress onto Vermont Avenue is only allowed toward the north. As such, Site 1 driveways have been designed to avoid potential injuries related to unsafe intersections. Accordingly, impacts at Site 1 would be less than significant.

Site 2

Vehicular access to Site 2 would be provided at a single right-turn-in / right-turn-out driveway on 6th Street at the eastern edge of the Site. As with Site 1, access to Site 2 was designed to help accommodate the goals of the City's Vision Zero program. No access to Site 2 would be provided on Vermont Avenue, for two reasons. First, though both Vermont Avenue and 6th Street are part of the HIN, Vermont Avenue has more lanes, higher traffic volumes, and travel speeds than 6th Street and therefore access was provided on 6th Street. Second, a driveway on Vermont Avenue would be too close to the proposed Site 1 ingress driveway (to be located at the southern edge of Site 1) to allow for safe operation of both driveways. Accordingly, the Site 2 driveway has been designed to avoid potential injuries related to unsafe intersections. Accordingly, impacts at Site 2 would be less than significant.

Site 3

Vehicular access to Site 3 would be provided via a single full-access driveway on Vermont Avenue providing access to subterranean parking. The driveway would be located in the northern end of the Site, similar to existing conditions. No additional or new access locations would be created compared to what currently exists. As such, impacts at Site 3 would be less than significant.

Threshold 4.14-4: Would the project result in inadequate emergency access?

Construction

Construction activities have the potential to affect emergency access, by adding construction traffic to the street network and requiring partial lane closures during street improvements and utility installations. These impacts are considered to be less than significant for the following reasons:

- Emergency access would be maintained to the Project Site during construction through marked emergency access points approved by the LAFD.
- Construction impacts are temporary in nature and do not cause lasting effects to impact LAFD fire protection services.
- Partial lane closures, if determined to be necessary, would not greatly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Site, flagmen would be used to facilitate the traffic flow until construction is complete.

- The Project would be required to prepare a Construction Staging and Traffic Management Plan (see RR TR-1, below) that would address traffic and access control during construction.

Accordingly, Project construction would not significantly affect emergency access. Therefore, construction-related impacts would be less than significant.

Operation

Emergency vehicle access to the Project Site would continue to be provided from major roadways adjacent to the Project Site, including Vermont Avenue, 6th Street, and Shatto Place. All circulation improvements that are proposed for the Project Site would comply with the Fire Code, including any additional access requirements of the LAFD. Emergency access to the Project Site would be maintained at all times.

While the Project is anticipated to affect the LOS of roadways in the Project vicinity, the increases in traffic would not greatly affect emergency vehicles because the drivers of emergency vehicles normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Furthermore, the Project Sites would primarily be served by Fire Station 6 located at 326 North Vigil Avenue, which would have access to the Sites via 4th Street, 5th Street, or Shatto Place from Virgil Avenue. None of these intersections along this route would be significantly impacted by the Project. Based on the Project's proposed circulation plan and the above considerations, it is anticipated that the LAFD would be able to respond to emergency calls within the established response time. Therefore, impacts related to emergency access would be less than significant.

Threshold 4.14-5: Would the project conflict with adopted policies, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

As discussed under Impact 4.14-2, the Project would use up to 0.47 percent of the additional morning peak hour transit capacity available and 0.71 percent of the additional evening peak hour transit capacity available. However, the Project Site and the greater Wilshire area are served by a considerable amount of transit options, and such an increase in ridership would be easily accommodated. The Project would not require the disruption of public transportation services or the alteration of public transportation routes.

Bicycle storage at Site 1 would be provided on the ground level, accessible from the sidewalk or from within the parking lanes off of Vermont Avenue. Additional bicycle storage would be provided on the ground level of the Replacement Shatto Structure, and would be accessible through the vehicular driveways. Currently, there are no dedicated bicycle facilities on Vermont Avenue nor Shatto Place. Vermont Avenue is designated for eventual Tier 3 bicycle lanes under Mobility Plan 2035, and the Project would not preclude installation of those lanes. Bicycle storage at Site 2 would be provided on the ground level, accessible from the sidewalk or from within the parking entry on 6th Street. There are no existing or planned bicycle lanes on 6th Street. Primary bicycle storage at Site 3 would be provided along the southern edge of Site 3 at ground level, and would be accessed from within the building setback area. Secondary bicycle storage would be provided in subterranean parking levels, accessed via the vehicular driveway. As with Site 1, the design of access at Site 3 would not preclude the proposed installation of Tier 3 bicycle lanes on Vermont Avenue.

Pedestrian access to Site 1 would be provided via a dedicated lobby entry on Vermont Avenue and pedestrian gates to the Replacement Shatto Structure on Shatto Place. There would also be direct

pedestrian access into the ground-floor retail spaces from Vermont Avenue. Pedestrian access to Site 2 would be provided via a dedicated residential lobby entrance on Vermont Avenue, along with direct access to the ground-floor retail spaces from Vermont Avenue and 6th Street. Pedestrian access to Site 3 would be provided directly to a residential lobby and a community recreation center lobby off of Vermont Avenue. The project would not permanently relocate or close any sidewalk.

Because the Project would not modify or conflict with any alternative transportation policies, plans, or programs, impacts to transit, bicycle, and pedestrian facilities policies, plans, and plans would be less than significant.

Threshold 4.14-6: Would the project cause 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?

The impact during operation for this threshold would be identical to that which is described under Impact 4.14-1 above (specifically, subsection “Construction” and Tables 4.14-11, 4.14-13, 4.14-15, and 4.14-17).

As detailed in Impact 4.14-1, construction worker trips would occur almost exclusively outside of the morning and afternoon peak hours, and therefore would not cause peak hour traffic impacts. Additionally, the numbers of hourly truck trips would be substantially lower than the peak hour trip generation estimates for the Project and their effects would be temporary. Construction worker parking would be provided in nearby surface lots or parking structures, or in remote lots with shuttle transportation provide to the construction site, until parking facilities constructed as part of the Project are available for use on-site. Most construction activities will be primarily contained within the Project Site boundaries. However, construction activities and fences would temporarily encroach into the public right-of-way requiring temporary closure of the curb lanes on northbound Vermont Avenue, southbound Vermont Avenue, and westbound 6th Street, loss of on-street parking along Shatto Place, and the temporary relocation of an existing Metro bus stop on the northeast corner of Vermont Avenue & 6th Street. On certain rare occasions, such as during major concrete pours, additional encroachment into those streets may be necessary for short periods. No traffic movements would be restricted in the vicinity of the Project Sites at any time during Project construction, with the possible exception of a very brief duration on Shatto Place. Therefore, construction would not result in a significant traffic impacts on nearby intersections. Furthermore, a Construction Management Plan (described below under RR TR-1) would contain measures to further reduce the effects of construction traffic on nearby intersections.

Additionally, as summarized in Table 4.14-18, operation of the Project would result in significant impacts at the following intersections:

Existing Year 2017 with Project Phase I Conditions

- 24. Vermont Avenue & Wilshire Boulevard (afternoon peak hour)

Interim Year 2021 with Phase I Project Conditions

- 6. Vermont Avenue & Beverly Boulevard (afternoon peak hour)
- 10. Vermont Avenue & 3rd Street (afternoon peak hour)
- 18. Vermont Avenue & 6th Street (afternoon peak hour)

- 24. Vermont Avenue & Wilshire Boulevard (afternoon peak hour)
- 30. Vermont Avenue & Olympic Boulevard (morning peak hour)
- 33. Vermont Avenue & Washington Boulevard (afternoon peak hour)

Existing Year (2017) with Project Phase I and II Conditions.

- 18. Vermont Avenue & 6th Street (morning and afternoon peak hours)
- 24. Vermont Avenue & Wilshire Boulevard (afternoon peak hour)

Buildout Year (2023) with Project Phase I and II Conditions

- 6. Vermont Avenue & Beverly Boulevard (afternoon peak hour)
- 10. Vermont Avenue & 3rd Street (morning and afternoon peak hours)
- 13. Vermont Avenue & 4th Street (afternoon peak hour)
- 18. Vermont Avenue & 6th Street (morning and afternoon peak hours)
- 24. Vermont Avenue & Wilshire Boulevard (morning and afternoon peak hours)
- 28. Vermont Avenue & 8th Street (afternoon peak hour)
- 30. Vermont Avenue & Olympic Boulevard (morning and afternoon peak hours)
- 32. Vermont Avenue & Venice Boulevard (morning peak hour)
- 33. Vermont Avenue & Washington Boulevard (afternoon peak hour)
- 35. Vermont Avenue & I-10 Eastbound Ramps (afternoon peak hour)

Please refer to Impact 4.14-1 above for greater detail regarding impacts to intersections during construction and operation of the Project.

Threshold 4.14-7: Would the project add 50 or more trips during either the AM or PM weekday peak hours on adjacent streets?

The impact during operation for this threshold would be identical to that which is described under Impact 4.14-2 above (specifically, subsection “CMP Arterial Traffic Impact Analysis”).

As described under Impact 4.14-2, because the Project would not generate 50 peak hour trips at any of the arterial monitoring intersections during either the morning or afternoon peak hour, no further analysis is required. Impacts to adjacent streets would be less than significant. Please refer to Impact 4.14-2 above for greater detail regarding impacts to adjacent streets.

Threshold 4.14-8: Would the project cause an increase in the demand-to-capacity (D/C) ratio on a freeway segment or freeway on- or off-ramp of two percent or more capacity (D/C increase > 0.02), which causes or worsens LOS F conditions to 100 percent of capacity (D/C > 1.00)?

The impact during operation for this threshold would be identical to that which is described under Impact 4.14-2 above.

As detailed in Impact 4.14-2, based on the Project-only traffic volumes, the Project would not add 150 trips in a single direction to any freeway segment during either peak hour. Therefore, no further analysis is required. Please refer to Impact 4.14-2 above for greater detail regarding impacts to freeway segments and on- off-ramps.

Threshold 4.14-9: Would the project increase ADT volumes as listed in Table 4.14-8?

The impact during operation for this threshold would be identical to that which is described under Impact 4.14-1 above (specifically, see “Residential Street Impacts”).

As detailed under Impact 4.14-1, existing ADT data was collected on Wednesday, February 1, 2017 at seven specific locations along the four streets. These locations include:

1. Berendo Street between 4th Street and 5th Street
2. New Hampshire Avenue north of 3rd Street
3. New Hampshire Avenue between 4th Street and 5th Street
4. New Hampshire Avenue south of 8th Street
5. Westmoreland Avenue between 4th Street and 5th Street
6. Westmoreland Avenue south of 8th Street
7. 5th Street between Westmoreland Avenue and Virgil Avenue

Table 4.14-19 above summarizes the Project traffic (cut-through or directly distributed) at each of the analyzed street segments. As shown, none of the streets would be significantly impacted by Project cut-through traffic. Therefore, impacts would be less than significant and no mitigation is required. Please refer to Impact 4.14-1 above for greater detail regarding impacts related to ADT volumes.

Threshold 4.14-10: Would the project substantially exceed the capacity of the existing transit system serving the Project area?

The impact during operation for this threshold would be identical to that which is described under Impact 4.14-2 above. As discussed under Impact 4.14-2, the Project would use up to 0.47 percent of the additional morning peak hour transit capacity available and 0.71 percent of the additional evening peak hour transit capacity available. However, the Project Site and the greater Wilshire area are served by a considerable amount of transit options, and such an increase in ridership would be easily accommodated. The Project would not require the disruption of public transportation services or the alteration of public transportation routes. Please refer to Impact 4.14-2 for greater detail regarding impacts to the transit system.

Threshold 4.14-11: Would the project include design features/physical configurations that would affect the visibility of pedestrians and bicyclists to drivers entering and exiting the site?

The impact during operation for this threshold would be identical to that which is described under Impacts 4.14-3 and 4.14-5 above. As detailed, bicycle storage at Site 1 would be provided on the ground level, accessible from the sidewalk or from within the parking lanes off of Vermont Avenue. Additional bicycle storage would be provided on the ground level of the Replacement Shatto Structure, and would be accessible through the vehicular driveways. Pedestrian access to Site 1 would be provided via a dedicated lobby entry on Vermont Avenue and pedestrian gates to the Replacement Shatto Structure on Shatto Place. There would also be direct pedestrian access into the ground-floor retail spaces from Vermont Avenue. Bicycle storage at Site 2 would be provided on the ground level, accessible from the sidewalk or from within the parking entry on 6th Street. Pedestrian access to Site 2 would be provided via a dedicated residential lobby entrance on Vermont Avenue, along with direct access to the ground-floor retail spaces from Vermont Avenue and 6th Street. Primary bicycle storage at Site 3 would be provided along the southern edge of Site 3 at ground level, and would be accessed from within the building setback area. Secondary bicycle storage would be provided in subterranean parking levels, accessed via the vehicular driveway. Pedestrian access to Site 3 would be provided directly to a residential lobby and a community recreation center lobby off of Vermont Avenue.

The Project would not permanently relocate or close any sidewalk and access driveways at Sites 1 and 2 have been designed to avoid potential injuries related to unsafe intersections. Access to Site 3 would remain as it currently exists. Accordingly, impacts related to visibility of pedestrians and bicyclists would be less than significant. Please refer to Impacts 4.14-3 and 4.14-5 above for a detailed discussion.

CUMULATIVE IMPACTS

Construction

One-hundred-fifteen related development projects have been identified in the Project area. Although these projects are in varying stages of development (proposed, planned, approved, or under construction), and many may not ultimately be constructed there likely would be some overlap of construction activities between the projects. The 115 related projects are dispersed throughout the Project area. Although the Project would result in less-than-significant construction-related traffic impacts, cumulative construction impacts would be significant and unavoidable due to the potential for concurrent and/or overlapping construction activities of the related projects and the Project. The Project's contribution to this significant cumulative impact would be cumulatively considerable.

Operation

The growth in traffic due to the combined effects of continuing development, intensification of development, and related projects in conjunction with the Project is incorporated into the traffic impacts analysis above. In combination with the traffic of related projects, the increased traffic generated by the Project would result in significant cumulative impacts, as shown in Table 4.14-18. The Project's contribution to this significant cumulative impact would be cumulatively considerable.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

PDF TR-1: **Transportation Initiative Funding.** The Developer would make financial contributions to various City transportation initiatives, including the 2010 Bicycle Plan and Vision Zero.

These contributions may be used at the City's discretion to fund infrastructure and safety improvements in and around the Study Area. While the funding of these improvements do not reduce the significance of transportation impacts on intersections based on City analysis methodology and impact criteria, they do help to advance the City's policies and goals relating to overall mobility for all travel modes.

Regulatory Requirements

The following standards would be imposed by existing laws and regulations and would work to address Project impacts. These are not required mitigation but are inherent Project components.

RR TR-1: Construction Management Plan. A detailed Construction Management Plan, including street closure information, a detour plan, haul routes, and a staging plan shall be prepared and submitted to the City for review and approval. The Construction Management Plan would formalize how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The Construction Management Plan shall be based on the nature and timing of the specific construction activities and other projects in the vicinity of the Project Site, and shall include, but not be limited to, the following elements, as appropriate:

- Prohibition of construction worker parking on nearby residential streets.
- Construction-related vehicles shall not park on surrounding public streets.
- Temporary traffic control (e.g., flag men) shall be used during all construction activities adjacent to public rights-of-way to improve traffic flow on public roadways.
- Construction activities shall be scheduled to reduce the effect on traffic flow on surrounding arterial streets.
- Construction-related deliveries, haul trips, etc. shall be scheduled so as to occur outside the commuter peak hours to the extent feasible.
- Safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers shall be utilized as appropriate.
- Workers shall be required to participate in a carpool registry with the goal of reducing single-occupant automobile trips by construction workers.

MITIGATION MEASURES

As shown in Table 4.14-18, significant impacts were identified based on LADOT thresholds at up to ten intersections, depending on analysis year and Project Phase. Mitigation measures were identified in consultation with LADOT and were prioritized based on LADOT's mitigation guidelines. The mitigation program for the Project includes the following major components:

1. Implementation of a transportation demand management (TDM) program for the Project Site to promote peak period trip reduction; and,

2. Transportation Systems Management (TSM) improvements, specifically consisting of the installation of a traffic monitoring camera and fiber optic data transmission line to allow additional video monitoring of the traffic signal system.

These mitigation measures would be consistent with the City's policies that support improvements that reduce greenhouse gas emissions by reducing the use of single-occupant vehicle trips, encourage developers to construct transit and pedestrian-friendly projects with safe and walkable sidewalks, and provide efficient and effective traffic control and management.

The combined effect of the various strategies implemented as part of the TDM program would result in a reduction in peak hour trip generation by offering services, actions, specific facilities, etc., aimed at encouraging use of alternative transportation modes. For the Project, a TDM trip reduction credit of 10 percent for Site 1 office workers was assumed as an achievable but conservative estimate, as stated in Appendix 4.14-2 to the Draft EIR and approved by LADOT. Accordingly, the TDM program would be expected to result in a reduction of 301 daily trips under Phase I, including 50 during the morning peak hour and 61 during the afternoon peak hour. The TDM program would be expected to result in a reduction of 316 daily trips upon completion of Phase II, including 52 during the morning peak hour and 65 during the afternoon peak hour.

The TSM improvement would enhance the ability to monitor traffic and adapt the signal system to real-time conditions along Vermont Avenue between 3rd Street and 6th Street. LADOT's ATSAC department has identified this improvement as a high priority for the area to allow for more immediate response to traffic conditions. For the improvement to the ability to manage the traffic systems, LADOT would allow a 1 percent increase in intersection capacity (reflected as a 0.01 improvement in intersection V/C ratio) at four study intersections on Vermont Avenue between 3rd Street and 6th Street:

10. Vermont Avenue & 3rd Street
13. Vermont Avenue & 4th Street
15. Vermont Avenue & 5th Street
18. Vermont Avenue & 6th Street

MM TR-a1: Transportation Demand Management Program. The Project shall develop and implement a TDM program in accordance with the June 29, 2017 LADOT Transportation Study Assessment letter to promote non-auto travel and reduce the use of single-occupant vehicle trips among the office workers on Site 1. The TDM program would be developed by the County, and approved by the County Department of Public Works. The TDM program would be submitted to the City (LADOT) for verification that the provisions of the TDM program sufficiently justify the 10 percent trip reduction used in the Project's Traffic Study. The County approval and City verification shall be received prior to issuance of certificate of occupancy for the Site 1 County office building. Examples of strategies that may be, but are not required to be, included in the TDM program would be the following:

- TDM-related information available in common area
- Bicycle amenities such as racks and showers
- Incentives for using alternative travel modes
- Parking incentives
- Contribution to the City's Bicycle Plan Trust Fund for implementation of bicycle improvements in the Project area

The following provides further information and description of the various TDM program strategies that may be, but are not required to be, incorporated into the Project's TDM program:

Educational Programs. A transportation management coordinator (TMC) on the building management staff would reach out to employees directly to promote the benefits of TDM.

Project Design Features to Promote Bicycling and Walking. The Project would incorporate features for bicyclists and pedestrians, such as exclusive access points, secured bicycle parking facilities, or a bicycle valet system. Additionally, the Project Site would be designed to be a friendly and convenient environment for pedestrians. The Project would also contribute a one-time payment of \$50,000 to be deposited into the City's Bicycle Plan Trust Fund to implement bicycle improvements in the Study Area.

Incentives for Using Alternative Travel Modes. The Project TMC could incorporate various incentives for use of its programs, including discounted transit passes for employees and/or "parking cash-out" subsidies, which act as a rebate for employees who choose not to park a car at the Project Site. An additional option could include unbundled parking, which allows for a separate charge for parking from office space and the flexibility to vary the number of spaces rented.

MM TR-a2: Transportation Systems Management Improvements. The Project shall fund and coordinate the installation of a traffic monitoring camera at the intersection of Vermont Avenue and 5th Street and install fiber optic line to connect the camera to LADOT's ATSAC system. The improvement includes installation of high-capacity fiber optic data cables on Vermont Avenue between 5th Street and Beverly Boulevard, a distance of approximately 4,000 feet. The Developer shall implement this improvement through the City's B-Permit process.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Construction

Project construction is considered to be a temporary short-term impact. Regulatory requirements have been recommended, including a Construction Management Plan, to ensure that Project impacts are reduced and that proper measures for protecting traffic flow and access would be maintained. The regulatory requirements would reduce the impacts to a less-than-significant level. However, cumulative construction impacts would be significant and unavoidable due to the potential for concurrent construction of the related projects in the vicinity of the Project. The Project's contribution to this significant cumulative impact would be cumulatively considerable.

Operation

MM TR-a1 would result in peak hour trip reductions and MM TR-a2 would result in capacity improvements from the installation of the traffic monitoring camera and fiber optic data line. The effectiveness of the mitigation measures was analyzed by applying the appropriate trip generation reductions and capacity enhancements to the analysis of the impacted study intersection. Table 4.14-19 shows the resulting conditions at the significantly impacted intersections after implementation of the mitigation measures.

As shown in Table 4.14-20, implementation of MM TR-a1 and MM TR-a2 would fully mitigate impacts to the following intersections:

- 24. Vermont Avenue & Wilshire Boulevard (Existing with Project Phase I Conditions)
- 18. Vermont Avenue & 6th Street (Existing with Project Phase I and II Conditions)
- 10. Vermont Avenue & 3rd Street (Interim Year 2021 with Project Phase I)
- 18. Vermont Avenue & 6th Street (Interim Year 2021 with Project Phase I)
- 30. Vermont Avenue & Olympic Boulevard (Interim Year 2021 with Project Phase I)
- 33. Vermont Avenue & Washington Boulevard (Interim Year 2021 with Project Phase I)
- 13. Vermont Avenue & 4th Street (Buildout Year 2023 with Project Phase I and II)
- 28. Vermont Avenue & 8th Street (Buildout Year 2023 with Project Phase I and II)
- 32. Vermont Avenue & Venice Boulevard (Buildout Year 2023 with Project Phase I and II)

However, significant impacts would remain at the following intersections (shown in **bold** in Table 4.14-20):

- 24. Vermont Avenue & Wilshire Boulevard (PM Peak; Existing with Project Phase I and II Conditions)
- 6. Vermont Avenue & Beverly Boulevard (PM Peak; Interim Year 2021 with Project Phase I)
- 24. Vermont Avenue & Wilshire Boulevard (PM Peak; Interim Year 2021 with Project Phase I)
- 6. Vermont Avenue & Beverly Boulevard (PM Peak; Buildout Year 2023 with Project Phase I and II)
- 10. Vermont Avenue & 3rd Street (PM Peak; Buildout Year 2023 with Project Phase I and II)
- 18. Vermont Avenue & 6th Street (AM and PM Peak; Buildout Year 2023 with Project Phase I and II)
- 24. Vermont Avenue & Wilshire Boulevard (AM and PM Peak; Buildout Year 2023 with Project Phase I and II)
- 30. Vermont Avenue & Olympic Boulevard (AM and PM Peak; Buildout Year 2023 with Project Phase I and II)
- 33. Vermont Avenue & Washington Boulevard (PM Peak; Buildout Year 2023 with Project Phase I and II)
- 35. Vermont Avenue & I-10 Eastbound Ramps (PM Peak; Buildout Year 2023 with Project Phase I and II)

While the impact at these intersections would be reduced by the mitigation program, they would remain significantly impacted. No further feasible mitigation was able to be identified at these locations. Metro determined that its bus lines on Vermont Avenue already operate at the highest frequency that can be accommodated, and therefore could not accept increases to transit capacity as mitigation. Additionally, physical street widening to add capacity is not feasible along Vermont Avenue due to right-of-way constraints and lack of undeveloped property where right-of-way could potentially be acquired. Therefore, these impacts would remain significant and unavoidable.

Impacts related to the Congestion Management Program, design feature hazards, emergency access, and conflicts with alternative transportation policies and plans would be less than significant.

Table 4.14-20
Intersection Levels of Service and Significant Impacts Following Implementation of Mitigation

No.	Intersection	Peak Hour	Existing Year 2017 with Project Phase I with Mitigation Conditions				Existing Year 2017 with Project Phase I and II with Mitigation Conditions				Interim Year 2021 with Project Phase I with Mitigation Conditions				Buildout Year 2023 with Project Phase I and II with Mitigation Conditions			
			V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
6.	Vermont Avenue & Beverly Boulevard	A.M. P.M.									0.847	D	0.002	NO	0.868	D	0.006	NO
											0.927	E	0.010	YES	0.949	E	0.014	YES
10.	Vermont Avenue & 3rd Street	A.M. P.M.									0.926	E	-0.003	NO	0.950	E	0.002	NO
											0.888	D	0.008	NO	0.913	E	0.015	YES
13.	Vermont Avenue & 4th Street	A.M. P.M.													0.713	C	0.006	NO
															0.732	C	0.037	NO
18.	Vermont Avenue & 6th Street	A.M. P.M.					0.733	C	0.032	NO	0.837	D	0.002	NO	0.884	D	0.033	YES
							0.693	B	0.038	NO	0.815	D	0.011	NO	0.859	D	0.039	YES
24.	Vermont Avenue & Wilshire Boulevard	A.M. P.M.	0.834	D	0.006	NO	0.843	D	0.015	NO	1.070	F	0.006	NO	1.099	F	0.016	YES
			0.808	D	0.017	NO	0.821	D	0.030	YES	1.068	F	0.017	YES	1.099	F	0.030	YES
28.	Vermont Avenue & 8th Street	A.M. P.M.													0.794	C	0.013	NO
															0.841	D	0.019	NO
30.	Vermont Avenue & Olympic Boulevard	A.M. P.M.									0.995	E	0.008	NO	1.017	F	0.011	YES
											1.042	F	0.007	NO	1.067	F	0.014	YES
32.	Vermont Avenue & Venice Boulevard	A.M. P.M.													0.905	E	0.008	NO
															0.950	E	0.006	NO
33.	Vermont Avenue & Washington Boulevard	A.M. P.M.									0.954	E	0.001	NO	0.976	E	0.005	NO
											1.076	F	0.009	NO	1.101	F	0.013	YES
35.	Vermont Avenue & I-10 Eastbound Ramps	A.M. P.M.													0.894	D	0.009	NO
															1.015	F	0.013	YES

Source: Gibson Transportation Consulting, Inc., 2017.

Table 4.14-20, Intersection Levels of Service and Significant Impacts Following Implementation of Mitigation, shows LOS and significant impact analysis results after implementation of the mitigation measures listed above. Table 4.14-21 summarizes the significantly impacted intersections before and after mitigation.

Table 4.14-21
Summary of Intersection Impacts Before and After Mitigation

No.	Intersection	Peak Hour	Existing with Phase I Conditions		Existing with Phase I and 2 Conditions		Interim with Phase I Conditions		Buildout with Phase I and 2 Conditions	
			Before Mit.	After Mit.	Before Mit.	After Mit.	Before Mit.	After Mit.	Before Mit.	After Mit.
6.	Vermont Avenue & Beverly Boulevard	A.M.	--	--	--	--	--	--	--	--
		P.M.	--	--	--	--	YES	YES	YES	YES
10.	Vermont Avenue & 3rd Street	A.M.	--	--	--	--	--	--	YES	NO
		P.M.	--	--	--	--	YES	NO	YES	YES
13.	Vermont Avenue & 4th Street	A.M.	--	--	--	--	--	--	--	--
		P.M.	--	--	--	--	--	--	YES	NO
18.	Vermont Avenue & 6th Street	A.M.	--	--	YES	NO	--	--	YES	YES
		P.M.	--	--	YES	NO	YES	NO	YES	YES
24.	Vermont Avenue & Wilshire Boulevard	A.M.	--	--	--	--	--	--	YES	YES
		P.M.	YES	NO	YES	YES	YES	YES	YES	YES
28.	Vermont Avenue & 8th Street	A.M.	--	--	--	--	--	--	--	--
		P.M.	--	--	--	--	--	--	YES	NO
30.	Vermont Avenue & Olympic Boulevard	A.M.	--	--	--	--	YES	NO	YES	YES
		P.M.	--	--	--	--	--	--	YES	YES
32.	Vermont Avenue & Venice Boulevard	A.M.	--	--	--	--	--	--	YES	NO
		P.M.	--	--	--	--	--	--	--	--
33.	Vermont Avenue & Washington Boulevard	A.M.	--	--	--	--	--	--	--	--
		P.M.	--	--	--	--	YES	NO	YES	YES
35.	Vermont Avenue & I-10 Eastbound Ramps	A.M.	--	--	--	--	--	--	--	--
		P.M.	--	--	--	--	--	--	YES	YES

Source: Gibson Transportation Consulting, Inc., 2017.

4.15 TRIBAL CULTURAL RESOURCES

INTRODUCTION

This section evaluates the potential impacts to tribal cultural resources associated with development of the Project Sites. The analysis is based in part on information provided in the archaeological data search prepared by the South Central Coastal Information Center ("SCCIC"), Department of Anthropology, California State University at Fullerton, dated March 6, 2017; the Sacred Lands File search prepared by the Native American Heritage Commission ("NAHC"), dated February 9, 2017, and consultation with a California Native American tribe. The SCCIC findings are included in Appendix 4.3-2, the NAHC report is included in Appendix 4.15-1, and copies of the notification letters sent to California Native American tribes are included in Appendix 4.15-2 to this Draft EIR.

ENVIRONMENTAL SETTING

Existing Conditions

The Project Sites are located within, but not necessarily limited to, a geographical area of interest identified by three California Native American tribes: Gabrieleño Band of Mission Indians - Kizh Nation, Gabrieleño Tongva San Gabriel Band of Mission Indians, and Fernandeño Tataviam Band of Mission Indians.

A resource records search for the Project was conducted by SCCIC and NAHC. The records search by SCCIC consisted of a review of all recorded archaeological and built-environment resources as well as a review of cultural resource reports on file. In addition, the California Points of Historical Interest, the California Historical Landmarks, the California Register of Historical Resources (the "California Register"), the National Register of Historic Places (the "National Register"), the California State Historic Properties Directory, and the City of Los Angeles Historic-Cultural Monuments listings were reviewed for the Project Sites and a half-mile radius. As set forth in Public Resources Code ("PRC") Section 21074, tribal cultural resources are either included or determined to be eligible for inclusion in the California Register or included in a local register of historical resources as defined in subdivision (k) of Section 5020.1.¹ The results of the SCCIC records search are presented in Table 4.3.2-1 (Archaeological Resources Search Results) in Section 4.3.2 (Cultural Resources – Archaeological Resources). As shown on Table 4.3.2-1, no archaeological resources were recorded at any of the three Project Sites.

The Sacred Lands File search for the USGS Hollywood Quadrangle conducted by NAHC did not identify resources. The NAHC is a Statewide Trustee Agency for the protection and preservation of Native American cultural resources pursuant to PRC Section 21070. The Sacred Lands File search is a search of recorded Native American sacred sites and burial sites as defined by the NAHC and PRC Sections 55097.94(a) and 5097.96.

¹ PRC Section 5020.1(k) states the following: "Local register of historical resources" means a list of properties officially designated or recognized as historically significant by a local government pursuant to a local ordinance or resolution.

Regulatory Framework

Federal

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (United States Code, Title 16, Sections 470aa-mm) became law on October 31, 1979, and has been amended four times. It regulates the protection of archaeological resources and sites that are on federal and Indian lands.

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act (United States Code, Title 25, Sections 3001 *et seq.*) is a federal law passed in 1990 that provides a process for museums and federal agencies to return certain Native American cultural items, such as human remains, funerary objects, sacred objects, or objects of cultural patrimony, to lineal descendants and culturally affiliated Indian tribes.

National Register of Historic Places

The National Register of Historic Places (Code of Federal Regulations, Title 36, Chapter I, Part 60) was established by the National Historic Preservation Act as “an authoritative guide to be used by federal, state, and local governments, private groups and citizens to identify the Nation’s cultural resources and to indicate what properties should be considered for protection from destruction or impairment.” The National Register recognizes properties that are significant at the national, State, and/or local levels.

To be eligible for listing in the National Register, a resource must be significant in American history, architecture, archaeology, engineering, or culture. Four criteria for evaluation have been established to determine the significance of a resource.

- a. It is associated with events that have made a significant contribution to the broad patterns of our history;
- b. It is associated with the lives of persons significant in our past;
- c. It embodies the distinctive characteristics of a type, period, or method of construction or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction; or
- d. It yields, or may be likely to yield, information important in prehistory or history.

Districts, sites, buildings, structures, and objects that are 50 years in age must meet one or more of the above criteria and retain integrity (i.e., convey their significance) to be eligible for listing on the National Register. Under the National Register, a property can be significant not only for the way it was originally constructed, but also for the way it was adapted at a later period, or for the way it illustrates changing tastes, attitudes, and uses over a period of time.

Within the concept of integrity, the National Register recognizes seven aspects or qualities that, in various combinations, define integrity: Location, Design, Setting, Materials, Workmanship, Feeling, and Association:

1. Location is the place where the historic property was constructed or the place where the historic event occurred. The relationship between the property and its location is often important to understanding why the property was created or why something happened. The actual location of a historic property, complemented by its setting, is particularly important in recapturing the sense of historic events and persons. Except in rare cases, the relationship between a property and its historic associations is destroyed if the property is moved.
2. Design is the combination of elements that create the form, plan, space, structure, and style of a property. It results from conscious decisions made during the original conception and planning of a property (or its significant alteration) and applies to activities as diverse as community planning, engineering, architecture, and landscape architecture. Design includes such elements as organization of space, proportion, scale, technology, ornamentation, and materials. A property's design reflects historic functions and technologies as well as aesthetics. It includes such considerations as the structural system; massing; arrangement of spaces; pattern of fenestration; textures and colors of surface materials; type, amount and style of ornamental detailing; and arrangement and type of plantings in a designed landscape.
3. Setting is the physical environment of a historic property. Whereas location refers to the specific place where a property was built or an event occurred, setting refers to the character of the place in which the property played its historic role. It involves how, not just where, the property is situated and its relationship to surrounding features and open space.
4. Workmanship is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory. It is the evidence of artisans' labor and skill in constructing or altering a building, structure, object, or site. Workmanship can apply to the property as a whole or to its individual components.
5. Materials are the physical elements that were combined or deposited during a particular period of time and in a particular pattern or configuration to form a historic property. The choice and combination of materials reveal the preferences of those who created the property and indicate the availability of particular types of materials and technologies. A property must retain key exterior materials dating from the period of its historic significance.
6. Feeling is a property's expression of the aesthetic or historic sense of a particular period of time. It results from the presence of physical features that, taken together, convey the property's historic character.
7. Association is the direct link between an important historic event or person and a historic property. A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer.

To retain historic integrity, a property will always possess most of the aspects and depending upon its significance, retention of specific aspects of integrity may be paramount for a property to convey its significance.² Determining which of these aspects are most important to a particular property requires

² *The National Register defines a property as an "area of land containing a single historic resource or a group of resources, and constituting a single entry in the National Register of Historic Places." A "Historic Property" is defined as "any prehistoric or historic district, site, building, structure, or object at the time it attained historic*

knowing why, where, and when a property is significant. For properties that are considered significant under National Register Criteria A and B, *National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation* (“*National Register Bulletin 15*”) explains: “a property that is significant for its historic association is eligible if it retains the essential physical features that made up its character or appearance during the period of its association with the important event, historical pattern, or person(s).”³ In assessing the integrity of properties that are considered significant under National Register Criterion C, *National Register Bulletin 15* states, “a property important for illustrating a particular architectural style or construction technique must retain most of the physical features that constitute that style or technique.”⁴

State

CEQA - Native American Historic Resource Protection Act

The Native American Historic Resource Protection Act (Assembly Bill [“AB”] 52) took effect July 1, 2015, and incorporates tribal consultation and analysis of impacts to tribal cultural resources into CEQA. It requires tribal cultural resources to be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California Native American tribes. Projects that require a Notice of Preparation of an EIR or Notice of Intent to adopt a ND or MND are subject to AB 52. A significant impact on a tribal cultural resource is considered a significant environmental impact, requiring feasible mitigation measures.

Tribal cultural resources are defined as either of the following:

8. Sites, features, places, cultural landscapes (must be geographically defined), sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources as set forth in PRC Section 21074(a)(1).
9. The lead agency, supported by substantial evidence, chooses to treat the resource as a tribal cultural resource as set forth in PRC Section 21074(a)(2)).

The first category requires that the tribal cultural resources qualify as a historical resource according to PRC Section 5024.1. The second category gives the lead agency discretion to qualify that resource granted that the lead agency supports its determination with substantial evidence and considers the resource’s significance to a California Native American tribe. The following is a brief outline of the process:⁵

significance. Glossary of National Register Terms, website: http://www.nps.gov/nr/publications/bulletins/nrb16a/nrb16a_appendix_IV.htm, accessed: January 23, 2017.

³ “A property retains association if it is the place where the event or activity occurred and is sufficiently intact to convey that relationship to an observer. Like feeling, association requires the presence of physical features that convey a property’s historic character. Because feeling and association depend on individual perceptions, their retention alone is never sufficient to support eligibility of a property for the National Register.” *Ibid.*, page 46.

⁴ “A property that has lost some historic materials or details can be eligible if it retains the majority of the features that illustrate its style in terms of the massing, spatial relationships, proportion, pattern of windows and doors, texture of materials, and ornamentation. The property is not eligible, however, if it retains some basic features conveying massing but has lost the majority of the features that once characterized its style.” *Ibid.*

⁵ PRC Sections 21080.3.1 – 21080.3.3.

- 1) A California Native American tribe must first request in writing to be notified by lead agencies of proposed projects in the geographic area that is traditionally and culturally affiliated with the tribe.
- 2) Within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested project notification.
- 3) A tribe must respond, in writing, within 30 days of receiving the notification if it wishes to request consultation.
- 4) The lead agency must initiate consultation within 30 days of receiving the request from the tribe.
- 5) Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a tribal cultural resource; or a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached.
- 6) Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on tribal cultural resources and discuss feasible alternatives or mitigation that avoid or lessen the impact.

California Health and Safety Code Section 7050.5

Under Health and Safety Code Section 7050.5, if human remains are discovered during any project activity, the county coroner must be notified immediately. If human remains are exposed, Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made the necessary findings as to the origin and disposition pursuant to PRC Section 5097.98. Construction must halt in the area of the discovery of human remains, the area of discovery shall be protected, and consultation and treatment shall occur as prescribed by law. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to PRC Section 5097.98 will immediately notify those persons it believes to be most likely descended from the deceased person so that they can inspect the burial site and make recommendations for treatment or disposal.

California Public Resources Code Sections 5020 – 5029.5

This code continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the California Register of Historical Resources and is responsible for the designation of State Historical Landmarks and Historical Points of Interest.

California Public Resources Code Sections 5097 – 5097.994

Native American Historic Resource Protection Act; Archaeological, Paleontological, and Historical Sites; Native American Historical, Cultural, and Sacred Sites (Public Resources Code Section 5097-5097.994) specifies the procedures to be followed in the event of the unexpected discovery of human remains on non-federal public lands. California Public Resources Code 5097.9 states that no public agency or private party on public property shall “interfere with the free expression or exercise of Native American Religion.” The code further states that: “No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine...

except on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, except for parklands larger than 100 acres.”

California Register of Historical Resources

The Office of Historic Preservation (“OHP”), as an office of the California Department of Parks and Recreation (“DPR”), implements the policies of the National Historic Preservation Act on a statewide level. OHP also carries out the duties as set forth in the PRC and maintains the Statewide Historical Resources Inventory and the California Register of Historical Resources (the “California Register”). The State Historic Preservation Officer (“SHPO”) is an appointed official who implements historic preservation programs within the State’s jurisdiction. Also implemented at the State level, CEQA requires projects to identify any substantial adverse impacts which may affect the significance of identified historical resources.

The California Register was signed into law on September 27, 1992. The California Register is an authoritative listing and guide to be used by State and local agencies, private groups, and citizens to identify the existing historical resources of the State and to indicate which resources deserve to be protected, to the extent prudent and feasible, from substantial adverse change. The criteria for eligibility for the California Register are based upon National Register criteria. Certain resources are determined by the statute to be automatically included in the California Register by operation of law, including California properties formally determined eligible for, or listed in, the National Register.

The California Register consists of resources that are listed automatically and those that must be nominated through an application and public hearing process. The California Register automatically includes the following:

- California properties listed on the National Register and those formally Determined Eligible for the National Register;
- California Registered Historical Landmarks from No. 770 onward; or
- Those California Points of Historical Interest that have been evaluated by the OHP and have been recommended to the State Historical Commission for inclusion on the California Register.

Other resources which may be nominated to the California Register include:

- Individual historical resources;
- Historical resources contributing to historic districts;
- Historical resources identified as significant in historical resources surveys with significance ratings of Category 1 through 5; or
- Historical resources designated or listed as local landmarks, or designated under any local ordinance.

To be eligible for the California Register, a historic resource must be significant at the local, State, or national level, under one or more of the following four criteria.

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past;

3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition, a historic resource eligible for listing in the California Register must meet one or more of the criteria of significance described above and retain enough of its historic character or appearance to be recognizable as a historic resource and to convey the reasons for its significance. Historical resources that have been rehabilitated or restored may be evaluated for listing. Integrity is evaluated with regard to the retention of seven aspects of integrity - similar to the National Register - location, design, setting, materials, workmanship, feeling, and association. Also, similar to the National Register, it must also be judged with reference to the particular criteria under which a resource is proposed for eligibility. Alterations over time to a resource or historic changes in its use may themselves have historical, cultural, or architectural significance. It is possible that historical resources may not retain sufficient integrity to meet the criteria for listing in the National Register, but they may still be eligible for listing in the California Register. A resource that has lost its historic character or appearance may still have sufficient integrity for the California Register if it maintains the potential to yield significant scientific or historical information or specific data.

ENVIRONMENTAL IMPACTS

Methodology

To evaluate potential impacts to tribal cultural resources, formal records searches were conducted to assess the presence of known archaeological and Native American sacred sites at the Project Sites by SCCIC and NAHC, respectively. The existing conditions and anticipated excavation depths were evaluated to determine the potential for inadvertent discovery of a resource. California Native American tribes who had previously contacted the County for inclusion to the AB52 notification process, and were determined to be traditionally and culturally affiliated with the geographic area containing the Project Sites based upon information provided by the Tribes, were contacted and notified of the Project to solicit requests for consultation in compliance with AB 52. The SCCIC findings are included in Appendix 4.3-2, the NAHC report is included in Appendix 4.15-1, and copies of the notification letters sent to California Native American tribes are included in Appendix 4.15-2 to this Draft EIR.

Thresholds of Significance

The potential for the Project to result in impacts associated with tribal cultural resources is based on the thresholds specified by Appendix G to the *State CEQA Guidelines*, which are addressed in this section. These significance thresholds are listed below.

- Threshold 4.15-1:** Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
- (a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or

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

An affirmative answer to this question would represent a significant impact.

Project Design Elements

Construction of the Project would involve underground excavations. As discussed in Section 4.3.2 Cultural Resources, Archaeological Resources, the Project would include an archaeological monitor during ground disturbing activities.

Impact Analysis

Threshold 4.15-1: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- (a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- (b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?

The County commenced tribal notification for this Project in accordance with AB 52 on May 8, 2017, via a mailing to tribal representatives of the following tribes that had requested notification of projects within the area including the Project Sites:

- Gabrielino/Tongva San Gabriel Band of Mission Indians
- Gabrieleño Band of Mission Indians – Kizh Nation
- Fernandeno Tataviam Band of Mission Indians

The 30-day notification response window closed on June 8, 2017. A request for consultation was received from the Gabrieleño Band of Mission Indians – Kizh Nation on June 1, 2017. No communication or request was received from any other notified tribes within the 30-day response period.

Pursuant to the requirements of AB 52, the County initiated the consultation process on June 14, 2017 in a letter to the Gabrieleño Band of Mission Indians—Kizh Nation, sent via email and U.S. mail. On August 23, 2017, County staff held a phone consultation with representatives of the Gabrieleño Band of Mission

Indians—Kizh Nation to discuss potential resources in the area, impacts of the Project, and mitigation measures.

Consultation under AB 52 with the Gabrieleño Band of Mission Indians—Kizh Nation formally concluded on October 26, 2017. Based on the records search conducted for the Project and documentation/information provided by Mr. Andrew Salas, on behalf of the Gabrieleño Band of Mission Indians—Kizh Nation, the Project Sites are considered sensitive for potential tribal cultural resources. Project grading activities may encounter these resources and impacts may be potentially significant. With the implementation of MM-TCR-1, which would provide for Native American monitor during Project grading and excavation activities, impacts on tribal resources would be reduced to less than significant.

CUMULATIVE IMPACTS

The study area for cumulative impacts to tribal cultural resources is the extent of the geographic area with which the identified tribes are traditionally and culturally affiliated. The Project Sites do not contain any known tribal cultural resources, nor did search results by NAHC or SCCIC, provide substantial evidence as to the presence of tribal cultural resources on site. However, the Project Sites are considered sensitive for potential tribal cultural resources. Projects within this area requiring the preparation of an IS/ND, IS/MND, or EIR are subject to the requirements of AB 52, which includes notifying tribes to solicit consultation and to analyze potential impact of tribal cultural resources. Compliance with existing regulatory measures safeguarding tribal cultural resources would ensure potential impacts from inadvertent discovery would be reduced to a less-than-significant level. Any project sites that contain tribal cultural resources would be required to comply with regulations and/or safeguard mitigation measures to reduce potential impacts to the greatest extent feasible. Nonetheless, as impacts related to tribal cultural resources within the Project Sites would be less than significant, the Project would not result in a cumulatively considerable contribution to a significant cumulative impact.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

No specific Project Design Features are relevant to tribal cultural resources.

Regulatory Requirements

No significant impacts related to tribal cultural resources have been identified; and no regulatory compliance measures are required.

MITIGATION MEASURES

MM TCR-1: Prior to issuance of a grading permit, the Applicant shall retain a qualified Native American Monitor (Monitor) from the Gabrieleno Band of Mission Indians-Kizh Nation to monitor all grading activities within the project site. The Monitor shall photo-document the grading activities and maintain a daily monitoring log that contains descriptions of the daily construction activities, locations and mappings of the graded areas, soils, and documentation of any identified tribal cultural resources. If tribal cultural resources are encountered during monitoring, all ground-disturbing activities within 50 feet of the find shall cease and the Monitor shall evaluate the significance of the find, and if significant, recommend appropriate measure(s) to mitigate impacts. Such measure(s) may include

avoidance, preservation in place, Phase III data recovery and associated documentation, or other appropriate measures. The County shall determine the appropriate and feasible measure(s) that will be necessary to mitigate impacts, in consideration of the measure(s) recommended by the Monitor. The Developer shall implement all measure(s) that the County determined necessary, appropriate and feasible. Within 60 days after grading activities are completed, the Monitor shall prepare and submit a final report to the County and the California Native American Heritage Commission. The report shall include documentation of any recovered tribal cultural resources, the significance of the resources, and the treatment of the recovered resources. In addition, the Monitor shall submit the monitoring log and photo documentation, accompanied by a photo key, to the County.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of MM TCR-1, Project impacts related to tribal cultural resources would be less than significant.

Cumulative impacts related to tribal cultural resources would be less than significant.

4.16 UTILITIES AND SERVICE SYSTEMS

This section describes the utilities and service systems and evaluates the construction and operational impacts associated with the Project. Topics addressed include wastewater, water, and solid waste. This section summarizes the *Vermont Corridor Development Project Utility Infrastructure Technical Report* (“Infrastructure Technical Report”) prepared by KPFF Consulting Engineers, August 16, 2017. The Infrastructure Technical Report is included as Appendix 4.16-1 to this Draft EIR.

Although the Project Sites are owned by the County, because water, wastewater, and solid waste services would be provided to the Project Sites by the City of Los Angeles, City practices and policies of the City’s General Plan related to utilities and service systems are addressed below.

WASTEWATER

INTRODUCTION

This subsection describes the potential impacts of the Project on the wastewater infrastructure serving the Project Sites.

ENVIRONMENTAL SETTING

Existing Conditions

The City of Los Angeles has one of the largest sewer systems in the world including more than 6,600 miles of sewers serving a population of more than four million. The Los Angeles sewer system is comprised of three systems: Hyperion Sanitary Sewer System, Terminal Island Water Reclamation Plant Sanitary Sewer System, and Regional Sanitary Sewer System. To comply with Waste Discharge Requirements (“WDRs”), a Sewer System Management Plan (“SSMP”) was prepared for each of these systems.

The Project Sites lie within the Hyperion Service Area served by the Hyperion Sanitary Sewer System. In February 2015, an SSMP was prepared for the Hyperion Sanitary Sewer System pursuant to the State Water Resources Control Board’s (“SWRCB”) May 2, 2006 Statewide General WDRs.¹

Sewer permit allocation for projects that discharge into the Hyperion Treatment Plant is regulated by Ordinance No. 166,060 adopted by the City in 1990. The Ordinance established an additional annual allotment of 5.0 million gallons per day (“mgd”), of which 34.5 percent (1.725 mgd) is allocated for priority projects, 8 percent (0.4 mgd) for public benefit projects, and 57.5 percent (2.875 mgd) for non-priority projects (of which 65 percent is for residential projects and 35 percent for non-residential projects).

The City of Los Angeles Municipal Code (“LAMC”) includes regulations that allow the City to assure available sewer capacity for new projects and fees for improvements to the infrastructure system. LAMC Section 64.15 requires that the City perform a Sewer Capacity Availability Request (“SCAR”) when any person seeks a sewer permit to connect a property to the City’s sewer collection system, proposes additional discharge through their existing public sewer connection, or proposes a future sewer connection or future development that is anticipated to generate 10,000 gallons or more of sewage per

¹ City of Los Angeles Department of Public Works, Bureau of Sanitation, *Sewer System Management Plan Hyperion Sanitary Sewer System*, February 2015.

day. A SCAR is an analysis of the existing sewer collection system to determine if there is adequate capacity existing in the sewer collection system to safely convey the newly generated sewage to the appropriate sewage treatment plant.

In addition, the City establishes design criteria for sewer systems to assure that new infrastructure provides sewer capacity and operating characteristics to meet City Standards (Bureau of Engineering Special Order No. SO06-0691). Per the Special Order, laterals sewers, which are sewers 18 inches or less in diameter, must be designated for a planning period of 100 years. The Special Order also requires that sewers be designated so that the peak dry weather flow depth during their planning period shall not exceed one-half the pipe diameter.²

In 2006 the City approved the Integrated Resources Plan, which incorporates a Wastewater Facilities Plan.³ The Integrated Resources Program was developed to meet future wastewater needs of more than 4.3 million residents expected to live within the City by 2020. In order to meet future demands posed by increased wastewater generation, the City has chosen to expand its current overall treatment capacity, while maximizing the potential to reuse recycled water through irrigation, and other approved uses.

Regional

The City of Los Angeles Bureau of Sanitation (“BOS”) operates and maintains the wastewater treatment, reclamation and collection facilities serving most of the City of Los Angeles incorporated areas as well as several other cities and unincorporated areas in the Los Angeles basin and San Fernando Valley. As stated above, the collection infrastructure consists of over 6,600 miles of local, trunk, mainline and major interceptor sewers, five major outfall sewers, and 46 pumping plants. The wastewater generated by the Project ultimately flows to the Hyperion Treatment Plant (“HTP”) System. The existing design capacity of the HTP is approximately 450 mgd⁴ and the existing average daily flow for the system is approximately 300 mgd.

Local

Sanitary sewer service to Site 1, Site 2, and Site 3 is provided by the City of Los Angeles Bureau of Sanitation (BOS).

Available record data shows an 8-inch vitrified clay pipe (“VCP”) and 10-inch VCP sewer main along Vermont Avenue fronting both Site 1 and Site 2, an 8-inch VCP sewer main along 6th Street fronting Site 2, and an 8-inch VCP sewer main along Shatto Place fronting Site 1. It appears that 510 Vermont, 526 Vermont, and 532 Vermont, Site 1 parcels, are allocated to the 10-inch main along Vermont Avenue. In addition, the 523 Shatto parcel is allocated to an 8-inch VCP main along Shatto Place. Site 2 has potential to connect to both the 10-inch and 8-inch main in Vermont Avenue. In addition, Site 2 has an 8-inch VCP sewer main on 6th Street. Site 3 is allocated to a 20-inch VCP sewer main along Vermont Avenue. Based

² City of Los Angeles, L.A. CEQA Thresholds Guide, Your Resource for Planning CEQA Analysis in Los Angeles, M-Public Utilities, 2006. <http://www.environmentla.org/programs/thresholds/M-Public%20Utilities.pdf> accessed July 28, 2016.

³ City of Los Angeles, Department of Public Works, LA Sewers Website, Integrated Resources Plan Facilities Plan, Summary Report, December 2006.

⁴ City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=oeplwklld_4&_afLoop=28344654751341747#!, accessed October 20, 2016.

upon the City of Los Angeles Bureau of Engineering's online Navigate LA database, the estimated capacity for the 10-inch, 8-inch, and 20-inch line at 50 percent full is 0.90 cubic feet per second (cfs), 0.37 cfs, and 3.91 cfs, respectfully.⁵

The sewer mains connect to a network of sewer lines, which ultimately convey wastewater to HTP.

Project Sites

Site 1 consists of an existing two-story office building, a one-story office with rooftop parking, two surface parking lots, and a parking structure. Site 2 consists of an existing 12-story building, a four-story building, and a parking structure. Site 3 consists of a 4-story building and surface parking lot. Wastewater generation estimates have been prepared based on the BOS sewerage generation factors for commercial categories, and are summarized in Table 4.16-1 (Estimated Existing Wastewater Generation), below.

**Table 4.16-1
Estimated Existing Wastewater Generation**

Connection	Existing Use Description	Average Daily Flow (gpd/unit) ^b	Quantity	Average Daily Sewer Demand (gpd)
Site 1				
10-inch City of L.A. Sewer Main	2-Story Office	120/1,000 gsf	30,788 gsf	3,695
	1-Story Office	120/1,000 gsf	13,325 gsf	1,599
	7-Story Parking Structure	--	235,248 gsf	0 ^a
Subtotal of Existing Wastewater Generation for Site 1				5,294
Site 2				
10-inch City of L.A. Sewer Main	12-Story Office	120/1,000 gsf	154,793 gsf	18,575
	4-Story Office	120/1,000 gsf	52,000 gsf	6,240
	2-Story Parking Structure	--	14,010 gsf	0 ^a
Subtotal of Existing Wastewater Generation for Site 2				24,815
Site 3				
20-inch City of L.A. Sewer Main	4-Story Office	120/1,000 gsf	29,292 gsf	3,515
Subtotal of Existing Wastewater Generation for Site 3				3,515
Total of Existing Wastewater Generation				33,624
^a Parking structures are only recognized by BOS to have sewer generation if restrooms are located within the structure.				
^b The average daily flow based on City of Los Angeles sewer generation factors. http://www.ci.la.ca.us/ead/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf . Source: KPFF, 2017.				

Regulatory Framework

Federal

The 1987 amendments to the Federal Water Pollution Control Act ("Clean Water Act"), added Section 402(p), which establishes a framework for regulating municipal and industrial storm water discharges under the National Pollutant Discharge Elimination System ("NPDES") program. As of 1991, all municipal

⁵ Based on input parameters provided by the City of Los Angeles such as size, slope, and roughness coefficient of the pipe, FlowMaster was used to determine the flow capacity at half-depth.

and industrial stormwater runoff is also regulated under the NPDES system. The Clean Water Act has established 126 “priority contaminants (metals and organic chemicals)”, while the California Ocean Plan has established effluent limitation for 21 of these pollutants. The U.S. Environment Protection Agency (“EPA”) is the primary Federal agency responsible for implementing the Clean Water Act. Subsequently, the EPA published final regulations that established requirements for applications for stormwater permits for specific categories of industries and construction activities of five acres or more and between one and five acres.

State

The California State Water Resources Control Board (“SWRCB”) and its regional water board, the Los Angeles Regional Water Quality Control Board (“LARWQCB”), is the primary State agency responsible for implementing the Clean Water Act and the State’s Porter-Cologne Water Quality Act within State waters. The LARWQCB is also responsible for water quality regulation through its work in preparing and adopting the California Ocean Plan. Local agencies also have responsibility for managing wastewater discharges. All are required to meet criteria set forth in their NPDES permits, to monitor their discharges, and to submit monthly reports to the LARWQCB and the EPA. Under Section 303(d) of the 1972 Clean Water Act, areas are required to declare a list of water quality limited segments. Watercourses included on this list do not meet water quality standards, even after installing the minimum level of pollutant control technology on point sources, and must develop action plans, known as Total Maximum Daily Loads to improve water quality. The LARWQCB indicates that certain pollutants in watersheds may include ammonia, nutrients, algae, odors, and unnatural scum/foam, both coming from point and non-point sources. In addition to infrastructure deficiencies, the increasing volume of stormwater runoff has become the major source of pollutants discharging into the Los Angeles River. For hydrology and water quality analysis, refer to Section 4.8 (Hydrology and Water Quality) of this Draft EIR.

In 2003, the SWRCB adopted the General Construction Activity Stormwater Permit (“General Permit”), which is “...required for all storm water discharges associated with construction activity where clearing, grading, and excavation results in a land disturbance of one or more acres.” The General Permit is effective as of July 1, 2010.

Phase II of the NPDES stormwater program covers small construction activities disturbing between one and five acres. Phase II became final and published in the Federal Register on December 8, 1999 with small construction permit applications due by March 10, 2003. The Phase II Final Rule also expanded the existing NPDES regulations (Phase I) to address stormwater discharges from municipal separate sewer systems serving populations of less than 100,000 persons. For hydrology and water quality analysis, refer to Section 4.8 (Hydrology and Water Quality) of this Draft EIR.

Regional

The LARWQCB is 1 of the 9 RWQCBs that are under the purview of the SWRCB. The SWRCB sets statewide policy and, together with the 9 State RWQCBs, implements State and federal laws and regulations that pertain to water quality. The LARWQCB implements State and federal laws and regulations within its jurisdiction and continuously maintains its Water Quality Control Plan (“WQCP”).

Local

As noted above, the City would provide wastewater service to all three Project Sites. Accordingly, the Project is evaluated against City policies and procedures with regard to wastewater service.

Development of Site 2 would be subject to the zoning and building requirements of the City of Los Angeles. In addition, Project Sites 1 and 3 would be subject to City of Los Angeles regulatory controls related to wastewater service since they would be served by BOS.

The *City of Los Angeles General Plan Framework Element* (Framework), adopted in December 1996, and readopted in August 2001, sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework land use policies are implemented at the community level through community plans and specific plans. The applicable policies and the consistency analysis that are related to the City wastewater collection infrastructure and treatment capacity are listed below in Table 4.16-2 (Applicable City of Los Angeles General Plan Framework Element Wastewater Treatment and Conveyance Goals, Objectives, and Policies).

Table 4.16-2
Applicable City of Los Angeles General Plan Framework Element Wastewater Treatment and Conveyance Goals, Objectives, and Policies

Goal, Policy, Objective	Goal, Policy, Objective Description
Objective 9.1	Monitor and forecast demand based upon actual and predicted growth.
Policy 9.1.1	Monitor wastewater generation.
Policy 9.1.2	Monitor wastewater flow quantities in the collection system and conveyed to the treatment plants.
Objective 9.2	Maintain the wastewater collection and treatment system, upgrade it to mitigate current deficiencies, and improve it to keep pace with growth as measured by the City's monitoring and forecasting efforts.
Policy 9.2.1	Collect and treat wastewater as required by law and Federal, State, and regional regulatory agencies.
Policy 9.2.2	Maintain wastewater treatment capacity commensurate with population and industrial needs.
Policy 9.3.1	Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.
<i>Source: City of Los Angeles, The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan, re-adopted 2001.</i>	

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Project with respect to wastewater are determined based on the proposed increase in wastewater generation and the capacity of existing and proposed wastewater infrastructure. The existing sewer capacity and wastewater generation is compared to the Project's wastewater generation and future sewer capacity, including improvements associated with the Project. In addition, the potential effects of wastewater treatment on water quality are evaluated in light of existing regulations.

Thresholds of Significance

The potential for the proposed Project to result in impacts associated with wastewater services is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. These significance thresholds are listed below.

Threshold 4.16-1: Would the project exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board?

Threshold 4.16-2: Would the project create wastewater system capacity problems, or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

An affirmative answer to either of these questions would represent a significant impact.

Project Design Elements

In order to comply with the 2016 CALGreen Low-Rise Residential Mandatory Measures, the Project would be required to reduce water demand by at least 20 percent. A reduction in water usage equals a reduction in wastewater generation. The Project would include design features to achieve this reduction, discussed in the Water section, below.

Impact Analysis

Threshold 4.16-1: Would the project exceed wastewater treatment requirements of the Los Angeles Regional Water Quality Control Board?

Threshold 4.16-2: Would the project create wastewater system capacity problems, or result in the construction of new wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction

Construction activities for the Project would result in a temporary increase in wastewater generation as a result of construction workers on-site. Wastewater generation would occur incrementally throughout construction of the Project. In addition, construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. In the event there is an increase in wastewater flow during construction, this increase would be limited and would be within the capacity of the wastewater facilities that currently serve the Project. Thus, wastewater generation from Project construction activities is not anticipated to cause a measurable increase in wastewater flows. Therefore, the Project construction impacts to the wastewater system would be less than significant.

The Project would require construction of new on-site infrastructure to serve new buildings, and potential upgrade and/or relocation of existing infrastructure. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, minor off-site work is required in order to connect to the public main. A Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Management Plan,

which would ensure safe pedestrian access and vehicle travel in general, and emergency vehicle access, in particular, throughout the construction period. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, Project impacts on wastewater associated with construction activities would be less than significant.

Operation

Wastewater Conveyance Infrastructure

The sewer flows from the Project were estimated on the BOS sewerage generation factors for commercial categories, and are summarized in Table 4.16-3 (Estimated Proposed Wastewater Generation), below.

Table 4.16-3
Estimated Proposed Wastewater Generation

Connection	Proposed Use Description	Average Daily Flow (gpd/unit) ^e	Quantity	Average Daily Sewer Demand (gpd)
Site 1				
10-inch City of L.A. Sewer Main-Vermont Avenue	Retail	25/1,000 gsf	10,000 gsf	250
	Restaurant ^c	300/1,000 gsf	3,650 gsf	1,095
	Auto Parking	--	800,002 gsf	0 ^a
	Office ^d	170/1,000 gsf	461,000 gsf	78,370
<i>Subtotal of Proposed Wastewater Generation for Site 1</i>				79,715
Site 2				
10-inch City of L.A. Sewer Main-Vermont Avenue	Retail	25/1,000 gsf	7,500 gsf	188
	Lounge	50/1,000 gsf	11,125 gsf	556
	Residential Apt: Studio	75/du	110 du	8,250
	Residential Apt: 1 Bed	110/du	84 du	9,240
	Residential Apt: 2 Bed	150/du	52 du	7,800
	Pool	-	4,275 cu.ft.	194 ^f
	Auto Parking	--	116,324 gsf	0 ^a
<i>Subtotal of Proposed Wastewater Generation for Site 2</i>				26,228
Site 3				
20-inch City of L.A. Sewer Main-Vermont Avenue	Community Recreation Center	3/occupant	3,105 ^g	9,315
	Residential Apt: 1 Bed	110/du	57	6,270
	Residential Apt: 2 Bed	150/du	15	2,250
	Auto Parking	--	51,591 gsf	0 ^a
<i>Subtotal of Proposed Wastewater Generation for Site 3</i>				17,835
Total of Proposed Wastewater Generation				123,778
Total Existing Wastewater Generation				33,624
Net Increase Wastewater Generation				90,154
^a Parking structures are only recognized by BOS to have sewer generation if restrooms are located within the structure. ^b Lounge used in place of amenity space. ^c Restaurant used in place of cafeteria. ^d With the exception retail and restaurant, the office includes all miscellaneous uses within the building (circulation space, lobbies, storage rooms, amenity space.). ^e The average daily flow based on City of Los Angeles sewer generation factors. http://www.ci.la.ca.us/ead/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf . ^f Assumes the pool to be filled twice a year. ^g As provided in SCAR sent by the City of Los Angeles Bureau of Engineering on December 12, 2016. Source: KPFF, 2017.				

In accordance with established City procedures, a SCAR was submitted to the City Bureau of Engineering to determine whether the existing public infrastructure could accommodate the Project. The Bureau of Sanitation analyzed the Project demands in conjunction with existing conditions and forecasted growth, and approved the Project to discharge up to 124,464 gpd of wastewater in addition to the flows from the existing uses at the Project Sites.⁶ This analysis is conservative considering the discontinuation of existing uses. As shown in Table 4.16-3 (Estimated Proposed Wastewater Generation (BOS Sewage Generation Factors), above, the estimated net increase in wastewater generation of 90,154 gpd to the sewer collection system is significantly less than the net increase in wastewater generation of 124,464 gpd to the sewer collection system allotted to the Project by the approved SCAR. Therefore, impacts on wastewater collection and conveyance infrastructure would be less than significant.

Wastewater Treatment

As previously discussed, the existing design capacity of the Hyperion Service Area is approximately 450 mgd. Currently, up to approximately 300 mgd is treated at the Hyperion Treatment Plant resulting in residual treatment capacity of approximately 150 mgd.⁷ The Project's proposed net wastewater generation is approximately 0.124 mgd, per the SCAR which is equal to 0.082 percent of the Hyperion Treatment Plant's capacity. Consequently, impacts on wastewater treatment capacity are less than significant. Further, the Hyperion Treatment Plant is required to meet wastewater discharge quality requirements of the US EPA and Regional Water Quality Control Board. Since all Project wastewater would be treated at the Hyperion Treatment Plant, Project wastewater discharges would not cause exceedance of the standards of the RWQCB. Impacts of the Project with respect to wastewater treatment would be less than significant.

CUMULATIVE IMPACTS

Wastewater Conveyance Infrastructure

In addition to the City's SCAR analysis, a related projects list has been generated within a 2.0-mile radius of the Project. There are 115 related projects within the 2.0-mile radius. The related projects consist of multifamily residential, schools, hotels, clinics, theaters, and commercial uses. The total increase in wastewater generation for the related projects is approximately 2.89 mgd. Combined with the Project, the net increase in wastewater generation is approximately 2.99 mgd, as shown in Table 4.16-4 (Related Projects Wastewater Generation).

The Project would result in the additional generation of sewer flow. However, as discussed above the Bureau of Sanitation has conducted an analysis of existing and planned capacity and determined that adequate capacity exists to serve the Project. Related projects connecting to the same sewer system are required to obtain a sewer connection permit and submit a Sewer Capacity Availability Request to the Bureau of Sanitation as part of the related project's development review. Impact determination would be provided following the completion of the SCAR analysis. If system upgrades are required as a result of

⁶ *Subsequent to the SCAR, the Project has been slightly modified, and thus the corresponding wastewater use has decreased to 123,778.*

⁷ *City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrl-state=oe98lwklid_4&_afLoop=28344654751341747#!, accessed October 20, 2016.*

Table 4.16-4
Related Projects Wastewater Generation

Land Use	Wastewater Generation Rates	Unit	Size	Wastewater Generated (gpd)
Multi-Family Residential	105	gpd/du	24,645	2,587,725
School: University/College	16	gpd/student	500	8,000
School: High School	11	gpd/student	480	5,280
School: Elementary/Jr. High	9	gpd/student	3,516	31,644
Hotels	120	gpd/room	1,414	169,680
Theater	3	gpd/seat	850	2,550
Commercial	0.05	Gpd/ gr sf	1,883,573	94,178.70
<i>Subtotal Cumulative Wastewater Generation</i>				2,899,057.7
Project Total Net Wastewater Generation				90,154
Total Cumulative Wastewater Generation				2,989,211.7
<i>Source: EcoTierra Consulting, 2017.</i>				

a given project's additional flow, arrangements would be made between the related project and the Bureau of Sanitation to construct the necessary improvements.

Wastewater Treatment

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant system. As previously stated, based on information from the Bureau of Sanitation, the existing design capacity of the Hyperion Service Area is approximately 450 mgd and the existing average daily flow for the system is approximately 300 mgd.⁸ The estimated wastewater generation increase of the Project and related projects combined would be 2.99 mgd, which represents approximately 2.0 percent of the available capacity in the system per the SCAR analysis.

Based on these forecasts the increase in wastewater generation would be adequately accommodated by the Hyperion Service Area. Therefore, cumulative impacts to wastewater treatment capacity would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

The following PDF would be incorporated into the Project and would reduce Project impacts. This is not required mitigation but is an inherent Project component.

PDF-USS-1: The Project would not generate wastewater that would require additional treatment beyond that provided to domestic wastewater and sewage lines from bathrooms, restrooms, and kitchens. Kitchen drains would be provided with oil separators, in accordance with and City requirements, to treat wastewater prior to discharge to the on-site sewer system.

⁸ City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, February 2015.

In addition, the Project would implement water conservation measures PDF USS-2, USS-3 and USS-4 on Project Sites 1, 2 and 3, respectively, which would also reduce wastewater generation.

Regulatory Requirements

The following standards would be imposed by existing laws and regulations and would work to address Project impacts related to wastewater. This is not required mitigation but is an inherent Project component.

RR USS-1: All wastewater from the Project would be treated according to requirements of the NPDES permit authorized by the LARWQCB.

RR-USS-2: Project construction shall comply with the County of Los Angeles Green Building Code (Sites 1 and 3) and City of Los Angeles Green Building Code (Site 2).

MITIGATION MEASURES

Impacts related to wastewater treatment and infrastructure would be less than significant. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of PDF USS-1 would ensure that all impacts related to wastewater conveyance infrastructure would be less than significant.

WATER

INTRODUCTION

This subsection describes the water supply and infrastructure that currently serve the Project Sites and surrounding areas, assesses potential impacts associated with the Project on the supply and infrastructure, and identifies the need for improvements in order to serve the Project and related development, if needed.

ENVIRONMENTAL SETTING

Existing Conditions

Water Supply

The City of Los Angeles Department of Water and Power (“LADWP”) is responsible for providing water supply to the City while complying with County, State, and Federal regulations. According to the *2015 Urban Water Management Plan*, discussed below, the primary LADWP sources of water supplies are water purchased from the Metropolitan Water District, surface water imported via the Los Angeles Aqueduct, and local groundwater. Recycled water projects are progressing and expected to be a greater portion of LADWP water supply in the future. Overall, these sources of water provide the necessary water to meet

LADWP's water supply needs. The 2015 *Urban Water Management Plan* water demand projection for 2040 is approximately 709,500 acre-feet per year, based on normal weather conditions.⁹

Regional

Primary sources of water for the LADWP service area are the Los Angeles Aqueducts (LAA), State Water Project (supplied by MWD) and local groundwater. The Los Angeles Aqueduct has been the primary source of the City's water supply. In recent years, however, the amount of water supplies from the Los Angeles Aqueduct has been limited due to environmental concerns, and the City's water supply relied heavily (average of 57 percent in recent years) on the purchased water from MWD delivered from the Colorado River or from the Sacramento-San Joaquin Delta. Local ground water has been a reliable water source, providing an average of 12 percent of the total water supply, but there have been concerns in recent years due to declining groundwater level and contamination issues. Lastly, the City's recycled water supply is limited to specific projects within the City at this time.¹⁰

Los Angeles Aqueduct

The Los Angeles Aqueduct, local groundwater, and recycled water constitute the City-controlled water supplies. The Los Angeles Aqueduct conveys snowmelt runoff from the eastern Sierra Nevada Mountains. Secondly, the Los Angeles Aqueduct water supplies are supplemented by groundwater pumping. The Los Angeles Aqueduct supplies fluctuate from year to year due to varying annual snowfall and hydrological conditions. In recent years, the Los Angeles Aqueduct supplies have decreased because of environmental obligations to dedicate water resources to mitigate groundwater pumping in the Owens Valley, restore the water level of Mono Lake, and mitigate dust emissions from Owens Lake.

The Los Angeles Aqueduct system extends approximately 340 miles from the Mono Basin to the City. From 1995 through 2004, the Los Angeles Aqueduct supplied about half of the City's water needs. The City owns approximately 312,000 acres of property in the Owens Valley and appropriates groundwater from its lands in the Owens Valley pursuant to a long-term groundwater management plan with Inyo County.¹¹ The City and Inyo County prepared a long-term groundwater management agreement, known as the *Green Book for the Long-Term Groundwater Management Plan for the Owens Valley and Inyo County*.¹² This agreement sets forth plans and procedures to prevent overdraft conditions from groundwater pumping as well as to manage vegetation in the Owens Valley. In July 1998, LADWP and the Great Basin Unified Air Pollution Control District entered into a Memorandum of Agreement to mitigate dust emissions from Owens Lake.

Groundwater

In addition to groundwater extraction from nine wellfields throughout the Owens Valley, the LADWP also extracts from three local groundwater basins: San Fernando, Sylmar, and Central. The LADWP plans to

⁹ Los Angeles Department of Water and Power, 2015 *Urban Water Management Plan*, June 2016, page ES-22.

¹⁰ LADWP, 2015 *Urban Water Management Plan*, October 2016.

¹¹ Los Angeles Department of Water and Power, *Facts & History*, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-losangelesaqueduct/a-w-laa-factsandhistory?_adf.ctrl-state=24csba1fg_303&_afLoop=391710679607312, accessed: February 15, 2017.

¹² Inyo County and City of Los Angeles, *Green Book for the Long-Term Groundwater Management Plan for the Owens Valley and Inyo County*, June 1990.

continue future pumping from the local basins, with limitations based on water quality and overdraft protection. The LADWP's groundwater pumping strategy is based on a "safe yield" strategy, in which the amount of water removed over a period of time equals the amount of water entering the groundwater basin through native and imported groundwater recharge. Further, protection from potential overdraft conditions is provided by the court-appointed Los Angeles River Area Watermaster for the San Fernando and Sylmar Basins, and a court-appointed Watermaster Panel for the Central Basin. The Watermaster Panel consists of three separate arms; first arm is the Administrative Body, performed by the Water Replenishment District of Southern California (WRD), which administers the Watermaster accounting and reporting functions; second arm is the Central Basin Water Rights Panel ("CBWRP"), which enforces issues related to pumping rights defined in the adjudication; and the third arm is the Storage Panel, which is comprised of the CBWRP and the WRD Board of Directors. Annually, the Watermaster prepares a Watermaster Service Report indicating groundwater extractions, replenishment operations, imported water use, recycled water use, finances of Watermaster services, administration of the water exchange pool, and significant water-related events in the Central Basin.¹³ Additionally, a long-term groundwater management agreement between the City and Inyo County ensures the protection of LADWP's groundwater resources within Owens Valley from overdraft conditions.

Local groundwater provides approximately 11 percent of the total water supply to the City and has provided nearly 30 percent of the supply in drought years. On average, about 80 percent of the LADWP's groundwater supply is extracted from the Upper Los Angeles River Area, while the Central Basin provides 20 percent. The Upper Los Angeles River Area has four local groundwater basins:

- San Fernando,
- Sylmar,
- Verdugo, and
- Eagle Rock.¹⁴

LADWP groundwater rights in the basins are adjudicated, meaning they are confirmed and apportioned by judgments of the California Superior Courts. The adjudications are based on maintaining long-term groundwater extractions that will not create an overdraft condition in the basin as well as to manage vegetation in the Owens Valley. The San Fernando, Sylmar, and Eagle Rock basins are subject to the judgment in *The City of Los Angeles vs. the City of San Fernando, et al. (1979)*. Pumping is reported to the court-appointed Upper Los Angeles River Area Watermaster. The average LADWP San Fernando, Sylmar, and Eagle Rock basin entitlements under the judgment are 87,000 acre-feet per year, 7,140 acre-feet per year, and 500 acre-feet per year, respectively.¹⁵ In addition, as of October 2013, LADWP accumulated nearly 537,453 acre-feet of stored water credits in the San Fernando Basin. This stored water credit is water that LADWP can withdraw from the basin during normal and dry years or in an emergency.

¹³ Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016, page 6-15.

¹⁴ Los Angeles Department of Water and Power, Groundwater, website: https://www.ladwp.com/ladwp/faces/wcnav_externalId/a-w-local-grndwter?_adf.ctrl-state=h254ikxvo_4&_afLoop=1163396831409184&_afWindowMode=0&_afWindowId=fpqo14f97_56%40%3F_afWindowId%3Dfpqo14f97_56%26_afLoop%3D1163396831409184%26_afWindowMode%3D0%26_adf.ctrl-state%3Dfpqo14f97_120, accessed: February 15, 2017.

¹⁵ Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016, page 6-6, 6-13.

The Central Basin and West Coast Basin water rights were established through the Central Basin Judgment and West Coast Basin Judgment, respectively. Pumping is reported to a Watermaster Panel, comprised of WRD and CBWR. The Central Basin Judgment entitlement for the LADWP is 15,000 acre-feet per year. The West Coast Basin Judgment entitles LADWP to approximately 1,503 acre-feet per year. LADWP does not currently exercise its water rights in the West Basin.¹⁶

LADWP plans to continue production from its groundwater basins in the coming years to offset reductions in imported supplies. Extraction from the basins will, however, be limited by water quality and overdraft protection. Both LADWP and the California Department of Water Resources have programs in place to monitor wells to prevent overdrafting.

In response to contamination issues and declining groundwater levels, the LADWP is working to clean up the San Fernando Basin's groundwater and is making investments to recharge local groundwater basins through stormwater recharge projects, while collaborating on the rehabilitation of aging stormwater capture and spreading facilities, with the long range goal of increasing the contribution of groundwater to overall City water supplies.

Secondary Sources

Secondary sources of water supply for the City include water conservation, recycling, and integrated planning. The LADWP has implemented water conservation and recycling programs with efforts to increase the percentage the City's water demand satisfied through these methods. It is expected that water conservation and planning will play an increasing role in meeting future water demand. Integrated planning will also play a crucial role in ensuring the reliability of the City's future water demand.

The City, together with the Metropolitan Water District, other regional water providers, and various stakeholder groups is developing and implementing programs to reduce overall water use by forming partnerships with other agencies, institutions, and organizations, addressing risk and uncertainty, and incorporating multiple objectives, including reliability, cost, water quality, environmental stewardship, and quality of life. In this way, water-use efficiency and recycling activities are maximized and potential alternative supplies such as water transfer, desalination, and stormwater runoff reuse are considered to be potential contributors to the City's future water supplies.¹⁷

Recycled Water

The use of recycled water reduces the demand for potable water in the area. LADWP presently uses recycled water for industrial and irrigation purposes. LADWP uses recycled water produced by four wastewater treatment plants:

- Los Angeles-Glendale Water Reclamation Plant,
- Donald C. Tillman Water Reclamation Plant,
- Terminal Island Treatment Plant, and

¹⁶ Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016, page 6-15, 6-17.

¹⁷ Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016.

- Hyperion Treatment Plant.

LADWP restores wastewater to a level of quality specified by the California Department of Health Services and distributes it for landscaping and industrial uses. The sustainability of the City's water supplies is dependent on the City's ability to maximize water conservation and increase recycled water use. LADWP's Action Plan states that the City will develop significant additional water conservation and water recycling, as well as other water resources, to ensure a reliable water supply. LADWP is currently engaged in an aggressive planning and outreach program to expand recycled water supplies and implement the use of recycled water for groundwater recharge. The City's goal is to increase the use of recycled water to 75,400 acre-feet per year by 2040.¹⁸ Water recycling and reuse is reducing Southern California's demand for potable water.

Purchased Water

The remainder of the City's water demand is supplied by purchases from Metropolitan Water District. The Metropolitan Water District imports its water supplies from Northern California through the State Water Project's California Aqueduct and from the Colorado River by way of the Metropolitan Water District's Colorado River Aqueduct. LADWP is one of 26 member agencies that have preferential rights to purchase water from the Metropolitan Water District. LADWP has a preferential right to purchase water from the Metropolitan Water District pursuant to Metropolitan Water District Act Section 135. As a percentage of the City's total water supply, purchases of Metropolitan Water District water have historically varied from 4 percent in 1983-84 to 71 percent in 2008-09, with a five-year average 52 percent between 2005-06 and 2009-10. The City relies on the Metropolitan Water District even more in dry years and has increased its dependence in recent years as Los Angeles Aqueduct supply has been reduced. Although the City plans to reduce its reliance on Metropolitan Water District supply, it has made significant investments in the Metropolitan Water District anticipating that the City will continue to rely on the wholesaler to meet its current and future supplemental water needs.¹⁹ The 2015 UWMP projects that LADWP's reliance on the Metropolitan Water District water supplies will be reduced significantly; from the five year average of 57 percent of total demand to 11 percent under average weather conditions by 2040.²⁰

Taking into account current water supplies, planned future water conservation and planned future water supplies, LADWP projects that it will be able to reliably provide water to its customers through the 25-year planning period covered by the 2015 UWMP. The Metropolitan Water District's 2010 Regional UWMP currently shows that with its investments in storage, water transfers and improving the reliability of the Delta, water shortages are not expected to occur within the next 25 years.

Water Infrastructure

LADWP maintains water infrastructure to the Project Sites. Based on available water service maps provided by LADWP, there is a 30-inch water main in South Vermont Avenue, a 24-inch water main in 6th Street, and an 8-inch water main in Shatto Place. LADWP water maps indicate that there are five metered water connections to the Project Sites. The water service maps indicate that there are several existing laterals serving the existing sites.

¹⁸ *Ibid.*, page 4-27.

¹⁹ *Ibid.*, page 8-1.

²⁰ *Ibid.*, page 8-1.

Regulatory Framework

Federal

The Safe Drinking Water Act (“SDWA”), enacted in 1974, ensures the quality of drinking water. The law requires actions to protect drinking water and its sources (e.g., rivers, lakes, reservoirs, springs and groundwater wells) and applies to public water systems that have at least 15 service connections or serve at least 25 people for at least 60 days a year. It authorizes the U.S. EPA to set national standards for drinking water to protect against health effects from exposure to naturally-occurring and man-made contaminants. In addition, the USEPA works with states, localities and water suppliers that implement the standards. U.S. EPA standards are set under the National Primary Drinking Water Regulations (“NPDWR”) which legally enforceable primary standards and treatment techniques that apply to public water systems. Primary standards and treatment techniques protect public health by limiting the levels of contaminants, Maximum Contaminant Levels (“MCLs”), in drinking water. The MCL is the highest level of contaminant that is allowed in drinking water at a level that is not anticipated to produce adverse health effects after a lifetime of exposure, based upon toxicity data and risk assessment principles. Secondary standards are non-enforceable guidelines regulating contaminants that may cause cosmetic effects (such as skin or tooth discoloration) or aesthetic effects (such as taste, odor, or color) in drinking water. USEPA does not enforce these “secondary maximum contaminant levels (“SMCLs”). They are established only as guidelines to assist public water systems in managing their drinking water for aesthetic considerations, such as taste, color, and odor.²¹

State

State Senate Bills 610 and 221

State of California Senate Bill (“SB”) 610 and SB 221 became effective January 1, 2002, amending State Water Code Sections 10910-10915, and requiring that counties and cities consider the availability of adequate water supplies for certain new large development projects. These statutes require that cities and counties obtain from the local water supplier written assessment or verification of the sufficiency of water supply to serve proposed large development projects in their jurisdiction through a Water Supply Assessment (“WSA”). Pursuant to SB 610, projects that are required to obtain a WSA include the following:

- a proposed residential development of more than 500 dwelling units;
- a proposed shopping center or business establishment of more than 500,000 square feet of floor space or employing more than 1,000 persons;
- a proposed commercial office building of more than 250,000 square feet of floor space or employing more than 1,000 persons;
- a proposed hotel or motel of more than 500 rooms;
- a proposed industrial, manufacturing, or processing plant or industrial park of more than 40 acres of land, more than 650,000 square feet of floor area, or employing more than 1,000 persons;

²¹ United States Environmental Protection Agency, Safe Drinking Water Act (SDWA) website, <http://water.epa.gov/lawsregs/rulesregs/sdwa/>, accessed February 15, 2017.

- a mixed-use project that falls in one or more of the above-identified categories; or
- a project not falling in one of the above-identified categories but that would demand water equal or greater to a 500 dwelling-unit project.

This Project is a mixed-use development that would exceed the threshold of an office building greater than 250,000 square feet and 1,000 employees and thus requires a WSA. A WSA was prepared by LADWP and is contained in Appendix 4.16-2 to the Draft EIR.

Urban Water Management Planning Act

The California Urban Water Management Planning Act of 1984 requires every municipal water supplier who serves more than 3,000 customers or provides more than 3,000 acre-feet per year (acre-feet per year) of water to prepare an Urban Water Management Plan (“UWMP”) every five years to identify short-term and long-term water resources management measures to meet growing water demands during normal, single-dry, and multiple-dry years.²² In the UWMP, the water supplier must describe the water supply projects and programs that may be undertaken to meet the total water use of the service area.

Local

As noted, although the Project on all three Project Sites would be approved by the County, the City would provide water service to all three Project Sites. Accordingly, the Project is evaluated against City policies and procedures with regard to water service.

Development of Site 2 would be subject to the zoning and building requirements of the City of Los Angeles. In addition, Project Sites 1 and 3 would be subject to City of Los Angeles regulatory controls related to water service since they would be served by LADWP.

City of Los Angeles General Plan Framework Element

The *City of Los Angeles General Plan Framework Element* (Framework), adopted in December 1996, and readopted in August 2001, sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework land use policies are implemented at the community level through community plans and specific plans. The applicable policies and the consistency analysis that are related to the City’s water supply are listed below in Table 4.16-5 (Applicable City of Los Angeles General Plan Framework Element Water Supply Goals, Objectives, and Policies).

Table 4.16-5
Applicable City of Los Angeles General Plan Framework Element Water Supply Goals, Objectives, and Policies

Goal, Policy, Objective	Goal, Policy, Objective Description
Goal 9C	Adequate water supply, storage facilities, and delivery system to serve the needs of existing and future residents and businesses.
Objective 9.8	Monitor and forecast water demand based upon actual and predicted growth.
Policy 9.8.1	Monitor water usage and population and job forecast to project future water needs.

²² Los Angeles Department of Water and Power, 2015 Urban Water Management Plan, June 2016, page ES-2.

Table 4.16-5
Applicable City of Los Angeles General Plan Framework Element Water Supply Goals, Objectives, and Policies

Goal, Policy, Objective	Goal, Policy, Objective Description
Objective 9.9	Manage and expand the City's water resources, storage facilities, and water lines to accommodate projected population increases and new or expanded industries and businesses.
Policy 9.9.1	Pursue all economically efficient water conservation measures at the local and statewide level.
Policy 9.9.7	Incorporate water conservation practices in the design of new projects so as not to impede the City's ability to supply water to its other users or overdraft its groundwater basins.
<i>Source: City of Los Angeles, The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan, re-adopted 2001.</i>	

LADWP 2015 Urban Water Management Plan

The LADWP 2015 UWMP, adopted in June 2016, addresses water supply needs through 2040. The UWMP includes estimates of past, current, and projected potable and recycled water use, identifies conservation and reclamation measures currently in practice, describes alternative conservation measures, and provides an urban water shortage contingency plan. The factors forecasting the LADWP's future water demand include Southern California Association of Governments' ("SCAG") Regional Transportation Plan/ Sustainable Communities Strategy ("RTP/SCS"), LADWP water billing data from each major customer class, weather, and water conservation.

The LADWP 2015 UWMP used a service area-wide method to develop its water demand projections. This methodology does not rely on individual development demands to determine area-wide growth. Rather, the growth in water use for the entire service area was considered in developing long-term water projections for the City through the year 2040. The UWMP is updated every five years, as required by California law. This process entails, among other requirements, an update to water supply and water demand projections for water agencies. Water supply planning is based on meeting these long-term demands.

The LADWP 2015 UWMP confirmed that water use in the City has remained relatively constant over the previous five years and about the same as in the 1970s despite the fact that over 1.1 million more people now live in Los Angeles.²³ More recently, water consumption levels have remained relatively steady even as the City's population has been slowly increasing. This stability in water use is largely attributed to the City's public education campaigns and water conservation programs over the past 15 years. In addition to conformance with SB 610 and SB 221, the LADWP has implemented its own City-mandated water conservation measures that include:

- "Water Closet, Urinal and Showerhead Regulations" (Los Angeles Municipal Code ["LAMC"] Sections 122.00–122.10): Reduces water consumption by requiring new buildings to include water conservation fixtures (such as ultra-low-flush toilets, urinals, taps, and showerheads) and plumbing fixtures that reduce water loss from leakage in order to obtain City building

²³ *Ibid.*, page ES-12.

permits. In addition, there are provisions requiring xeriscaping (i.e., the use of low-maintenance, drought-resistant plants).

- “The Emergency Water Conservation Plan of the City of Los Angeles” (LAMC Sections 121.00-121.13): Provides for the implementation of a citywide phased water conservation program to respond to dry weather periods based on the LADWP’s evaluation of the projected supply and demand of City water supplies. The phased conservation program provides for mandatory water conservation measures at the user level and customer use curtailment of normal water use.

LADWP policy has long been that water shortages are unavoidable in California, absent development and maintenance at extraordinary cost of large surplus water supplies. Water shortages in Los Angeles are managed by LADWP as transitory events consistent with historical multiple dry-year water cycles accounted for in the 2015 UWMP. This approach to water management is consistent with water agencies throughout the arid Southwestern United States where periods of drought alternate with periods of normal and high rain and snowfall conditions.

On October 14, 2014, the Mayor of Los Angeles issued Executive Directive 5: Emergency Drought Response (ED5) for the City to achieve a 20 percent per capita reduction in potable water use by 2017; a reduction in LADWP purchase of imported water by 50 percent by 2024; and creation of an integrated strategy that increases local water supplies and improves water security in the context of climate change and seismic vulnerability.

Existing Water Demand

Site 1 consists of an existing two-story office building, a one-story office with rooftop parking, two surface parking lots, and a parking structure. Site 2 consists of an existing 12-story building, a four-story building, and a parking structure. Site 3 consists of an existing 4-story building and surface parking lots.

Water demand associated with existing uses on the Project Sites was determined based upon LADWP billing data (annual average from 2010 to 2017). Existing water demand is summarized in Table 4.16-6 (Estimated Existing Water Demand). Existing water demand was determined to be 13,406 gallons per day (“gpd”), or approximately 15 acre-feet per year (“AFY”).

Table 4.16-6
Estimated Existing Water Demand

Existing Uses^a	Quantity	Existing Water Use to be Removed (gpd)
Site 1: Office, Parking	44,113 sf	---
Site 2: Office	206,793 sf	---
Site 3: Office	29,292 sf	---
	Total Existing Water Demand^b	13,406
^a Provided by the County of Los Angeles in the Request for Water Supply Assessment letter Scope of Confirmation e-mail. See Appendix A of the WSA. ^b The existing water demand is based on the LADWP billing data (annual average from 2010 to 2017). Source: LADWP, WSA, 2017.		

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Project with respect to water are determined based on the proposed increase in water demand and the capacity of existing and proposed infrastructure. The existing water demand is compared to the Project's water demand and water infrastructure capacity, including improvements associated with the Project. The discussion included below reflects the findings of the WSA prepared by LADWP for the Project.

Thresholds of Significance

The potential for the proposed Project to result in impacts associated with water services is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. These significance thresholds are listed below.

Threshold 4.16-3: Would the project create water system capacity problems, or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Threshold 4.16-4: Would the project have sufficient reliable water supplies available to serve the project demand from existing entitlements and resources, considering existing and projected water demands from other land uses?

An affirmative answer to either of these questions would represent a significant impact.

Project Design Elements

In order to comply with the 2016 CALGreen Low-Rise Residential Mandatory Measures, the Project would be required to reduce water demand by at least 20 percent. The Project would include design features to achieve this reduction.

Impact Analysis

Threshold 4.16-3: Would the project create water system capacity problems, or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction

Water demand for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal and re-compaction. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gpd. Considering temporary construction water use would be substantially less than the existing water consumption, it is anticipated that the existing water infrastructure would meet the limited and temporary water demand associated with construction of the Project. Impacts on the water infrastructure due to construction activity would be less than significant.

The Project would require construction of new, on-site water distribution lines to serve new buildings and potential relocation of existing lines. Construction impacts associated with the installation of water

distribution lines would primarily involve trenching in order to place the lines below surface. Installation of new water infrastructure would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. No upgrades to public water mains are anticipated. Prior to ground disturbance, Project contractors would coordinate with LADWP to identify the locations and depths of all lines. Further, LADWP would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Therefore, Project impacts on water associated with construction activities would be less than significant.

Operation

When analyzing the Project for infrastructure capacity, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Nevertheless, conservative analysis for both fire suppression and domestic water flows has been completed by LADWP for the Project. The results of the Service Advisory Request ("SAR") (see Exhibit 1 to Appendix 4.16-1 to this Draft EIR) demonstrates that adequate infrastructure capacity exists.

Fire Water Demand

Article 7 of Fire Protection and Prevention, Section 57.507 of the LAMC sets the fire flow requirements for the Project. These guidelines, in addition to the requirements set by the City Fire Chief, would prescribe the fire flow requirements (pressure and duration) and hydrant spacing requirements for the Project.

Based on fire flow standards set forth in Section 57.507.3 of the LAMC, the Project Sites fall within the industrial and commercial category, which has a required fire flow of 6,000-9,000 gallons per minute (gpm) from 4 to 6 fire hydrants flowing simultaneously with a residual pressure of 20 pounds per square inch. This translates to a required flow of 1,500 gpm for each of the five hydrants that were tested. An Information of Fire Flow Availability Request ("IFFAR") was submitted to LADWP. The results confirmed the five hydrants flowing simultaneously for a combined flow that is greater than the 7,500 gpm required at or above 20 psi. According to the IFFAR, the Project has adequate fire flow available to comply with Section 57.507 of the LAMC²⁴.

The Project would also incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which would be subject to fire department review and approval during the design and permitting of the Project. Based on Section 94.2020.0 of the LAMC that adopts by reference NFPA 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinklered building would be 1,250 gpm. Thus, the estimated fire service flows are compliant with the Fire Code.

Through compliance with City of Los Angeles Fire Department ("LAFD") and LADWP requirements, the Project's fire flow impacts to water infrastructure would be less than significant.

Domestic Water Demand

The Project would either protect existing or install new fire and domestic infrastructure to meet the proposed plumbing and fire suppression demands in compliance with Los Angeles Department of Building

²⁴ KPFF, *Utility Infrastructure Technical Report*, page 25.

and Safety (LADBS) and LADWP requirements. New domestic services would be connected from the mains located in Vermont Avenue and 6th Street. Based on the fixture unit count and type of use the peak domestic water demands for Site 1 are 200 gpm for the DMH tower and 70 gpm for the parking structure retail. The peak demands for Site 2 are 500 and 70 gpm for residential and retail, respectively. The peak demand for Site 3 is 183 gpm.²⁵ The approved SAR's for the Project demonstrate that the existing public water distribution infrastructure has sufficient capacity to serve the Project. Therefore, the Project would not have a significant impact on domestic water infrastructure.

The approved SARs confirm that sufficient capacity is available for the Project. The Project proposes to connect to the existing mains within all of the surrounding streets: Vermont Avenue, 6th Street, and Shatto Place with laterals that would be adequately sized to simultaneously accommodate fire demand and domestic demand. In addition, the services would include backflows and be metered separately. Therefore, impacts on water supply infrastructure would be less than significant.

Threshold 4.16-4: Would the project have sufficient reliable water supplies available to serve the project demand from existing entitlements and resources, considering existing and projected water demands from other land uses?

With respect to water supplies available to serve the Project, LADWP prepared the WSA in accordance with California Water Code Sections 10910-10915. The approved WSA is included as Appendix 4.16-2 to this Draft EIR. WSAs are prepared to ensure that proposed projects that utilize water resources are consistent with the City's conservation goals and long-term water supply availability, as detailed in LADWP's 2015 UWMP. LADWP's 2015 UWMP is the water supply planning document for the City.

LADWP estimated water consumption of the Project based on 100 percent of Bureau of Sanitation ("BOS") sewerage generation factors to calculate indoor water use. Outdoor landscape water demand was estimated per California Code of Regulations Title 23 Division 2 Chapter 2.7 Model Water Efficient Landscape Ordinance. LADWP also calculated the reduction in water demand that would result from the application of existing City water conservation ordinances to the Project. In addition, the County agreed to include additional water conservation measures beyond the requirements of existing codes, which would be included in the Project as Project Design Features PDF USS-2, PDF USS-3 and PDF-USS-4, and would further reduce total Project water demand. The estimated water demand of the Project is shown in Table 4.16-7 (Estimated Proposed Water Demand), below. The total net increase in water demand that would result from the Project, taking all of these factors into account, would be 91,421 gpd, or approximately 102 AFY.

Table 4.16-7
Estimated Proposed Water Demand

Proposed Uses ^a	Quantity	Water Use Factor (gpd/unit) ^c	Base Demand	Required Ordinance Water Savings ^d (gpd)	Proposed Water Demand (gpd)
Office	471,000 sf	0.12	56,520	---	---
Retail	6,350 sf	0.025	159	---	---
Restaurant: Take Out	3,650 sf	0.30	1,095	---	---

²⁵ *Ibid*, page 24.

Table 4.16-7
Estimated Proposed Water Demand

Proposed Uses^a	Quantity	Water Use Factor (gpd/unit)^c	Base Demand	Required Ordinance Water Savings^d (gpd)	Proposed Water Demand (gpd)
Base Demand Adjustment (Residential)			1,480	---	---
Site 1 Total			59,254	4,971	54,283
Residential: Apt. Studio	110 du	75	8,250	---	---
Residential: Apt. 1 bd	84 du	110	9,240	---	---
Residential: Apt. 2 bd	52 du	150	7,800	---	---
Lounge	11,125 sf	0.05	556	---	---
Retail	7,500 sf	0.025	188	---	---
Pool	1,058 sf		99	---	---
Base Demand Adjustment (Residential)			2,732	---	---
Site 2 Total			28,865	7,993	20,872
Community Recreation Center	3,105 occupant	3	9,315	---	---
Residential: Apt. Studio	57 du	75	4,275	---	---
Residential: Apt. 2 bd	15 du	150	2,250	---	---
Base Demand Adjustment (Commercial) ^e			835	---	---
Site 3 Total			16,675	1,945	14,730
Landscaping ^f	17,900 sf		1,672	803	869
Parking Structures ^g	937,915 sf	0.02	617	0	617
Cooling Towers Site 1 ^h	1,000 ton	10	10,029	2,006	---
Cooling Towers Site 2 ⁱ	650 ton	12	7,722	1,544	---
Cooling Towers Total			17,751	3,550	14,201
Proposed Subtotal			124,834	19,262	105,572
Less Existing to be Removed Total ^b					13,406
Less Additional Conservation Commitment ^j					745
Net Additional Water Demand					91,421
<i>Apt. - apartment bd - bedroom du - dwelling unit sf- square feet gpd - gallons per day</i> ^a <i>Provided by the County of Los Angeles in the Request for Water Supply Assessment letter Scope of Confirmation e-mail. See Appendix A of the WSA.</i> ^b <i>The existing water demand is based on the LADWP billing data (annual average from 2010 to 2017).</i>					

Table 4.16-7
Estimated Proposed Water Demand

Proposed Uses ^a	Quantity	Water Use Factor (gpd/unit) ^c	Base Demand	Required Ordinance Water Savings ^d (gpd)	Proposed Water Demand (gpd)
^c 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 . Units are either 1,000 sq.ft. or dwelling units. ^d 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 Los Angeles Green Building Code. ^e 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. ^f Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance. ^g 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 assumption. ^h Operating 8 hours/day, 5 days/week, 6 cycles of concentration and 65 percent of chiller capacity. ⁱ Operating 8 hours/day, 7 days/week, 6 cycles of concentration and 55 percent of chiller capacity. ^j Water conservation due to additional conservation commitments agreed by the Applicant. See Table II. Source: LADWP, WSA, 2017.					

The WSA concludes that the additional water demand of the Project has been accounted for in the City's overall total demand projections in the LADWP 2015 UWMP using a service area-wide approach that does not rely on individual development demand. The LADWP 2015 UWMP utilized SCAG's RTP/SCS data that provide for more reliable water demand forecasts, taking into account changes in population, housing units, and employment. The LADWP 2015 UWMP forecasts adequate water supplies to meet all projected water demands in the City through the year 2040.

The WSA concludes that the 102 AFY increase in the total water demand for the Project falls within the available and projected water supplies for normal, single-dry, and multiple dry years through the year 2040, as described in LADWP's 2015 UWMP. LADWP will be able to meet the proposed water demand of the Project, as well as existing and planned future water demands of its service area.²⁶ Impacts of the Project with respect to water supply would be less than significant.

CUMULATIVE IMPACTS

The geographic context for the cumulative impact analysis on water supply is the LADWP service area (i.e., the City). As discussed above, LADWP, as a public water service provider, is required to prepare and periodically update an Urban Water Management Plan to plan and provide for water supplies to serve existing and projected demands. The 2015 Urban Water Management Plan prepared by LADWP accounts for existing development within the City, as well as projected growth through the year 2040.

Additionally, under the provisions of Senate Bill 610, LADWP is required to prepare a comprehensive water supply assessment for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that reaches certain thresholds. As described in the Regulatory Framework section above, the types of projects that are subject to the requirements of Senate Bill 610 tend to be larger

²⁶ LADWP, WSA, page 48

projects that may or may not have been included within the growth projections of the 2015 Urban Water Management Plan. The water supply assessment for projects would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed.

Furthermore, as discussed above, through LADWP's Urban Water Management Plan process, the City would meet all new demand for water due to projected population growth through a combination of water conservation and water recycling. These plans outline the creation of sustainable sources of water for the City of Los Angeles to reduce dependence on imported supplies. LADWP is planning to achieve these goals by expanding its water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge.

There are 115 related projects within a 2.0-mile radius of the Project Sites. The related projects consist of multifamily residential, schools, hotels, theaters, and commercial uses. The total increase in water demand for the related projects is approximately 2.90 mgd. Combined with the Project, the net increase in water demand is approximately 2.99 mgd, as shown in Table 4.16-8 (Related Projects Water Demand).

Table 4.16-8
Related Projects Water Demand

Land Use	Water Consumption Rates	Unit	Size	Water Generated
Multi-Family Residential	105	gpd/du	24,645	2,587,725
School: University/College	16	gpd/student	500	8,000
School: High School	11	gpd/student	480	5,280
School: Elementary/Jr. High	9	gpd/student	3,516	31,644
Hotels	120	gpd/room	1,414	169,680
Theater	3	gpd/seat	850	2,550
Commercial	0.05	Gpd/ gr sf	1,883,573	94,178.7
<i>Subtotal Cumulative Water Demand</i>				2,899,057.7
<i>Project Total Net Water Demand</i>				91,421
Total Cumulative Water Demand				2,990,478.7
<i>Source: EcoTierra Consulting, 2017.</i>				

The 2015 Urban Water Management Plan has estimated a water demand of 475 mgd by the year 2025, which means the Project combined with the related projects would account for approximately 0.63 percent of the total daily demand.

Based on the above, it is anticipated that LADWP would be able to supply the demands of the Project and future growth through the year 2040. Therefore, cumulative impacts on water supply would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

The Project would implement the following water conservation features which are included in the adopted WSA for the Project. These measures would provide water conservation that exceeds Code requirements.

PDF USS-2: The County and Developer commit to the following conservation measures to promote water conservation at Site 1:

- o High Efficiency Toilets with a flush volume of 1.1 gallons per flush.
- o Domestic Water Heating System located in close proximity to point(s) of use: For typical Office Levels, Electric Water Heaters are provided at floors 2, 5, 8 & 11 to supply hot water to lavatories for the floor below, floor above, and the floor on which the heater is located; for Terrace Level a dedicated electric heater(s) is provided for Showers & Restroom Lavatories; for Ground Floor, a dedicated electric heater is provided for Restroom Lavatories.
- o Individual Metering and billing for water use for commercial unit: Individual metering is provided for each retail space at Ground Level and separate metering is provided for the Office use (single use tenant).
- o Tankless and on-demand Water Heaters: Tankless water heaters (InstaHot) are provided for all pantry sink locations.
- o Drip/Subsurface Irrigation (Micro-Irrigation) is provided for 100 percent of the irrigation system.
- o Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together).
- o Drought Tolerant Plants: 50 percent of total landscaping.
- o Cistern - captures stormwater runoff as it comes down through the roof gutter system: Capture and reuse cistern water for irrigation.

PDF USS-3: The Developer commits to the following conservation measures to promote water conservation at Site 2:

- o Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together).
- o Drought Tolerant Plants: 50 percent of total landscaping.
- o CEE Tier 1 High Efficiency Clothes Washers.

PDF USS-4: The Developer commits to the following conservation measures to promote water conservation at Site 3:

- o Proper Hydro-zoning/Zoned Irrigation (groups plants with similar water requirements together).
- o Drought Tolerant Plants: 50 percent of total landscaping.
- o CEE Tier 1 High Efficiency Clothes Washers.

Regulatory Requirements

RR USS-2 (above) would be imposed by existing laws and regulations and would reduce Project impacts related to water. These are not required mitigation but are inherent Project components.

MITIGATION MEASURES

There would be less-than-significant impacts related to water supply and infrastructure. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of project design features PDF USS-2, USS-3 and USS-4, impacts related to water supplies and infrastructure would be less than significant.

SOLID WASTE

INTRODUCTION

This subsection describes the potential impacts of the Project on the solid waste services serving the Project Sites.

ENVIRONMENTAL SETTING

Existing Conditions

Within the City, solid waste management, including collection and disposal services and landfill operation, is administered by various public agencies and private companies. Refuse from single-family residential and limited multi-family residential uses on public streets is collected by City Department of Public Works Bureau of Sanitation (“LABS”) and disposed of at City operated landfills. LABS provides collection services primarily to single-family residences and some of the smaller multi-family residences, collecting over one million tons of refuse annually from 750,000 customers including single- and small multi-family residences, averaging 6,652 tons per day.²⁷ The City is also responsible for collecting waste from the City Hall complex, some public buildings, parks, and fire stations. Large multi-family residences, such as apartment complexes and condominiums, and commercial and industrial buildings, contract with a private company to collect and transport their materials for disposal or recycling.²⁸

Waste generated by the majority of multi-family residential sources and all commercial and industrial sources is collected by private contractors. Construction waste is also collected by private contractors. Private contractors can dispose of waste at a City-operated landfill or a landfill of their choosing. On April 15, 2014, the Mayor and City Council approved the ordinance that established the Zero Waste LA Franchise System, which allows the City to establish an exclusive franchise system with 11 zones. With a single trash hauler responsible for each zone, the franchise system allows for the efficient collection and sustainable management of solid waste resources and recyclables. The Franchise System will service all users within a zone that are not serviced by LABS, and became operational in July, 2017. The Project Sites are located within the North Central Zone that will be serviced by Athens Services.

Landfills

Waste disposal sites (i.e., landfills) are operated by the City and County as well as by private companies. In addition, transfer stations temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill’s jurisdiction and/or watershed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Planning to serve long-

²⁷ Los Angeles Bureau of Sanitation, *Solid Resources*, website: http://san.lacity.org/solid_resources/index.htm, accessed: February 15, 2017.

²⁸ Los Angeles Department of City Planning, *L.A. CEQA Thresholds Guide*, September 2006, page M.3-1.

term disposal needs is constantly being conducted at the regional level (e.g., siting new landfills within the County and transporting waste outside the region). Most commonly, the City is serviced by the Sunshine Canyon Landfill. The landfill accepts residential, commercial, and construction waste. Solid waste from the project area is transported to the Sunshine Canyon Landfill for disposal by private waste haulers.

The Sunshine Canyon Landfill, located on both City and County land, is owned and operated by Browning-Ferris Industries, who purchased the landfill from the City in 1978, when landfill operations were limited to the City side of the property. In 1991, the operating permit for the landfill expired and operations ceased. The County Board of Supervisors issued a Conditional Use Permit in 1993 to allow the operation of the landfill on the County portion of the site. As one of the conditions of the permit, Browning-Ferris Industries had to obtain City approval to re-start operations on the City half of the landfill, establishing a City/County landfill. In 1996, landfill operations on the County side of the landfill began with an approximate 6,600 tons per day (“tpd”) capacity with an expected 10-year life span. In 1999, the City Council approved Ordinance 172,933, a zone change and General Plan Amendment, allowing for the continued use on the City portion of the landfill along with a Subsequent EIR to assess the combined landfill operations.²⁹ Ordinance 172,933 allowed the City to work with the County to combine the City and County portions of the landfill.³⁰ On June 17, 2008, the California Integrated Waste Management Board concurred in the issuance of a new solid waste facilities permit No. 19-AA-2000 for the Sunshine Canyon City/County Landfill.³¹ The landfill has a permitted maximum daily intake of 12,100 tpd and an estimated closure date in 2037.³² Table 4.16-9 (Landfill Capacity and Intake) lists the permitted daily intake, average intake, and remaining capacity of the Sunshine Canyon Landfill.

Table 4.16-9
Sunshine Canyon Landfill Capacity and Intake

Landfill Facility	Permitted Daily Intake (tons per day)	2014 Average Daily Intake (tons per day)	Estimated Remaining Disposal Capacity (million tons)
Sunshine Canyon	12,100	7,582	64.7

Source: County Department of Public Works, Countywide Integrated Waste Management Plan 2014 Annual Report.

Additional landfills within the County that may be used include the following:

- Antelope Valley Landfill,
- Burbank Landfill,
- Lancaster Landfill,
- Pebbly Beach Landfill,
- San Clemente Island Landfill, and

²⁹ *Sunshine Canyon Landfill, About Sunshine Canyon Landfill, History, website: [http://www.sunshinecanyonlandfill.com/home/pdf/env/City_Conditions_of_Approval_\(98-0184\).pdf](http://www.sunshinecanyonlandfill.com/home/pdf/env/City_Conditions_of_Approval_(98-0184).pdf), accessed: February 15, 2017.*

³⁰ *Ibid.*

³¹ *California Integrated Waste Management Board, Solid Waste Facility Permit Facility No. 19-AA-2000, website: <http://www.calrecycle.ca.gov/swfacilities/permitting/notices/SunshineCnyn/Permits/July7Issued.pdf>, accessed: February 15, 2017.*

³² *Ibid.*

- Savage Canyon (Whittier) Landfill.

As discussed in the *Los Angeles Countywide Integrated Waste Management Plan 2015 Annual Report*, the County would meet the disposal capacity requirements of AB 939 by using available or planned out-of-County disposal capacity and developing the necessary infrastructure to facilitate exportation of waste to out-of-County landfills. Landfills outside of the County that may be used include the following:

- Olinda Alpha Sanitary Landfill in Orange County;
- Frank R. Bowerman Sanitary Landfill in Orange County;
- H.M. Holloway Landfill in Kern County;
- Prime Deshecha Sanitary Landfill in Orange County;
- Simi Valley Landfill & Recycling Center in Ventura County;
- El Sobrante Landfill in Riverside County;
- San Timoteo Sanitary Landfill in San Bernardino County;
- Mid-Valley Sanitary Landfill in San Bernardino County; and
- Mesquite Regional Landfill in Imperial County.³³

Recycling Facilities

Waste generated in the City may also be diverted from landfills and recycled. In 2000, the City had a diversion rate of approximately 58.8 percent.³⁴ In 2001, the City adopted a 70 percent diversion rate goal by the year 2020. During his term of office, Mayor Antonio Villaraigosa revised the diversion rate goal to 75 percent by 2013, and the City adopted a new goal of “Zero Waste” by the year 2025. By the end of 2011, the City achieved a diversion rate of 76.4 percent.³⁵

LABS’ Solid Resources Citywide Recycling Division develops and implements source reduction, recycling, and reuse programs in the City.³⁶ The Solid Resources Citywide Recycling Division provides technical assistance to public and private recyclers, manages the collection and disposal programs for Household Hazardous Waste (“HHW”), and helps create markets for recycled materials.³⁷ In order to help meet the diversion goals of AB 939 and the City, the City adopted the Citywide Construction and Demolition Waste Recycling Ordinance (Ordinance No. 181,519). This ordinance, which became effective January 1, 2011, requires that all haulers and contractors responsible for handling construction and demolition waste obtain a Private Solid Waste Hauler Permit from the Bureau of Sanitation prior to collecting, hauling and transporting construction and demolition waste. It requires that all construction and demolition waste generated within City limits be taken to City certified construction and demolition waste processors, where the waste would be recycled to the extent feasible.

³³ County Department of Public Works, *Countywide Integrated Waste Management Plan 2015 Annual Report*, December 2016, Appendix E-2, Table 3.

³⁴ Los Angeles Bureau of Sanitation, *AB 939 2000 Report*, August 2001, page ES-1.

³⁵ City of Los Angeles Department of Public Works Bureau of Sanitation, *Zero Waste Progress Report*, March 2013, page 7.

³⁶ Los Angeles Bureau of Sanitation, *Construction and Demolition Recycling Guide*, website: http://www.lacitysan.org/solid_resources/recycling/c&d.htm, accessed: June 29, 2015.

³⁷ *Ibid.*

Project Sites

Site 1 consists of an existing two-story office building, a one-story office with rooftop parking, two surface parking lots, and a parking structure. Site 2 consists of an existing 12-story building, a four-story building, and a parking structure. Site 3 consists of a 4-story building and surface parking lot.

As shown on Table 4.16-10 (Existing Average Daily Solid Waste Generation), the existing uses generate approximately 1,602 pounds per day (“ppd”) of solid waste.

Table 4.16-10
Estimated Existing Solid Waste Generation

Existing Use Description	Quantity	Generation Rate ^a (pounds/day)	Total Generation (pounds/day)
Site 1			
2-Story Office	30,788 gsf	0.006/sf	185
1-Story Office	13,325 gsf	0.006/sf	0 ^b
7-Story Parking Structure	235,248 gsf	--	0 ^c
Subtotal of Existing Solid Waste Generation for Site 1			185
Site 2			
12-Story Office	154,793 gsf	0.006/sf	929
4-Story Office	52,000 gsf	0.006/sf	312
2-Story Parking Structure	14,010 gsf	--	0 ^c
Subtotal of Existing Solid Waste Generation for Site 2			1,241
Site 3			
4-Story Office	29,292 gsf	0.006/sf	176
Subtotal of Existing Solid Waste Generation for Site 3			176
Total of Existing Solid Waste Generation			1,602
^a Cal Recycle website: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates , February 2017. ^b Building has been vacant for several years. ^c Parking Structure does not generate solid waste. Source (table): EcoTierra Consulting, 2017.			

Regulatory Framework

Federal

No federal regulations related to solid waste are applicable to the Project.

State

California Integrated Waste Management Act of 1989

The *California Integrated Waste Management Act of 1989* (“AB 939”) was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible. Specifically, AB 939 required cities and counties to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal by 2000. AB 939 also required each city and county to promote source reduction, recycling, and safe disposal or transformation. Cities and counties were required to maintain 50 percent diversion past the year 2000. The City surpassed the state-mandated 50 percent diversion rate for 2000

and achieved a 58.8 percent diversion rate.³⁸ In 2001, the City adopted a 70 percent diversion rate goal by the year 2020. During his term of office, Mayor Antonio Villaraigosa revised the diversion rate goal to 75 percent by 2013, and the City adopted a new goal of “Zero Waste” by the year 2025. The City had a diversion rate of 20.6 percent in 1990, 46.0 percent by 1995, and 65.2 percent by 2000. By the end of 2011, the City achieved a diversion rate of 76.4 percent.³⁹

AB 939 further requires each city to conduct a Solid Waste Generation Study and to prepare a Source Reduction and Recycling Element (“SRRE”) to describe how it would reach the goals. The SRRE contains programs and policies for fulfillment of the goals of AB 939, including the diversion goals and must be updated annually to account for changing market and infrastructure conditions. As projects and programs are implemented, the characteristics of the waste stream, the capacities of the current solid waste disposal facilities, and the operational status of those facilities are upgraded, as appropriate. California cities and counties are required to submit annual reports to the California Integrated Waste Management Board to update it on their progress toward the AB 939 goals (i.e., source reduction, recycling and composting, and environmentally safe land disposal).⁴⁰ To date, implementation of AB 939 has proven to be a successful method of reducing landfill waste in the City.

Assembly Bill 1327 – California Solid Waste Reuse and the Recycling Access Act of 1991

The California Solid Waste Reuse and the Recycling Access Act of 1991, pursuant to AB 1327, passed on October 11, 1991, required CalRecycle to develop a model ordinance for adoption of recyclable materials in development projects by March 1, 1993. By September 1, 1993, local agencies were required to adopt a model ordinance of their own which provided adequate areas for collection and loading of recyclable materials in development projects. If local agencies did not come up with their own model ordinance the adopted CalRecycle model ordinance took effect. The City passed the Space Allocation Ordinance (Ordinance No. 171,687) to meet the requirements of AB 1327. The Ordinance sets forth requirements for inclusion of recycling areas or rooms within development projects.

Senate Bill 1374 – Construction and Demolition Waste Materials Diversion Requirements

The Construction and Demolition Waste Materials Diversion Requirements, pursuant to SB 1374, signed in 2002, assists jurisdictions with diverting construction and demolition (C&D) waste material. SB 1374 required a model C&D ordinance to be prepared by March 1, 2004 and for jurisdictions to include their annual AB 939 report summary of the progress made in diverting C&D wastes. The City adopted a model ordinance on March 16, 2004.⁴¹

Assembly Bill 341 – Mandatory Commercial Recycling 2011

The requirements of Mandatory Commercial Recycling 2011, pursuant to AB 341, signed July 1, 2012, helps meet California’s recycling goal of 75 percent by the year 2020. AB 341 states “...that it is the policy

³⁸ Los Angeles Bureau of Sanitation, AB 939 2000 Report, August 2001, page ES-1.

³⁹ City of Los Angeles Department of Public Works Bureau of Sanitation, Zero Waste Progress Report, March 2013, page 7.

⁴⁰ California Public Resources Code, §40050 et seq.

⁴¹ CalRecycle, Senate Bill 1374, website: <http://www.calrecycle.ca.gov/LGCentral/Library/CandDModel/Instruction/SB1374.htm>, accessed: February 15, 2017.

goal of the state that not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020, and would require the department [Department of Resources Recycling and Recovery], by January 1, 2014, to provide a report to the Legislature that provides strategies to achieve that policy goal and also includes other specified information and recommendations.” The law requires businesses⁴² to (1) source separate recyclable materials from the solid waste they are discarding, and either self-haul or arrange for separate collection of the recyclables and (2) subscribe to a service that includes mixed waste processing that yields diversion results comparable to source separation.⁴³

Local

County of Los Angeles

County of Los Angeles General Plan

The County of Los Angeles General Plan 2035, adopted in October 2015, provides the policy framework and establishes the long-range vision for how and where the unincorporated areas will grow, and establishes goals, policies, and programs to foster healthy, livable, and sustainable communities. The framework of the County’s waste management plans, the Roadmap to a Sustainable Waste Management Future, was adopted in October 2014, and has been incorporated into the County General Plan.

Roadmap to a Sustainable Waste Management Future

As available landfill space in Los Angeles County decreases, the County develops innovative policies and procedures for waste management that further reduce County reliance on landfills. It involves rethinking the approach to waste management, and rethinking the characterization of waste and which materials might be suitable for reuse and recycling. A traditional waste hierarchy seeks to implement waste reduction measures, reuse practices, recycling and composting techniques, and waste-to-energy processing to handle a large portion of the typical waste stream. Even when this is done effectively, a large volume of waste is still disposed at landfills.

The Roadmap creates a new vision to significantly reduce, and someday eliminate waste. As a result, an increasing amount of materials previously characterized as waste will be reduced, reused, or recycled, and a decreasing volume of material will remain for disposal. The Roadmap focuses on the unincorporated areas, as well as regional/countywide and County operations (i.e., County-owned and/or operated facilities and offices, and County sponsored events), and the following four strategies: 1) Programs and Services; 2) Measuring Results; 3) Facilities and Infrastructure; and 4) Outreach and Education. These four strategies establish a framework for the implementation of specific initiatives.

Through the implementation of the Roadmap, the County’s goal is to maximize the recovery of products, materials, and energy from waste that would otherwise be disposed of at landfills, and achieve the following:

- 80% diversion from landfills by 2025

⁴² Defined to include a commercial or public entity, that generates more than 4 cubic yards of commercial solid waste per week or is a multifamily residential dwelling of 5 units or more to arrange for recycling services, on and after July 1, 2012.

⁴³ Assembly Bill 341, website: http://www.leginfo.ca.gov/pub/11-12/bill/asm/ab_0301-0350/ab_341_bill_20111006_chaptered.html, accessed: February 15, 2017.

- 90% diversion from landfills by 2035
- 95+% diversion from landfills by 2045.

Los Angeles County Integrated Waste Management Plan

The *Los Angeles County Integrated Waste Management Plan* (“CoIWMP”), which was formally approved on June 23, 1999, identifies a regional approach for the management of solid waste through source reduction, recycling and composting, and environmentally safe transformation and disposal. The CoIWMP recognizes that landfills would remain an integral part of the County’s solid waste management system in the foreseeable future and ensures that the waste management practices of cities and other jurisdictions in the County are consistent with the solid waste diversion goals of AB 939. The CoIWMP includes annual reports that provide updated information related to landfills and other solid waste facilities located in the County.

City of Los Angeles

Development of Site 2 would be subject to the zoning and building requirements of the City of Los Angeles. In addition, solid waste disposal from Project Sites 1 and 3 would be provided from the City’s Zero Waste LA Franchise System, and would be subject to City of Los Angeles regulatory controls related to solid waste disposal.

City of Los Angeles Solid Waste Integrated Resources Plan

The City of Los Angeles Department of Public Works, Bureau of Sanitation, is currently in the process of preparing the City of Los Angeles Solid Waste Integrated Resources Plan (“SWIRP”), which is a 20-year master plan to reduce waste, increase recycling, and manage trash in the City. The SWIRP will outline the City’s objectives to provide sustainability, resource conservation, source reduction, recycling, renewable energy, maximum material recovery, public health and environmental protection for solid waste management planning through 2030 with a goal of a “zero waste city”.⁴⁴ Although the City of Los Angeles SWIRP is a long-term overarching plan to manage solid resources, it will also encompass all of the solutions and programs currently in place within the City by addressing all solid waste generators within the City, including residential, commercial, industrial, and institutional uses. In addition, the SWIRP process will identify the number, types, and size of new solid waste disposal facilities that the City will need in the future.

City of Los Angeles General Plan Framework Element

The *City of Los Angeles General Plan Framework Element* (“Framework”), adopted in December 1996, and readopted in August 2001, sets forth a citywide comprehensive long-range growth strategy and defines citywide policies regarding land use, housing, urban form, neighborhood design, open space and conservation, economic development, transportation, infrastructure, and public services. Framework land use policies are implemented at the community level through community plans and specific plans. The applicable policies and the consistency analysis that are related to the City’s solid waste disposal are listed below in Table 4.16-11 (Applicable City of Los Angeles General Plan Framework Element Solid Waste Supply Goals, Objectives, and Policies).

⁴⁴ *City of Los Angeles, Department of Public Works, Sanitation, Solid Resources, Solid Waste Integrated Resources Plan, website: <http://san.lacity.org/srssd/swirp/home/index.html>, accessed: February 15, 2017.*

Table 4.16-11
Applicable City of Los Angeles General Plan Framework Element Solid Waste Supply Goals, Objectives, and Policies

Goal, Policy, Objective	Goal, Policy, Objective Description
Goal 9D	An integrated solid waste management system that maximizes source reduction and materials recovery and minimizes the amount of waste requiring disposal.
Goal 9F	Adequate collection, transfer and disposal of mixed solid waste - the City shall seek to ensure that all mixed solid waste that cannot be reduced, recycled or composted is collected, transferred and disposed of in a manner that minimizes adverse environmental impacts.
<i>Source: City of Los Angeles, The Citywide General Plan Framework, An Element of the City of Los Angeles General Plan, re-adopted 2001.</i>	

ENVIRONMENTAL IMPACTS

Methodology

The environmental impacts of the Project with respect to solid waste are determined based on the proposed increase in solid waste generation and the capacity of existing and proposed solid waste infrastructure. The existing landfill capacities and solid waste generation is compared to the Project's solid waste generation and future landfill capacities, including a discussion of recycling programs and design features that would be implemented with the Project.

Thresholds of Significance

The potential for the proposed Project to result in impacts associated with solid waste services is based on the CEQA significance thresholds specified by Appendix G of the State CEQA Guidelines, which are addressed in this section. These significance thresholds are listed below.

Threshold 4.16-5: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Threshold 4.16-6: Would the project comply with federal, State, and local statutes and regulations related to solid waste?

An affirmative answer to either of these questions would represent a significant impact.

Project Design Elements

The Project would include design elements that would facilitate recycling of waste materials during construction and operations.

Impact Analysis

Threshold 4.16-5: Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Threshold 4.16-6: Would the project comply with federal, State, and local statutes and regulations related to solid waste?

Construction

Implementation of the Project would generate construction and demolition waste. Construction and demolition debris includes concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. Construction debris would consist primarily of debris from the demolition of the existing uses on Sites 1 and 3 and the renovation of uses on Site 2 that would be disposed of as inert waste. Much of this material would be recycled and salvaged at a minimum of 75 percent diversion from the landfill as required by PDF USS-5. Construction contractors would also be required to utilize disposal services certified by the County (Sites 1 and 3) and City (Site 2) that meet statutory requirements for recycling of construction materials and diversion from landfill, as required by PDF USS-6. Solid waste would also be generated during the building construction phase. Construction activities generate a variety of scraps and wastes, with the majority of recyclables being wood waste, drywall, metal, paper, and cardboard. As shown in Table 4.16-12 (Estimated Construction Solid Waste Generation), the construction of the Project is estimated to generate a total of approximately 3,622 tons (7,244,069 pounds) of solid waste, and approximately 35,774 tons (71,547,956 pounds) of demolition debris for a total of approximately 39,396 tons (78,792,025 pounds) of total construction solid waste. This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. The C&D waste would be delivered to City certified C&D waste processors where it would be recycled as feasible. The County of Los Angeles Countywide Integrated Management Plan 2015 Annual Report (the “2015 Annual Report”) concludes that there is current capacity of 57.56 million tons available in the County for the disposal of inert waste.⁴⁵ Therefore, Project-generated demolition and construction waste (i.e., asphalt and construction debris) would represent a very small percentage (approximately 0.07 percent) of the inert waste disposal capacity in the region. This would be a less-than-significant impact, as the Project would not create a need for additional solid waste disposal facilities to adequately handle project construction-generated inert waste.

Operation

Operation of the Project would result in ongoing generation of solid waste. Over the long-term, the Project would be expected to generate approximately 2,706 net ppd of solid waste (see Table 4.16-13 [Estimated Solid Waste Generation]).

All solid waste generating activities, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, the Project would divert at least 50 percent of its solid waste generated as required by PDF USS-4 and RR USS-6. The City does not collect recycled materials from commercial land uses; therefore, a private recycling waste hauler would be retained to haul recyclables from the Project Sites to the facility of choice. As such, it is conservatively assumed that all 2,706 ppd of operational waste would be disposed of at regional landfills. The average daily intake of the Sunshine Canyon Landfill is approximately 7,250 tons and the permitted daily intake is 12,100 million tons. The 2,706 ppd of Project’s daily operational solid waste represents approximately 0.02 percent of the remaining capacity of the Sunshine Canyon Landfill’s daily intake. As such, the landfill would have adequate capacity to accommodate the daily operational waste generated by the Project. The Project would also comply with all federal, State, and local regulations related to solid waste. Therefore, a less-than-significant impact associated with operational solid waste would occur.

⁴⁵ County of Los Angeles Department of Public Works, *Countywide Integrated Management Plan 2015 Annual Report*, December 2016, page 33.

Table 4.16-12
Estimated Construction Solid Waste Generation

Proposed Use Description	Quantity	Construction Rate (pounds)	Demolition Rate ^b (pounds)	Total Construction Generation (pounds)	Total Demolition Generation (pounds)
Site 1					
Existing 2-Story Office	30,788 gsf	--	173 lbs/sf	--	5,326,324
Existing 1-Story Office	13,325 gsf	--	173 lbs/sf	--	2,305,225
Existing 7-Story Parking Structure	235,248 gsf	--	173 lbs/sf	--	40,697,904
Existing Surface Parking	38,909 sf		173 lbs/sf		6,731,257
New 21-Story Office & Retail	481,000 sf	4.02 lbs/sf ^a	--	1,933,620	--
New 12-Story Parking Structure	380,000 sf	4.02 lbs/sf	--	1,527,600	--
Subtotal of Construction Solid Waste Generation for Site 1				3,461,220	55,060,710
Site 2					
Reuse 12-Story Office into Residential	154,793 gsf	17.67 lbs/sf ^c	--	2,735,192	--
Existing 4-Story Office	52,000 gsf	--	173 lbs/sf	--	8,996,000
Existing 2-Story Parking Structure	14,010 gsf	--	173 lbs/sf	--	2,423,730
New 6-Story Parking Structure	116,324 sf	4.02 lbs/sf	--	467,622	--
Subtotal of Construction Solid Waste Generation for Site 2				3,202,814	11,419,730
Site 3					
Existing 4-Story Office	29,292 gsf	--	173 lbs/sf	--	5,067,516
New 6-Story Residential	132,428 sf	4.38 lbs/sf ^d	--	580,035	--
Subtotal of Construction Solid Waste Generation for Site 3				580,035	5,067,516
Total of Construction Solid Waste Generation				7,244,069	71,547,956
^a A nonresidential construction waste generation rate of 4.02 pounds per square foot was used. Source: U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-2, June 1998. ^b A demolition waste generation rate of 173.00 pounds per square foot was used. Source: U.S. EPA, Characterization of Building Related Construction and Demolition Debris in the United States, Table A-4, June 1998. ^c A renovation waste generation rate of 17.67 pounds per square foot was used. Source: U.S. EPA, Characterization of Building Related Construction and Demolition Debris in the United States, Table A-6, June 1998. ^d A residential construction waste generation rate of 4.38 pounds per square foot was used. Source: U.S. EPA, Characterization of Building Related Construction and Demolition Debris in the United States, Table A-1, June 1998. Source (table): EcoTierra Consulting, 2017.					

Table 4.16-13
Estimated Solid Waste Generation

Proposed Use Description	Quantity	Generation Rate^a (pounds/day)	Total Generation (pounds/day)
Site 1			
Retail	10,000 gsf	0.005/sf	50
Auto Parking	800,002 gsf	--	0 ^b
Office	471,000 gsf	0.006/sf	2,826
<i>Subtotal of Solid Waste Generation for Site 1</i>			2,876
Site 2			
Lounge	11,125 gsf	0.005/sf	56
Residential Apt: Studio	110 du	4/unit	440
Residential Apt: 1 Bed	84 du	4/unit	336
Residential Apt: 2 Bed	52 du	4/unit	208
Retail	7,500 gsf	0.005/sf	38
Auto Parking	116,324 gsf	--	0 ^b
<i>Subtotal of Solid Waste Generation for Site 2</i>			1,078
Site 3			
Community Recreation Center	13,200 gsf	0.005/sf	66
Residential Apt: 1 Bed	57 du	4/unit	228
Residential Apt: 2 Bed	15 du	4/unit	60
Auto Parking	--	51,591 gsf	0 ^a
<i>Subtotal of Solid Waste Generation for Site 3</i>			354
Total of Proposed Solid Waste Generation			4,308
Existing Solid Waste Generation			1,602
Net Total Solid Waste Generation			2,706
^a Cal Recycle website: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates , February 2017.			
^b Parking Structure does not generate solid waste.			
Source (table): EcoTierra Consulting, 2017.			

During its long-term operational phase, the Project would provide a recycling collection and storage program for non-hazardous waste by dedicating recycling areas for glass, plastic, paper, aluminum, as well as employing techniques for individual workstations such as cardboard balers, aluminum can crushers, recycling chutes, and collection bins as required by PDF USS-7. The Project would also implement recycling during construction, such as recycling concrete cylinder test samples and steel reinforcing bars.

CUMULATIVE IMPACTS

The geographic context for the cumulative impact analysis on solid waste generation is the LABS service area. The use of out-of-County landfills will increase in the future given the difficulties associated with permitting new or expanded landfill facilities within the County. As such, the appropriate context within which to view the Project's potential solid waste impacts is total disposal capacity available at landfills located within, as well as outside of, the County. In addition, in order to satisfy the disposal capacity requirements of AB 939, the County is developing facilities utilizing conversion technologies defined as a wide array of biological, chemical, thermal (excluding incineration) and mechanical technologies capable

of converting post-recycled residual solid waste into useful products and chemicals, green fuels, such as hydrogen, natural gas, ethanol and biodiesel, and clean, renewable energy such as electricity.⁴⁶

Pursuant to CCR Section 18755.5, the County prepared a Countywide Siting Element in June 1997. The Countywide Siting Element has identified goals, policies, and strategies to maintain adequate permitted disposal capacity on an ongoing basis through a 15-year planning period, and for the long term. To provide this needed disposal capacity, the Countywide Siting Element identified sites County-wide that may be suitable for development of new, or expansion of existing, Class III landfills. The Countywide Siting Element also identified out-of-County landfills that may be available to receive waste generated in the County. Additionally, the Countywide Siting Element includes goals and policies to facilitate the use of out-of-County and remote landfills and foster the development of alternatives to landfill disposal.

The CoISWMP, inclusive of its annual reports, serves as the primary planning documents for the County's waste disposal needs, which includes solid waste generated throughout the City. The *2015 Annual Report* forecasts conditions over a 15-year planning horizon. The *2015 Annual Report* concludes that there is enough capacity within permitted solid waste facilities (i.e., landfills) to serve the County through the 15-year planning period of 2015 through 2030 through a combination of all or some of the following:

- Maximize waste reduction and recycling;
- Expand existing landfills;
- Study, promote, and develop alternative technologies;
- Expand transfer and processing infrastructure; and
- Out-of-county disposal (including waste-by-rail).⁴⁷

The County will continually address landfill capacity through the preparation of Annual Reports. The preparation of each Annual Report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Therefore, combined cumulative operational waste disposal impacts would be less than significant.

There are 115 projects within a 2.0-mile radius of the Project Sites. The related projects consist of multifamily residential, schools, hotels, clinics, theaters, and commercial uses. The total increase in solid waste generation for the related projects is approximately 301,363 ppd. Combined with the Project, the net increase in solid waste generation is approximately 304,069 ppd, as shown in Table 4.16-14 (Related Projects Solid Waste Generation). All solid waste generating activities, including the Project, would continue to be subject to the requirements set forth in AB 939. Therefore, it is estimated that the related projects would divert 50 percent of solid waste generated. The City does not collect recycled materials from commercial land uses; therefore, a private recycling waste hauler would be retained to haul recyclables from the related projects to the facility of choice. As such, it is conservatively assumed that all 303,995 ppd (152 tons per day) of waste would be disposed of at regional landfills. The 2015 Annual Report concludes that there is current capacity of 114 million tons available in the County for the disposal

⁴⁶ County of Los Angeles, *Conversion Technology Evaluation Report, Phase II, October 2007, page ES-1.*

⁴⁷ County of Los Angeles Department of Public Works, *Countywide Integrated Management Plan 2015 Annual Report, December 2016, page 51.*

Table 4.16-14
Related Projects Solid Waste Generation – Operations ^b

Land Use	Generation Rate^a (pounds/day)	Unit	Size	Total Generation (pounds/day)
Multi-Family Residential	4	lbs/du	46,690	186,760
School: University/College	1	lbs/student	21,800	21,800
School: High School	1	lbs/student	1,080	1,080
School: Elementary/Jr. High	1	lbs/student	4,624	4,624
Hotels	2	lbs/room	2,864	5,728
Clinic	16	lbs/bed	197	3,152
Theater	3	lbs/seat	2,792	8,376
Commercial	0.005	lbs/sf	13,968,670	69,843
<i>Subtotal Cumulative Solid Waste Generation</i>				301,363
<i>Project Total Net Solid Waste Generation</i>				2,706
<i>Total Cumulative Solid Waste Generation</i>				304,069
^a Cal Recycle website: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates , February 2017.				
^b Since construction and demolition waste would be hauled by a private construction contractor permitted by the City, the Project and each of the related projects would not result in the need for an additional solid waste collection route, therefore, a cumulative construction analysis is not required.				
Source (table): EcoTierra Consulting, 2017.				

at landfills.⁴⁸ Therefore, solid waste generated from related projects would represent a very small percentage (approximately 0.0001 percent) of the waste disposal capacity in the region.

It is also anticipated that related projects and other reasonably foreseeable growth would be subject to environmental review on a case-by-case basis to ensure that they would not conflict with AB 939 waste diversion goals or the solid waste policies and objectives in the CoIWMP, Siting Element, as well as the City's SRRE and its updates, and the General Plan Framework. Therefore, cumulative impacts associated with solid waste regulations, plans, and programs would be less than significant.

PROJECT DESIGN FEATURES AND REGULATORY REQUIREMENTS

Project Design Features

The following PDFs would be incorporated into the Project and would work to address Project impacts. These are not required mitigation but are inherent Project components.

- PDF USS-5:** The Project will establish a Solid Waste Diversion Program of 50 percent for project operations.
- PDF USS-6:** The Project will establish a Solid Waste Diversion Program of 75 percent for project construction.
- PDF USS-7:** Construction contractors shall only contract for solid waste disposal services with a company that recycles demolition and construction-related wastes, as demonstrated to

⁴⁸ County of Los Angeles Department of Public Works, *Countywide Integrated Management Plan 2015 Annual Report*, December 2016, page 32.

the County of Los Angeles Department of Public Works (Sites 1 and 3), or City Department of Building and Safety (Site 2) prior to issuance of demolition or construction permits.

PDF USS-8: The Project will provide readily accessible areas around the Project Sites for the deposit, storage, and collection of non-hazardous materials for recycling.

Regulatory Requirements

The following standards would be imposed by existing laws and regulations and would work to address Project impacts. These are not required mitigation but are inherent Project components.

RR USS-3: In compliance with AB 939, the Developer would be required to implement a Solid Waste Diversion Program and divert at least 50 percent of the solid waste generated by the Project.

MITIGATION MEASURES

Impacts to solid waste facilities would be less than significant. Therefore, no mitigation measures are required.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

With implementation of design features USS-5 through USS-8, impacts to solid waste facilities would be less than significant.

5.0 ALTERNATIVES

INTRODUCTION

CEQA requires that EIRs include the identification and evaluation of a reasonable range of alternatives that are designed to reduce one or more of the significant environmental impacts of the project while still meeting most of the basic project objectives. The State CEQA Guidelines also set forth the intent and extent of alternatives analysis to be provided in an EIR. Those considerations are discussed below.

Alternatives to the Project

Section 15126.6(a) of the State CEQA Guidelines states the following requirement to discuss alternatives to a project:

An EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparable merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.

Section 15126.6(f)(1) of the State CEQA Guidelines states that, among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control, or otherwise have access to an alternative site.

Purpose

Section 15126.6(b) of the State CEQA Guidelines states the following purpose of the alternatives discussion:

Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment, the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of project objectives, or would be more costly.

Selection of a Reasonable Range of Alternatives

Section 15126.6(c) of the State CEQA Guidelines states the following regarding the selection of alternatives:

The range of potential alternatives to the project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale

for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Additional information explaining the choice of alternatives may be included in the administrative record. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.

Assumptions and Methodology

Whereas mitigation measures are designed to directly address and reduce impacts generated by a project, alternatives analysis examines the potential reduction in impacts that could result from changes to the project through, for example, modifications in design or modifications in development parameters. The alternatives analysis is presented as a comparative analysis to the Project, and assumes that all applicable mitigation measures identified for the Project would apply to each alternative. Each alternative is considered in light of the project objectives to determine whether the alternative would feasibly attain most of the basic project objectives, and whether it would avoid or substantially lessen any of the significant impacts of the Project.

Impacts associated with each alternative are compared to Project-related impacts and are classified as greater (or higher), less (or lower), or essentially similar to (or comparable to) the level of impacts associated with the Project. Environmental issues that were analyzed in the Initial Study and for which it was determined that there is no substantial evidence that the Project could cause significant environmental effects are not included in the alternatives analysis, because the alternatives were selected based on their potential to reduce the significant impacts of the Project.

Level of Detail

The State CEQA Guidelines do not require the same level of detail in the alternative analysis as in the analysis of the Project. Section 15126.6(d) of the CEQA Guidelines states the following regarding the evaluation of alternatives:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

Project Objectives

As discussed in Section 3.0 (Project Description and Environmental Setting) of this Draft EIR, the basic and fundamental objectives for the Project are:

- 1. Provide a mix of uses that maximizes building density at locations served by public transit and locates residential uses in areas that reduce automobile dependency, replaces obsolete County facilities with new state-of-the art office facilities and infrastructure that will meet the current and future needs of County Departments located within or near the Vermont Corridor, and provides residential and retail uses to serve the local community, in a transit priority area.**

2. **Promote revitalization of the currently underutilized project sites, by expediting the elimination of blight and improving the visual character of the Project area through the redevelopment of underutilized sites.**
3. **Provide needed housing near public transit, by constructing high density residential dwelling units to serve a range of potential tenants, and developing new housing stock at infill locations close to commercial and office uses.**
4. **Provide needed deed restricted senior affordable housing units in the Vermont Corridor.**
5. **Promote fiscal and community benefits, economic development, and job creation, by creating construction jobs, consolidating DMH and WDACS employees in the Vermont Corridor, providing economic benefit to the County, and providing community benefits through construction of a community recreation center and deed restricted senior affordable housing.**
6. **Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.**

ALTERNATIVES CONSIDERED BUT REJECTED

Section 15126.6(c) of the State CEQA Guidelines requires EIRs to identify any alternatives that were considered by the lead agency but were rejected during the scoping process, and briefly explain the reasons underlying the lead agency's determination.

Larger Community Recreation Center

An alternative design was considered for Site 3 that would increase the size of the community recreation center to approximately 40,000 square feet while maintaining the size of the proposed building. This alternative was evaluated in response to comments raised during the scoping process that advocated for a larger community recreation center within the Project. The size of the building would be required to remain the same because of the limitations in the funding sources available to construct this building. Therefore a larger community recreation center would need to be accommodated by converting two levels of the building from residential to community recreation center use. Accordingly, the number of senior affordable housing units would be significantly reduced by 30 units to a total of 42 units, or 58 percent. This alternative was rejected because the provision of deed restricted senior affordable housing units to address the current supply shortage is considered a fundamental Project Objective.

Alternate Location for Community Recreation Center

An alternative was considered that would locate the proposed community recreation center on Site 1 for the purpose of providing a larger community recreation center. This alternative was evaluated in response to comments raised during the scoping process that advocated for a larger community recreation center within the Project. Under this alternative, the community recreation center would share Site 1 with the County office building, and the associated parking facilities for cars and bicycles. This alternative was determined infeasible because of financing regulations. The buildings and uses on Site 1 must be funded by tax-exempt bond financing. Specifically, the developer would issue bonds to investors and would size the bond issuance precisely to pay for the cost of constructing the building, with payments sized exactly to match the DMH's rent over a thirty-year period. At the end of the thirty years, DMH would have paid off all the bonds, and would own the building free and clear. This structure allows for the least

expensive form of private financing possible for a public use, build-to-suit project. This very precise equation cannot sustain any project cost (such as a community recreation center) that is not supported by an equal thirty-year commitment of County rent. Accordingly, the location of the community recreation center on Site 1 was rejected, and this alternative was therefore not considered further.

Reduced Parking

An alternative was considered that would reduce the parking within the Project in order to promote transit access, and potentially allow for design modifications on the Project Sites to provide additional open space and pedestrian amenities. This alternative was evaluated in response to comments provided during the scoping process that suggested that parking for the Project be reduced, and that the cost savings be applied to providing a larger community recreation center and/or more affordable housing within the Project. To estimate the magnitude of the parking supply modification that would result from this alternative, it was assumed that only the new parking garage on Shatto Place would be provided and that the podium parking under the new County office building on Site 1 would be eliminated. This would reduce the proposed parking supply on Site 1 by 965 spaces, to the total of 768 spaces that would be provided within the proposed new Shatto Place parking structure. The proposed parking supply for the Project on Site 1 (1,733 spaces) was determined based upon a ratio of 0.8 parking spaces per County employee as discussed in Section 3.0 Project Description and Environmental Setting of this Draft EIR. The County has found this ratio to be necessary as an operational measure in order to adequately accommodate employees and visitors to County office buildings. The potential reduction in parking that would result from the elimination of the podium garage would reduce this ratio to 0.45 spaces per employee. While the removal of the podium parking structure could potentially provide an alternative design for Site 1 that would allow for additional open space and/or pedestrian orientation, such a reduction in the parking supply would be significantly below the County Code requirement of 1,191 spaces for the office and retail uses, plus an additional parking space for every three persons expected to occupy the 3,650 square foot Site 1 restaurant use, as well as significantly below the current County operating parking ratio of 0.8. This alternative was rejected because the difference between the projected supply and adequate supply based on the County's experience in operating public office buildings at this specific location could potentially result in parking spillover into adjacent neighborhoods if the reduced supply were to prove insufficient, and thereby cause potentially significant impacts on the surrounding community. Therefore, this alternative was not considered further.

Remodel Existing Buildings

An alternative was considered that would remodel the existing County buildings, and not provide any new construction on the Project Sites. The existing County office buildings on Site 1 (DPR), Site 2 (DMH and WDACS), Site 3 (DPR), and the Shatto Place Parking Structure would be upgraded and remodeled under this alternative, and, after remodeling, would continue to operate in their same basic configurations (site layout, height, mass) as presently exists. The existing vacant office building on Site 1 would be demolished as it has been determined to be structurally deficient. The exteriors of the other buildings would be upgraded and modernized, and additional design features, such as landscaping and enhanced pedestrian access, would be added. While this alternative would partially meet the Project objective of removing blight and providing facilities for County employees, it was rejected because it would not allow for the consolidation of other employees presently located in off-site leased office space, would not provide any affordable housing, a fundamental Project objective, and would entail fiscal costs to the County to temporarily relocate the existing employees in these buildings while remodeling activities are taking place. This alternative was therefore not considered further.

All Residential Project

An alternative was considered that would increase the amount of residential use within the Project in order to potentially reduce traffic impacts, since residential uses have lower traffic generation. Because Sites 2 and 3 of the Project proposed already contain residential developments, the additional residential development under the alternative would occur on Site 1. This alternative was rejected because it would not meet a fundamental Project objective, the provision of new County office facilities to accommodate existing and future County employees in an area served by public transit. This alternative was therefore not considered further.

Alternative Location

State CEQA Guidelines Section 15126.6 (f)(2) provides guidance regarding the consideration of one or more alternative location(s) for a proposed project, stating that putting the project in another location should be considered if doing so would allow significant effects of the project to be avoided or substantially lessened; and if no feasible alternative locations exist, the EIR must disclose the reasons for this conclusion.

Development of the Project at alternate offsite locations would not be consistent with the Project's objectives. The Project's objectives are to upgrade and consolidate County office facilities at the proposed Site 1 location in the Vermont Corridor, and contribute to the efforts to revitalize the area and provide benefits to the community regarding the Site 2 and 3 locations. The Project objectives also include locating these facilities in proximity to transit. As such, the Project is focused on the development of this particular area of the City of Los Angeles, which is located near the Metro Rail Red Line Wilshire/Vermont station. Although the County owns other property, there are no other suitable County-owned sites on the Vermont Corridor that have setting characteristics that would likely result in fewer environmental impacts than the development of the Project Sites. Given the limited potential for impact reduction and failure to meet the Project Objectives, an alternative location(s) was(were) rejected, and not considered further.

ALTERNATIVES TO THE PROJECT

The three alternatives analyzed for the Project include the following:

- Alternative 1: No Project
- Alternative 2: Reduced Project
- Alternative 3: Office Project

These alternatives were included for analysis because of their potential to reduce the significant impacts of the Project and are required by the CEQA Guidelines as constituting a reasonable range of alternatives as well as the required No Project Alternative. Table 5-1 (Project and Alternative Components Comparison) shows the differences between the various components of the alternatives.

The following alternatives analysis compares the potential environmental impacts of the three feasible alternatives with those of the Project for each of the environmental topics analyzed in detail in Section 4.0 (Environmental Impact Analysis) of this Draft EIR, although in less detail than in Section 4.0 (pursuant to State CEQA Guidelines Section 15126.6(d)). Based on the analysis in Section 4.0 (Environmental Impact Analysis) of this Draft EIR, implementation of the Project would result in significant unavoidable

Table 5-1
Project and Alternative Components Comparison

	Project	Alternative 1 No Project	Alternative 2 Reduced Project	Alternative 3 Office Project
Site 1				
County Office	471,000 sf	44,113 sf	296,000 sf	471,000 sf
Retail	10,000 sf	-	10,000 sf	10,000 sf
Parking Spaces	1,733	1,004	1,013	1,733
Building Stories	21 ^a	2/1	10 ^d	21 ^a
Parking Structure Levels	11 ^b	7 ^c	11 ^b	11 ^b
Site 2				
Residential (Reuse)	172	-	172	-
Retail (Reuse)	4,100 sf	-	4,100 sf	-
Amenity (Reuse)	8,875 sf	-	8,875 sf	-
Residential (New Construction)	74	-	74	-
Retail (New Construction)	3,400 sf	-	3,400 sf	-
Amenity (New Construction)	2,250 sf	-	2,250 sf	-
County Office	-	206,793 sf	-	221,728 sf
Parking Spaces	263	53	263	263
Building Stories	12/8.5 ^e	12/4	12/8.5 ^e	12/8.5 ^g
Site 3				
Senior Affordable Housing	72 units	-	72 units	-
Community Recreation Center	13,200 sf	-	13,200 sf	13,200 sf
County Office	-	29,292 sf	-	67,637 sf
Parking Spaces	116	65	116	116
Building Stories	6 ^f	4	6 ^f	6 ^h
<i>Notes: sf = square feet</i> ^a 13 story office over 8 above ground parking levels ^b 9 levels above ground over 2 below ground levels ^c 6 levels above ground over 1 level below ground ^d 7 story office over 3 above ground parking levels ^e 5 story residential over 3.5 above ground parking levels and 1.5 below ground parking levels ^f 6 story residential and community recreation center over 3 below ground parking levels ^g 5 story office over 3.5 above ground parking levels and 1.5 below ground parking levels ^h One story community recreation center and 5 story office over 3 below ground parking levels <i>Source: Gensler, Steinberg, and Y&M Architects, 2017; and EcoTierra Consulting, 2017.</i>				

environmental impacts relative to: Air Quality (construction daily emissions for NO_x, and overlapping construction and operation phases for NO_x and ROG); Noise (construction noise); and Transportation (10 peak hour impacts at seven intersections and cumulative construction traffic). The impacts associated with each alternative are compared to Project-related impacts and are classified as greater, less, or essentially similar (or comparable to) the level of impacts associated with the Project.

5.0 ALTERNATIVES TO THE PROJECT

5.1. ALTERNATIVE 1 - NO PROJECT

DESCRIPTION

CEQA requires the alternatives analysis to include a No Project Alternative. The purpose of analyzing a No Project Alternative is to allow decision makers to compare the impacts of approving the Project with the impacts of not approving the Project (State CEQA Guidelines Section 15126.6(e)(1)). Pursuant to State CEQA Guidelines Section 15126.6(e)(2):

The “no project” analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time the environmental analysis is commenced, as well as what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans, and consistent with available infrastructure and community services.

In the event the Project is not approved, it is expected that the Project Sites would remain in their current condition and no new development would occur for the foreseeable future. The County would continue to operate the office building and parking facilities on Site 1, the existing DMH and WDACS buildings and parking on Site 2, and the existing DPR and surface parking lot on Site 3. The existing vacant office building on Site 1 would be demolished as it has been determined to be structurally deficient.

The potential environmental impacts associated with the No Project Alternative are described below and are compared to the environmental impacts that would result from the implementation of the Project, as described in Section 4.0 of this Draft EIR.

COMPARATIVE ANALYSIS

Aesthetics

As stated in Section 4.1 Aesthetics, CEQA provides that aesthetics for this Project shall not be considered a significant impact on the environment because it is a qualifying infill Project which is both mixed use residential and an employment center in a Transit Priority Area. Therefore, the following comparative analyses regarding aesthetics, visual character, views, shade/shadow, and light/glare are provided for informational purposes. The No Project Alternative would not represent a residential, mixed-use residential, or employment center project on infill sites in a Transit Priority Area or a change to the existing environmental setting as it is the existing condition.

Aesthetics/Views

Under the No Project Alternative, the Project Sites would remain in their current condition and no new development would occur for the foreseeable future. As no development would occur, there would be no potential for construction activities to temporarily alter the visual appearance of the Project Sites. Therefore, no temporary changes in the visual environment associated with construction activities would occur under the No Project Alternative. Thus, the No Project Alternative would not substantially alter or degrade the existing visual character of the Project Site or surrounding area. Effects on the visual environment would be less than those of the Project.

The No Project Alternative would not demolish existing Project Sites uses, including: the two-story office building, open parking areas, and carport, and an existing parking structure on Site 1; the two office buildings on Site 2; and/or the office building on Site 3. The existing vacant office building on Site 1 would be demolished as it has been determined to be structurally deficient. Therefore, the No Project Alternative would only minimally change the existing visual character and blight conditions associated with the Project Sites. Thus, although the No Project Alternative would not substantially alter or degrade the existing visual character of the Project Site or surrounding area, it would not have the beneficial effects of the Project.

Under the No Project Alternative, the existing uses on the Project Sites would remain on-site and the Project's proposed buildings would not be developed. As such, the No Project Alternative would not result in an increase in the height or massing of on-site structures, and existing views of and across the Project Sites would remain. Due to the lack of on-site development, no changes to views would occur under the No Project Alternative, and the change to the visual environment would be lower than the Project

Shade/Shadow

Under the No Project Alternative, the existing uses on the Project Sites would remain on-site, except for the existing vacant office building on Site 1, which would be demolished as it has been determined to be structurally deficient. The Project's proposed buildings would not be developed. Thus, no new shadows would be cast on any shade-sensitive land uses, compared to the Project, which would cast shadows.

Light/Glare

Under the No Project Alternative, the Project Sites would remain in their current condition, except for the existing vacant office building on Site 1, which would be demolished as it has been determined to be structurally deficient. No new development would occur for the foreseeable future. Therefore, under the No Project Alternative, no new sources of light or glare would be introduced to the Project Site, compared to the Project, which would include new light and glare sources.

Air Quality

Under the No Project Alternative, no excavation and construction would occur, and there would be no new energy demand or vehicle trips generated. Only minimal emissions would be associated with the demolition of the existing vacant office building on Site 1. As such, air pollutant emissions related to construction or operations (including criteria emissions or toxic air contaminants) would be less than the Project and less than significant. The No Project Alternative would avoid the significant and unavoidable construction and construction/operational overlap impacts associated with the Project.

Cultural Resources

Historical Resources

Under the No Project Alternative, no demolition of the existing uses on the Project Sites would occur. The technical report prepared for the proposed Project evaluated the historical significance of the on-site buildings. The Historic Evaluation concluded that the Project would have no direct impact on historical resources, and a less than significant indirect impact on the Brynmoor Apartments Neon Roof Sign. The No Project Alternative would not change the existing on-site uses. Thus, area surrounding the sign would not be modified under the No Project Alternative. Therefore, no historical resource impacts could occur

under the No Project Alternative, and impacts would be less than the Project's less-than-significant impact.

Archaeological Resources

Under the No Project Alternative, the Project Sites would remain in their current condition. The No Project Alternative would not demolish existing Project Sites uses including: the two-story office structure, open parking areas, and carport, and an existing parking structure on Site 1; the two office buildings on Site 2; and/or the office building on Site 3. The existing vacant office building on Site 1 would be demolished as it has been determined to be structurally deficient. No excavation would be associated with this demolition that could uncover archaeological resources. As such, there would be no impact to archaeological resources, which is less than the less-than-significant impact under the Project.

Paleontological Resources

Under the No Project Alternative, the Project Sites would remain in their current condition. The No Project Alternative would not demolish existing Project Sites uses including: the two-story office building, open parking areas, and carport, and an existing parking structure on Site 1; the two office buildings on Site 2; and/or the office building on Site 3. The existing vacant office building on Site 1 would be demolished as it has been determined to be structurally deficient. No excavation would be associated with this demolition that could uncover paleontological resources. As such, there would be no impact to paleontological resources, which is less than the less-than-significant impact under the Project.

Energy

Electricity

Under the No Project Alternative, no new construction would occur on the Project Sites that would increase the demand for electricity. However, the existing buildings on the Project Sites, which consume an estimated 5,412,233 KW-Hours/year, are not constructed or operated with energy-efficient design features. No new buildings would be constructed under this alternative; therefore, this alternative would not result in the construction of buildings that improve energy efficiency on the Project Sites as compared to existing conditions. Nevertheless, because no increase in electricity use would occur, no impact to electricity would occur under the No Project Alternative. The impact of the No Project Alternative regarding electricity would be less than the Project's less-than-significant impact.

Natural Gas

Under the No Project Alternative, no new construction would occur on the Project Sites that would increase the demand for natural gas. However, the existing buildings on the Project Sites, which consume 2,930,870 kBTU/year, are not constructed or operated with energy-efficient design features. No new buildings would be constructed under this alternative; therefore, this alternative would not result in the construction of buildings that improve energy efficiency on the Project Sites as compared to existing conditions. Nevertheless, because no increase in natural gas use would occur, no impact to natural gas would occur under the No Project Alternative. The impact of the No Project Alternative regarding natural gas would be less than the Project's less-than-significant impact.

Transportation Energy

Under the No Project Alternative, no new construction would occur on the Project Sites that would increase the demand for transportation energy. Under the Project, construction activities would consume 375,667 gallons of gasoline, and 32,515 gallons of diesel fuel for transportation. Impacts of the No Project Alternative would be less than the Project's less-than-significant impacts. Under the No Project Alternative, no increase in operational fuel consumption would occur. Under the Project, 399,200 gallons of gasoline would be consumed annually. Impacts of the No Project Alternative would be less than the Project's less-than-significant impacts.

Wasteful, Inefficient, and Unnecessary Consumption of Energy

Under the No Project Alternative, no increase in energy consumption would occur. The Project would not result in the inefficient, unnecessary, or wasteful consumption of energy because it would: (1) incorporate Title 24 energy efficiency standards into the Project, (2) provide trip reduction measures, a mixed use project in a High Quality Transit Area, electric vehicle charging stations, and bicycle parking that would maximize the potential for mobility and accessibility for people and reduce the overall consumption of fuel required for transportation, and (3) incorporate renewable energy through the generating portfolio of LADWP, coupled with the inclusion of solar generating infrastructure within Site 1. The No Project Alternative would not include any of these measures, however, it would result in the inefficient, unnecessary, or wasteful consumption of energy because the No Project Alternative would still consume energy.

Geology and Soils

Under the No Project Alternative, no grading or new land uses would be constructed that would be subject to potential impacts associated with seismic fault rupture, strong seismic ground shaking, liquefaction, landside/lateral spreading, seismic-induced settlement, subsidence soil stability, expansive soils acceleration of geologic hazards. As such, this alternative would not expose people or structures to substantial adverse effects involving rupture of a known earthquake fault, seismic ground shaking, seismic-related ground failure, landslides, soil expansion, or liquefaction as a result of new construction. Therefore, there would be no impact to geology and soils, which is less than the less-than-significant impact under the Project.

Greenhouse Gas Emissions

Under the No Project Alternative, no new buildings would be constructed. Additionally, no new net vehicle trips would be generated nor would there be new buildings that would require energy, water, etc. that would result in greenhouse gas ("GHG") emissions. Therefore, under the No Project Alternative, no new GHG emissions would be generated from construction or operation activities at the Project Sites and no impact would occur. However, the No Project Alternative would not be consistent with adopted GHG plans, because it would not implement any of the features of these plans related to concentrating development in transit areas, or incorporating energy and water efficiency measures. As a result, the impact with respect to GHG emissions would be higher than the Project's less-than-significant impact.

Hazards and Hazardous Materials

Under the No Project Alternative, this alternative would not create upset or accident conditions involving the release of hazardous materials into the environment. The No Project Alternative would not release

subsurface hazardous substances to the environment or expose future occupants or site users to hazardous materials. There are six schools within one-quarter mile of the site, however, the No Project Alternative would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste and no uses are proposed that would require the use of hazardous materials. Under the No Project Alternative, no new structures would be constructed on the Project Sites and no excavation would occur. As such, this alternative would not construct any buildings on a site that is included on a list of hazardous materials sites. The No Project Alternative would not change vehicular circulation routes and patterns, or impede public access or travel upon public rights-of-way because no new structures or access routes would be constructed. No impact related to hazardous materials would occur. Therefore, the No Project Alternative's impacts with respect to hazardous materials would be less than the Project's less-than-significant impact with the implementation of mitigation.

Hydrology and Water Quality

Under the No Project Alternative, no grading, construction activities, or development of new land uses would occur. The Project Sites are currently paved or covered entirely with impervious surfaces. Under the No Project Alternative, conditions at the Project Sites would continue as they presently exist. The No Project Alternative would not provide the Project's beneficial water quality impact, which would decrease the amount of storm water leaving the site and improve the quality of surface runoff from the Project Sites over the existing conditions. The No Project Alternative would not be located in a flood plain or flood hazard area, same as the Project. The Project Sites are located within Hansen Dam Reservoir, Pacoima Dam Reservoir Lopez Dam and Reservoir dam inundation area, but these dams are continuously monitored by various agencies such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. The No Project Alternative would not impact surface or groundwater movement or groundwater contamination. Because the Project would implement BMPs and LID measures with which the No Project Alternative is not required to comply, impacts from the No Project Alternative, while less-than-significant, would be greater than the less-than-significant impacts under the Project.

Land Use and Planning

Under the No Project Alternative, no new development would occur. No applicable habitat conservation plans or natural community conservation plans cover the Project Site. No impact related to community division would occur. Therefore, this impact under the No Project Alternative would be less than the Project's less-than-significant impact.

The No Project Alternative would not be subject to the requirements of, nor would it implement any applicable regional or local land use plans and policies for the Project Site, including SB 375, Southern California Association of Governments' ("SCAG") 2008 Regional Comprehensive Plan ("RCP"), 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy ("RTP/SCS"), Southern California Compass Blueprint Growth Vision Report, County of Los Angeles General Plan, City of Los Angeles General Plan Framework Element, the Wilshire Community Plan, Plan for A Healthy Los Angeles, City of Los Angeles Adaptive Reuse Incentive Areas Specific Plan, the Walkability Checklist, and/or Wilshire Center/Koreatown Redevelopment Plan. Accordingly, no impact to land use plans and policies would occur under the No Project Alternative, and impacts would be less than the Project's less-than-significant impacts. Although the No Project Alternative would be located in a Transit Priority Area, the No Project Alternative use of the transit areas would be far less intense as to Site 1 as it is much smaller and not an employment center and would have no benefit from the Project Sites, thereby reducing traffic generation and associated air and GHG emissions.

Under the No Project Alternative, the Project Sites would remain in their current condition. Thus, no impact to land use compatibility would occur. Therefore, this impact would be less than the less-than-significant impact under the Project.

Noise

Under the No Project Alternative, no grading or new construction would occur. The existing vacant office building on Site 1 would be demolished as it has been determined to be structurally deficient. Only minimal noise or vibration from construction would occur. The No Project Alternative would avoid the significant and unavoidable impacts from construction noise that would occur under the Project.

No new operations would occur at the Project Sites; thus, no vibration from operation would be generated under the No Project Alternative. Furthermore, no new noise from outdoor spaces during project operation would be generated under the No Project Alternative. Additionally, no new vehicle trips would be generated under the No Project Alternative. As such, no increase in vibration or noise levels at the Project Sites or along study area roadways related to operation would occur under the No Project Alternative. There would be no new noise impacts, which would be less than the less-than-significant impacts under the Project.

Population, Housing, and Employment

Under the No Project Alternative, no new structures would be constructed on the Project Sites. As such, this alternative would not induce population, housing, or employment growth in the Wilshire Community Plan area or in the region. Further, the Project Sites are located in a developed urbanized area, and would not introduce unplanned infrastructure to the Sites or the area. The No Project Alternative would not result in new residents or new visitors to the Sites. Therefore, there would be no impact to population, housing and employment, which is less than the less-than-significant impact under the Project.

Public Services

Fire

Under the No Project Alternative, no new construction would occur on the Project Sites and, therefore, no construction activities, or new mixed-use development, which could increase demand for services from the LAFD, would occur at the Project Sites. Additionally, under the No Project Alternative, there would be no change to fire flows or emergency access on the Project Sites, and no new or expanded facilities would be needed. Therefore, the No Project Alternative would have no impact related to fire services, which is less than the Project's less-than-significant impacts.

Police

Under the No Project Alternative, no new construction would occur on the Project Sites and, therefore, no construction activities, or a new mixed-use development, which could result in increased demand for services from the LAPD, would occur at the Project Sites. Additionally, under the No Project Alternative, there would be no change to emergency access or security and/or design features on the Project Sites, and no new or expanded facilities would be needed. Therefore, the No Project Alternative would have no impact related to police services, which would be less than the Project's less-than-significant impacts.

Schools

Under the No Project Alternative, no new structures would be constructed on the Project Sites and no new population would be introduced to the Project Sites. As such, this alternative would not create a need for new or physically altered school facilities. Therefore, there would be no impact to schools, which is less than the less-than-significant impact under the Project.

Libraries

Under the No Project Alternative, no new structures would be constructed on the Project Sites and no new population, which could demand libraries, would be introduced to the Project Sites. As such, this alternative would not create a need for new or physically altered libraries. Therefore, there would be no impact to libraries, which is less than the less-than-significant impact under the Project.

Recreation

Under the No Project Alternative, no new structures would be constructed on the Project Sites and no new population, which could demand park facilities, would be introduced to the Project Sites. As such, this alternative would not create the need for new or physically altered parks. Further, this alternative would not increase the use or deterioration of parks and recreational facilities. Therefore, there would be no impact to recreation and park facilities, which is less than the less-than-significant impact under the Project. However, the No Project Alternative would not include the beneficial effect of the Project that would include a new community recreation center to serve the community.

Transportation and Traffic

Under the No Project Alternative, no new development would occur at the Project Sites and current traffic conditions at the Project Sites would continue as they currently exist. The existing vacant office building on Site 1 would be demolished as it has been determined to be structurally deficient, which would generate only minimal construction traffic. The No Project Alternative would not result in any new operational vehicle trips. In the absence of the Project, growth in traffic due to the combined effects of continuing development, intensification of development, and related projects would result in reduced level of service at study intersections located in the vicinity of the Project. However, the No Project Alternative would not contribute any vehicles to this reduced level of service, and there would be no impact. Furthermore, the No Project Alternative would avoid the 10 significant and unavoidable peak hour impacts that would occur at seven intersections under the Project and the cumulative construction traffic impact. Thus, no construction or operation impacts under this alternative would occur, and the impact would be less than the significant and unavoidable impact under the Project.

Additional or changed parking would not be required for the No Project Alternative; thus effects related to parking would be less than the Project. CEQA provides that parking impacts for this Project shall not be considered a significant impact on the environment because it is a qualifying infill Project which is both mixed use residential and an employment center in a Transit Priority Area. Impacts of the No Project Alternative would be lower than the Project's less-than-significant impact with respect to the Congestion Management Program or Caltrans freeway impact procedure because of the lower trip generation. The No Project Alternative would not provide bicycle and pedestrian facilities, include traffic mitigations, provide access, or conflict with alternative transportation policies and plans. Therefore, the No Project Alternative would have no impact with respect to plan consistency, which is less than the less-than-significant impact under the Project. Although the No Project Alternative would be located in a Transit

Priority Area, the No Project Alternative use of the transit areas would be far less intense as to Site 1 as it is much smaller and not an employment center and would have no benefit from the Project Sites, thereby reducing traffic generation.

Tribal Cultural Resources

Under the No Project Alternative, the Project Sites would remain in their current condition. The No Project Alternative would not demolish existing uses at the Project Sites including: the two-story office building, open parking areas, and carport, and an existing parking structure on Site 1; the two office buildings on Site 2; and/or the office building on Site 3. The existing vacant office building on Site 1 would be demolished as it has been determined to be structurally deficient. No excavation would be associated with this demolition that could uncover tribal cultural resources. As such, there would be no impact regarding tribal cultural resources, which is less than the less-than-significant impact under the Project.

Utilities and Service Systems

Wastewater

Under the No Project Alternative, no new construction would occur and no changes to existing land uses or site operations would occur on the Project Sites. Therefore, no construction-related impacts to wastewater conveyance and treatment infrastructure would occur. Thus, there would be no potential to increase the Project Sites wastewater flow. Because no increase in wastewater generation would occur, no impact would occur under the No Project Alternative. Impacts of the No Project Alternative regarding wastewater would be less than the Project's less-than-significant impacts.

Water

Under the No Project Alternative, no new construction would occur and no changes to existing land uses or site operations would occur on the Project Sites. Thus, there would be no increase in water demand at the Project Sites. Because no increase in water supply or infrastructure would occur, no impact would occur under the No Project Alternative. Impacts of the No Project Alternative regarding water would be less than the Project's less-than-significant impacts.

Solid Waste

Under the No Project Alternative, no demolition or new construction would occur and no changes to existing land uses or site operations would occur on the Project Sites. Thus, there would be no potential to increase the Project Sites' construction and operational waste production. Because no increase in solid waste generation would occur, no impact would occur under the No Project Alternative. Impacts of the No Project Alternative regarding solid waste would be less than the Project's less-than-significant impacts.

RELATIONSHIP TO PROJECT OBJECTIVES

Although the No Project Alternative would have fewer impacts than the Project, it would not satisfy any of the Project Objectives, as listed in Section 3.0 (Project Description and Environmental Setting) of this Draft EIR. Specifically, the No Project Alternative would not meet the following Project Objectives:

1. Provide a mix of uses that maximizes building density at locations served by public transit and locates residential uses in areas that reduce automobile dependency, replaces obsolete County

facilities with new state-of-the art office facilities and infrastructure that will meet the current and future needs of County Departments located within or near the Vermont Corridor, and provides residential and retail uses to serve the local community, in a transit priority area.

2. Promote revitalization of the currently underutilized project sites, by expediting the elimination of blight and improving the visual character of the Project area through the redevelopment of underutilized sites.
3. Provide needed housing near public transit, by constructing high density residential dwelling units to serve a range of potential tenants and developing new housing stock at infill locations close to commercial and office uses.
4. Provide needed deed restricted senior affordable housing units in the Vermont Corridor.
5. Promote fiscal and community benefits, economic development, and job creation, by creating construction jobs, consolidating DMH and WDACS employees in the Vermont Corridor, providing economic benefit to the County, and providing community benefits through construction of a community recreation center and deed restricted senior affordable housing.
6. Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

REDUCTION OF SIGNIFICANT PROJECT IMPACTS

A comparison of the impact of each of the alternatives to the Project is summarized in Table 5-22 (Summary of Alternatives' Impacts). The Project would result in significant and unavoidable impacts to air quality (construction daily emissions for NO_x, and overlapping construction and operation phases for NO_x and ROG), noise (construction), and transportation (10 peak hour impacts at seven intersections , and cumulative construction traffic). The No Project Alternative would avoid these significant and unavoidable Project-related impacts because no new development would occur on the Project Site. However, the No Project Alternative would not implement any of the basic and fundamental Project Objectives.

5.0 ALTERNATIVES TO THE PROJECT

5.2 ALTERNATIVE 2 – REDUCED PROJECT

DESCRIPTION

Under Alternative 2, Reduced Project, a new County office building would be constructed on Site 1. However, this building and associated parking facilities would be reduced in size so as to accommodate only the relocation of the existing DMH and WDACS employees presently located on Site 2. No further consolidation or growth in County employees on Site 1 would be accommodated under this Alternative. Development on Sites 2 and 3 would be the same as that of the Project under this Alternative.

The design and configuration of this Alternative would be similar to the Project. The main difference would be the reduced total square footage, building height and mass, and parking facilities compared to the Project on Site 1. The new County office building on Site 1 would be reduced from 471,000 square feet to 296,000 square feet, and the parking supply would be reduced from 1,733 spaces to 1,013 spaces. The Reduced Project Alternative would include the 10,000 square feet of ground floor retail on Site 1 that would be included in the Project. Parking would be provided at the same ratio under the Alternative as would be provided under the Project. This would result in a building consisting of 7 office levels over three parking levels, compared to 13 office levels over eight parking levels for the Project on Site 1. The Shatto Place parking structure would remain the same under the Alternative.

With this Alternative, development of Sites 2 and 3 would remain the same as under the Project. The existing Site 2 building would be redeveloped into 172 housing units with ground floor retail, and a new building containing 74 housing units would be constructed over a new five-level parking structure with ground floor retail on the current site of the WDACS building. Site 3 would be developed with a new building containing 72 senior affordable housing units, and an approximately 13,200 square foot community recreational center, over an underground parking garage.

Alternative 2 would include the same Project design features (“PDFs”) and require the same mitigation measures as the Project. The potential environmental impacts associated with the Alternative 2 are described below and are compared to the environmental impacts that would result from the implementation of the Project, as described in Section 4.0 (Environmental Impact Analysis) of this Draft EIR.

COMPARATIVE ANALYSIS

Aesthetics

As stated in Section 4.1 Aesthetics, CEQA provides that aesthetics impacts for this Project shall not be considered a significant impact on the environment because it is a qualifying infill Project which is both mixed use residential and an employment center in a Transit Priority Area. Therefore, the following analyses regarding aesthetics, visual character, views, shade/shadow, and light/glare are provided for informational purposes.

Aesthetics/Views

As with the Project, the visual appearance of the Project Sites would be altered during construction of the Reduced Project Alternative due to the removal of existing uses to include: the two-story structure, the

two-story office building, open parking areas, and carport, and an existing parking structure on Site 1; the WDACS office building on Site 2; and the office building on Site 3. Similar to the Project, the existing 12-story DMH office building on Site 2 would remain and would be redeveloped with residential units.

Other construction activities, including site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of the building foundations and proposed structures, would also alter the visual character and quality of the Project Sites and adjacent roadways. These construction activities could be visible to pedestrians and motorists on adjacent streets, as well as to viewers within nearby buildings. Consequently, construction under the Reduced Project Alternative would alter the visual character of the Project area on a temporary basis. However, similar to the Project, construction activities under this alternative would not substantially alter or degrade the existing visual character and quality of the Project Sites and its surroundings or introduce elements that generate substantial long-term contrast with or substantially detract from the visual character of the surrounding area for the following reasons: (1) views of construction activities would be limited in duration and location; (2) the site appearance would be typical of construction sites in urban areas; (3) construction would occur within an urban setting with a high level of human activity and development; and (4) impacts would be reduced through standard best management practices implemented during the construction period.

Compared to the Project, the Reduced Project Alternative would reduce the height and massing of the structures on Site 1, with development of Sites 2 and 3 remaining the same as the Project. Thus, similar to the Project, this alternative would alter the visual character of the Project Sites as compared to existing conditions. However, as with the Project, the change in scale would be moderated by façade articulation and fenestration; variations in building planes (both vertical and horizontal), rooflines, heights, and façade setbacks and projections; and a variety of surface materials to reduce the visual effect of the height and massing and provide a pedestrian scale adjacent to the public streets. .

As with the Project, existing valued views (e.g., focal views and panoramic views or vistas of identified visual resources) in the Project area are limited, mostly obscured by existing intervening urban features, and generally intermittent in the vicinity of the Project Sites. Scenic vistas of visual resources in the Project vicinity are further limited due to the predominantly flat terrain of the vicinity and the dense, intervening development that blocks long-range, expansive views. The Project Sites are located approximately three miles south of the Hollywood Hills. Because of this distance, the Hollywood Hills do not provide a substantial scenic resource in this area. No other visually prominent scenic resources are located in the vicinity of the Project Sites. As noted above, the visual environment on and in the vicinity of the Project Sites is characterized by the existing urban development.

The Project Sites are located in an urban setting. As a result, the Project Sites provide direct views of surrounding low- to mid-rise commercial and residential development to the north, west, and east. Direct views of high rise development to the south are available from Site 2 and Site 3 (most view lines to the south from Site 1 are blocked by the existing Site 2 building, see Figure 3-9 in Section 3.0, Project Description and Environmental Setting).

Similar to the Project, under the Reduced Project Alternative, the buildings would be prominently visible from the surrounding areas. The introduction of the high-rise office and residential buildings would result in changes to short-range focal views and long-range distant views of the Project Sites. As with the Project, due to the height and massing of the proposed buildings, even with the reduction in heights of the building, the changes to short-range views would be more substantial than changes to long-range views. Specifically, from street-level vantage points adjacent to the Project Sites, the Reduced Project Alternative would be prominently visible and would be substantially taller and have more massing than the existing

office structures. However, the overall effect of the Reduced Project Alternative, similar to the Project, would be to improve the current appearance of the Project Sites, and to provide an aesthetically pleasing and pedestrian-friendly scale and atmosphere along Vermont Avenue and 6th Street.

Shade/Shadow

The footprint of the proposed development under the Reduced Project Alternative would be the same as that of the Project. However, the County office building in the Reduced Project Alternative on Site 1 would have reduced building height when compared to the Project. Consequently, shadow lengths from the Reduced Project Alternative on Site 1 would be lower than those of the Project. Shadows from the Project buildings on Sites 2 and 3 under the Alternative would be the same as the Project.

Light/Glare

As with the Project, lighting needed during construction of the Reduced Project Alternative has the potential to generate light spillover to off-site sensitive land uses in the Project vicinity, including nearby properties. Construction hours would follow County requirements for Sites 1 and 3, and City requirements for Site 2, and would generally be from 6:30 AM to 8:00 PM, Monday through Saturday (Sites 1 and 3), and 7:00 AM to 9:00 PM Monday through Friday and 8:00 AM to 6:00 PM Saturday (Site 2). As such, Reduced Project Alternative construction lighting would not result in high-brightness illuminated surfaces that are directly visible from residences or other affected light-sensitive land uses and would not result in substantial changes to existing artificial light conditions or interfere with off-site activities. Therefore, similar to the Project, with adherence to existing regulations and shielding of construction lighting, light resulting from construction activities under this alternative would not significantly affect off-site sensitive uses, substantially alter the character of off-site areas surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

As with the Project, daytime or nighttime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight or nighttime light sources could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. As noted above, construction would primarily occur during the daytime hours in accordance with regulations. The glare from vehicles that currently park on the Project Sites would be similar or cause greater visual impacts than temporary construction glare (depending on the construction equipment used and materials handled), if any. Therefore, similar to the Project, there would be a negligible potential for daytime or nighttime glare associated with construction activities to occur. As a result, as with the Project, light and glare associated with construction of Reduced Project Alternative would not substantially alter the character of off-site areas surrounding the Project Sites or adversely impact day or nighttime views in the area.

The Reduced Project Alternative would have the potential to alter nearby lighting patterns similar to the Project. Nighttime sources of light from buildings and operations under the Alternative would include interior and exterior building lights, parking structure and other security lighting, vehicle headlights, and street lighting, similar to the Project. Under the Alternative, lighting would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses, similar to the Project. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties. Illuminated areas would be localized and

would minimize light trespass and spill. Light fixtures that broadcast light over large areas or which are a source of direct glare would not be used. Furthermore, the majority of lighting associated with the Reduced Project Alternative would be directed internal to the Project Sites, away from neighboring land uses. Therefore, interior and exterior lights on the Reduced Project Alternative would not shine directly onto light-sensitive uses, and would not result in light trespass, similar to the Project.

The Reduced Project Alternative would also include the use of similar building materials as the Project and would incorporate the use of low-reflectivity materials. Therefore, as with the Project, glare associated with operation of the Reduced Project Alternative would not substantially alter the character of the off-site areas surrounding the Project Sites.

Air Quality

Under the Reduced Project Alternative, excavation and construction would occur, and there would be new energy demand and vehicle trips generated. However, development under this alternative would be reduced in total square footage, building height and mass, and parking facilities. The reduced amount of construction and shorter construction schedule as to Site 1 would result in reduced total air pollutant emissions related to construction (including criteria emissions and toxic air contaminants). However, daily levels of construction activity under the Alternative would be similar to those of the Project, with a shorter overall duration than the Project. Because impacts are based on maximum daily emissions, the Alternative would result in similar significant and unavoidable construction air quality impacts as the Project.

With respect to operational emissions, under the Reduced Project Alternative, trip generation would be reduced. Because mobile source emissions are roughly proportional to trip generation, mobile source emissions would also be reduced under the Reduced Project Alternative. As shown in Table 5-2, Alternative 2 Estimated Daily Operational Emissions, the emissions associated with the Alternative would be lower than Project emissions for all pollutants, and lower than the SCAQMD thresholds of significance. The Reduced Project Alternative's impact would be lower than the Project's less-than-significant impact.

Table 5-2
Alternative 2 Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	25.71	0.31	26.47	<0.01	0.15	0.15
Energy Demand	0.17	1.46	0.91	<0.01	0.11	0.11
Mobile (Motor Vehicles)	10.63	52.00	137.43	0.47	28.35	8.10
Total Alternative 2 Emissions	36.50	53.77	164.81	0.48	28.61	8.36
Total Existing Emissions	16.66	47.73	138.53	0.36	16.64	5.06
Alternative 2 Net Increase Emissions	19.84	6.04	26.28	0.12	11.97	3.30
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	No	No	No	No	No
Project Net Increase Emissions	31.84	8.21	40.25	0.19	21.15	5.76
Difference Between Alternative 2 Net Emissions and Project Net Emissions	(12.0)	(2.17)	(13.97)	(0.07)	(9.18)	(2.46)
Calculation data provided in Appendix 4.2-1 to this Draft EIR. Column totals may not add due to rounding from the model results. Source: EcoTierra Consulting, 2017.						

Cultural Resources

Historical Resources

Under the Reduced Project Alternative, demolition of the existing uses on the Project Sites would occur. The technical report prepared for the proposed Project evaluated the historical significance of the on-site buildings. The historic evaluation concluded that the Project would have no direct impact on historical resources, and a less than significant indirect impact on the Brynmoor Apartments Neon Roof Sign located near Site 3. The Reduced Project Alternative would include the same development on Site 3 as would occur under the Project in the vicinity of the Brynmoor Apartments Neon Roof Sign; however, the setting in Wilshire Center is already characterized by a variety of mid and high-rise buildings that obscure views of the roof sign from Vermont Avenue. As such, similar to the Project, the Reduced Project Alternative would not result in a substantial adverse change to the Brynmoor Apartments Neon Roof Sign or its immediate surroundings to the degree its eligibility as a resource would be materially impaired. Therefore, the Reduced Project Alternative impact would be similar to the less-than-significant impact of the Project.

Archaeological Resources

Similar to the Project, the Reduced Project Alternative would include excavation below existing grade to construct the subterranean levels at each Project Site and, thereby, would create a potential to disturb any previously undiscovered archaeological resources. In the event archaeological resources are encountered, the Reduced Project Alternative would be subject to the same regulatory requirements as the Project to ensure that the resources are properly recovered and evaluated. Therefore, the impact related to archaeological resources under the Reduced Project Alternative would be less-than-significant and similar to that of the Project.

Paleontological Resources

Similar to the Project, the Reduced Project Alternative, would include excavation below existing grade to construct the subterranean levels at each Project Site and, thereby, would create a potential to disturb any previously undiscovered paleontological resources. In the event paleontological resources are encountered, the Reduced Project Alternative would be subject to the same regulatory requirements as the Project to ensure that the resources are properly recovered and evaluated. Therefore, the impact related to paleontological resources under the Reduced Project Alternative would be less-than-significant and similar to that of the Project.

Energy

Electricity

Under the Reduced Project Alternative, new construction would occur on the Project Sites. Similar to the Project, there would be construction and operation of new mixed-use development that could increase the consumption of electricity at the Project Sites. As shown in Table 5-3, the decreased office square footage of the Reduced Project Alternative would demand 6,430,377 KW-Hours/yr, which would be less than the Project's 10,351,023 KW-Hours/yr. Therefore, the impact of the Reduced Project Alternative regarding electricity would be less than the Project's less-than-significant impact.

Table 5-3
Reduced Project Alternative Estimated Electricity Consumption

Facility	Total (kWh /yr)^a
Site 1	9,334,733
Site 2	1,654,642
Site 3	853,235
Total Proposed Electricity Demand for Project Sites	11,842,610
Existing Total Electricity Demand for Project Sites	5,412,233
Net Increase in Electricity Demand	6,430,377
<i>Note: kWh = kilowatt hours</i> ^a <i>CalEEmod version 2016.3.1 was used to calculate the electricity demand based on land use.</i> <i>Source: KPFF, 2017.</i>	

Natural Gas

Under the Reduced Project Alternative, new construction would occur on the Project Site. Similar to the Project, there would be construction and operation of new mixed-use project that could increase the consumption of natural gas at the Project Site. As shown in Table 5-4, the decrease in office square footage of the Reduced Project Alternative would demand 3,659,447 kBTU of natural gas per year, which would be less than the Project's 13,827,325 kBTU of natural gas per year. Therefore, the impact of the Reduced Project Alternative regarding natural gas would be less-than-significant and less than the Project's less-than-significant impact.

Table 5-4
Reduced Project Alternative Estimated Natural Gas Consumption

Facility	Total (kBTU/yr)^a
Site 1	3,096,160
Site 2	2,043,597
Site 3	1,450,560
Total Proposed Natural Gas Demand for Project Sites	6,590,317
Existing Total Natural Gas Demand for Project Sites	2,930,870
Net Increase in Natural Gas Demand	3,659,447
^a <i>CalEEmod version 2016.3.1 was used to calculate the natural gas demand based on land use.</i> <i>Source: KPFF, 2017.</i>	

Transportation Energy

Under the Reduced Project Alternative, excavation and construction would occur, and there would be new energy demand and vehicle trips generated. However, development under the Reduced Project Alternative would be reduced in total square footage, building height and mass, and parking facilities with respect to Site 1. The reduced amount of overall construction would result in reduced energy consumption compared to the Project. Impacts of the Reduced Project Alternative during construction would be less than the Project's less-than-significant impacts overall. Under the Reduced Project Alternative, reduced development would result in fewer vehicle trips, and the increase in fuel

consumption that would occur would be lower than the Project. Impacts of the Reduced Project Alternative during operations would be less than the Project's less-than-significant impacts.

Wasteful, Inefficient, and Unnecessary Consumption of Energy

Under the Reduced Project Alternative, the increase in energy consumption would be lower than the Project. The Project would not result in the inefficient, unnecessary, or wasteful consumption of energy because it would: (1) incorporate Title 24 energy efficiency standards into the Project, (2) provide trip reduction measures, a mixed use project in a High Quality Transit Area, electric vehicle charging stations, and bicycle parking that would maximize the potential for mobility and accessibility for people and reduce the overall consumption of fuel required for transportation, and (3) incorporate renewable energy through the generating portfolio of LADWP, coupled with the inclusion of solar generating infrastructure within Site 1. The Reduced Project would also include these measures, and would therefore not result in the inefficient, unnecessary, or wasteful consumption of energy, similar to the Project.

Geology and Soils

Under the Reduced Project Alternative, new land uses would be constructed that would be subject to potential impacts associated with seismic fault rupture, strong seismic ground shaking, liquefaction, landside/lateral spreading, seismic-induced settlement, subsidence soil stability, expansive soils and acceleration of geologic hazards. Because the Reduced Project proposes less office space, fewer people would be exposed to seismic hazards under the Reduced Project. Although there would be an increase in people on the Project Sites in comparison to the existing conditions under the Alternative, the Alternative would employ the same construction activities on the same Project Sites, and, similar to the Project, would not exacerbate any existing geotechnical hazards. Thus, this impact would be similar to the Project. Additionally, similar to the Project, the Project footprint would cover the Project Sites and grading and excavation would occur over the Project Sites. Therefore, the impact from erosion would be similar to the less-than-significant impact under the Project. Lastly, the impact of the Reduced Project Alternative with respect to alteration of landforms would be the same as those of the Project, which would have no impact. Overall, the less-than-significant impact of the Reduced Project Alternative with respect to geology and soils would be similar to the Project's less-than-significant impact.

Greenhouse Gas Emissions

Under the Reduced Project Alternative, grading, construction activities, and development of a new mixed-use project would occur. Additionally, new vehicle trips would be generated and a new set of buildings requiring energy, water, etc. would be constructed. The Reduced Project Alternative would construct smaller buildings and generate fewer vehicle trips (as to Site 1), resulting in reduced GHG emissions during both construction and operations at the Project Sites. In addition, the Reduced Project Alternative would be consistent with GHG plans, similar to the Project. Therefore, the less-than-significant impact of the Reduced Project Alternative with respect to GHG emissions would be similar to the Project's less-than-significant impact.

Hazards and Hazardous Materials

Similar to the Project, demolition of existing structures from the Project Sites would occur which would involve removal of all asbestos-, lead-, and PCB-containing materials in accordance with applicable regulatory requirements. Further, similar to the Project, remediation or abatement would be required before any disturbance occurs. In addition, Cal-OSHA has established limits of exposure to lead contained

in dusts and fumes through California Code of Regulations, Title 8, Section 1532.1. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code. Furthermore, any materials found to contain PCBs must be removed and disposed of in accordance with all applicable local, State and federal regulations including, but not limited to California Code of Regulations, Title 22, and EPA 40 CFR. Compliance with these regulatory requirements would minimize risks associated with the presence of ACMs, LBPs, PCBs, and methane. Therefore, the impact of the Alternative would be similar to the Project's less-than-significant impact.

Routine cleaning supplies would be used on-site; however, usage is subject to County, State and federal requirements that minimize exposure to people and ensure safe use and storage. This alternative's impact would be incrementally less than the Project's less-than-significant impact due to a smaller development.

The Project Sites are listed as having historical uses on-site. Based on information gathered during the Phase I ESA for Site 1, Site 2 and Site 3, and follow up information provided to Site 1, no RECs, CRECS, or HRECs have been found in connection with the Sites. Therefore, no hazardous material site pursuant to Government Code Section 65962.5 is located on the Project Sites, and the Project would not create a significant hazard to the public or the environment. Thus, the impact for the Reduced Project Alternative would be similar to the Project's less-than-significant impact.

No road closures are anticipated for the Reduced Project Alternative and impacts would be less-than-significant. For Reduced Project Alternative operation, a project-specific emergency response plan would be submitted to the LAFD during the building permit process. Moreover, the Reduced Project Alternative would not cause permanent alterations to vehicle circulation routes and patterns, or impede public access or travel upon public rights-of-way and impacts would be less-than-significant. Thus, the impact with respect to hazardous features under the Reduced Project Alternative would be similar to the Project's less-than-significant impact.

Hydrology and Water Quality

Under the Reduced Project Alternative, grading, excavation, construction activities, and development of new land uses over the entire Project Sites would occur. Similar to the Project, the Reduced Project would be required to implement BMPs and comply with the City's LID Ordinance. Therefore, similar to the Project, the Reduced Project Alternative would not increase the amount of storm water leaving the Project Sites and would improve the quality of surface runoff from the Project Sites over the existing conditions. Similar to the Project, the Reduced Project Alternative would not be located in a flood plain, flood hazard area, nor would it impact surface or groundwater movement or groundwater contamination. The Reduced Project Alternative is not located within a 100-year flood plain,¹ however, the Project Sites are located within the potential inundation area of the Hollywood Reservoir.² Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, dams and reservoirs are monitored during storms and measures are

¹ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: March 27, 2017.

² City of Los Angeles Department of City Planning, *Safety Element of the Los Angeles City General Plan, Adopted November 26, 1996, Exhibit G: Inundation & Tsunami Hazard Areas in the City of Los Angeles*.

instituted in the event of potential overflow. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. Further, in the event of a dam failure at the Hollywood Reservoir, existing urban development north of the Project, including the US 101 Freeway, would serve as a physical barrier between the upstream portion of the reservoirs/dams and the Project Sites. Therefore, under the Reduced Project Alternative, the risk of flooding from inundation by dam failure is considered low and impacts would be less-than-significant. Overall, the impacts to hydrology and water quality from the Reduced Project Alternative would be similar to the Project's less-than-significant impact.

Land Use and Planning

Under the Reduced Project Alternative, the Project Sites would be developed. The Project area includes other multi-family and office uses and the project use would be similar to many of the surrounding land uses. The Reduced Project Alternative would increase residential units and office uses and would integrate with existing residential and commercial uses in the area. The Reduced Project Alternative would be designed with pedestrian and bicycle facilities. Accordingly, the Reduced Project Alternative would not divide the existing community and the impact would be similar to the Project's less-than-significant impact.

The Reduced Project Alternative would implement applicable regional or local land use plans and policies for the Project Site, including SB 375, SCAG, RCP, RTP/SCS, Southern California Compass Blueprint Growth Vision Report, County of Los Angeles General Plan, City of Los Angeles General Plan Framework Element, the Wilshire Community Plan, Plan for A Healthy Los Angeles, City of Los Angeles Adaptive Reuse Incentive Areas Specific Plan, the Walkability Checklist, and Wilshire Center/Koreatown Redevelopment Plan. The Reduced Project Alternative would implement the principles of City and regional land use planning documents and, similar to the Project, would be consistent with the above land use plans.

Similar to the Project, the Reduced Project Alternative on Sites 1 and 3 would not be subject to City zoning requirements. The Reduced Project Alternative on Site 2 would be the same as the Project and, like the Project, would require the same land use approvals for changes to the existing zoning of Site 2. With implementation of entitlements (assuming new Site 2 construction), the Project would be consistent with the existing zoning designations for uses, height, density, and FAR, and the impact would be similar to the Project's less-than-significant impact.

The Reduced Project Alternative would develop the same land uses on the Project Sites as the Project, but would construct a shorter building on Site 1 with a reduced total square footage, building height and mass, and parking facilities in comparison to the Project. Therefore, the Reduced Project Alternative would have a similar impact on land use compared to the less-than-significant impact under the Project because of the similar mix of uses that would be included under the Alternative.

Noise

Similar to the Project, the Reduced Project Alternative would require grading and construction which would generate noise and vibration during construction. However, the design and configuration of development under this Alternative would be reduced in total square footage, building height and mass, and parking facilities as to Site 1. However, the same construction equipment and activities would be associated with the Reduced Project Alternative, only with reduced duration at least as to Site 1. Thus, the Reduced Project Alternative would result in construction noise levels and vibration similar to those of the Project, although the duration would be less at least as to Site 1. Construction noise impacts under

the Reduced Project Alternative would be similar to the significant and unavoidable construction noise impacts and similar to the less than significant construction vibration impacts of the Project.

Similar to the Project, the Reduced Project Alternative would create some vibration during operation on the Project Sites. However, this vibration would be incrementally less than the Project due to the smaller project size. In addition, noise from outdoor spaces during operation would be incrementally less, than Project due to the reduced size of the Project and associated on-site employment. Similar to the Project, new vehicle trips would be generated along study area roadways. This increase in roadway noise would be incrementally less than Project's less-than-significant impact. Therefore, the Reduced Project's operational noise impact would be less than the less-than-significant impact under the Project.

Population, Housing, and Employment

The construction duration and activities to develop this Alternative would be less than the Project. As such, the number of construction workers and the housing, population, and employment impact associated with the construction of the Reduced Project Alternative would be lower than the Project's less-than-significant impact.

The Project is located in an urbanized area of the City. Similar to the Project, the Reduced Project Alternative does not involve the extension of roadways or infrastructure to an undeveloped area and the Alternative would be supported by the existing infrastructure. As such, the indirect population growth impact would be similar to that of the Project, and less-than-significant.

The Project Sites are currently developed with multiple structures. The Reduced Project Alternative would only accommodate the relocation of the 1,223 DMH and WDACS employees from Site 2 to Site 1. Employment generation on Sites 2 and 3 would be the same as that of the Project. As shown in Table 5-5, 102 fewer employees would be accommodated under the Reduced Project Alternative as compared to the Project. Similar to the Project, the Reduced Project Alternative could result in induced housing growth in the vicinity of the Project Sites as employees may choose to relocate closer to their jobs. However, neither the Reduced Project Alternative's nor the Project's potential to induce housing growth from the employees on the Project Sites would be significant since the primary employment effect of the Project is the relocation of existing County employees, coupled with the readily available local labor force to fill new positions, existing transit accessibility to the Project Sites, the potential for County employees to rent the proposed new residential units, and the existing and forthcoming housing stock available on the Project Sites.

Table 5-5
Reduced Project Alternative Estimated Permanent Employment Generation

Type of Development	Size	Employee Generation Factor ^a	Total Employees
Site 1			
Office	296,000 sf	N/A	1,223
Retail	10,000 sf	2.71 employees/1,000 sf	27
<i>Site 1 Subtotal of Proposed Employment Generation</i>			<i>1,250</i>
<i>Site 1 Existing Employment</i>			<i>93</i>
<i>Site 1 Employment Generation</i>			<i>1,157</i>
Site 2			
Apartments	246 units	N/A	<10 ^b
Retail	7,500 sf	2.71 employees/1,000 sf	20
<i>Site 2 Subtotal of Proposed Employment Generation</i>			<i>30</i>
<i>Site 2 Existing Employment</i>			<i>1,223</i>
<i>Site 2 Net Employment Generation</i>			<i>(1,193)</i>
Site 3			
Senior Affordable Housing	72 units	N/A	<10 ^b
Community Recreation Center	13,200 sf	2.71 employees/1,000 sf	36
<i>Site 3 Subtotal of Proposed Employment Generation</i>			<i>46</i>
<i>Site 3 Existing Employment</i>			<i>112</i>
<i>Site 3 Net Employment Generation</i>			<i>(66)</i>
<i>Subtotal Proposed Employment Generation</i>			<i>1,326</i>
<i>Existing Employment Generation</i>			<i>1,428</i>
Total Net Decrease in Employment Generation			(102)
^a Los Angeles Unified School District, Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, page 15, March 2014.			
^b The School Fee Justification Studies for Los Angeles Unified School District do not include employee generation factors for multi-family residential uses. The small number of employees (estimated at less than 10) was assumed to be required to provide management and maintenance for the residential units.			
Source: EcoTierra Consulting, 2017.			

The Reduced Project Alternative involves the construction of approximately 246 residential units on Sites 2 and 3, similar to the Project. Similar to the Project, the residential development under the Reduced Density Alternative would be within the SCAG forecasts for housing unit growth. Similar to the Project, the Reduced Project Alternative would accommodate approximately 618 residents. Similar to the Project, the addition of these new residents would be within the SCAG population growth forecast for the City. Because the population growth associated with this Alternative would be within the projected growth for the citywide SCAG projections, similar to the Project, the impact of the Reduced Project Alternative relative to population growth would be less-than-significant.

Public Services

Fire

The design, configuration, and operation of the Reduced Project Alternative would be comparable to the Project. Similar to the Project there would be approximately 618 new permanent residents under the Reduced Project Alternative; however, there would be fewer jobs than currently exist on the Project Sites. Similar to the Project, the Reduced Project Alternative would be within the current fire response distance, provide adequate fire flow and access, and meet building fire safety regulations. In addition, no new or

expanded facilities would be needed. Due to an overall decrease in on-site employees, the Reduced Project Alternative would have lower impacts than the Project's less-than-significant impacts related to fire protection services.

Police

The design, configuration, and operation of the Reduced Project Alternative would be comparable to the Project. Similar to the Project there would approximately 618 new permanent residents under the Reduced Project Alternative, however, there would be fewer jobs, than currently exist on the Project Site. The current officer to population ratio within the Olympic Community Station service area is one officer per approximately 851 residents ($200,000 \text{ division population} \div 235 \text{ officers} = \text{approximately } 851$), the addition of up to 618 residents could create demand for one additional officer. Since the Olympic Community Police Station currently accommodates approximately 250 personnel, it is not anticipated that this level of additional staffing would require the enlargement or the construction of a police station, the construction of which would cause significant environmental impacts. As it is highly unlikely that the increase in the officer to population ratio would require the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the impact would be less-than-significant. The Project would incorporate crime prevention measures into Project design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional lighting to enhance public safety. The Project would include nighttime security lighting and secure parking facilities. No new or expanded police facilities would be needed to accommodate the Reduced Project Alternative. Due to an overall decrease in on-site employment, the Reduced Project Alternative would have lower impacts than the Project's less-than-significant impacts related to police protection services.

Schools

As shown in Table 5-6 (Reduced Project Alternative Student Generation), this Alternative would generate an increase of approximately 152 students over existing conditions, which is less than the 364 students over existing conditions that would be generated by the Project. Similar to the Project, the increase of approximately 152 new students to LAUSD schools would contribute to the projected seating shortage or overcrowding at all three schools serving the Project Site. Further, pursuant to SB 50, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate this Alternative's direct and indirect impacts on schools. Therefore, impacts of the Reduced Project Alternative would be similar to the Project's less-than-significant impact with respect to schools.

Table 5-6
Reduced Project Alternative Student Generation

Land Use	Size	Employees per Square Foot ^a	Students per Employee ^a	Total
Existing Uses				
Site 1				
County Office (Occupied)	30,788 sf	93 ^b	0.2247	21
County Office (Vacant)	13,325 sf	--	--	--
<i>Site 1 Subtotal Existing Students</i>				<i>21</i>
Site 2				
County Office (Occupied)	154,793 sf	973 ^b	0.2247	219
County Office (Occupied)	52,000 sf	250 ^b	0.2247	56

Table 5-6
Reduced Project Alternative Student Generation

Land Use	Size	Employees per Square Foot^a	Students per Employee^a	Total
<i>Site 2 Subtotal Existing Students</i>				<i>275</i>
Site 3				
Office	29,292 sf	112 ^b	0.2247	25
<i>Site 3 Subtotal Existing Students</i>				<i>25</i>
Total Existing Students				321
Proposed Uses				
Site 1				
Office	296,000 sf	1,223 employees	0.2247	275
Retail	10,000 sf	2.71 employees/1,000 sf	0.2247	6
<i>Site 1 Subtotal of Proposed Student Generation</i>				<i>281</i>
<i>Site 1 Existing Students & Relocation of County Employees from Site 2</i>				<i>296</i>
Site 1 Net Student Generation				(15)
Site 2				
Apartments	256 units	N/A	0.7 ^c	179
Retail	7,500 sf	2.71 employees/1,000 sf	0.2247	5
Site 2 Net Student Generation				184
Site 3				
Senior Affordable Housing	72 units	N/A	N/A	0.00
Community Recreation Center	13,200 Sf	2.71 employees/1,000 sf	0.2247	8
<i>Site 3 Subtotal of Proposed Student Generation</i>				<i>8</i>
<i>Site 3 Existing Students</i>				<i>25</i>
Site 3 Net Student Generation				(17)
<i>Subtotal Proposed Student Generation</i>				<i>473</i>
Existing Student Generation				321
Total Net Increase in Student Generation				152
<i>Note: sf = square feet</i> ^a Los Angeles Unified School District, Residential Development School Fee Justification Study, March 2014. ^b Employee counts provided by the County of Los Angeles. ^c Students per household. Source (table): EcoTierra Consulting, 2017.				

Libraries

Since the Reduced Project Alternative and the Project would generate the same number of residents, the Reduced Project Alternative would have an impact similar to the Project's less-than-significant impacts related to library facilities.

Recreation

The Reduced Project Alternative and the Project would generate the same number of residents. Typically, residential developments have the greatest potential to result in impacts to parks and recreation facilities. Similar to the Project, the Reduced Project Alternative would be required to provide open space and landscaping and would provide sufficient open space to meet the City's requirements on Site 2. In addition, the community recreation center would be provided on Site 3 under the Alternative. The

Reduced Project Alternative would have an impact similar to the Project's less-than-significant impact related to parks and recreational facilities.

Transportation and Traffic

Under the Reduced Project Alternative, demolition and development would occur at the Project Sites. However, construction traffic would be reduced slightly from the Project due to the reduced Project that would be constructed and decreased duration of construction. The impact of the Reduced Project Alternative construction traffic would thus be lower than the Project's less-than-significant construction traffic impact.

Under the Reduced Project Alternative, traffic conditions would change in the vicinity. Due to the decrease in the size of development, the Reduced Project Alternative would generate fewer vehicle trips. Similar to the Project, growth in traffic due to the combined effects of continuing development, intensification of development, and related projects would result in reduced level of service at study intersections located in the vicinity of the Reduced Project Alternative. Trip generation of the Reduced Project Alternative would be lower than the Project as shown in Table 5-7. The Reduced Project Alternative would generate an estimated 1,839 daily trips, 94 a.m. peak hour trips, and 131 p.m. peak hour trips, compared to 3,215 daily trips, 320 a.m. peak hour trips, and 414 p.m. peak hour trips under the Project.

Table 5- 7
Project Trip Generation Estimates
Reduced Project Alternative

Land Use	ITE Land Use	Size	Daily	Morning Peak Hour			Afternoon Peak Hour		
				In	Out	Total	In	Out	Total
Proposed									
Site 1									
269,000 sf office building	[a]	1,223 employees	1,786	288	6	294	7	360	367
10,000 sf ground-floor retail	820	10,000 sf	429	6	4	10	18	19	37
Internal Capture Adjustment - 10%			-43	-1	0	-1	-2	-2	-4
Transit/HOV Adjustment - 15%			-58	-1	0	-1	-2	-3	-5
Pass-by Trip Adjustment - 50%			-164	-2	-2	-4	-7	-7	-14
Site 2									
172-unit apartment (adapted from office)	220	172 units	1,144	18	70	88	70	37	107
Transit/HOV Adjustment - 15%			-172	-3	-10	-13	-11	-5	-16
4,100 sf ground-floor retail	820	4,100 sf	176	2	2	4	7	8	15
Internal Capture Adjustment - 10%			-18	0	0	0	-1	-1	-2
Transit/HOV Adjustment - 15%			-24	-1	0	-1	-1	-1	-2
Pass-by Trip Adjustment - 50%			-67	-1	-1	-2	-3	-3	-6
74-unit apartment building	220	74 units	492	8	30	38	30	16	46
Transit/HOV Adjustment - 15%			-74	-1	-5	-6	-5	-2	-7
3,400 sf ground-floor retail	820	3,400 sf	146	2	1	3	6	7	13
Internal Capture Adjustment - 10%			-15	0	0	0	0	-1	-1

Table 5- 7
Project Trip Generation Estimates
Reduced Project Alternative

Land Use	ITE Land Use	Size	Daily	Morning Peak Hour			Afternoon Peak Hour		
				In	Out	Total	In	Out	Total
Transit/HOV Adjustment - 15%			-20	0	0	0	-1	-1	-2
Pass-by Trip Adjustment - 50%			-56	-1	-1	-2	-2	-3	-5
Site 3									
72-unit senior affordable housing	252	72 units	122	3	6	9	6	5	11
13,200 sf community recreation center	495	13,200 sf	446	18	9	27	18	18	36
Transit/HOV Adjustment - 15%			-67	-3	-1	-4	-2	-3	-5
Walk-In Adjustment - 10%			-38	-1	-1	-2	-1	-2	-3
Proposed Total			3,925	330	107	437	124	436	560
Removed									
Site 1									
510 S Vermont Avenue (30,788 sf)	^a	93 employees	136	22	0	22	1	27	28
523 S Vermont Avenue (13,325 sf)	^a	(vacant)	0	0	0	0	0	0	0
Site 2 (employees moved to Site 1)									
550 S Vermont Avenue (154,793 sf)	^a	973 employees	1,421	229	5	234	6	286	292
3175 W 6th Street (52,000 sf)	^a	250 employees	365	59	1	60	1	74	75
Site 3									
433 S Vermont Avenue (29,292 sf)	^a	112 employees	164	26	1	27	1	33	34
Removed Total			2,086	336	7	343	9	420	429
Net Reduced Project Alternative Trip Generation			1,839	-6	100	94	115	16	131
Project Net Trip Generation			3,215	216	104	320	121	293	414
Difference Between Net Alternative 2 Trip Generation and Project Net Trip Generation			-1376	-222	-4	-226	-6	-277	-283
sf square-feet									
^a Empirical office trip generation rate as shown in Table 10 of the Traffic Study included as Appendix 4.14-1 of this Draft EIR.									
Source: Gibson Transportation Consulting, Inc., 2017.									

Implementation of the Reduced Project Alternative would result in significant project traffic impacts at five intersections, as shown in Table 5-8. The same traffic mitigation measures would be necessary for mitigating the existing plus project traffic impacts for Reduced Project Alternative. With implementation of mitigation measures, the Reduced Project Alternative would still have a significant and unavoidable impact at one intersection, Vermont and Olympic Boulevard. Therefore, the Reduced Project Alternative

Table 5-8
Buildout Year 2023 With Alternative 2 With Mitigation Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Buildout without Project Conditions		Buildout with Alternative 2 Conditions				Buildout with Alternative 2 with Mitigation Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
1.	Vermont Avenue &	A.M.	0.751	C	0.759	C	0.008	NO	0.759	C	0.008	NO
	US 101 Northbound On-ramp	P.M.	0.653	B	0.657	B	0.004	NO	0.654	B	0.001	NO
2.	Vermont Avenue &	A.M.	0.502	A	0.504	A	0.002	NO	0.503	A	0.001	NO
	US 101 Northbound Off-ramp	P.M.	0.552	A	0.555	A	0.003	NO	0.555	A	0.003	NO
3.	US 101 Southbound Off-ramp / New	A.M.	0.356	A	0.356	A	0.000	NO	0.355	A	-0.001	NO
	Hampshire Street & Rosewood Avenue	P.M.	0.431	A	0.436	A	0.005	NO	0.436	A	0.005	NO
4.	Vermont Avenue &	A.M.	0.636	B	0.635	B	-0.001	NO	0.633	B	-0.003	NO
	Rosewood Avenue	P.M.	0.761	C	0.769	C	0.008	NO	0.769	C	0.008	NO
5.	Vermont Avenue & Oakwood Avenue /	A.M.	0.709	C	0.715	C	0.006	NO	0.715	C	0.006	NO
	US 101 Southbound On-ramp	P.M.	0.753	C	0.760	C	0.007	NO	0.760	C	0.007	NO
6.	Vermont Avenue &	A.M.	0.862	D	0.868	D	0.006	NO	0.868	D	0.006	NO
	Beverly Boulevard	P.M.	0.935	E	0.936	E	0.001	NO	0.934	E	-0.001	NO
7.	Vermont Avenue &	A.M.	0.654	B	0.660	B	0.006	NO	0.660	B	0.006	NO
	1st Street	P.M.	0.793	C	0.801	D	0.008	NO	0.801	D	0.008	NO
8.	Western Avenue &	A.M.	0.853	D	0.853	D	0.000	NO	0.853	D	0.000	NO
	3rd Street	P.M.	0.880	D	0.882	D	0.002	NO	0.882	D	0.002	NO
9.	Normandie Avenue &	A.M.	0.772	C	0.773	C	0.001	NO	0.772	C	0.000	NO
	3rd Street	P.M.	0.769	C	0.771	C	0.002	NO	0.771	C	0.002	NO

Table 5-8
Buildout Year 2023 With Alternative 2 With Mitigation Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Buildout without Project Conditions	LOS	Buildout with Alternative 2 Conditions	LOS	Δ V/C	Impact	Buildout with Alternative 2 with Mitigation Conditions	LOS	Δ V/C	Impact
			V/C		V/C				V/C			
10. ^a	Vermont Avenue & 3rd Street	A.M.	0.948	E	0.958	E	0.010	YES	0.947	E	-0.001	NO
		P.M.	0.898	D	0.911	E	0.013	YES	0.899	D	0.001	NO
11.	Virgil Avenue & 3rd Street	A.M.	0.831	D	0.831	D	0.000	NO	0.831	D	0.000	NO
		P.M.	0.858	D	0.868	D	0.010	NO	0.867	D	0.009	NO
12.	Rampart Boulevard & 3rd Street	A.M.	0.752	C	0.754	C	0.002	NO	0.754	C	0.002	NO
		P.M.	0.833	D	0.834	D	0.001	NO	0.833	D	0.000	NO
13. ^a	Vermont Avenue & 4th Street	A.M.	0.707	C	0.695	B	-0.012	NO	0.685	B	-0.022	NO
		P.M.	0.695	B	0.735	C	0.040	YES	0.721	C	0.026	NO
14.	Shatto Place & 4th Street	A.M.	0.489	A	0.454	A	-0.035	NO	0.454	A	-0.035	NO
		P.M.	0.445	A	0.455	A	0.010	NO	0.455	A	0.010	NO
15. ^a	Vermont Avenue & 5th Street	A.M.	0.510	A	0.521	A	0.011	NO	0.508	A	-0.002	NO
		P.M.	0.589	A	0.597	A	0.008	NO	0.585	A	-0.004	NO
16.	Western Avenue & 6th Street	A.M.	0.615	B	0.617	B	0.002	NO	0.617	B	0.002	NO
		P.M.	0.654	B	0.655	B	0.001	NO	0.655	B	0.001	NO
17.	Normandie Avenue & 6th Street	A.M.	0.793	C	0.795	C	0.002	NO	0.795	C	0.002	NO
		P.M.	0.735	C	0.735	C	0.000	NO	0.735	C	0.000	NO
18. ^a	Vermont Avenue & 6th Street	A.M.	0.851	D	0.881	D	0.030	YES	0.868	D	0.017	NO
		P.M.	0.820	D	0.835	D	0.015	NO	0.820	D	0.000	NO
19.	Shatto Place & 6th Street	A.M.	0.593	A	0.597	A	0.004	NO	0.597	A	0.004	NO
		P.M.	0.611	B	0.627	B	0.016	NO	0.622	B	0.011	NO
20.	Rampart Boulevard & 6th Street	A.M.	0.861	D	0.861	D	0.000	NO	0.861	D	0.000	NO
		P.M.	0.962	E	0.965	E	0.003	NO	0.965	E	0.003	NO
21.	Alvarado Street &	A.M.	0.877	D	0.879	D	0.002	NO	0.879	D	0.002	NO

Table 5-8
Buildout Year 2023 With Alternative 2 With Mitigation Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Buildout without Project Conditions		Buildout with Alternative 2 Conditions				Buildout with Alternative 2 with Mitigation Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
	6th Street	P.M.	0.782	C	0.785	C	0.003	NO	0.785	C	0.003	NO
22.	Western Avenue &	A.M.	1.052	F	1.054	F	0.002	NO	1.054	F	0.002	NO
	Wilshire Boulevard	P.M.	1.161	F	1.164	F	0.003	NO	1.164	F	0.003	NO
23.	Normandie Avenue &	A.M.	0.912	E	0.914	E	0.002	NO	0.914	E	0.002	NO
	Wilshire Boulevard	P.M.	1.019	F	1.019	F	0.000	NO	1.019	F	0.000	NO
24.	Vermont Avenue &	A.M.	1.083	F	1.093	F	0.010	YES	1.091	F	0.008	NO
	Wilshire Boulevard	P.M.	1.069	F	1.080	F	0.011	YES	1.077	F	0.008	NO
25.	Hoover Street &	A.M.	0.844	D	0.845	D	0.001	NO	0.844	D	0.000	NO
	Wilshire Boulevard	P.M.	0.821	D	0.819	D	-0.002	NO	0.818	D	-0.003	NO
26.	Alvarado Street &	A.M.	0.909	E	0.912	E	0.003	NO	0.912	E	0.003	NO
	Wilshire Boulevard	P.M.	0.929	E	0.933	E	0.004	NO	0.933	E	0.004	NO
27.	Vermont Avenue &	A.M.	0.737	C	0.745	C	0.008	NO	0.745	C	0.008	NO
	7th Street	P.M.	0.809	D	0.817	D	0.008	NO	0.817	D	0.008	NO
28.	Vermont Avenue &	A.M.	0.781	C	0.781	C	0.000	NO	0.779	C	-0.002	NO
	8th Street	P.M.	0.822	D	0.825	D	0.003	NO	0.822	D	0.000	NO
29.	Hoover Street &	A.M.	0.956	E	0.954	E	-0.002	NO	0.954	E	-0.002	NO
	8th Street	P.M.	1.012	F	1.014	F	0.002	NO	1.014	F	0.002	NO
30.	Vermont Avenue &	A.M.	1.006	F	1.005	F	-0.001	NO	1.005	F	-0.001	NO
	Olympic Boulevard	P.M.	1.053	F	1.064	F	0.011	YES	1.063	F	0.010	YES
31.	Vermont Avenue &	A.M.	0.888	D	0.887	D	-0.001	NO	0.886	D	-0.002	NO
	Pico Boulevard	P.M.	0.875	D	0.882	D	0.007	NO	0.882	D	0.007	NO
32.	Vermont Avenue &	A.M.	0.897	D	0.896	D	-0.001	NO	0.895	D	-0.002	NO
	Venice Boulevard	P.M.	0.944	E	0.949	E	0.005	NO	0.949	E	0.005	NO

Table 5-8
Buildout Year 2023 With Alternative 2 With Mitigation Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Buildout without Project Conditions		Buildout with Alternative 2 Conditions				Buildout with Alternative 2 with Mitigation Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
33.	Vermont Avenue &	A.M.	0.971	E	0.976	E	0.005	NO	0.976	E	0.005	NO
	Washington Boulevard	P.M.	1.088	F	1.088	F	0.000	NO	1.086	F	-0.002	NO
34.	Vermont Avenue &	A.M.	0.862	D	0.861	D	-0.001	NO	0.858	D	-0.004	NO
	I-10 Westbound Ramps	P.M.	0.793	C	0.798	C	0.005	NO	0.796	C	0.003	NO
35.	Vermont Avenue &	A.M.	0.885	D	0.887	D	0.002	NO	0.886	D	0.001	NO
	I-10 Eastbound Ramps	P.M.	1.002	F	1.008	F	0.006	NO	1.007	F	0.005	NO
36.	Vermont Avenue &	A.M.	1.000	E	1.000	E	0.000	NO	1.000	E	0.000	NO
	Adams Boulevard	P.M.	0.847	D	0.848	D	0.001	NO	0.848	D	0.001	NO
37.	Hoover Street &	A.M.	1.041	F	1.043	F	0.002	NO	1.042	F	0.001	NO
	Olympic Boulevard	P.M.	1.079	F	1.077	F	-0.002	NO	1.077	F	-0.002	NO
38.	Alvarado Street &	A.M.	0.843	D	0.843	D	0.000	NO	0.843	D	0.000	NO
	Olympic Boulevard	P.M.	0.930	E	0.930	E	0.000	NO	0.930	E	0.000	NO

^a Conditions with mitigation include 0.01 V/C credit at this location for implementation of Transportation Systems Management ("TSM") improvements as described in Chapter 7 of the Traffic Study included as Appendix 4.14-1 of this Draft EIR.

Source: Gibson Transportation Consulting, Inc., 2017.

would have a lower impact than the Project, which would result in 10 unmitigated peak hours impacts at seven intersections. Nevertheless, the impact of the Alternative would still be significant and unavoidable.

Parking supply for the Reduced Project Alternative would be less than the Project. CEQA provides that parking impacts for this Project shall not be considered a significant impact on the environment because it is a qualifying infill Project which is both mixed use residential and an employment center in a Transit Priority Area. The impact of the Reduced Project Alternative would be lower than the Project's less-than-significant impact with respect to the Congestion Management Program or Caltrans freeway impact procedure because of lower trip generation. Because the Reduced Project Alternative would have a similar layout for the Project Sites, would provide similar bicycle and pedestrian facilities, and would also include traffic mitigations, it would also provide adequate emergency access, and would not conflict with alternative transportation policies and plans. Therefore, the Reduced Project Alternative would have a less-than-significant impact similar to that of the Project.

A total of 115 related projects are dispersed throughout the Project area. Although the Reduced Project Alternative would result in less-than-significant construction-related traffic impacts, similar to the Project, cumulative construction impacts would be significant and unavoidable due to the potential for concurrent and/or overlapping construction activities of the related projects and the Reduced Project Alternative. The Reduced Project Alternative's contribution to this significant cumulative impact would be cumulatively considerable. Therefore, the cumulative construction traffic impact of the Reduced Project Alternative would still be significant and unavoidable, similar to that of the Project.

Tribal Cultural Resources

Similar to the Project, the Reduced Project Alternative, would include excavation below existing grade to construct the subterranean levels at each Project Site and, thereby, create a potential to disturb any previously undiscovered tribal cultural resources. In the event tribal cultural resources are encountered, the Reduced Project Alternative would be subject to the same regulatory requirements as the Project to ensure that the resources are properly recovered and evaluated. Therefore, the impact related to tribal cultural resources under the Reduced Project Alternative would be less-than-significant and similar to that of the Project.

Utilities and Service Systems

Wastewater

Under the Reduced Project Alternative, development would occur on the Project Sites and a new mixed use project would increase the generation of wastewater at the Project Sites from existing conditions. As shown in Table 5-9, due to the decrease in units and floor area, the Reduced Project Alternative would generate 62,013 gallons of wastewater, which would be less than 90,154 gallons of wastewater per day generated by the Project. Therefore, the impact of the Reduced Project Alternative regarding wastewater would be less than the Project's less-than-significant impact.

Table 5-9
Estimated Reduced Project Alternative Wastewater Generation

Connection	Existing Use Description	Average Daily Flow (gpd/unit) ^e	Quantity	Average Daily Sewer Demand (gpd)
Site 1				
10-inch City of L.A. Sewer Main-Vermont Avenue	Retail	25/1,000 gsf	6,350 gsf	159
	Restaurant ^c	300/1,000 gsf	3,650 gsf	1,095
	Auto Parking	--	800,002 gsf	0 ^a
	Office ^d	170/1,000 gsf	296,000 gsf	50,320
<i>Subtotal of Proposed Wastewater Generation for Site 1</i>				51,574
Site 2				
10-inch City of L.A. Sewer Main-Vermont Avenue	Retail	25/1,000 gsf	7,500 gsf	188
	Lounge	50/1,000 gsf	11,125 gsf	556
	Residential Apt: Studio	75/du	110 du	8,250
	Residential Apt: 1 Bed	110/du	84 du	9,240
	Residential Apt: 2 Bed	150/du	52 du	7,800
	Pool	-	4,275 cu.ft.	194 ^f
	Auto Parking	--	116,324 gsf	0 ^a
<i>Subtotal of Proposed Wastewater Generation for Site 2</i>				26,228
Site 3				
20-inch City of L.A. Sewer Main-Vermont Avenue	Community Recreation Center	3/occupant	3,105 ^g	9,315
	Residential Apt: 1 Bed	110/du	57	6,270
	Residential Apt: 2 Bed	150/du	15	2,250
	Auto Parking	--	51,591 gsf	0 ^a
<i>Subtotal of Proposed Wastewater Generation for Site 3</i>				17,835
Total of Proposed Wastewater Generation				95,637
Total Existing Wastewater Generation				33,624
Net Increase				62,013
^a Parking structures are only recognized by BOS to have sewer generation if restrooms are located within the structure. ^b Lounge used in place of amenity space. ^c Restaurant used in place of cafeteria. ^d With the exception retail and restaurant, the office includes all miscellaneous uses within the building (circulation space, lobbies, storage rooms, amenity space). ^e The average daily flow based on City of Los Angeles sewer generation factors. http://www.ci.la.ca.us/ead/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf . ^f Assumes the pool to be filled twice a year. ^g Community Recreation Center Quantity is defined by City of Los Angeles Bureau of Engineering, Sewer Capacity Availability Request (SCAR) dated December 15, 2016 as having a quantity of 3,105, which is utilized to calculate the sewage generation rate of 3 gallons per day per occupant. Appendix 4.16-1 Utility Infrastructure Technical Report. Source: KPFF, 2017.				

Water

Under the Reduced Project Alternative, the demand for water during construction would be similar to the Project based on similar construction activities. Under the Reduced Project Alternative, development would occur on the Project Sites and the new mixed-use project would increase the use of water at the Project Sites from existing conditions. As shown in Table 5-10, due to the decrease in units and square footage, the Reduced Project Alternative would use 72,545 net gallons of water per day, which would be less than the 91,421 net gallons of water per day used by the Project. Therefore, the less-than-significant impact of the Reduced Project Alternative would be less than the Project's less-than-significant impact.

Table 5-10
Reduced Project Alternative Water Demand

Proposed Uses^a	Quantity	Water Use Factor^c (gpd/unit)	Base Demand	Required Ordinance Water Savings^d (gpd)	Proposed Water Demand (gpd)
Office	296,000 sf	0.12	35,520		
Retail	6,350 sf	0.025	159		
Restaurant: Take Out	3,650 sf	0.30	1,095		
Base Demand Adjustment ^e			1,480		
Site 1 Total			38,254	3,124	35,130
Residential: Apt. Studio	110 du	75	8,250		
Residential: Apt. 1 bd	84 du	110	9,240		
Residential: Apt. 2 bd	52 du	150	7,800		
Lounge	11,125 sf	0.05	556		
Retail	7,500 sf	0.025	188		
Pool	1,058 sf		99		
Base Demand Adjustment ^e			2,732		
Site 2 Total			28,865	7,993	20,872
Community Recreation Center	3,105 occupant ^k	3	9,315		
Residential: Apt. Studio	57 du	75	4,275		
Residential: Apt. 2 bd	15 du	150	2,250		
Base Demand Adjustment ^e			835		
Site 3 Total			16,675	1,945	14,730
Landscaping ^f	17,900 sf		1,672	803	869
Parking Structures ^g	937,915 sf	0.02	617	0	617
Cooling Towers Site 1 ^h	1,000 ton	10	10,029	2,006	
Cooling Towers Site 2 ⁱ	650 ton	12	7,722	1,544	
Cooling Towers Total			17,751	3,550	14,201
Proposed Subtotal			103,834	17,415	86,419
Less Existing to be Removed Total ^b					13,406
Less Additional Conservation ^j					468
Net Additional Water Demand					72,545
^a Provided by the County of Los Angeles in the Request for Water Supply Assessment letter Scope of Confirmation e-mail. See Appendix A of the WSA.					
^b The existing water demand is based on the LADWP billing data (annual average from 2010 to 2017).					
^c 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					
^d 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 Los Angeles Green Building Code. Determined proportionally for Reduced Project Alternative.					
^e 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.					
^f Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance.					
^g 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 assumption.					

Table 5-10
Reduced Project Alternative Water Demand

Proposed Uses^a	Quantity	Water Use Factor^c (gpd/unit)	Base Demand	Required Ordinance Water Savings^d (gpd)	Proposed Water Demand (gpd)
^h Operating 8 hours/day, 5 days/week, 6 cycles of concentration and 65 percent of chiller capacity.					
ⁱ Operating 8 hours/day, 7 days/week, 6 cycles of concentration and 55 percent of chiller capacity.					
^j Water conservation due to additional conservation commitments agreed by the Applicant. See Table II. Determined proportionally for Reduced Project Alternative					
^k Community Recreation Center Quantity is defined by City of Los Angeles Bureau of Engineering, Sewer Capacity Availability Request (SCAR) dated December 15, 2016 as having a quantity of 3,105, which is utilized to calculate the sewage generation rate of 3 gallons per day per occupant. Appendix 4.16-1 Utility Infrastructure Technical Report.					
Abbreviations: Apt. - apartment bd - bedroom du - dwelling unit sf- square feet gpd - gallons per day					
Source: LADWP, 2017.					

Solid Waste

Under the Reduced Project Alternative, demolition and new construction would occur on the Project Sites. Solid waste from demolition on the site would be similar to the Project, as the same land uses would be demolished. Construction solid waste would be less than the Project because of reduced construction associated with the Site 1 County office building. Under the Reduced Project Alternative, the mixed-use project would decrease solid waste generation at the Project Sites from existing conditions. As shown in Table 5-11, the decrease in units and square footage would generate 1,656 pounds per day, which would be less than the 2,706 pounds per day generated by the Project. Therefore, the Reduced Project Alternative would generate less solid waste than the Project and the impact of the Reduced Project Alternative regarding solid waste would be less than the Project's less-than-significant impact.

The main difference would be the reduced total square footage, building height and mass, and parking facilities compared to the Project on Site 1. The new County office building on Site 1 would be reduced from 471,000 square feet to 296,000 square feet, and the parking supply would be reduced from 1,733 spaces to 1,013 spaces.

Table 5-11
Estimated Reduced Project Alternative Solid Waste Generation

Proposed Use Description	Quantity	Generation Rate^a (pounds/day)	Total Generation (pounds/day)
Site 1			
Retail	10,000 sf	0.005/sf	50
Auto Parking	800,002 sf	--	0 ^b
Office ^c	296,000 sf	0.006/sf	1,776
<i>Subtotal of Solid Waste Generation for Site 1</i>			1,826
Site 2			
Lounge	11,125 sf	0.005/sf	56
Residential Apt: Studio	110 du	4/unit	440
Residential Apt: 1 Bed	84 du	4/unit	336
Residential Apt: 2 Bed	52 du	4/unit	208
Retail	7,500 sf	0.005/sf	38
Auto Parking	116,324 sf	--	0 ^b
<i>Subtotal of Solid Waste Generation for Site 2</i>			1,078
Site 3			
Community Recreation Center	13,200 sf	0.005/sf	66
Residential Apt: 1 Bed	57 du	4/unit	228
Residential Apt: 2 Bed	15 du	4/unit	60
Auto Parking	--	51,591 sf	0 ^b
<i>Subtotal of Solid Waste Generation for Site 3</i>			354
Total of Proposed Solid Waste Generation			3,258
Existing Solid Waste Generation			1,602
Net Total Solid Waste Generation			1,656
^a Cal Recycle website: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates , February 2017.			
^b Parking Structure does not generate solid waste.			
^c This is the reduced quantity of the County Office Reduced Project Site.			
Source (table): EcoTierra Consulting, 2017.			

RELATIONSHIP TO PROJECT OBJECTIVES

The Reduced Project Alternative would have fewer impacts than the Project, in addition, it would satisfy the Project Objectives, as listed in Section 3.0 (Project Description and Environmental Setting) of this Draft EIR. Specifically, the Reduced Project Alternative would meet the following Project Objectives to a lesser degree than the Project:

1. Provide a mix of uses that maximizes building density at locations served by public transit and locates residential uses in areas that reduce automobile dependency, replaces obsolete County facilities with new state-of-the art office facilities and infrastructure that will meet the current and future needs of County Departments located within or near the Vermont Corridor, and provides residential and retail uses to serve the local community, in a transit priority area.
5. Promote fiscal and community benefits, economic development, and job creation, by creating construction jobs, consolidating DMH and WDACS employees in the Vermont Corridor, providing economic benefit to the County, and providing community benefits through construction of a community recreation center and deed restricted senior affordable housing.

The Reduced Project Alternative would meet the following Project Objectives to a similar degree as the Project:

2. Promote revitalization of the currently underutilized project sites, by expediting the elimination underutilized sites.
3. Provide needed housing near public transit, by constructing high density residential dwelling units to serve a range of potential tenants, and developing new housing stock at infill locations close to commercial and office uses.
4. Provide needed deed restricted senior affordable housing units in the Vermont Corridor.
6. Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

REDUCTION OF SIGNIFICANT PROJECT IMPACTS

A comparison of the impact of each of the alternatives to the Project is summarized in Table 5-22 (Summary of Alternatives' Impacts). The Project would result in significant and unavoidable impacts to air quality (construction daily emissions for NO_x, and overlapping construction and operation phases for NO_x and ROG), noise (construction), and transportation (10 peak hour impacts at seven intersections, and cumulative construction traffic). The Reduced Project Alternative would also generate significant and unavoidable Project-related impacts; however, these impacts would be less than the Project because the development would be reduced in size. The Reduced Project Alternative would have one significant and unavoidable peak hour impact at one intersection. In addition, the Reduced Project Alternative would realize the Project Objectives, although in some cases to a lesser degree than the Project.

5.0 ALTERNATIVES TO THE PROJECT

5.3 ALTERNATIVE 3 – OFFICE PROJECT

DESCRIPTION

Alternative 3, Office Project, would involve using the Project Sites for County office use, thereby allowing additional consolidation and relocation of County offices to the Vermont Corridor. Under Alternative 3, Site 1 would be developed with a new County office building and parking facilities in the same manner as the Project. Sites 2 and 3 would incorporate the same square footage of use as would occur under the Project. However, this square footage would be provided for office use, rather than for residential, retail, and senior affordable housing use, as would occur under the Project. The community recreation center use would continue to be included on Site 3 under this Alternative.

Under Alternative 3, the same County office building containing 471,000 square feet of office use over a 390,000-square foot parking structure containing 965 spaces, and 10,000 square feet of ground floor retail and restaurant uses would be provided on Site 1 as would occur under the Project. The existing DMH office building on Site 2 would be upgraded and reused as a 154,793 square foot office building. The same structural and building upgrades as would be included in the Project would also be included under the Alternative. The proposed new construction on the site of the existing WDACS building on Site 2 would include five levels of office use, totaling 66,935 square feet, over 1.5 levels of subterranean parking, and 3.5 levels of above ground parking, the same configuration as the Project, other than use. The conversion of the residential units on Site 3 to office and community recreation center under the Alternative would result in a 13,200 square foot community recreation center, and five stories of office use totaling 67,637 square feet. The office use would be located over three levels of subterranean parking containing 116 spaces, same as the Project. In the configurations described, office development on Sites 2 and 3 would be able to accommodate an additional 1,020 and 311 County employees, respectively.

The design and exterior configuration of the buildings provided under this Alternative would be similar to the Project. The main difference would be the proposed uses and building heights required to accommodate parking needs.

Alternative 3 would include the same Project design features (PDFs) and require the same mitigation measures as the Project. The potential environmental impacts associated with the Alternative 3 are described below and are compared to the environmental impacts that would result from the implementation of the Project, as described in Section 4.0 (Environmental Impact Analysis) of this Draft EIR.

COMPARATIVE ANALYSIS

Aesthetics

As stated in Section 4.1 Aesthetics, CEQA provides that aesthetics impacts for this Project shall not be considered a significant impact on the environment because it is a qualifying infill Project which is both mixed use residential and an employment center in a Transit Priority Area. Thus the following analyses regarding aesthetics, visual character, views, shade/shadow, and light/glare are provided for informational purposes.

Aesthetics/Views

As with the Project, the visual appearance of the Project Sites would be altered during construction of the Office Project Alternative due to the removal of all of the existing uses including: the two-story structure, the two-story office building, open parking areas, and carport, and an existing parking structure on Site 1; the two office buildings on Site 2; and the office building on Site 3.

Other construction activities, including site preparation, grading, and excavation; the staging of construction equipment and materials; and the construction of the building foundations and proposed structures, would also alter the visual character and quality of the Project Sites and adjacent roadways. These construction activities could be visible to pedestrians and motorists on adjacent streets, as well as to viewers within nearby buildings. Consequently, construction under the Office Project Alternative would alter the visual character of the Project area on a temporary basis. However, similar to the Project, construction activities under this alternative would not substantially alter or degrade the existing visual character and quality of the Project Sites and its surroundings or introduce elements that generate substantial long-term contrast with or substantially detract from the visual character of the surrounding area for the following reasons: (1) views of construction activities would be limited in duration and location; (2) the site appearance would be typical of construction sites in urban areas; (3) construction would occur within an urban setting with a high level of human activity and development; and (4) impacts would be reduced through standard best management practices implemented during the construction period.

The Office Project Alternative would generate similar heights and massing of the structures and, thus, this Alternative would alter the visual character of the Project Sites in a manner similar to the Project. Buildout of this Alternative would also increase the height, density, and massing of on-site structures as compared to existing conditions. However, as with the Project, the change in scale would be moderated by façade articulation and fenestration; variations in building planes (both vertical and horizontal), rooflines, heights, and façade setbacks and projections; and a variety of surface materials to reduce the visual effect of the height and massing and provide a pedestrian scale adjacent to the public streets. Nonetheless, as with the Project, the Office Project Alternative would alter the existing visual character of the Project area.

As with the Project, existing valued views (e.g., focal views and panoramic views or vistas of identified visual resources) within the greater Project area are limited, mostly obscured by existing intervening urban features, and generally intermittent in the vicinity of the Project Site. Scenic vistas of visual resources in the Project vicinity are further limited due to the predominantly flat terrain of the vicinity and the dense, intervening development that blocks long-range, expansive views. The Project Sites are located approximately three miles south of the Hollywood Hills. Because of this distance, the Hollywood Hills do not provide a substantial scenic resource in this area. No other visually prominent scenic resources are located in the vicinity of the Project Sites. As noted above, the visual environment on and in the vicinity of the Project Sites is characterized by existing urban development.

The Project Sites are located in an urban setting. As a result, the Project Sites provide direct views of surrounding low- to mid-rise commercial and residential development to the north, west, and east. Direct views of high rise development to the south are available from Site 2 and Site 3 (most view lines to the south from Site 1 are blocked by the existing Site 2 building).

Similar to the Project, under the Office Project Alternative, new buildings would be prominently visible from the surrounding areas. The introduction of the high-rise office buildings would result in changes to short-range focal views and long-range distant views of the Project Sites. As with the Project, due to the height and massing of the proposed buildings, even with the reduction in heights of the building, the

changes to short-range views, would be more substantial than changes to long-range views. Specifically, within short-range views from street-level vantage points adjacent to the Project Sites, Office Project Alternative would be prominently visible and would be substantially taller and have more massing than the existing office structures.

Shade/Shadow

The footprint of the proposed development under the Office Project Alternative would be the same as that of the Project. In addition, the Office Project Alternative would have similar building heights as the Project and would cast similar shadows.

Light/Glare

As with the Project, lighting needed during construction of the Office Project Alternative has the potential to generate light spillover to off-site sensitive land uses in the Project vicinity, including nearby properties. Construction hours would follow County requirements for Sites 1 and 3, and City requirements for Site 2, and would generally be from 6:30 AM to 8:00 PM, Monday through Saturday (Sites 1 and 3), and 7:00 AM to 9:00 PM Monday through Friday and 8:00 AM to 6:00 PM Saturday (Site 2). As such, Project construction lighting would not result in high-brightness illuminated surfaces that are directly visible from residences or other affected light-sensitive land uses and would not result in substantial changes to existing artificial light conditions or interfere with off-site activities. Therefore, similar to the Project, with adherence to existing regulations and shielding of construction lighting, light resulting from construction activities under this alternative would not significantly affect off-site sensitive uses, substantially alter the character of off-site areas surrounding the construction area, adversely impact day or nighttime views in the area, or substantially interfere with the performance of an off-site activity.

As with the Project, daytime or nighttime glare could potentially occur during construction activities if reflective construction materials were positioned in highly visible locations where the reflection of sunlight or nighttime light sources could occur. However, any glare would be highly transitory and short-term, given the movement of construction equipment and materials within the construction area, and the temporary nature of construction activities. In addition, large, flat surfaces that are generally required to generate substantial glare are typically not an element of construction activities. As noted above, construction would primarily occur during the daytime hours in accordance with regulations. The glare from vehicles that currently park on the Project Sites would be similar or cause greater visual impacts than temporary construction glare (depending on the construction equipment used and materials handled), if any. As a result, as with the Project, light and glare associated with construction of Office Project Alternative would not substantially alter the character of off-site areas surrounding the Project Sites or adversely impact day or nighttime views in the area.

The Office Project Alternative would have the potential to alter nearby lighting patterns similar to the Project. Nighttime sources of light from buildings and operations associated with the Office Project Alternative would include interior and exterior building lights, parking structure and other security lighting, vehicle headlights, and street lighting. Lighting associated with the Alternative would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties. Illuminated areas would be localized and would minimize light trespass and spill. Light fixtures that broadcast light over large areas or which are a source of direct glare would not be used. Furthermore, the majority of lighting associated with the Office Project Alternative would be directed internal to the Project Site, away from neighboring land uses.

Therefore, interior and exterior lights on the Office Project Alternative would not shine directly onto light-sensitive uses, and would not result in light trespass.

The Office Project Alternative would also include the use of similar building materials as the Project and would incorporate the use of low-reflectivity materials. Therefore, as with the Project, glare associated with operation of the Office Project Alternative would not substantially alter the character of the off-site areas surrounding the Project Site.

Air Quality

Under the Office Project Alternative, a similar amount of excavation and construction would occur, and there would be new energy demand and vehicle trips generated. In addition, the design and configuration of development under this alternative would be similar to the Project. As such, the amount of construction and potential vehicle trips during operation would result in air pollutant emissions related to construction similar those of the Project. Thus, the construction air quality impact of the Office Project Alternative would be similar to the Project's significant and unavoidable impact.

With respect to operational emissions, trip generation associated with the Office Project Alternative would be higher than the Project, which would result in increased regional operational emissions compared to the Project that would exceed the SCAQMD's threshold for daily NO_x emissions. As shown in Table 5-12, Alternative 3 Estimated Daily Operational Emissions, the alternative emissions would be higher than Project emissions for all pollutants, and the alternative's NO_x emissions would be significant and unavoidable, whereas other Project operational emissions would be less-than-significant.

Table 5-12
Alternative 3 - Estimated Daily Operational Emissions

Emissions Source	Emissions in Pounds per Day					
	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Area Sources	31.99	<0.01	0.28	<0.01	<0.01	<0.01
Energy Demand	0.15	1.35	1.13	<0.01	0.10	0.10
Mobile (Motor Vehicles)	28.90	142.10	377.67	1.29	48.61	15.09
Total Alternative 3 Emissions	61.04	143.45	379.08	1.30	48.61	15.09
Total Existing Emissions	16.66	47.73	138.53	0.36	16.64	5.06
Alternative 3 Net Increase Emissions	44.38	95.72	240.55	0.94	31.97	10.03
SCAQMD Thresholds	55.00	55.00	550.00	150.00	150.00	55.00
Potentially Significant Impact?	No	Yes	No	No	No	No
Project Net Increase Emissions	31.84	8.21	40.25	0.19	21.15	5.76
Difference Between Alternative 3 Net Emissions and Project Net Emissions	12.54	87.51	20.03	0.75	10.82	4.27
Calculation data provided in Appendix 4.2-1 to this Draft EIR. Column totals may not add due to rounding from the model results. Source: EcoTierra Consulting, 2017.						

Cultural Resources

Historical Resources

Under the Office Project Alternative, demolition of the existing uses on the Project Sites would occur. The technical report prepared for the proposed Project evaluated the historical significance of the on-site buildings. The historic evaluation concluded that the Project would have no direct impact on historical resources, and a less than significant indirect impact on the Brynmoor Apartments Neon Roof Sign located near Site 3. The Office Project Alternative would add additional structures on-site which, similar to the Project, would introduce a new visual element to the setting of the Brynmoor Apartments Neon Roof Sign; however, the setting in Wilshire Center is already characterized by a variety of mid and high-rise buildings that obscure views of the roof sign from Vermont Avenue. As such, similar to the Project, the Office Project Alternative would not result in a substantial adverse change to the Brynmoor Apartments Neon Roof Sign or its immediate surroundings to the degree its eligibility as a resource would be materially impaired. It would continue to possess all aspects of integrity, including setting, and would continue to be eligible for listing as historical resource defined by CEQA. Therefore, the Office Project Alternative's impact would be similar to the less-than-significant impact of the Project.

Archaeological Resources

Similar to the Project, the Office Project Alternative, would include excavation below existing grade to construct the subterranean levels at each Project Site and, thereby, create a potential to disturb any previously undiscovered archaeological resources. In the event archaeological resources are encountered, the Office Project Alternative would be subject to the same regulatory requirements as the Project to ensure that the resources are properly recovered and evaluated. Therefore, the impact related to archaeological resources under the Office Project Alternative would be less-than-significant and similar to that of the Project.

Paleontological Resources

Similar to the Project, the Office Project Alternative, would include excavation below existing grade to construct the subterranean levels at each Project Site and, thereby, create a potential to disturb any previously undiscovered paleontological resources. In the event paleontological resources are encountered, the Office Project Alternative would be subject to the same regulatory requirements as the Project to ensure that the resources are properly recovered and evaluated. Therefore, the impact related to paleontological resources under the Office Project Alternative would be less-than-significant and similar to the Project.

Energy

Electricity

Under the Office Project Alternative, new construction would occur on the Project Site. Similar to the Project, there would be construction and operation of new office development that could increase the consumption of electricity at the Project Sites. As shown in Table 5-13, the increase office square footage of the Office Project Alternative would demand 12,829,235 KW-Hours/yr, which would be greater than the Project's 10,351,023 KW-Hours/yr. Therefore, the impact of the Office Project Alternative regarding electricity would be greater than the Project's less-than-significant impact. However, the impact would still be less-than-significant.

Table 5-13
Office Project Alternative Estimated Electricity Consumption

Facility	Total (kWh /yr)^a
Site 1	13,255,379
Site 2	3,737,441
Site 3	1,248,648
Total Proposed Electricity Demand for Project Sites	18,241,468
<i>Existing Total Electricity Demand for Project Sites</i>	<i>5,412,233</i>
Net Increase in Electricity Demand	12,829,235
<i>kWh = kilowatt hours</i> ^a CalEEmod version 2016.3.1 was used to calculate the electricity demand based on land use. Source: KPFF, 2017.	

Natural Gas

Under the Office Project Alternative, new construction would occur on the Project Site. Similar to the Project, there would be construction and operation of new office development that could increase the consumption of natural gas at the Project Site. As shown in Table 5-14, the increase in office square footage of the Office Project Alternative would demand 12,736,999 kBTU of natural gas per year, which would be less than the Project's 13,827,325 kBTU of natural gas per year. Therefore, the impact of the Office Project Alternative regarding natural gas would be less-than-significant and less than the Project's less-than-significant impact.

Table 5-14
Office Project Alternative Estimated Natural Gas Consumption

Facility	Total (kBTU/yr)^a
Site 1	13,264,038
Site 2	2,319,275
Site 3	84,556
Total Proposed Natural Gas Demand for Project Sites	15,667,869
<i>Existing Total Natural Gas Demand for Project Sites</i>	<i>2,930,870</i>
Net Increase in Natural Gas Demand	12,736,999
^a CalEEmod version 2016.3.1 was used to calculate the natural gas demand based on land use. Source: KPFF, 2017.	

Transportation Energy

Under the Office Project Alternative, a similar amount of excavation and construction would occur, and there would be new energy demand and vehicle trips generated during construction. As such, energy consumption under the Alternative during construction would be similar to the Project. Impacts of the Office Project would be similar to the Project's less-than-significant impacts. Under the Office Project Alternative, the change in use from residential to office would result in higher vehicle trips, and the

increase in fuel consumption that would occur during operation would be higher than the Project. Impacts of the Office Project Alternative would be higher than the Project's less-than-significant impacts.

Wasteful, Inefficient, and Unnecessary Consumption of Energy

Under the Office Project Alternative, the increase in energy consumption would be higher than the Project. The Project would not result in the inefficient, unnecessary, or wasteful consumption of energy because it would: (1) incorporate Title 24 energy efficiency standards into the Project, (2) provide trip reduction measures, a mixed use project in a High Quality Transit Area, electric vehicle charging stations, and bicycle parking that would maximize the potential for mobility and accessibility for people and reduce the overall consumption of fuel required for transportation, and (3) incorporate renewable energy through the generating portfolio of LADWP, coupled with the inclusion of solar generating infrastructure within Site 1. The Office Project Alternative would also include these measures, and would therefore not result in the inefficient, unnecessary, or wasteful consumption of energy, similar to the Project.

Geology and Soils

Under the Office Project Alternative, new land uses would be constructed that would be subject to potential impacts associated with seismic fault rupture, strong seismic ground shaking, liquefaction, landslide/lateral spreading, seismic-induced settlement, subsidence soil stability, expansive soils and acceleration of geologic hazards. The Office Project Alternative proposes a similar amount of development as the Project; therefore, similarly, people would be exposed to seismic hazards under the Office Project Alternative. Additionally, similar to the Project, the project footprint would cover the entire site and grading and excavation would occur over the entire site. Therefore, the impact from erosion would be similar to the less-than-significant impact under the Project. The impact of the Office Project Alternative with respect to alteration of landforms would be the same as that of the Project, which would have no impact. Overall, the less-than-significant impact of the Office Project Alternative with respect to geology and soils would be similar to the Project's less-than-significant impact.

Greenhouse Gas Emissions

Under the Office Project Alternative, grading, construction activities, and development would be similar to the Project. New vehicle trips would be generated and a new grouping of buildings requiring energy, water, etc. would be constructed under this alternative. The Office Project Alternative would generate more vehicle trips than the Project (see Transportation/Traffic discussion below), resulting in greater GHG emissions during operations at the Project Sites. However, the Office Project Alternative would be consistent with GHG plans, similar to the Project, and this consistency is the basis for the significance determination related to GHG. As a result, the less-than-significant impact of the Office Project Alternative with respect to GHG emissions would be similar to the Project's less-than-significant impact.

Hazards and Hazardous Materials

Similar to the Project, demolition of existing structures from the Project Sites would occur which would involve removal of all asbestos-, lead-, and PCB-containing materials in accordance with applicable regulatory requirements. Further, similar to the Project, remediation or abatement would be required before any disturbance occurs. In addition, Cal-OSHA has established limits of exposure to lead contained in dusts and fumes through California Code of Regulations, Title 8, Section 1532.1. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code. Furthermore, any materials found to contain PCBs must be

removed and disposed in accordance with all applicable local, State and federal regulations including, but not limited to California Code of Regulations, Title 22, and EPA 40 CFR. Compliance with existing federal and State laws regarding identified hazardous materials would be required. Compliance with these regulatory requirements would minimize risks associated with the presence of ACMs, LBP, PCBs, and methane. Therefore, the Office Project Alternative's impact would be similar to the Project's less-than-significant impact.

Routine cleaning supplies would be used on-site, however, usage is subject to County, State and federal requirements that minimize exposure to people and ensure safe use and storage. This alternative's impact would be incrementally less than the Project's less-than-significant impact due to a smaller development.

The Project Sites are listed as having historical uses on site. Based on the information gathered during the performance of the Phase I ESA for Site 1, Site 2 and Site 3, no RECs, CRECS, or HRECs have been found in connection with the Sites. Therefore, there is no hazardous material site pursuant to Government Code Section 65962.5 located on the Project Site, and the Project would not create a significant hazard to the public or the environment and impacts would be less-than-significant. The impact for the Office Project Alternative would be similar to the Project's less-than-significant impacts.

No road closures are anticipated for the Office Project Alternative and impacts would be less-than-significant. For Office Project Alternative operation, a project-specific emergency response plan would be submitted to the LAFD during the building permit process. Moreover, the Project would not cause permanent alterations to vehicle circulation routes and patterns, or impede public access or travel upon public rights-of-way and impacts would be less-than-significant. Thus, the impact with respect to hazardous features under the Office Project Alternative would be similar to the Project's less-than-significant impact.

Hydrology and Water Quality

Under the Office Project Alternative, grading, excavation, construction activities, and development of new land uses over the entire site would occur. Similar to the Project, the Office Project would be required to implement BMPs and comply with the City's LID Ordinance. Therefore, similar to the Project, the Office Project Alternative would not increase the amount of storm water leaving the Project Sites and would improve the quality of surface runoff from the Project Sites over the existing conditions. Similar to the Project, the Office Project Alternative would not be located in a flood plain, flood hazard area, nor would it impact surface or groundwater movement or groundwater contamination. The Office Project Alternative is not located within a 100-year flood plain,³ however, the Sites are located within the potential inundation area of the Hollywood Reservoir.⁴ Dam safety regulations are the primary means of reducing damage or injury due to inundation occurring from dam failure. The California Division of Safety of Dams regulates the siting, design, construction, and periodic review of all dams in the State. In addition, dams and reservoirs are monitored during storms and measures are instituted in the event of potential overflow. These measures include seismic retrofits and other related dam improvements completed under the requirements of the 1972 State Dam Safety Act. Further, in the event of a dam failure at the Hollywood Reservoir, existing urban development north of the Project, including the US 101 Freeway,

³ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: March 27, 2017.

⁴ City of Los Angeles Department of City Planning, *Safety Element of the Los Angeles City General Plan, Adopted November 26, 1996, Exhibit G: Inundation & Tsunami Hazard Areas in the City of Los Angeles*.

would serve as a physical barrier between the upstream portion of the reservoirs/dams and the Sites. Therefore, the risk of flooding from inundation by dam failure is considered low and impacts would be less-than-significant under the Office Project Alternative. Overall, the impact to hydrology and water quality from the Office Project Alternative would be the same as the Project's less-than-significant impact.

Land Use and Planning

Under the Office Project Alternative, the entire Project Sites would be developed. The Project area includes other multi-family and office uses and the project use would be similar to many of the surrounding land uses. The Office Project Alternative would increase office uses and would integrate with existing residential and commercial uses in the area. The Office Project Alternative would be designed with pedestrian and bicycle facilities. Accordingly, the Office Project Alternative would not divide the existing community, and the impact would be similar to the Project's less-than-significant impact.

The Office Project Alternative would implement applicable regional or local land use plans and policies for the Project Site related to the concentration of future development in transit areas and promotion of transit and pedestrian friendly design, including SB 375, SCAG, RCP, RTP/SCS, Southern California Compass Blueprint Growth Vision Report, County of Los Angeles General Plan, City of Los Angeles General Plan Framework Element, the Wilshire Community Plan, Plan for A Healthy Los Angeles, the Walkability Checklist, and Wilshire Center/Koreatown Redevelopment Plan. The Office Project Alternative would implement the principles of City and regional land use planning documents and, similar to the Project, would be consistent with the above land use plans. The Office Project Alternative would not be consistent with the policies of the above listed plans with respect to locating housing in transit station areas or providing affordable housing. Overall, the Office Project Alternative would be less effective in implementing land use plans than the Project.

Because the Office Project Alternative would involve the construction of County office buildings for use by County Departments on County-owned sites, the Office Project Alternative on Sites 1, 2 and 3 would not be subject to City zoning requirements. The impact would be similar to the Project's less-than-significant impact.

The Office Project Alternative would develop land uses on the site similar to what currently exists on-site. Thus, the Office Project would an impact with respect to land use consistency similar to the less-than-significant impact under the Project.

Noise

Similar to the Project, development of the Office Project Alternative would require grading and construction that would generate noise and vibration. In addition, the design and configuration of development under this alternative would be similar to that of the Project. Thus, the amount and duration of construction would result in similar construction noise and vibration levels under this alternative. Therefore, construction noise impacts under the Office Project Alternative would be significant and unavoidable, and the vibration impacts would be less than significant, similar to the impacts of the Project.

Similar to the Project, the Office Project Alternative would create some vibration from operation. As a result of the change in use from mixed use with residential uses to office uses, noise from outdoor spaces during operation would be incrementally less than the Project, and less-than-significant.

Similar to the Project, new vehicle trips would be generated along study area roadways. Because of the increase in trip generation under this Alternative, the increase in roadway noise would be higher, and

greater than the Project's less-than-significant impact. It is generally accepted that a doubling of traffic is required to generate an audible increase in traffic noise levels. The impact under this Alternative would be less-than-significant because the Office Project Alternative would not result in a doubling of traffic see Appendix 4.14-1 Traffic Study of this Draft EIR.

Population, Housing, and Employment

The construction duration and activities to develop this alternative would be similar to the Project. As such, the number of construction workers and the housing, population, and employment impact associated with construction of the Office Project Alternative would be similar the Project's less-than-significant impact.

The Project Site is located in an urbanized area of the City. Similar to the Project, the Office Project Alternative does not involve the extension of roadways or infrastructure to an undeveloped area and the Project Alternative would be supported by the existing infrastructure. As such, the indirect population growth impact would be less-than-significant and similar to that of the Project.

The Project Sites are currently developed with multiple structures. Although the Office Project Alternative would have similar overall square footage compared to the Project, this Alternative would provide an increase of 1,291 on-site employees over the existing condition, as shown in Table 5-15, and over the Project's net employment of 841 full- and part time jobs. Similar to the Project, this could result in induced housing growth on and in the vicinity of the Project Sites as employees may choose to relocate closer to their jobs. However, neither the Office Project Alternative's nor the Project's potential to induce housing growth from the employees on the Project Sites is considered significant due to the readily available local labor force, existing transit opportunities to the Project Site, employees renting the proposed residential units, and the existing and forthcoming housing stock available within the Project Site.

Table 5-15
Estimated Permanent Employment Generation for the Office Project Alternative

Type of Development	Size	Employee Generation Factor ^a	Total Employees
Site 1			
Office	471,000 sf	--	2,166 ^b
Retail	10,000 sf	2.71 employees/1,000 sf	27
<i>Site 1 Subtotal of Proposed Employment Generation</i>			<i>2,193</i>
<i>Site 1 Existing Employment</i>			<i>93</i>
<i>Site 1 Employment Generation</i>			<i>2,100</i>
Site 2			
Apartments	0 units	N/A	0
Retail	0 sf	2.71 employees/1,000 sf	0
County Office	221,728 sf	-	1,020
<i>Site 2 Subtotal of Proposed Employment Generation</i>			<i>1,020</i>
<i>Site 2 Existing Employment</i>			<i>1,223</i>
<i>Site 2 Net Employment Generation</i>			<i>(203)</i>
Site 3			
Senior Affordable Housing	0 units	N/A	0
Community Recreation Center	13,200 sf	2.71 employees/1,000 sf	36
County Office	67,637 sf	2.69 employees/1,000 sf	311
<i>Site 3 Subtotal of Proposed Employment Generation</i>			<i>347</i>
<i>Site 3 Existing Employment</i>			<i>112</i>

Table 5-15
Estimated Permanent Employment Generation for the Office Project Alternative

Type of Development	Size	Employee Generation Factor ^a	Total Employees
Site 3 Net Employment Generation			235
<i>Subtotal Proposed Employment Generation</i>			<i>3,560</i>
Existing Employment Generation			1,428
Total Net increase in Employment Generation			2,132
^a Los Angeles Unified School District, Level 1 – Developer Fee Justification Study for Los Angeles Unified School District, page 15, March 2014. ^b The School Fee Justification Studies for Los Angeles Unified School District do not include employee generation factors for multi-family residential uses. The small number of employees (estimated at less than 10) was assumed to be required to provide management and maintenance for the residential units. Source (table): EcoTierra Consulting, 2017.			

No housing units would be developed under the Office Project Alternative. Therefore, the Office Project Alternative would not directly contribute to population or housing growth in the City. As such, no impact would occur under the Office Project Alternative with respect to direct impacts to population or housing, similar to the Project.

Public Services

Fire

The design, configuration, and operation of the Office Project Alternative would be comparable to the Project. Similar to the Project, the Office Project Alternative would be within the current fire response distance, provide adequate fire flow and access, and meet building fire safety regulations. In addition, no new or expanded facilities would be required. Therefore, the Office Project Alternative would have an impact similar to the Project's less-than-significant impact related to fire protection services.

Police

The design, configuration, and operation of the Office Project Alternative would be comparable to the Project. However, under the Project there would be approximately 618 new permanent residents and approximately 841 full- and part time jobs while under the Office Project Alternative, there would be no new permanent residents and approximately 2,132 new jobs.⁵ Although some employees may choose to relocate closer to their jobs, it is reasonable to expect that some of the new employees would be drawn from the local labor force within the Community Plan area and surrounding communities. It is also reasonable to expect that the indirect increase in population and the increase in development on the Project Sites would result in a demand for additional police protection. However, this impact is not expected to be significant because, similar to the Project, this alternative would incorporate crime prevention measures into its design as well as implement comprehensive safety and security measures, including adequate and strategically positioned functional lighting to enhance public safety. This alternative would include nighttime security lighting and secure parking facilities. In addition, no new or expanded facilities would be required. Considering these crime prevention features as well as the similar amount of development that would be constructed under this Alternative as compared to the Project, the

⁵ 583,000 sf x 2.71 employees/1,000 sf = 1,580 (Employee generation rates were derived from the Los Angeles Unified School District, Lodging Development School Fee Justification Study, March 2014, page 15.)

Office Project Alternative would have a similar impact to the Project's less-than-significant impact to police protection services.

Schools

As shown in Table 5-16 (Office Project Alternative Student Generation), this Alternative would generate an increase of approximately 479 students over existing conditions, which is greater than the 364 students that would be generated by the Project over existing conditions. Similar to the Project, the increase of approximately 479 new students to LAUSD schools would contribute to the projected seating shortage or overcrowding at all three schools serving the Project Site. Further, pursuant to SB 50, payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees, would, by law, mitigate this Alternative's direct and indirect impacts on schools. Therefore, the impact of the Office Project Alternative would be higher than the Project's less-than-significant impact with respect to schools.

Table 5-16
Office Project Alternative Student Generation

Land Use	Size	Employees per Square Foot^a	Students per Employee^a	Total
Existing Uses				
Site 1				
County Office (Occupied)	30,788 sf	93 ^b	0.2247	21
County Office (Vacant)	13,325 sf	--	--	--
<i>Site 1 Subtotal Existing Students</i>				21
Site 2				
County Office (Occupied)	154,793 sf	973 ^b	0.2247	219
County Office (Occupied)	52,000 sf	250 ^b	0.2247	56
<i>Site 2 Subtotal Existing Students</i>				275
Site 3				
Office	29,292 sf	112 ^b	0.2247	25
<i>Site 3 Subtotal Existing Students</i>				25
Total Existing Students				321
Proposed Uses				
Site 1				
Office	491,000 sf	2,166	0.2247	487
Retail	10,000 sf	2.71 employees/1,000 sf ^a	0.2247	6
<i>Site 1 Subtotal of Proposed Student Generation</i>				493
<i>Site 1 Existing Students</i>				21
Site 1 Net Student Generation				472
Site 2				
Apartments	N/A	N/A	N/A	0
Retail	N/A	N/A	N/A	0
County Office	221,728 sf	1,020	0.2247	229
<i>Site 2 Subtotal of Proposed Student Generation</i>				229
<i>Site 2 Existing Students</i>				275
Site 2 Net Student Generation				(46)
Site 3				
Senior Affordable Housing	N/A	N/A	N/A	0.00
Community Recreation Center	13,200 sf	2.71 employees/1,000 sf ^a	0.2247	8

Table 5-16
Office Project Alternative Student Generation

Land Use	Size	Employees per Square Foot^a	Students per Employee^a	Total
County Office	67,637 sf	311	0.2247	70
<i>Site 3 Existing Students</i>				25
<i>Site 3 Net Student Generation</i>				78
<i>Subtotal Proposed Student Generation</i>				<i>800</i>
<i>Existing Student Generation</i>				321
Total Net Increase in Student Generation				479
<i>sf = square feet</i> ^a Los Angeles Unified School District, Residential Development School Fee Justification Study, March 2014. ^b Employee counts provided by the Developer. Source: EcoTierra Consulting, 2017.				

Libraries

Typically, residential developments have the greatest potential to result in impacts to libraries. Under the Project there would be approximately 618 new permanent residents, while under the Office Project Alternative, there would be no new residents on the Project Site. Due to the decrease in number of residents compared to the Project, the Office Project Alternative would have a lower less-than-significant impact on libraries than the Project.

Recreation

Typically, residential developments have the greatest potential to result in impacts to parks and recreation facilities. Under the Project there would be approximately 618 new permanent residents, while under the Office Project Alternative, there would be no new residents on the Project Site. Thus, due to the decrease in number of residents compared to the Project, the Office Project Alternative would have a lower less-than-significant impact on parks and recreation than the Project. The Alternative would include the community recreation center to serve the community.

Transportation and Traffic

Under the Office Project Alternative, demolition and development would occur at the Project Sites. However, construction traffic would be similar to Project, due to the similar overall square footage of the Project Sites. Impacts of the Office Project Alternative construction traffic would be higher than the Project's significant and unavoidable impacts. Under the Office Project Alternative, traffic conditions would change in the vicinity. Due to the type of the development, the Office Project Alternative would generate more vehicle trips during peak hours. Similar to the Project, growth in traffic due to the combined effects of continuing development, intensification of development, and related projects would result in reduced levels of service at study intersections located in the vicinity of the Office Project Alternative.

Trip generation of the Office Project Alternative would be higher than that of the Project, as shown in Table 5-17. The Office Project Alternative would generate 3,524 daily trips, 522 a.m. peak hour trips, and 662 p.m. peak hour trips, compared to 3,215 daily trips, 320 a.m. peak hour trips, and 414 p.m. peak hour trips under the Project.

Table 5-17
Project Trip Generation Estimates
Office Project Alternative

Land Use	ITE Land Use	Size	Daily	Morning Peak Hour			Afternoon Peak Hour		
				In	Out	Total	In	Out	Total
Proposed									
Site 1									
471,000 sf office building	a	2,166 employees	3,162	510	10	520	13	637	650
10,000 sf ground-floor retail	820	10,000 sf	429	6	4	10	18	19	37
Internal Capture Adjustment - 10%			-43	-1	0	-1	-2	-2	-4
Transit/HOV Adjustment - 15%			-58	-1	0	-1	-2	-3	-5
Pass-by Trip Adjustment - 50%			-164	-2	-2	-4	-7	-7	-14
Site 2									
1,020-employee Office Building	a	1,020 employees	1,489	240	5	245	6	300	306
Site 3									
311-Employee Office Building	a	311 Employees	454	74	1	75	2	91	93
13,200 sf community recreation center	495	13,200 sf	446	18	9	27	18	18	36
Transit/HOV Adjustment - 15%			-67	-3	-1	-4	-2	-3	-5
Walk-In Adjustment - 10%			-38	-1	-1	-2	-1	-2	-3
Proposed Total			5,610	840	25	865	43	1,048	1,091
Removed									
Site 1									
510 S Vermont Avenue (30,788 sf)	a	93 employees	136	22	0	22	1	27	28
523 S Vermont Avenue (13,325 sf)	a	(vacant)	0	0	0	0	0	0	0
Site 2 (employees moved to Site 1)									
550 S Vermont Avenue (154,793 sf)	a	973 employees	1,421	229	5	234	6	286	292
3175 W 6th Street (52,000 sf)	a	250 employees	365	59	1	60	1	74	75
Site 3									
433 S Vermont Avenue (29,292 sf)	a	112 employees	164	26	1	27	1	33	34
Removed Total			2,086	336	7	343	9	420	429
Office Project Alternative Net Trip Generation			3,524	504	18	522	34	628	662
Project Net Trip Generation			3,215	216	104	320	121	293	414
Difference Between Alternative 3 Net Trip Generation and Project Net Trip Generation			309	288	-86	202	-87	335	248
sf square-feet									
a Empirical office trip generation rate as shown in Table 10 of the Traffic Study included as Appendix 4.14-1 of this Draft EIR.									
Source: Gibson Transportation Consulting, Inc., 2017.									

Table 5-18
Buildout Year 2023 With Alternative 3 With Mitigation Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Buildout without Project Conditions		Buildout with Alternative 3 Conditions				Buildout with Alternative 3 with Mitigation Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
1.	Vermont Avenue &	A.M.	0.751	C	0.755	C	0.004	NO	0.755	C	0.004	NO
	US 101 Northbound On-ramp	P.M.	0.653	B	0.697	B	0.044	NO	0.691	B	0.038	NO
2.	Vermont Avenue &	A.M.	0.502	A	0.517	A	0.015	NO	0.514	A	0.012	NO
	US 101 Northbound Off-ramp	P.M.	0.552	A	0.553	A	0.001	NO	0.553	A	0.001	NO
3.	US 101 Southbound Off-ramp / New	A.M.	0.356	A	0.373	A	0.017	NO	0.371	A	0.015	NO
	Hampshire Street & Rosewood Avenue	P.M.	0.431	A	0.433	A	0.002	NO	0.433	A	0.002	NO
4.	Vermont Avenue &	A.M.	0.636	B	0.673	B	0.037	NO	0.667	B	0.031	NO
	Rosewood Avenue	P.M.	0.761	C	0.764	C	0.003	NO	0.763	C	0.002	NO
5.	Vermont Avenue & Oakwood Avenue /	A.M.	0.709	C	0.736	C	0.027	NO	0.731	C	0.022	NO
	US 101 Southbound On-ramp	P.M.	0.753	C	0.755	C	0.002	NO	0.755	C	0.002	NO
6.	Vermont Avenue &	A.M.	0.862	D	0.864	D	0.002	NO	0.863	D	0.001	NO
	Beverly Boulevard	P.M.	0.935	E	0.974	E	0.039	YES	0.967	E	0.032	YES
7.	Vermont Avenue &	A.M.	0.654	B	0.655	B	0.001	NO	0.655	B	0.001	NO
	1st Street	P.M.	0.793	C	0.797	C	0.004	NO	0.796	C	0.003	NO
8.	Western Avenue &	A.M.	0.853	D	0.856	D	0.003	NO	0.855	D	0.002	NO
	3rd Street	P.M.	0.880	D	0.880	D	0.000	NO	0.880	D	0.000	NO
9.	Normandie Avenue &	A.M.	0.772	C	0.778	C	0.006	NO	0.777	C	0.005	NO
	3rd Street	P.M.	0.769	C	0.771	C	0.002	NO	0.769	C	0.000	NO
10. ^a	Vermont Avenue &	A.M.	0.948	E	0.963	E	0.015	YES	0.950	E	0.002	NO
	3rd Street	P.M.	0.898	D	0.952	E	0.054	YES	0.933	E	0.035	YES

Table 5-18
Buildout Year 2023 With Alternative 3 With Mitigation Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Buildout without Project Conditions		Buildout with Alternative 3 Conditions				Buildout with Alternative 3 with Mitigation Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
11.	Virgil Avenue & 3rd Street	A.M.	0.831	D	0.839	D	0.008	NO	0.836	D	0.005	NO
		P.M.	0.858	D	0.873	D	0.015	NO	0.869	D	0.011	NO
12.	Rampart Boulevard & 3rd Street	A.M.	0.752	C	0.753	C	0.001	NO	0.753	C	0.001	NO
		P.M.	0.833	D	0.857	D	0.024	YES	0.853	D	0.020	YES
13. ^a	Vermont Avenue & 4th Street	A.M.	0.707	C	0.765	C	0.058	YES	0.749	C	0.042	YES
		P.M.	0.695	B	0.733	C	0.038	NO	0.715	C	0.020	NO
14.	Shatto Place & 4th Street	A.M.	0.489	A	0.567	A	0.078	NO	0.559	A	0.070	NO
		P.M.	0.445	A	0.520	A	0.075	NO	0.511	A	0.066	NO
15. ^a	Vermont Avenue & 5th Street	A.M.	0.510	A	0.528	A	0.018	NO	0.514	A	0.004	NO
		P.M.	0.589	A	0.617	B	0.028	NO	0.601	B	0.012	NO
16.	Western Avenue & 6th Street	A.M.	0.615	B	0.616	B	0.001	NO	0.615	B	0.000	NO
		P.M.	0.654	B	0.654	B	0.000	NO	0.654	B	0.000	NO
17.	Normandie Avenue & 6th Street	A.M.	0.793	C	0.801	D	0.008	NO	0.800	C	0.007	NO
		P.M.	0.735	C	0.740	C	0.005	NO	0.739	C	0.004	NO
18. ^a	Vermont Avenue & 6th Street	A.M.	0.851	D	0.894	D	0.043	YES	0.877	D	0.026	YES
		P.M.	0.820	D	0.907	E	0.087	YES	0.883	D	0.063	YES
19.	Shatto Place & 6th Street	A.M.	0.593	A	0.671	B	0.078	NO	0.661	B	0.068	NO
		P.M.	0.611	B	0.703	C	0.092	YES	0.688	B	0.077	NO
20.	Rampart Boulevard & 6th Street	A.M.	0.861	D	0.874	D	0.013	NO	0.871	D	0.010	NO
		P.M.	0.962	E	0.963	E	0.001	NO	0.963	E	0.001	NO
21.	Alvarado Street & 6th Street	A.M.	0.877	D	0.878	D	0.001	NO	0.878	D	0.001	NO
		P.M.	0.782	C	0.783	C	0.001	NO	0.783	C	0.001	NO
22.	Western Avenue & Wilshire Boulevard	A.M.	1.052	F	1.054	F	0.002	NO	1.054	F	0.002	NO
		P.M.	1.161	F	1.166	F	0.005	NO	1.165	F	0.004	NO
23.	Normandie Avenue &	A.M.	0.912	E	0.912	E	0.000	NO	0.912	E	0.000	NO

Table 5-18
Buildout Year 2023 With Alternative 3 With Mitigation Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Buildout without Project Conditions		Buildout with Alternative 3 Conditions				Buildout with Alternative 3 with Mitigation Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
	Wilshire Boulevard	P.M.	1.019	F	1.026	F	0.007	NO	1.025	F	0.006	NO
24.	Vermont Avenue &	A.M.	1.083	F	1.107	F	0.024	YES	1.102	F	0.019	YES
	Wilshire Boulevard	P.M.	1.069	F	1.126	F	0.057	YES	1.116	F	0.047	YES
25.	Hoover Street &	A.M.	0.844	D	0.853	D	0.009	NO	0.852	D	0.008	NO
	Wilshire Boulevard	P.M.	0.821	D	0.841	D	0.020	YES	0.838	D	0.017	NO
26.	Alvarado Street &	A.M.	0.909	E	0.909	E	0.000	NO	0.909	E	0.000	NO
	Wilshire Boulevard	P.M.	0.929	E	0.930	E	0.001	NO	0.930	E	0.001	NO
27.	Vermont Avenue &	A.M.	0.737	C	0.767	C	0.030	NO	0.761	C	0.024	NO
	7th Street	P.M.	0.809	D	0.813	D	0.004	NO	0.812	D	0.003	NO
28.	Vermont Avenue &	A.M.	0.781	C	0.819	D	0.038	YES	0.812	D	0.031	YES
	8th Street	P.M.	0.822	D	0.873	D	0.051	YES	0.864	D	0.042	YES
29.	Hoover Street &	A.M.	0.956	E	0.963	E	0.007	NO	0.963	E	0.007	NO
	8th Street	P.M.	1.012	F	1.013	F	0.001	NO	1.013	F	0.001	NO
30.	Vermont Avenue &	A.M.	1.006	F	1.040	F	0.034	YES	1.034	F	0.028	YES
	Olympic Boulevard	P.M.	1.053	F	1.070	F	0.017	YES	1.063	F	0.010	YES
31.	Vermont Avenue &	A.M.	0.888	D	0.914	E	0.026	YES	0.910	E	0.022	YES
	Pico Boulevard	P.M.	0.875	D	0.878	D	0.003	NO	0.878	D	0.003	NO
32.	Vermont Avenue &	A.M.	0.897	D	0.923	E	0.026	YES	0.919	E	0.022	YES
	Venice Boulevard	P.M.	0.944	E	0.946	E	0.002	NO	0.946	E	0.002	NO
33.	Vermont Avenue &	A.M.	0.971	E	0.972	E	0.001	NO	0.971	E	0.000	NO
	Washington Boulevard	P.M.	1.088	F	1.123	F	0.035	YES	1.117	F	0.029	YES
34.	Vermont Avenue &	A.M.	0.862	D	0.904	E	0.042	YES	0.896	D	0.034	YES
	I-10 Westbound Ramps	P.M.	0.793	C	0.822	D	0.029	YES	0.817	D	0.024	YES
35.	Vermont Avenue &	A.M.	0.885	D	0.905	E	0.020	YES	0.902	E	0.017	YES
	I-10 Eastbound Ramps	P.M.	1.002	F	1.023	F	0.021	YES	1.019	F	0.017	YES

Table 5-18
Buildout Year 2023 With Alternative 3 With Mitigation Conditions
Intersection Levels of Service and Significant Impacts

No.	Intersection	Peak Hour	Buildout without Project Conditions		Buildout with Alternative 3 Conditions				Buildout with Alternative 3 with Mitigation Conditions			
			V/C	LOS	V/C	LOS	Δ V/C	Impact	V/C	LOS	Δ V/C	Impact
36.	Vermont Avenue &	A.M.	1.000	E	1.009	F	0.009	NO	1.008	F	0.008	NO
	Adams Boulevard	P.M.	0.847	D	0.848	D	0.001	NO	0.847	D	0.000	NO
37.	Hoover Street &	A.M.	1.041	F	1.045	F	0.004	NO	1.044	F	0.003	NO
	Olympic Boulevard	P.M.	1.079	F	1.091	F	0.012	YES	1.089	F	0.010	YES
38.	Alvarado Street &	A.M.	0.843	D	0.843	D	0.000	NO	0.843	D	0.000	NO
	Olympic Boulevard	P.M.	0.930	E	0.930	E	0.000	NO	0.930	E	0.000	NO

^{as} Conditions with mitigation include 0.01 V/C credit at this location for implementation of TSM improvements as described in Chapter 7 of the Traffic Study included as Appendix 4.14-1 of this Draft EIR.

Source: Gibson Transportation Consulting, Inc., 2017.

Implementation of the Office Project Alternative would result in 16 significant intersection impacts prior to imposing mitigation measures in the Office Alternative Project condition, as shown in Table 5-18. Applying the same traffic mitigation measures that would be necessary for mitigating the traffic impacts of the Project to the Office Project Alternative, as well as comparable measures for additionally impacted intersections, the Office Project Alternative would have 20 peak hour significant and unavoidable impacts at 14 intersections, which would be greater than the 10 peak hour significant and unavoidable impacts at seven intersections that would occur under the Project. Therefore, the Office Project Alternative would have greater significant and unavoidable impacts than the Project.

CEQA provides that parking impacts for this Project shall not be considered a significant impact on the environment because it is a qualifying infill Project which is both mixed use residential and an employment center in a Transit Priority Area. Parking supply for the Office Project Alternative would be the same as for the Project. The proposed parking supply for the Office Project Alternative on Site 1 (1,733 spaces) would be the same as that of the Project, which is consistent with the County's operating parking ratio of 0.8 spaces per employee. The County has found this ratio to be necessary as an operational measure in order to adequately accommodate employees and visitors to County office buildings. Under the Office Project Alternative, 263 parking spaces would be provided on Site 2 in a new parking garage, which would represent a ratio of 0.26 spaces per employee. Under the Alternative, 116 parking spaces would be provided on Site 3, which would represent a ratio of 0.37 spaces per employee. On Sites 2 and 3, under the Office Project Alternative, parking supply would be significantly below the current County operating parking ratio of 0.8. The difference between the projected supply and adequate supply based on the County's experience in operating public office buildings could potentially result in parking spillover into adjacent neighborhoods if the reduced supply were to prove insufficient, and thereby affect the surrounding community.

Impacts of the Office Project Alternative would be higher than the Project's less-than-significant impact with respect to the Congestion Management Program or Caltrans freeway impact procedure because of higher trip generation. Since the Office Project Alternative would have a similar site layout, would provide similar bicycle and pedestrian facilities, and would also include traffic mitigations, the Office Project Alternative would also provide adequate emergency access, and would not conflict with alternative transportation policies and plans. Therefore, the Office Project Alternative would have a less-than-significant impact similar to that of the Project.

A total of 115 related projects are dispersed throughout the Project area. Although the Office Project Alternative would result in less-than-significant construction-related traffic impacts, similar to the Project, cumulative construction impacts would be significant and unavoidable due to the potential for concurrent and/or overlapping construction activities of the related projects and the Office Project Alternative. The Office Project Alternative's contribution to this significant cumulative impact would be cumulatively considerable. Therefore, the Office Project Alternative would still be significant and unavoidable, similar to that of the Project.

Tribal Cultural Resources

Similar to the Project, the Office Project Alternative, would include excavation below existing grade to construct the subterranean levels at each Project Site and, thereby, create a potential to disturb any previously undiscovered tribal cultural resources. In the event tribal cultural resources are encountered, the Office Project Alternative would be subject to the same regulatory requirements as the Project to ensure that the resources are properly recovered and evaluated. Therefore, the impact related to tribal

cultural resources under the Office Project Alternative would be less-than-significant and similar to that of the Project.

Utilities and Service Systems

Wastewater

Under the Office Project Alternative, development would occur on the Project Sites and the new mixed-use project would increase the use of wastewater at the Project Sites from existing conditions. As shown in Table 5-19, based on the decrease in units and increase in office square footage, the Office Project Alternative would generate 104,507 gallons of wastewater per day, which would be more than the 90,154 gallons of wastewater per day generated by the Project. Therefore, the less-than-significant impact of the Office Project Alternative would be greater than the Project's less-than-significant impact.

Table 5-19
Estimated Office Project Alternative Wastewater Generation

Connection	Existing Use Description	Average Daily Flow (gpd/unit) ^e	Quantity	Average Daily Sewer Demand (gpd)
Site 1				
10-inch City of L.A. Sewer Main-Vermont Avenue	Retail	25/1,000 gsf	6,350 gsf	159
	Restaurant ^c	300/1,000 gsf	3,650 gsf	1,095
	Auto Parking	--	800,002 gsf	0 ^a
	Office ^d	170/1,000 gsf	461,000 gsf	78,370
<i>Subtotal of Proposed Wastewater Demand for Site 1</i>				79,624
Site 2				
10-inch City of L.A. Sewer Main-Vermont Avenue	Lounge	50/1,000 gsf	0 gsf	0
	Residential Apt: Studio	75/du	0 du	0
	Residential Apt: 1 Bed	110/du	0 du	0
	Residential Apt: 2 Bed	150/du	0 du	0
	Pool	N/A	0 cu.ft.	0 ^e
	County Office	170/1,000 gsf	221,728 gsf	37,694
24-inch City of L.A. Water Main-6 th Street	Retail	25/1,000 gsf	0 gsf	0
	Auto Parking	--	116,324 gsf	0 ^a
<i>Subtotal of Proposed Wastewater Demand for Site 2</i>				37,694
Site 3				
20-inch City of L.A. Sewer Main-Vermont Avenue	Community Recreation Center	3/occupant	3,105 ^b	9,315
	Residential Apt: 1 Bed	110/du	0	0
	Residential Apt: 2 Bed	150/du	0	0
	Auto Parking	--	51,591 gsf	0 ^a
	County Office	170/1,000 gsf	67,637 gsf	11,498
<i>Subtotal of Proposed Wastewater Demand for Site 3</i>				20,813
Total of Proposed Wastewater Generation				138,131
Total Existing Wastewater Generation				33,624
Net Increase				104,507
^a Parking structures are only recognized by BOS to have sewer generation if restrooms are located within the structure.				
^b Lounge used in place of amenity space.				
^c Restaurant used in place of cafeteria.				

Table 5-19
Estimated Office Project Alternative Wastewater Generation

Connection	Existing Use Description	Average Daily Flow (gpd/unit) ^e	Quantity	Average Daily Sewer Demand (gpd)
^d	With the exception retail and restaurant, the office includes all miscellaneous uses within the building (circulation space, lobbies, storage rooms, amenity space.).			
^e	The average daily flow based on City of Los Angeles sewer generation factors. http://www.ci.la.ca.us/ead/programs/Thresholds/Complete%20Threshold%20Guide%202006.pdf .			
^f	Assumes the pool to be filled twice a year.			
^g	Community Recreation Center Quantity is defined by City of Los Angeles Bureau of Engineering, Sewer Capacity Availability Request (SCAR) dated December 15, 2016 as having a quantity of 3,105, which is utilized to calculate the sewage generation rate of 3 gallons per day per occupant. Appendix 4.16-1 Utility Infrastructure Technical Report.			
Source: KPFF, 2017.				

Water

Under the Office Project Alternative, the demand for water during construction would be similar to the Project based on similar construction activities. Under the Office Project Alternative, development would occur on the Project Sites and the new mixed-use project would increase the use of water at the Project Sites from existing conditions. As shown in Table 5-20, based on the decrease in units and increase in office square footage, the Office Project Alternative would use 93,893 gallons of water per day, which would be more than the 91,421 gallons of water per day used by the Project. Therefore, the less-than-significant impact of the Office Project Alternative would be greater than the Project's less-than-significant impact.

Table 5-20
Office Project Alternative Water Demand

Proposed Uses ^a	Quantity	Water Use Factor ^c (gpd/unit)	Base Demand	Required Ordinance Water Savings ^d (gpd)	Proposed Water Demand (gpd)
Office	471,000 sf	0.12	56,520		
Retail	6,350 sf	0.025	159		
Restaurant: Take Out	3,650 sf	0.30	1,095		
Base Demand Adjustment ^e			1,480		
Site 1 Total			59,254	4,971	54,283
Office	221,728 sf	0.12	22,607		
Base Demand Adjustment ^e			697		
Site 2 Total			23,304	2,340	20,964
Community Recreation Center	3,105 ^k occupant	3	9,315		
Office	67,637 sf	0.12	8,116		
Base Demand Adjustment ^e			253		
Site 3 Total			17,684	851	16,833
Landscaping ^f	17,900 sf		1,672	803	869
Parking Structures ^g	937,915 sf	0.02	617	0	617
Cooling Towers Site 1 ^h	1,000 ton	10	10,029	2,006	
Cooling Towers Site 2 ⁱ	650 ton	12	7,722	1,544	

Table 5-20
Office Project Alternative Water Demand

Proposed Uses ^a	Quantity	Water Use Factor ^c (gpd/unit)	Base Demand	Required Ordinance Water Savings ^d (gpd)	Proposed Water Demand (gpd)
Cooling Towers Total			17,751	3,550	14,201
Proposed Subtotal			120,282	12,515	107,767
Less Existing to be Removed Total ^b					13,406
Less Additional Conservation ^j					468
Net Additional Water Demand					93,893
^a Provided by the County of Los Angeles in the Request for Water Supply Assessment letter Scope of Confirmation e-mail. See Appendix A of the WSA. ^b The existing water demand is based on the LADWP billing data (annual average from 2010 to 2017). ^c 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 ^d 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 Los Angeles Green Building Code. Determined proportionally for Office Project Alternative. ^e 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. ^f Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance. ^g 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 assumption. ^h Operating 8 hours/day, 5 days/week, 6 cycles of concentration and 65percent of chiller capacity. ⁱ Operating 8 hours/day, 7 days/week, 6 cycles of concentration and 55percent of chiller capacity. ^j Water conservation due to additional conservation commitments agreed by the Applicant. See Table II. Determined proportionally for Office Project Alternative ^k Community Recreation Center Quantity is defined by City of Los Angeles Bureau of Engineering, SCAR dated December 15, 2016 as having a quantity of 3,105, which is utilized to calculate the sewage generation rate of 3 gallons per day per occupant. Appendix 4.16-1 Utility Infrastructure Technical Report. Abbreviations: Apt. - apartment bd - bedroom du - dwelling unit sf - square feet gpd - gallons per day Source: LADWP, 2017.					

Solid Waste

Under the Office Project Alternative, demolition and new construction would occur on the Project Site. Solid waste from demolition on the site would be similar to the Project, as the same land uses would be demolished. Construction solid waste would be similar to the Project because of similar construction that would be associated with the Site 1 County office building. Under the Office Project Alternative, the office project would decrease solid waste generation at the Project Sites from existing conditions. As shown in Table 5-21, the Office Project Alternative would generate 2,994 pounds per day, which would be greater than the 2,706 pounds per day generated by the Project. Therefore, the Office Project Alternative would generate more solid waste than the Project. Therefore, the impact of the Office Project Alternative regarding solid waste would be greater than the Project's less-than-significant impact, but the impact would be less-than-significant.

Table 5-21
Estimated Office Project Alternative Solid Waste Generation

Proposed Use Description	Quantity	Generation Rate ^a (pounds/day)	Total Generation (pounds/day)
Site 1			
Retail	10,000 sf	0.005/sf	50
Auto Parking	800,002 sf	--	0 ^b
Office ^d	457,350 sf	0.006/sf	2,744
<i>Subtotal of Solid Waste Generation for Site 1</i>			<i>2,794</i>
Site 2			
Lounge	0 sf	0.005/sf	0
Residential Apt: Studio	0 du	4/unit	0
Residential Apt: 1 Bed	0 du	4/unit	0
Residential Apt: 2 Bed	0 du	4/unit	0
Retail	0 sf	0.005/sf	0
Auto Parking	116,324 sf	--	0 ^b
County Office	221,728	0.006/sf	1,330
<i>Subtotal of Solid Waste Generation for Site 2</i>			<i>1,330</i>
Site 3			
Community Recreation Center	13,200 sf	0.005/sf	66
Residential Apt: 1 Bed	0 du	4/unit	0
Residential Apt: 2 Bed	0 du	4/unit	0
Auto Parking	--	51,591 sf	0 ^a
County Office	67,637	0.006/sf	406
<i>Subtotal of Solid Waste Generation for Site 3</i>			<i>472</i>
Total of Proposed Solid Waste Generation			4,596
Existing Solid Waste Generation			1,602
Net Total Solid Waste Generation			2,994
^a Cal Recycle website: https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates , February 2017.			
^b Parking Structure does not generate solid waste.			
Source (table): EcoTierra Consulting, 2017.			

RELATIONSHIP TO PROJECT OBJECTIVES

The Office Project Alternative would have higher impacts than the Project, in addition, it would not satisfy some of the Project Objectives, as listed in Section 3.0 (Project Description and Environmental Setting) of this Draft EIR. Specifically, the Office Project Alternative would meet the following Project Objective:

- Promote revitalization of the currently underutilized project sites, by expediting the elimination of blight and improving the visual character of the Project area through the redevelopment of underutilized sites.

The Office Project Alternative would partially meet the following Project Objectives:

- Provide a mix of uses that maximizes building density at locations served by public transit and locates residential uses in areas that reduce automobile dependency, replaces obsolete County facilities with new state-of-the art office facilities and infrastructure that will meet the current and future needs of County Departments located within or near the Vermont Corridor, and provides residential and retail uses to serve the local community, in a transit priority area.

5. Promote fiscal and community benefits, economic development, and job creation, by creating construction jobs, consolidating DMH and WDACS employees in the Vermont Corridor, providing economic benefit to the County, and providing community benefits through construction of a community recreation center and deed restricted senior affordable housing.
6. Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

The Office Project Alternative would not meet the following Project Objective:

3. Provide needed housing near public transit, by constructing high density residential dwelling units to serve a range of potential tenants and developing new housing stock at infill locations close to commercial and office uses.
4. Provide needed deed restricted senior affordable housing units in the Vermont Corridor.

REDUCTION OF SIGNIFICANT PROJECT IMPACTS

A comparison of the impact of each of the alternatives to the Project is summarized in Table 5-22 (Summary of Alternatives' Impacts). The Project would result in significant and unavoidable impacts to air quality (construction daily emissions for NO_x, and overlapping construction and operation phases for NO_x and ROG), noise (construction), transportation (10 peak hour impacts at seven intersections, and cumulative construction traffic). The Office Project Alternative would also generate higher (and significant and unavoidable) operational air quality impacts, similar significant and unavoidable construction impacts, and higher traffic impact (20 peak hour impacts at 14 intersections). In addition, due to the lack of residential uses, the Office Project Alternative would not achieve the Project Objectives to the same degree as the Project, and will not meet the fundamental Project Objectives related to the provision of housing and affordable housing.

5.0 ALTERNATIVES TO THE PROJECT

5.4 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Based on the information and analysis presented in Section 4.0 (Environmental Impact Analysis), Table 5-22 (Summary of Alternatives' Impacts) summarizes the results of the CEQA analysis for each resource area addressed therein. In order to provide a meaningful comparison of each alternative, Table 5-22 lists the level of significance of each resource area analyzed in Section 4.0 and provides color-coding in order to visually represent the differences in the levels of impact among the alternatives. However, this table is a summary and, as such, generalizes the impacts. For example, if there is more than one threshold that applies to a resource area listed in the table, the impact listed in the table refers to the greatest impact among the relevant thresholds. For specific details regarding the impacts of each of the alternatives within the resource areas, refer to the analysis throughout the earlier part of this section.

Table 5-22
Summary Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Resource Area	Project	Alternative		
		1 – No Project	2 – Reduced Project	3 – Office Project
Aesthetics^a				
Aesthetics/Views	NI (SB 743)	NI	NI (SB 743)	NI (SB 743)
Shade/Shadow	NI (SB 743)	NI	NI (SB 743)	NI (SB 743)
Light/Glare	NI (SB 743)	NI	NI (SB 743)	NI (SB 743)
Air Quality				
Construction Emissions	SU	NI	SU	SU
Operational Emissions	SU	NI	SU	SU
Cultural Resources				
Historical Resources	LTS	NI	LTS	LTS
Archaeological Resources	LTS	NI	LTS	LTS
Paleontological Resources	LTS	NI	LTS	LTS
Energy				
Electricity	LTS	NI	LTS	LTS
Natural Gas	LTS	NI	LTS	LTS
Geology and Soils				
Seismic Hazards	LTS	NI	LTS	LTS
Soil Stability/Erosion	LTS	NI	LTS	LTS
Other Geologic Hazards	LTS	NI	LTS	LTS
Greenhouse Gas Emissions				
Consistency with Plans	LTS	LTS	LTS	LTS
Hazards and Hazardous Materials	LTS	NI	LTS	LTS
Hydrology and Water Quality				
Water Quality	LTS	LTS	LTS	LTS
Groundwater	LTS	LTS	LTS	LTS
Drainage Patterns	LTS	LTS	LTS	LTS
Flooding	LTS	LTS	LTS	LTS
Land Use and Planning				
Community Division	LTS	NI	LTS	LTS
Land Use Plans and Policies	LTS	NI	LTS	LTS

Table 5-22
Summary Comparison of Impacts Associated with the Alternatives and Impacts of the Project

Resource Area	Project	Alternative		
		1 – No Project	2 – Reduced Project	3 – Office Project
Land Use Compatibility	LTS	NI	LTS	LTS
Noise				
Construction Noise	SU	NI	SU	SU
Operational Noise	LTS	NI	LTS	LTS
Construction Vibration – Human Annoyance	LTS	NI	LTS	LTS
Construction Vibration – Building Damage	LTS	NI	LTS	LTS
Operational Vibration	LTS	NI	LTS	LTS
Population, Housing, and Employment	LTS	NI	LTS	LTS
Public Services				
Fire Protection	LTS	NI	LTS	LTS
Police Protection	LTS	NI	LTS	LTS
Schools	LTS	NI	LTS	LTS
Libraries	LTS	NI	LTS	LTS
Recreation	LTS	NI	LTS	LTS
Transportation and Traffic				
Construction Traffic	LTS	NI	LTS	LTS
Operational Traffic	SU	NI	SU	SU
Consistency with Plans	LTS	NI	LTS	LTS
Cumulative Construction Traffic	SU	NI	SU	SU
Tribal Cultural Resources	LTS	NI	LTS	LTS
Utilities and Service Systems				
Water	LTS	NI	LTS	LTS
Wastewater	LTS	NI	LTS	LTS
Solid Waste	LTS	NI	LTS	LTS
NI = No impact LTS = Less-than-significant impact LTS(M) = Less-than-significant impact with mitigation SU = Significant and Unavoidable  Impacts of the alternative are <u>greater than</u> the Project.  Impacts of the alternative are <u>similar to</u> the Project.  Impacts of the alternative are <u>less than</u> the Project ^a As stated in Section 4.1 (Aesthetics), in accordance with SB 743 and Section 21099(d)(1) of the Public Resources Code, the Project's aesthetic impacts shall not be considered a significant impact on the environment. Source: EcoTierra Consulting, 2017.				

In addition to the discussion and comparison of impacts of a proposed project and its alternatives, Section 15126.6 of the State CEQA Guidelines requires that an environmentally superior alternative be identified and the reasons for such a selection be disclosed. In general, the environmentally superior alternative is the alternative that would be expected to generate the least amount of adverse impacts. In this case, the No Project Alternative (Alternative 1) would result in fewer impacts on the existing environment.

However, Section 15126.6(e)(2) of the State CEQA Guidelines states that if the No Project Alternative is the environmentally superior alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. As shown in Table 5-22, the alternative with the most number of impact categories where the impacts are less than the Project (i.e., shaded in green) is Alternative 2, the Reduced Project Alternative. The environmentally superior alternative is Alternative 2 because it would reduce impacts with respect to air quality, noise, and traffic, but would not avoid the significant and unavoidable impacts of the Project. Additionally, Alternative 2 would meet the Project Objectives, but to a lesser degree than the Project, because the Reduced Project Alternative would accommodate fewer County employees than the Project, and would be less effective than the Project in consolidating DMH employees in the Vermont Corridor, and accommodating County Departments' expected future growth and requirements. The Reduced Project Alternative would also be less effective in implementing key State, regional and local land use policies that promote the concentration of future development in areas served by transit than would the Project. The Reduced Project Alternative would implement fundamental Project Objectives related to housing and affordable housing because it would include the same residential uses as the Project.

6.0 OTHER CEQA CONSIDERATIONS

6.1. SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) of the State CEQA Guidelines requires that an EIR describe any significant impacts that cannot be avoided. Specifically, Section 15126.2(b) states:

Describe any significant impacts, including those which can be mitigated but not reduced to a level of insignificance.

Based on the analysis in Section 4.0 (Environmental Impact Analysis) of this Draft EIR, implementation of the Project would result in significant unavoidable environmental impacts relative to: Air Quality (construction daily emissions for NO_x, and overlapping construction and operation phases for NO_x and ROG); Noise (construction noise); and Transportation (10 peak hour impacts at seven intersections at buildout) and cumulative construction traffic.

AIR QUALITY

Emissions associated with the Project would exceed the SCAQMD's thresholds of significance for NO_x during overlapping construction on Site 1 and Site 3, and NO_x and ROG during construction and operation overlapping phases and would be significant and unavoidable, as discussed in Section 4.2 (Air Quality) of this Draft EIR.

NOISE

Construction noise impacts would be significant and unavoidable at four locations, which include Sensitive Receptor 2, the school/religious use located east of the Shatto Place parking structure; and Sensitive Receptors 12, 14 and 15, which are residential, religious, and residential uses, respectively, located in the vicinity of Site 3.

TRAFFIC, TRANSPORTATION

Cumulative construction traffic impacts would be significant and unavoidable due to the potential for concurrent construction of the related projects in the vicinity of the Project. The Project's contribution to this significant cumulative impact would be cumulatively considerable.

Significant and unavoidable impacts would remain at the following intersections (numbers refer to intersection numbers in Table 4.14-1 in Section 4.14, Transportation and Traffic, of this Draft EIR):

Existing with Project Phases I and II Conditions

- 24. Vermont Avenue & Wilshire Boulevard (PM Peak)

Interim Year 2021 with Project Phase I

- 6. Vermont Avenue & Beverly Boulevard (PM Peak)
- 24. Vermont Avenue & Wilshire Boulevard (PM Peak)

Buildout Year 2023 with Project Phases I and II

- 6. Vermont Avenue & Beverly Boulevard (PM Peak)
- 10. Vermont Avenue & 3rd Street (PM Peak)
- 18. Vermont Avenue & 6th Street (AM and PM Peak)
- 24. Vermont Avenue & Wilshire Boulevard (AM and PM Peak)
- 30. Vermont Avenue & Olympic Boulevard (AM and PM Peak)
- 33. Vermont Avenue & Washington Boulevard (PM Peak)
- 35. Vermont Avenue & I-10 Eastbound Ramps (PM Peak)

6.0 OTHER CEQA CONSIDERATIONS

6.2. REASONS WHY THE PROJECT IS BEING PROPOSED, NOTWITHSTANDING SIGNIFICANT UNAVOIDABLE IMPACTS

Section 15126.2(b) goes on to say:

Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described.

As noted above, the Project would have significant unavoidable impacts in the areas of construction air quality, construction noise, operational traffic, and cumulative construction traffic. In spite of these impacts, the Project is being proposed because it would:

- Provide a mix of uses that maximizes building density at locations served by public transit and locates residential uses in areas that reduce automobile dependency, by replacing obsolete County facilities with new state-of-the art office facilities and infrastructure that will meet the current and future needs of County Departments located within or near the Vermont Corridor, and by providing residential and retail uses to serve the local community, in a transit priority area.
- Promote revitalization of the currently underutilized project sites, by expediting the elimination of blight and improving the visual character of the Project area through the redevelopment of underutilized sites.
- Provide needed housing near public transit, by constructing high density residential dwelling units to serve a range of potential tenants, and developing new housing stock at infill locations close to commercial and office uses.
- Provide needed deed restricted senior affordable housing units in the Vermont Corridor.
- Promote fiscal and community benefits, economic development, and job creation, by creating construction jobs, consolidating DMH and WDACS employees in the Vermont Corridor, providing economic benefit to the County, and providing community benefits through construction of a community recreation center and deed restricted senior affordable housing.
- Create an environmentally sensitive development, by incorporating sustainable and green building design and construction that reduces waste, manages water use efficiently and conserves energy, and by providing employment, housing, and shopping opportunities within easy access of established public transit.

6.0 OTHER CEQA CONSIDERATIONS

6.3. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15126.2(c) of the State CEQA Guidelines states that the “uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely.” Section 15126.2(c) further states “irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The types and level of development associated with the Project would consume limited, slowly renewable, and non-renewable resources. This consumption would occur during construction of the Project and would continue throughout its operational lifetime. The development of the Project would require a commitment of resources that would include (1) building materials, (2) fuel and operational materials/resources, and (3) the transportation of goods and people to and from the Project Site.

Construction of the Project would require consumption of resources that are not replenishable or that may renew so slowly as to be considered non-renewable. These resources would include certain types of lumber and other forest products, aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone), metals (e.g., steel, copper and lead), petrochemical construction materials (e.g., plastics), and water. Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment. The consumption of these resources would be spread out through the construction period.

The commitment of resources required for the type and level of proposed development would limit the availability of these resources for future generations for other uses during the operation of the Project. However, this resource consumption would be consistent with growth and anticipated change in Los Angeles County and the City of Los Angeles. In addition, the Project would include the adaptive reuse of the existing County office building located at Vermont Avenue and 6th Street, which would involve the consumption of fewer new resources than full demolition of the existing building and construction of a new building at this location.

6.0 OTHER CEQA CONSIDERATIONS

6.4. GROWTH INDUCING IMPACTS

State CEQA Guidelines Section 15126.2(d) requires a discussion of the ways in which a project could induce growth. This includes ways in which a project would foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. State CEQA Guidelines Section 12126.2(d) states:

Discuss the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a waste water treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. Also discuss the characteristic of some projects which may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

The Project is being undertaken to generate substantial economic benefit to the area by eliminating blight, creating construction jobs for local residents, as well as providing growth and expansion opportunities for local and small businesses. The Vermont Corridor Project would include the updated re-development and occupancy of three County-owned properties located in the Vermont Corridor, which is home to over a half million square feet of County-owned office space, and over a half million square feet of County-leased office space. County-owned facilities, built between 1938 and 1963, have contributed to blight in the surrounding community due to the age of the buildings. To promote improved efficiency, reverse blight in the area, and promote redevelopment of the County-owned properties and surrounding areas, the County's intends to consolidate these departments' locations within new office facilities, and relocate employees accordingly. Further, the aged facilities occupy prominent parcels that offer potential opportunities for economic revitalization through their redevelopment that would also provide public benefits and aesthetic enhancement for the surrounding community.

Site 1 is currently occupied by a two-story abandoned structure with roof parking that has been identified as structurally deficient, a two-story office building occupied by County staff, open parking areas, and carport in the north parking area, and an existing parking structure at 523 Shatto Place that is connected to the site. Proposed development on Site 1 would involve removal of the existing office building, vacant office building, surface parking lots, and parking structure, and construction of a new County office building containing 471,000 square feet of office use over a 390,000-square foot parking structure containing 965 spaces, and 10,000 square feet of ground floor retail. In addition, a new parking structure would be constructed on the site of the existing 7-story parking structure on Shatto Place.

Site 2 is currently occupied by two County office buildings and a parking structure. Proposed development on Site 2 would involve reuse and conversion of the existing 154,793-square foot, 12-story DMH building into a maximum of 172 residential units (82 studio, 46 one-bedroom, 44 two-bedroom), 4,100 square feet of ground floor retail, 1,375 square feet of ancillary space (office, common area, etc.), and an

approximately 7,500 square foot roof deck amenity. Upgrade to existing steel framing and installation of new HVAC, and life/safety systems would be included in the reuse of the existing DMH building, as well as new exterior building facades. The existing building height of 173.5 feet (including the elevator machine room) would not change under the Project. In addition, the development of Site 2 would involve removal of the existing four-story, approximately 52,000 square foot, WDACS office building and two-story parking structure, and construction of a new 116,324 square foot, five-level parking structure (3.5 levels above grade and 1.5 levels below grade). A future option for the development of Site 2 would include construction of a new 66,935 square foot, mixed-use building above the parking structure, containing five residential levels and 74 units (28 studio, 38 one-bedroom, and 8 two-bedroom), and 2,250 square feet of ancillary space. In addition, 3,400 square feet of retail uses would be provided at the ground level of the new mixed-use building on 6th Street. The parking structure would provide 263 auto parking spaces and 290 bicycle storage spaces (30 short-term and 260 long-term) to serve the residential units (new and reused/converted), and the retail uses on Site 2. The new mixed-use building would be approximately 95 feet from the highest adjacent grade to the top of the parapet (105 feet to top of elevator machine room).

Site 3 is currently occupied by a County office building. Proposed development on Site 3 would involve removal of the existing building, and construction of a new 80,837 square foot, six-story, one hundred percent senior affordable housing project containing 72 units, and an approximately 13,200 square foot community recreation center, over a three-story, 51,591 square foot underground parking structure.

The Project would consolidate up to 2,063 existing County employees on Site 1, and would be designed to accommodate future growth, to a maximum of 2,166 employees, between 2021 and 2023. The net increase in employment on Sites 1 and 2 as a result of the Project would be 907 employees by 2023. The new Project employees on Sites 1 and 2 would be within the SCAG employment growth forecasts, representing approximately 0.19 percent of the citywide total growth for the period of 2020 to 2040 as discussed in Section 4.11 (Population, Housing, and Employment) of this Draft EIR. Site 3 uses would generate approximately 46 employees, which would result in a net decrease of approximately 66 employees on the Site. The location of employment in this area of the City that would occur under the Project would be consistent with the regional growth management policies discussed in detail in Section 4.9 (Land Use and Planning). This increased employee population of the Project Sites would patronize local businesses and services in the area, and would foster economic growth. The potential concentration of employment in this area of the City that would occur under the Project would be consistent with the regional growth management policies discussed in detail in Section 4.9 (Land Use and Planning). These policies promote development activity in existing developed areas, especially areas near existing transit and transportation infrastructure, such as the Project Sites, which are located within walking distance of the Metro Rail Red/Purple Line Wilshire/Vermont Station. The Project would foster economic growth and revitalize an area by adding businesses to the Project Site. The employees associated with the Project could, in turn, patronize existing local businesses and services in the area. The Wilshire Community Plan policies also promote an arrangement of land use, circulation, and services which encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the community. The projected employment growth would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels, and that would result in an adverse physical change in the environment, or introduce unplanned infrastructure (see Section 4.11 [Population, Housing, and Employment]). Therefore, projected employment growth associated with the Project would not generate adverse impacts.

The Project includes the development of up to 318 new housing units, including 72 senior affordable housing units. The additional units proposed to be developed on Sites 2 and 3 would be within SCAG's anticipated growth forecast, representing approximately 0.13 percent of the total citywide growth for the period of 2020 to 2040. Therefore, the residential development associated with the Project would be within the projections for housing unit growth Citywide.

In 2012, SCAG estimates that the City of Los Angeles had a total population of 3,845,500 persons. According to SCAG, the City's population is expected to increase by 171,500 between 2012 and 2020, with additional growth of 592,400 persons between 2020 and 2040. The construction of additional residential dwelling units on the Project Site would be expected to accommodate up to 799 permanent residents by 2023. The addition of these new residents would be within the SCAG population growth forecasts, representing approximately 0.13 percent of the Citywide total growth for the period of 2020 to 2040. Since the population growth associated with Site 2 would be within the projected growth for the City of Los Angeles, impacts related to population growth would be less than significant. Therefore, the population growth associated with the residential development associated with the Project would be within the projections for population growth Citywide. This increased residential population would patronize local businesses and services in the area, and would foster economic growth. The potential concentration of housing and population in this area of the City that would occur under the Project would be consistent with the regional growth management policies discussed in detail in Section 4.9 (Land Use and Planning). These policies promote development activity in existing developed areas, especially areas near existing transit and transportation infrastructure, such as the Project Sites, which are located within walking distance of the Metro Rail Red/Purple Line Wilshire/Vermont Station. The Wilshire Community Plan policies also promote an arrangement of land use, circulation, and services which encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the community. The projected population growth would not cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels, and that would result in an adverse physical change in the environment, or introduce unplanned infrastructure (see Section 4.11 [Population, Housing, and Employment]). Therefore, projected population growth associated with the Project not generate adverse impacts.

6.0 OTHER CEQA CONSIDERATIONS

6.5. EFFECTS NOT FOUND TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires an EIR to contain a brief statement indicating reasons that various possible significant effects of a project were determined not to be significant and not discussed in detail in the EIR. Pursuant to Section 15128, the lead agency determined that the proposed project would not result in potentially significant impacts to the following environmental topics included in CEQA Guidelines Appendix G:

- Aesthetics (scenic vistas, views from trails, scenic resources within a State scenic highway)
- Agriculture and Forest Resources (all subtopics)
- Air Quality (objectionable odors)
- Biological Resources (all subtopics)
- Geology and Soils (surface rupture along known faults, landslides, erosion, expansive soil, septic tanks/wastewater treatment, conflicts with hillside management area ordinance)
- Hazards and Hazardous Materials (routine use of hazardous materials, airports, interference with emergency response, fire hazards)
- Hydrology and Water Quality (mosquito habitat, pollutant discharge into areas of Special Biological Significance, wastewater treatment, 100-Year flooding, seiche/tsunami/mudflow)
- Land Use (division of a community)
- Mineral Resources (all subtopics)
- Noise (proximity to airports)
- Population and Housing (displacement of housing, displacement of people)
- Recreation (regional open space connectivity)
- Transportation and Traffic (air traffic patterns)

An analysis prepared pursuant to Guidelines Section 15128 for these environmental topics is provided below.

AESTHETICS (SCENIC VISTAS, VIEWS FROM TRAILS, SCENIC RESOURCES WITHIN A STATE SCENIC HIGHWAY)

Proposed development of Sites 1, 2 and 3 would represent residential, mixed-use residential, or employment center projects on infill sites within a transit priority area, and, as such, the Project's aesthetic and parking impacts shall not be considered significant impacts on the environment pursuant to PRC Section 21099. The following analyses regarding aesthetics, are provided for informational purposes.

The Project Sites are located in an urbanized setting and are surrounded by commercial, institutional, parking, and multi-family residential uses. There are no scenic vistas or prominent topographical features that would provide scenic vistas nor are there scenic corridors or expansive views available at or in the vicinity of the Project Sites. Therefore, impacts to scenic vistas would be less than significant.

There are no regional riding or hiking trails within view of the Project Sites or area surrounding the Project Sites. According to the City of Los Angeles Department of Recreation and Parks, the nearest City-designated equestrian riding trails to the Project Sites are in Griffith Park, approximately four miles north of the Project Sites. According to the County of Los Angeles Department of Parks and Recreation, the nearest County-designated equestrian riding trails to the Project Sites are in Whittier Narrows Recreation Area, located approximately 17 miles east of the Project Sites, and Eaton Canyon Park and Nature Center, located approximately 17 miles northeast of the Project Sites.¹ The nearest designated mountain biking trails to the Project Sites are located at Colonel H. Leon Washington Park, approximately 10 miles southeast of the Project Sites.² The nearest hiking trails to the Project Sites are the Ferndell trail to Griffith Park, approximately four miles north of the Project Sites, and Runyon Park trail from Wattles Garden Park, approximately six miles northwest of the Project Sites.³ The Project Sites would not obstruct views from these trails. Accordingly, impacts to views from trails would be less than significant.

The nearest designated scenic highway to the Project Sites is Highland Avenue, north of Wilshire Boulevard; Highland Avenue is approximately three miles west of the Project Sites.⁴ The Project Sites are not located along or within the scenic vistas or viewsheds of this scenic highway. Therefore, the Project would not damage and/or remove any scenic resources within a State or City designated scenic highway, and no impact would occur.

AGRICULTURE AND FOREST RESOURCES

The Project Sites are all currently developed with active and abandoned buildings and parking. No Farmland, agricultural uses, or related operations are present within the Project Sites or surrounding area. The Project Sites are not zoned for agricultural uses, enrolled under the Williamson Act, located within a designated Agricultural Opportunity Area, nor included in the Farmland Mapping and Monitoring Program of the California Resources Agency. Additionally, the Project Sites and the surrounding area are not zoned for forest land, timberland, or zoned for Timberland Production. Accordingly, the Project would not directly or indirectly cause the conversion of Farmland to non-agricultural use or the conversion of forest land to non-forest use. Therefore, the Project would not result in any impacts related to agriculture and forest resources.

AIR QUALITY (OBJECTIONABLE ODORS)

Potential sources of odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project Sites. The Project would utilize typical construction techniques, and any odors would be typical of urban construction activity. Additionally, any odors would be temporary, and construction activity associated

¹ County of Los Angeles Department of Parks and Recreation, Horseback Riding trails website: <http://parks.lacounty.gov/wps/portal/dpr/ThingsToDo/>, accessed March 23, 2017, and City of Los Angeles, Department of City Planning, Existing and Potential Equestrian Trails, website: <http://planning.lacity.org/complan/pdf/EquestrianTrailsGuide.pdf>, June 2002.

² County of Los Angeles Department of Parks and Recreation, Hiking trails website: <http://parks.lacounty.gov/wps/portal/dpr/ThingsToDo/>, accessed March 23, 2017.

³ AllTrails, Inc., website: <https://www.alltrails.com/?ref=header> accessed March 23, 2017.

⁴ California Scenic Highway Mapping System, State of California Department of Transportation, website: <http://www.dot.ca.gov/hq/LandArch/scenic/cahisys.htm>, and City of Los Angeles, Department of City Planning, Environmental and Public Facilities Maps, Scenic Highways, September 1, 1996.

with the Project would be required to comply with SCAQMD Rule 402, which prohibits discharge of air contaminants that cause nuisance odors. Accordingly, Project construction would not cause an odor nuisance, and odor impacts are anticipated to be less than significant.

According to the SCAQMD CEQA Air Quality Handbook, land uses and industrial operations that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies and fiberglass molding. The Project involves the construction and operation of office space, residential units, commercial/retail uses, and associated parking which are not typically associated with odor complaints. Restaurants that would be included in the Project would be subject to SCAQMD Rule 402, Nuisance, as it applies to the generation of odors. As the Project involves no elements related to odor-causing uses listed or similar to those identified in the SCAQMD CEQA Air Quality Handbook, no objectionable odors are anticipated. Therefore, the Project's impacts associated with objectionable odors would be less than significant.

BIOLOGICAL RESOURCES (TREES AND BIOLOGICAL RESOURCES)

The Project Sites are entirely developed and/or paved.

Trees

Tree reports were prepared for Sites 1, 2 and 3, and are contained in Appendices 6.5-1, 6.5-2, and 6.5-3, respectively to this Draft EIR.

Site 1

Site 1 is under the jurisdiction of the County of Los Angeles and guided by the Oak Tree Ordinance, County Code Section 22.56.2060, which the County has adopted to recognize the aesthetic, environmental, ecological, economic benefits and historical legacy that Oak trees provide the county. The tree report for Site 1 found that there are no trees on this Site that would be protected under the Los Angeles County Oak Tree Ordinance.

The Project includes sidewalk improvements and construction that will significantly impact seven City of Los Angeles Street Trees. Four of these trees are Indian laurel fig trees (*Ficus microcarpa nitida*) located on Vermont Avenue. The three other trees are carrotwood trees (*Cupaniopsis anacardioides*) located on Shatto Place. These trees would be removed and replaced in accordance with existing regulations of the City of Los Angeles Urban Forestry Division. The seven street trees will be replaced at a 2:1 ratio to the satisfaction of the City of Los Angeles Urban Forestry Division, for a total of fourteen (14) new street trees. Impacts would be less than significant.

Non-Protected Significant Trees on Site 1 consist of existing trees on the Site with a diameter at breast height (DBH) of 8 inches (8") or greater. Ten Non-Protected Significant Trees will be impacted by Site 1 construction. The trees are all Canary pines (*Pinus canariensis*) located in a row near the sidewalk by Shatto Place. These trees would be removed and replaced upon the completion of construction.

Existing trees on Site 1 do not contain any habitat capable of sustaining 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.

Site 2

Site 2 is under the jurisdiction of the City of Los Angeles and guided by the Native Tree Protection Ordinance No. 177,404. Protected Trees are defined by this ordinance as Oaks (*Quercus* sp) indigenous to California but excluding the scrub oak (*Quercus dumosa*); Southern California black walnut (*Juglans californica* var. *californica*); Western sycamore (*Platanus racemosa*) and California bay laurel (*Umbellularia californica*) trees with a DBH of four inches (4") or greater. The tree report for Site 2 found that there are no trees on this Site that would be protected under the City of Los Angeles Native Tree Protection Ordinance.

The Project includes sidewalk improvements and construction that will significantly impact four City of Los Angeles Street Trees. These trees are Indian laurel fig trees (*Ficus mircocarpa nitida*) located on Vermont Avenue and 6th Street. These trees would be removed and replaced in accordance with existing regulations of the City of Los Angeles Urban Forestry Division. The four street trees will be replaced at a 2:1 ratio to the satisfaction of the City of Los Angeles Urban Forestry Division, for a total of eight new street trees. Impacts would be less than significant.

Non-Protected Significant Trees on Site 1 consist of existing trees on the site with a diameter at breast height (DBH) of 8 inches (8") or greater. Ten Non-Protected Significant Trees will be impacted by Site 2 construction. The trees are all Canary pines (*Pinus canariensis*) located in a row near the sidewalk by Shatto Place. These trees would be removed and replaced upon the completion of the project.

Existing trees on Site 2 do not contain any habitat capable of sustaining 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.

Site 3

Site 3 is under the jurisdiction of the County of Los Angeles and guided by the Oak Tree Ordinance, County Code Section 22.56.2060, which the County has adopted to recognize the aesthetic, environmental, ecological, economic benefits and historical legacy that Oak trees provide the county. The tree report for Site 3 found that there are no trees on this Site that would be protected under the Los Angeles County Oak Tree Ordinance.

The tree report for Site 3 did not identify any other trees on the Site.

Biological Resources

In addition, the Project Sites and the surrounding areas are highly urbanized with no open spaces, water bodies, or stream courses that would facilitate movement of migratory fish or wildlife. Thus, no suitable habitats exist on the Project Sites to support these sensitive natural communities (such as riparian habitat, coastal sage scrub, oak woodlands, unique native trees, or non-jurisdictional wetlands). Similarly, the Project would not interfere with or impede the movement or migration of any native resident or wildlife species.

The Project Sites are not located within any Wildflower Reserve Areas, Significant Ecological Areas, or Sensitive Environmental Resource Areas, or areas subject to the Los Angeles County Oak Tree Ordinance. In addition, there is no adopted State, regional, or local habitat conservation plan that is applicable to the Project Sites or the surrounding areas. Given the above, the Project would not impact any sensitive plant or wildlife species, either directly or through habitat modification, and it would not conflict with any local

policies or ordinances protecting biological resources. Additionally, there are no federally or State protected wetlands, vernal pools, coastal wetlands, drainages, or waters of the U.S. located on or near the Project Sites. Accordingly, the proposed project would not have any impact, either, directly or through removal, filling, hydrological interruption, or other means, on these sensitive natural resources.

While trees on the Sites 1 and 2 could potentially contain bird nests, the birds would be substantially accustomed to urban activity. The Project would be required to comply with the federal Migratory Bird Treaty Act of 1918 (50 Code of Federal Regulation Section 10.13), and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, as part of regulatory compliance for Sites 1 and 2 (there are no trees Site 3).

Overall, the Project would not be anticipated to significantly impact biological resources.

GEOLOGY AND SOILS (SURFACE RUPTURE ALONG KNOWN FAULTS, LANDSLIDES, EROSION, EXPANSIVE SOIL, SEPTIC TANKS/WASTEWATER TREATMENT, CONFLICTS WITH HILLSIDE MANAGEMENT AREA ORDINANCE)

All aspects of seismic-related hazards, other geotechnical hazards, and erosion and sedimentation issues are regulated by Los Angeles County and/or the State of California. Development at the Project Sites would incorporate the recommendations of the geotechnical assessments as a Project Design Features. In addition, adherence to design and construction standards, as required by State and County regulations and codes, would ensure maximum practicable protection for users of the buildings such that they can withstand acceptable risk.

Surface Fault Rupture

The Project Sites are not located within an Alquist-Priolo Earthquake Fault Zone, nor are they located within a Preliminary Fault Rupture Study Area as designated by the City of Los Angeles. No known active or potentially active faults underlie any of the Project Sites⁵ and the nearest fault to Project Sites is the Hollywood Fault, approximately three miles to the northwest.⁶ As such, significant impacts related to surface rupture of faults are not anticipated at the Project Sites.

Landslides

The Project Sites and vicinity are relatively flat and not located within a “Landslide Inventory and Hillside Areas” or within an area identified as having a potential for seismic slope instability. There are no known landslides at any of the Project Sites, nor are the Project Sites in the path of any known or potential

⁵ *Geotechnologies, Inc., Geotechnical Assessment, Site 1: Proposed Office Building and Parking Structure, 510, 526, 532 South Vermont Avenue and 523 Shatto Place, Los Angeles, California, November 2016, revised May, 2017; Geotechnical Assessment Site 2: Proposed Adaptive Reuse Project and Mixed-Use Structure 540, 542 and 550 South Vermont Avenue and 3175 West 6th Street, Los Angeles, California, November, 2016, revised May, 2017; and Geotechnical Assessment Site 3: Proposed Affordable Housing Development 427 and 433 South Vermont Avenue, Los Angeles, California, November, 2016, revised May, 2017. See Appendices 4.5-1, 4.5-2 and 4.5-3 to this Draft EIR.*

⁶ *City of Los Angeles Bureau of Engineering, Department of Public Works, NavigateLA, website: <http://navigatea.lacity.org/navigatea/>, accessed: March 20, 2017.*

landslides.⁷ As such, the probability of seismically-induced landslides is low and no impacts would occur.

Erosion

The Project Sites are currently improved with office buildings and associated parking and the area surrounding the Project Sites is completely developed and would not be susceptible to indirect erosional processes (e.g., uncontrolled runoff) caused by development at any of the Project Sites. During construction, grading and excavation would expose soils to potential erosion for a limited time, however, due to the temporary nature of the soil exposure during the grading and excavation processes, no substantial erosion would occur. In addition, during this period, construction activities would be required to prevent the transport of sediments from the Project Sites by stormwater runoff and winds through the use of appropriate Best Management Practices (BMPs). These BMPs would be detailed in the required Stormwater Pollution Prevention Program (SWPPP), which must be approved by the County on Sites 1 and 3, and by the City on Site 2, and be in compliance with the latest National Pollutant Discharge Elimination System (NPDES) Stormwater Regulations.

Expansive Soil

Materials underlying the Project Sites are anticipated to be deep fill materials, alluvial soils, and bedrock of the Puente Formation.⁸ The alluvial soils underlying the fill generally consists of mixtures of sands, silty sands, and silty clays. The alluvium is typically medium dense to very dense, or stiff, and well-consolidated with expansion characters that range from low to moderate. Development to the depth required for the proposed underground parking structures at the Sites would require the removal the existing fill and foundation supports would extend into competent soils or bedrock beneath the Sites. As such, potentially expansive alluvial soils would be removed during excavation. The geotechnical reports prepared for the Project Sites conclude that the Sites can be feasibly developed from a geotechnical engineering standpoint.⁹

Septic Tanks/Wastewater Treatment,

The Project Sites are located in a developed area of the City of Los Angeles, which is served by a wastewater collection, conveyance, and treatment system operated by the City. Project development at all three Project Sites would connect to the existing wastewater system. No septic tanks or alternative disposal systems are necessary, nor are they proposed.

Hillside Management Area Ordinances

Sites 1 and 3 are not located within a County-designated “Hillside Management Area”¹⁰, and Site 2 is not located within a City-designated hillside area.¹¹ Therefore, no conflict with hillside development

⁷ City of Los Angeles Department of City Planning, *General Plan, Safety Element, Exhibit C, Landslide Inventory & Hillside Areas in the City of Los Angeles*, June 1994.

⁸ Geotechnologies Inc., *Geotechnical Assessments*, op.cit.

⁹ Geotechnologies Inc., *Geotechnical Assessments*, op.cit.

¹⁰ Los Angeles County Department of Regional Planning, *General Plan, Conservation and Natural Resources Element, Figure 9.8, Hillside Management Areas and Ridgeline Management Map*, 2001.

¹¹ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: March 2017 for APN 5077-003-902.

regulations would occur.

HAZARDS AND HAZARDOUS MATERIALS (ROUTINE USE OF HAZARDOUS MATERIALS, AIRPORTS, INTERFERENCE WITH EMERGENCY RESPONSE, FIRE HAZARDS)

The types and amounts of hazardous materials that would be used in connection with development at the three Project Sites would be typical of those used in other office, residential, and commercial developments (e.g., cleaning solvents, pesticides for landscaping, painting supplies, and petroleum products). Construction of the Project would also involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable federal, State, and local regulations. Any associated risk would be adequately reduced to a less-than-significant level through compliance with these standards and regulations.

The Project Sites are not located within the vicinity of an airport or a private airstrip.¹² Project construction and operation would not result in airport- or airstrip-related safety hazards for people residing or working in the area. Therefore, the Project would have no impact related to airport or airstrip activity.

The Project Sites are not located along a County-identified disaster route.¹³ The Project would not cause permanent alterations to vehicular circulation routes and patterns, impede public access or travel upon public rights-of-way.¹⁴ No full road closures are anticipated during construction of the Project, and none of the surrounding roadways would be impeded.¹⁵ Access for emergency service providers and evacuation routes would be maintained during construction. Furthermore, during Project construction, the Project Applicant would be required to prepare a Traffic/Construction Management Plan, which would involve close coordination with applicable agencies, including, but not limited to, the City of Los Angeles Department of Transportation, Fire Department, and Police Department, to ensure that emergency response or evacuation is not interrupted or affected by the Project during construction or operation. Therefore, the Project would not be expected to impact emergency response or emergency evacuation plans.

The Project Sites are not located within a Very High Fire Hazard Severity Zone or any other high fire hazard area.¹⁶ The Sites are located in an area that has established water infrastructure and no uses that would constitute a potentially dangerous fire hazard (e.g., petroleum production, chemical plant, industrial uses)

¹² Los Angeles County Airport Land Use Commission, *Airports and Airport Influence Areas*, June 2012, website: http://planning.lacounty.gov/assets/upl/project/ALUC_Airports_June2012_rev2d.pdf, accessed: March, 2017.

¹³ Los Angeles County Department of Public Works, *Disaster Route Maps, City of Los Angeles Central Area*, website: <http://dpw.lacounty.gov/dsg/disasterRoutes/map/Los%20Angeles%20Central%20Area.pdf>, accessed: March 20, 2017.

¹⁴ *Transportation Study for the Vermont Corridor Development Plan*, Gibson Transportation Consulting, June, 2017. See Appendix 4.14-1 to this Draft EIR.

¹⁵ *Ibid.*

¹⁶ City of Los Angeles Department of City Planning, *Zone Information & Map Access System*, website: <http://zimas.lacity.org>, accessed: March 2017.

are proposed. Accordingly, the Project is not anticipated to result in significant impacts related to fire hazards.

HYDROLOGY AND WATER QUALITY (MOSQUITO HABITAT, POLLUTANT DISCHARGE INTO AREAS OF SPECIAL BIOLOGICAL SIGNIFICANCE, WASTEWATER TREATMENT, 100-YEAR FLOODING, SEICHE/TSUNAMI/MUDFLOW)

The Project would not include any water features¹⁷ or create conditions in which standing water could accumulate that could provide habitat for mosquitoes and other vectors that transmit diseases or result in increased pesticide use. Therefore, no impact related to the vector-transmitted diseases would occur.

The Project Sites are located in a heavily urbanized area of the City of Los Angeles. The Project Sites and their vicinity are not situated in County-designated Significant Ecological Areas (i.e., Areas of Special Biological Significance)¹⁸. Therefore, the Project would not result in any point or nonpoint source pollutant that would directly discharge into such designated areas.

The Project does not include the use of on-site wastewater treatment systems. Therefore, the Project would have no impact related to the use of such systems.

The Project Sites are not located within a City designated Flood Hazard Zone¹⁹, or within a flood hazard area as defined by the Federal Emergency Management Agency (FEMA).²⁰ In addition, the Project Sites are located at least 12 miles from the Pacific Ocean and are not in the vicinity of any other major water bodies that would be susceptible to seiche or open space where mudflows could occur. As such, the Project would not be exposed to 100-Year floods, tsunamis, seiche, or mudflows.

LAND USE (DIVISION OF A COMMUNITY)

A physical division of an established community is caused by an impediment to through travel or a physical barrier, such as a new freeway with limited access between neighborhoods on either side of the freeway, or major street closures. The Project would not involve any street vacation or closure or result in development of new thoroughfares or highways. The Project, which would involve the redevelopment of three Project Sites with infill development including office, residential, and commercial uses in an urbanized area in Los Angeles, would not divide an established community since there is no residential community located within the Project Sites.

MINERAL RESOURCES

The Project Sites are not located within an identified Mineral Resource Zone (MRZ), as determined by the State Mining and Geology Board, or as designated by the Conservation Element of the City of Los Angeles General Plan, or within an "O" (Oil Drilling) District, City-designated Oil Drilling/Surface Mining

¹⁷ *The pool amenity on Site 2 would not be considered a water feature because it would be regularly maintained to preclude mosquito or other vector growth.*

¹⁸ *Los Angeles County Department of Regional Planning, SEA Development Map, http://planning.lacounty.gov/assets/upl/sea/SEA-dev-map_041014.pdf, accessed July, 2017.*

¹⁹ *City of Los Angeles Department of City Planning, website: www.zimas.lacity.org, accessed March 2017.*

²⁰ *City of Los Angeles Department of City Planning, website: www.zimas.lacity.org, accessed March 2017.*

Supplemental Use District, or City-designated Oil Field/Drilling Area.²¹ In addition, the Project would not directly or indirectly impact any known oil drilling activities or facilities in the surrounding area. Therefore, Project development would not result in the loss or nonavailability of any known, local or regionally valuable mineral resource, and no impact to mineral resources would occur.

NOISE (PROXIMITY TO AIRPORTS)

The nearest airport to the Project Sites is the Santa Monica Municipal Airport, located more than 9 miles to the west. The Project Sites are not located within an airport land use plan or within the vicinity of a private airstrip. As such, the Project would not expose people to excessive aircraft noise levels.

POPULATION AND HOUSING (DISPLACEMENT OF HOUSING, DISPLACEMENT OF PEOPLE)

The Project would redevelop three Project Sites that currently contain office uses, parking and no housing. Therefore, no housing or people would be displaced as a result of project development.

RECREATION (REGIONAL OPEN SPACE CONNECTIVITY)

The Project Sites are located in a highly urbanized area in the Wilshire community of Los Angeles that contains no existing regional open space or trails that could be affected by implementation of the Project. Therefore, the Project would have no impact related to interference with open space connectivity.

TRANSPORTATION AND TRAFFIC (AIR TRAFFIC PATTERNS)

The Project does not include any aviation-related uses and would have no airport impact. It would also not require any modification of flight paths for the existing airports in the Los Angeles Basin. Because the County office building on Site 1 would be over 250 feet in height, the Developer would be required to notify the Federal Aviation Administration prior to commencing construction on Site 1 by filing FAA Form 7460-1, Notice of Proposed Construction or Alteration, at least 45 days prior to commencing construction, in accordance with existing regulations. Therefore, no impact would occur.

²¹ City of Los Angeles Department of City Planning, Zone Information & Map Access System, website: <http://zimas.lacity.org>, accessed: March 2017.

7.0 PREPARERS OF THE EIR AND PERSONS CONSULTED

Lead Agency

County of Los Angeles c/o
Community Development Commission
County of Los Angeles
700 West Main Street
Alhambra, CA 91801

Project Developer

TC LA Development, Inc.
2221 Rosecrans Avenue, Suite 200
El Segundo, CA 90245

EIR Consultant

EcoTierra Consulting, Inc.
633 W. 5th Street, 26th Floor
Los Angeles, CA 90071
<http://www.ecotierraconsulting.com/>
Craig Fajnor, B.A., M.Pl., Principal/Project Manager
Jenny Mailhot, B.A., Project Manager
Brad Perrine, B.A., Senior Environmental Planner
Jennifer Johnson, B.A., Environmental Planner
Marisa Wyse, B.A., Environmental Planner

Air Quality, Greenhouse Gas Emissions, Noise Consultant

Pomeroy Environmental Services
25101 The Old Road, Suite 246
Santa Clarita CA 91381
<https://www.pomeroyes.com/>
Brett Pomeroy, B.A., Principal

Geology and Soils Consultant

Geotechnologies, Inc.
439 Western Avenue
Glendale, CA 91201-2837
<http://geoteq.com/>
Scott T. Prince, R.C.E. 83961
Gregorio Varela, R.C.E. 81201

Hazardous Materials Consultant

Tetra Tech, Inc.
17885 Von Karman Avenue, Suite 500
Irvine, CA 92614
<http://www.tetrattech.com/>
Steven Grod, Project Manager
Jon R. Lovegreen, CEG No. 1164

Historical Resources Consultant

GPA Consulting
231 California Street
El Segundo, CA 90245
<http://gpaconsulting-us.com/>
Allison M. Lyons, Associate Architectural Historian
Audrey Von Ahrens, Architectural Historian I
GPA Consulting meets the Secretary of the Interior's Professional Qualifications Standards for history and architectural history pursuant to the Code of Federal Regulations, 36 CFR Part 61, Appendix A.

Hydrology, Energy, and Utilities

KPFF Consulting Engineers
700 S Flower Street, Suite 2100
Los Angeles, CA 90017
<https://www.kpff.com/>
Brian Powers, P.E., Principal
Kyle Trudeau, Project Engineer
Morgan Bell, Project Engineer

Methane Consultant

Citadel Environmental Services, Inc.
1725 Victory Boulevard
Glendale, CA 91201
<http://www.citadelenvironmental.com/>
Mark Drollinger, Director, Engineering and Environmental Services

Traffic Consultant

Gibson Transportation Consulting, Inc.
555 W. 5th Street, Suite 3375
Los Angeles, CA 90013
<http://www.gibsontransportation.com/>
Patrick A. Gibson, P.E., PTOE, President
Jonathan Chambers, P.E., Senior Associate

Tree Consultant

The Tree Resource

P.O. Box 49314

Los Angeles, CA 90049

<http://www.thetreeresource.com/>

Lisa Smith, Registered Consulting Arborist #464

8.0 ACRONYMS, ABBREVIATIONS, AND TERMINOLOGY

AAEE	Achievable Energy Efficiency
AAM	Annual Arithmetic Mean
AB	Assembly Bill
AB 32	California Global Warming Solutions Act of 2006
AB 52	California Native American Historic Resource Protection Act
AB 939	California Integrated Waste Management Act of 1989
ACBM	asbestos containing building materials
ACMs	asbestos-containing materials
ADT	average daily traffic
AE	Anderson Environmental
Alquist-Priolo Act	Alquist-Priolo Geologic Hazards Zone Act
AOC	Area of Concern
APA	Allowed Pumping Allocation
APN	Assessor Parcel Number
AQ	air quality
AQMD	Air Quality Management District
AQMP	Air Quality Management Plan
ARB	Air Resources Board
ASTM	American Standard for Testing and Materials
ATCS	Adaptive Traffic Control System
ATSAC	Automated Traffic Surveillance and Control
Ave.	Avenue
AVO	average vehicle occupancy
BAAQMD	Bay Area Air Quality Management District
Basin	South Coast Air Basin
Basin Plan	Water Quality Management Plan for the Los Angeles Region

bgs	below ground surface
Blvd.	Boulevard
BMP	Best Management Practice
Board	County Board of Supervisors
BOS	Bureau of Sanitation
BTEX	benzene, toluene, ethylbenzene, and xylene
Business Plan Act	Hazardous Materials Release Response Plan and Inventory Law of 1985
C2-1	Commercial, Height District 1
C&D	construction and demolition
CAA	Federal Clean Air Act
CAAQS	California ambient air quality standards
CADPH	California Department of Public Health
Cal-Arp	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards
California Register	California Register of Historical Resources
Cal-OSHA	California Occupational Safety and Health Administration
Caltrans	California Department of Transportation
CARB	Clean Air Resource Board
CBC	California Building Code
CBIA	California Building Industry Association
CBWRP	Central Basin Water Rights Panel
CCAA	California Clean Air Act
CCAP	Community Climate Action Plan
CCR	California Code of Regulations
CDC	Community Development Commission
CDMG	California Division of Mines and Geology
CEC	California Energy Commission

CEO	County Chief Executive Officer
CEQA	California Environmental Quality Act
CEQA Guidelines	State CEQA Guidelines
CEQA Statute	Sections 21000-21189
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation and Liability Information System
CERFA	Community Environmental Response Facilitation Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
cfs	cubic feet per second
CGS	California Geological Survey
CH ₄	Methane
CHAS	Comprehensive Housing Affordability Strategy
CiSWMPP	City of Los Angeles Solid Waste Management Policy Plan
City	City of Los Angeles
City Air Quality Element	Air Quality Element of the City of Los Angeles General Plan
City Housing Element	2013-2021 Housing Element of the City of Los Angeles General Plan
Climate Scenarios report	Scenarios of Climate Change in California: An Overview
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	carbon monoxide
CO ₂	carbon dioxide
COC	chemicals of concern
COHb	carboxyhemoglobin
ColWMP	Los Angeles County Integrated Waste Management Plan
Community Plan	Wilshire Community Plan
Compass Growth Vision	Southern California Compass Blueprint Growth Vision Report

CORRACTS	Corrective Action
County	County of Los Angeles
County Air Quality Element	Air Quality Element of the County of Los Angeles General Plan
CPA	Community Plan Area
CPTED	crime prevention through environmental design
CPUC	California Public Utilities Commission
CRA/LA	Community Redevelopment Agency of Los Angeles
CREC	controlled recognized environmental condition
CSTMP	Construction Staging and Traffic Management Plan
CTP	Context/Theme/Property Type
Cultural Heritage Ordinance	City of Los Angeles Cultural Heritage Ordinance
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
CWC	California Water Code
DASH	Downtown Area Shuttle
dB	decibel
dba	A-weighted decibel
DBH	diameter at breast height
D/C	demand-to-capacity
DHS	California Department of Health Services
DMH	Department of Mental Health
DOGGR	Division of Oil, Gas and Geothermal Resources
DOSH	Division of Occupational Safety and Health
DPR	Department of Parks and Recreation
Dr.	Drive
Draft EIR	Draft Environmental Impact Report
DRO	diesel range organic compounds
DTSC	Department of Toxic Substance Control
du	dwelling unit

DWR	Department of Water Resources
ED5	Executive Directive 5: Emergency Drought Response
EDR	Environmental Data Resources
EG	electric generation
EIR	Environmental Impact Report
EISA	Energy Independence and Security Act
EMS	emergency medical service
EOR	enhanced oil recovery
EPA	Environmental Protection Agency (see also USEPA)
EPCRA	Emergency and Community Right to Know Act
ERNS	Emergency Release Notification System
ESA	Environmental Sensitive Areas
ESCP	erosion and sediment control plan
EV	electric vehicle
EVSE	electric vehicle supply equipment
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Flood Emergency Management Agency
FHWA	Federal Highway Administration Highway Noise Prediction Model
FID	flame ionization detector
FIFRA	Federal Insecticide, Fungicide, and Rodenticide Act
Final EIR	Final Environmental Impact Report
FIRM	Flood Insurance Rate Map
Framework	City of Los Angeles General Plan Framework Element
FTA	Federal Transit Administration
GCASP	General Construction Activities Stormwater Permit
General Plan	City of Los Angeles General Plan
General Plan 2035	County of Los Angeles General Plan
GMED	Geotechnical and Materials Engineering Division

gpd	gallons per day
GHG	greenhouse gas
GMED	Geotechnical and Materials Engineering Division
GPM	gallons per minute
GS	geology and soils
gsf	gross square footage
GWhr	Giga Watt-hours
GWP	global warming potential
HAZNET	Hazardous Waste Information System
HCD	California Department of Housing and Community Development
HCM	Highway Capacity Manual
HCM	Historic Cultural Monument
HCS	Historic Context Statement
Healthy LA Plan	The Plan for a Healthy Los Angeles
HFC	hydrofluorocarbon
HH	Hazards and Hazardous Materials
HHMD	Health Hazardous Materials Division
HHW	Hazardous Household Waste
HIN	High Injury Network
HIST UST	Hazardous Substance Storage Container Database
HMIS	Hazardous Material Identification System
HMMP	Hazardous Material Management Program
HQTA	High Quality Transit Area
HRA	Health Risk Assessment
HREC	historical recognized environmental conditions
HRS	Hazard Ranking System
HSC	Health and Safety Code
HSSUD	Hollywood Signage Supplemental Use District
HSWA	Hazardous and Solid Waste Act

HTP	Hyperion Treatment Plant
HUD	U.S. Department of Housing and Urban Development
HVAC	heating, ventilation, and air conditioning units
HWCL	Hazardous Waste Control Law
HWQ	Hydrology and Water Quality
I-110/SR-110	Harbor Freeway
I-10	Santa Monica Freeway
IES	Illuminating Engineers Society
IFFAR	Information of Fire Flow Availability Request
IIPP	Injury and Illness Prevention Program
IOUs	Investor Owned Utilities
IRIS	Integrated Risk Information System
IRP	Integrated Resource Plan
IS	Initial Study
ITE	Institute of Transportation Engineers
KBTU	1,000 British Thermal Units
kW	kilowatts
kWhr	kilowatt-hour
LA	Los Angeles
LAA	Los Angeles Aqueducts
LAAFP	Los Angeles Aqueduct Filtration Plant
LABS IWM	City of Los Angeles Bureau of Sanitation, Industrial Wastewater Management
LACC	Los Angeles County Code
LACDHS	Los Angeles County Department of Health Services
LACF	Los Angeles Community Facilities, Inc.
LACFCD	Los Angeles County Flood Control District
LADBS	City of Los Angeles Department of Building and Safety
LADOT	City of Los Angeles Department of Transportation

LADRP	City of Los Angeles Department of Recreation and Parks
LADWP	City of Los Angeles Department of Water and Power
LAFD	City of Los Angeles Fire Department
LA Green Building Code	Los Angeles Green Building Code
LA Green Plan	Green LA, An Action Plan to Lead the Nation in Fighting Global Warming
LAHCM	City of Los Angeles Historic-Cultural Monuments
LAHCS	Los Angeles Citywide Historic Context Statement
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LAPL	Los Angeles Public Library
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
LBP	lead-based paint
LCFS	Low Carbon Fuel Standard
LCMs	lead-containing materials
Ldn	day-night average sound level
L_{eq}	equivalent energy noise level
LG	light and glare
LID	Low Impact Development
L_{max}	maximum instantaneous noise level
L_{min}	minimum instantaneous noise level
LOS	Level of Service
LQG	Large Quantity Generator
LST	localized significance thresholds
LUST	Leaking Underground Storage Tank
MCL	maximum contaminant level
MDRPES	Maximum Distribution Renewable Energy Penetration Study
MEP	maximum extent possible
MERV	Minimum Efficiency Reporting Value

METRO	Los Angeles County Metropolitan Transit Authority
Mg/cm	milligram per centimeter
mg/kg	milligrams per kilogram
mgd	million gallons per day
MM	Mitigation Measure
MMTCO ₂ e	million metric tons of carbon dioxide equivalent
MND	Mitigated Negative Declaration
Mobility Plan 2035	City of Los Angeles Mobility Plan
MORO	motor oil range organic compounds
MOU	Memorandum of Understanding
mpg	miles per gallon
mph	miles per hour
MRZ	Mineral Resource Zone
MS4	municipal separate storm sewer systems
MSSL	Maximum Soil Screening Level
MTBE	methyl-tert butyle ether
MTCO ₂ e	metric tons of carbon dioxide equivalent
MT	metric tons
MW	megawatts
MWD	Metropolitan Water District of Southern California
MWh	megawatt-hours
n/a	not available
NAAQS	national ambient air quality standards
NAHC	Native American Heritage Commission
National Register	National Register of Historical Resources
National Register Bulletin 15	National Register Bulletin 15: How to Apply the National Register Criteria for Evaluation
NCP	National Contingency Plan
ND	Negative Declaration

NESHAP	National Emissions Standards for Hazardous Air Pollution
NGV	natural gas vehicle
N ₂ O	nitrous oxide
NHMLAC	Natural History Museum of Los Angeles County
NHTSA	National Highway Traffic Safety Administration
NO	nitric oxide
NO ₂	nitrogen dioxide
NO _x	nitrogen oxide
NOI	Notice of Intent
NOP	Notice of Preparation
NPDES	National Pollution Discharge Elimination System
NPL	National Priorities List
NRPA	National Recreation and Parks Association
O	oxygen
O ₃	ozone
O & M	Operation and Maintenance
ODD	Oil Drilling District
OEHHA	Office of Environmental Health Hazard Assessment
OHP	Office of Historic Preservation
Ord. No. 175,790	City of Los Angeles Methane Ordinance
OSHA	Occupational Safety and Health Administration
PA	Participating Agency
Pb	lead
PB-1	Parking Building, Height District 1
PCB	polychlorinated biphenyl
PCE	passenger car equivalency
pCi/L	picoCuries per liter
PDF	Project Design Feature
PeMS	Performance Measurement System

PFC	perfluorocarbons
Phase I ESA	Phase I Environmental Site Assessment
Pl.	Place
pLAn	Sustainable City pLAn
Planning and Zoning Code	Chapter I of the Municipal Code, City of Los Angeles
PM ₁₀	respirable particulate matter
PM _{2.5}	fine particulate matter
ppb	pounds per billion
ppd	pounds per day
ppm	pounds per millions
ppmv	parts per million by volume
PPV	peak particle velocity
PRC	Public Resources Code
PRG	Preliminary Remediation Goal
Project	Proposed Vermont Corridor Project
Project Sites	Three County-owned sites that comprise the Project
Proposition 65	Safe Drinking Water and Toxic Enforcement Act of 1986
PS	Public Services
PSI	pounds per square inch
pVEC	potential Vapor Encroachment Condition
Q	allowable discharge
RCP	Regional Comprehensive Plan
RCRA	Resource Compensation and Recovery Act
RD	Reporting District
REC	recognized environmental concern
RFP	Request for Proposals
RHNA	Regional Housing Needs Assessment
RMS	root mean square
ROG	reactive organic gases

RPS	Renewable Portfolio Standards
RR	Regulatory Requirement
RTP	Regional Transportation Plan
RTP/SCS	Regional Transportation Plan/Sustainable Communities Strategy
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SAR	Service Advisory Request
SARA	Superfund Amendment and Reauthorization Act
SB	Senate Bill
SB 375	Senate Bill 375
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCAR	Sewer Capacity Availability Request
SCCIC	South Central Coastal Information Center
SCG	Southern California Gas Company
Scoping Plan	State Climate Change Scoping Plan (AB32)
SCS	Sustainable Community Strategy
SDWA	Safe Drinking Water Act
sec	second
Seismic Act	Seismic Hazard Mapping Act of 1990
SEMS	Superfund Enterprise Management System
SERC	State of Emergency Response Commission
sf	square foot
SF ₆	sulfur hexafluoride
SHPO	State Historic Preservation Officer
SMCL	secondary maximum contaminant level
SMP	Soil Management Plan
SO ₂	sulfur dioxide
SO ₄	sulfate

SO _x	sulfur oxide
SoCal Gas	Southern California Gas Company
SOHP	State Office of Historic Preservation
SPCC	Spill Prevention Control and Countermeasures
SPE	Special Purpose Entity
Specific Plan	Adaptive Reuse Incentive Areas Specific Plan
SQG	small quantity generator
SQMP	stormwater quality management plan
SRA	source receptor area
SRA 1	Central Los Angeles Area
SRRE	Source Reduction and Recycling Element
SSMP	Sewer System Management Plan
St.	Street
Strategy	SCS Land Use Strategy of “Focusing New Growth Around Transit”
STIP	State Transportation Improvement Program
SUD	Supplemental Use District
SUSMP	Standard Urban Stormwater Mitigation Plan
SVOC	semi-volatile organic compounds
SWIRP	City of Los Angeles Solid Waste Integrated Resources Plan
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic Air Contaminants
Tanner Act	Hazardous Waste Management Planning and Facility Siting
TCLA	TC LA Development, Inc.
TDM	Transportation Demand Management
TIS	Traffic Impact Study
Title 24	California Code of Regulations, California’s Energy Efficiency Standards for Residential and Nonresidential Buildings
Title 31	Los Angeles County Green Building Standards Code

TMC	transportation management coordinator
TMO	Transportation Management Organization
TMP	Transportation Management Program
tpd	tons per day
TPH	total petroleum hydrocarbons
TR	transportation and traffic
TRPH	total recoverable petroleum hydrocarbons
TSCA	Toxic Substances Control Act
TSD	Treatment, Storage and Disposal
TSM	Transportation Systems Management
UFC	Uniform Fire Code
µg/g	micrograms per gram
µg/m ³	micrograms per cubic meter
ULSD	Ultra Low Sulfur Diesel
US-101	Hollywood Freeway
U.S. EPA	United States Environmental Protection Agency (see also EPA)
USGS	United States Geological Survey
USS	Utilities and Service Systems
UST	underground storage tank
UWMP	Urban Water Management Plan
V/C	volume/capacity
VCP	vittrified clay pipe
VdB	vibration decibels
VEC	Vapor Encroachment Condition
VMT	vehicle miles traveled
vphpl	vehicles per hour per lane
VOC	volatile organic compounds
VT	vehicle trips
Walkability Checklist	Walkability Checklist: Guidance for Entitlement Review

WECC	Western Electricity Coordinating Council
WDACS	Workforce Development Aging and Community Services Department, County of Los Angeles
WDID	Waste Discharger Identification
WDR	Waste Discharge Requirements
WRD	Water Replenishment District of Southern California
WSA	Water Supply Assessment
WSDM	Water Surplus and Drought Management Plan
ZI	Zoning Information
ZIMAS	Zoning Information and Map Access System

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