ADOPTED

BOARD OF SUPERVISORS
COUNTY OF LOS ANGELES

1-D October 1, 2019

CELIA ZAVALA
EXECUTIVE OFFICER

October 01, 2019

Honorable Board of Commissioners
Los Angeles County Development Authority
383 Kenneth Hahn Hall of Administration
500 West Temple Street
Los Angeles, California 90012

Dear Commissioners:

APPROVAL OF FUNDING AND ENVIRONMENTAL DOCUMENTATION FOR18 MULTIFAMILY AFFORDABLE RENTAL HOUSING DEVELOPMENTS LOCATED IN THE CITY OF EL MONTE, CITY OF LANCASTER, CITY OF LOS ANGELES, CITY OF SOUTH GATE, UNINCORPORATED SOUTH WHITTIER, AND UNINCORPORATED LOS ANGELES (ALL DISTRICTS) (3 VOTES)

SUBJECT

This letter recommends that your Board approve loans totaling up to $126,868,000, to fund the development of 18 affordable multifamily rental housing developments selected through the No Place Like Home (NPLH) Program Notice of Funding Availability (NOFA), Round 2019-1, issued by the Los Angeles County Development Authority (LACDA).

IT IS RECOMMENDED THAT THE BOARD:

1. Acting as a responsible agency pursuant to the California Environmental Quality Act (CEQA), certify that the LACDA has considered the attached exemption determination for the Ingraham Apartments project, which was prepared by the City of Los Angeles as lead agency; and find that this project will not cause a significant impact on the environment.

2. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached exemption determination for the Cecil Residential Apartments project, which was prepared by the City of Los Angeles as lead agency; and find that this project will not cause a significant impact on the environment.

3. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached exemption determination for the Ramona Metro project, which was prepared by the City of

El Monte as lead agency; and find that this project will not cause a significant impact on the environment.

4. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached exemption determination for the 67th and Main project, which was prepared by the City of Los Angeles as lead agency; and find that this project will not cause a significant impact on the environment.

5. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached exemption determination for the Depot at Hyde Park project, which was prepared by the City of Los Angeles as lead agency; and find that this project will not cause a significant impact on the environment.

6. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached determination for the Weingart Tower 1A/1B projects, which was prepared by the City of Los Angeles as lead agency; and find that these projects will not cause a significant impact on the environment.

7. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached exemption determination for the Rose Apartments project, which was prepared by the City of Los Angeles as lead agency; and find that this project will not cause a significant impact on the environment.

8. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached exemption determination for the Palm Vista Apartments project, which was prepared by the City of Los Angeles as lead agency; and find that this project will not cause a significant impact on the environment.

9. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached exemption determination for the South Library project, which was prepared by the County of Los Angeles Department of Regional Planning as lead agency; and find that this project will not cause a significant impact on the environment.

10. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached exemption determination for the 68th and Main project, which was prepared by the City of Los Angeles as lead agency; and find that this project will not cause a significant impact on the environment.

11. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached exemption determination for the Washington Arts Collective project, which was prepared by the City of Los Angeles as lead agency; and find that this project will not cause a significant impact on the environment.

12. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached exemption determination for the 11408 South Central Avenue project, which was prepared by the City of Los Angeles as lead agency; and find that this project will not cause a significant impact on the environment.

13. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached determination for the Montecito II Senior Housing project, which was prepared by the City of Los Angeles as lead agency; and find that this project will not cause a significant impact on the

environment.

14. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached exemption determination for the Reseda Theater Senior Housing project, which was prepared by the City of Los Angeles as lead agency; and find that this project will not cause a significant impact on the environment.

15. Find that the West Los Angeles VA Campus Building 207 project is exempt from CEQA; and find that this project will not cause a significant impact on the environment.

16. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached Initial Study/Mitigated Negative Declaration (IS/MND) and Initial Study Addendum for the Kensington Homes project, which were prepared by the City of Lancaster as lead agency, find that the mitigation measures identified in the Mitigation Monitoring and Reporting Program (MMRP) are adequate to avoid or reduce potential impacts below significant levels; and find that this project will not cause a significant impact on the environment.

17. Acting as a responsible agency pursuant to CEQA, certify that the LACDA has considered the attached exemption determination for the PATH Villas at South Gate project, which was prepared by the City of South Gate as lead agency; and find that this project will not cause a significant impact on the environment.

18. Approve loans to the recommended developers identified in Attachment A, using up to a total of $126,868,000 in NPLH Funds, contingent upon the transfer of NPLH Funds from the State of California Department of Housing and Community Development (HCD) to the LACDA, and also using funds previously approved by your Board and carried forward from prior NOFA rounds.

19. Authorize the Executive Director, or designee, in consultation with the Director of Department of Mental Health (DMH), or designee, to negotiate, execute, and if necessary, amend, or reduce the loan agreements with the recommended developers identified in Attachment A, or their LACDA-approved designees, and all related documents, including but not limited to documents to subordinate the loans to construction and permanent financing, and any intergovernmental, interagency, or inter-creditor agreements necessary for the implementation of each development, following approval as to form by County Counsel.

20. Authorize the Executive Director, or designee, to accept and incorporate, as needed, up to $126,868,000 Funds into the LACDA's approved Fiscal Year 2019-2020 budget, and future Fiscal Year budgets, as needed, for the purposes described herein.

21. Authorize the Executive Director, or designee, to reallocate LACDA funding set aside for affordable housing at the time of project funding, as needed and within each project's approved funding limit, in line with each project's needs, and within the requirements for each funding source.

PURPOSE/JUSTIFICATION OF RECOMMENDED ACTION

As a result of NPLH NOFA Round 2019-1, a total of 68 projects applied for NPLH Program funding. Project scoring and evaluation is complete and 18 of the projects are being recommended to your Board for approval at this time. The LACDA will return to your Board at a later date with separate actions to recommend awards for remaining projects selected for funding through NPLH NOFA Round 2019-1.

The 18 projects seeking approval through this action are affordable multifamily rental housing developments that will provide a total of 1,541 housing units, consisting of 581 NPLH units set aside for households who are homeless, chronically homeless, or at-risk of chronic homelessness with a serious mental disorder or seriously emotionally disturbed child or adolescent; 398 units for homeless households; 187 units for general low-income families and seniors; 140 units for homeless veterans; 131 units for chronically homeless households; 30 units for Transition Age Youth; 22 units for homeless seniors; 17 units for frequent users of the Department of Health Services or DMH services; 12 units for homeless households with a mental illness; and 23 units for onsite managers.

Approval is requested to ensure that the housing development projects identified in Attachment A can meet upcoming deadlines for submitting applications to other leveraged finance sources.

FISCAL IMPACT/FINANCING

The recommended loans to the developers identified in Attachment A will provide a total amount of up to $126,868,000 in NPLH Funds. This amount will be incorporated into the LACDA's approved Fiscal Year 2019-2020 budget on an as-needed basis and included in future Fiscal Year budgets accordingly. One project is carrying forward $5,000,000 and one project is carrying forward $4,581,000 in funds that were previously approved by your Board through a prior NOFA round.

NPLH funds will be generated via an upcoming October 2019 sale of bonds by the State of California's Department of Finance. Once the NPLH bonds are issued and funding is secured, NPLH funds are expected to be transferred by HCD to the LACDA in February 2020. Approval of project funding and disbursement of NPLH funds are contingent upon receipt of NPLH funds from HCD.

The recommended loan amounts are identified in Attachment A.

FACTS AND PROVISIONS/LEGAL REQUIREMENTS

In 2004, California voters approved Proposition 63, also known as the Mental Health Services Act (MHSA). MHSA provides funding for various county mental health services by increasing the income tax paid by those with incomes above $1 million. This income tax increase raises $1.5 billion to $2.5 billion per year.

On July 1, 2016, Governor Brown signed Assembly Bill 1618, which authorized the creation of the NPLH Program. The NPLH Program authorizes the issuance of $2 billion in bond proceeds to be repaid with MHSA funds for the development of supportive housing for those experiencing homelessness, chronic homelessness, or at-risk of chronic homelessness and living with mental illness. On November 6, 2018, California voters approved Proposition 2, also known as the No Place Like Home Act of 2018, which allows the state to carry out the NPLH Program utilizing MHSA funds.

Los Angeles County (County) is authorized to implement the NPLH Program locally, which includes all actions necessary to select, finance, and monitor projects during the life of the affordability covenant. The LACDA has been designated as an agent of the County in the implementation of the NPLH Program for selection, project financing and monitoring in conjunction with DMH. DMH has been designated as an agent of the County to provide supportive services to the tenants in the NPLH-funded units for at least 20 years, monitor the provision of services, and approve eligible

tenants.

On April 30, 2019, the LACDA issued NOFA Round 2019-1 for the NPLH Program. As a result, a total of 68 applications seeking NPLH Program funding were submitted. Due to the overwhelming response of applications received and the timing for securing a financing commitment by certain projects, the LACDA prioritized scoring for projects submitting applications for non-competitive 4% Low-Income Housing Tax Credits and bond financing through the California Tax Credit Allocation Committee (CTCAC) and California Debt Limit Allocation Committee (CDLAC), in addition to other funding applications for leveraged finance sources.

The LACDA will continue to review and score the remaining NPLH applications and will return to your Board at a later date with separate actions for the projects that are selected for funding recommendations. Among these projects are those that met the minimum eligibility requirements for funding in NOFA Round 24-A, but were not funded at the time due to insufficient funds, and projects that have secured an award of Proposition HHH funds through the City of Los Angeles

The NPLH loan agreements and related documents will incorporate affordability restrictions, target assisted populations, and contain provisions requiring the developers to comply with all applicable federal, state, and local laws. Each loan will be evidenced by a promissory note and secured by a deed of trust, with the term of affordability enforced by a recorded regulatory agreement. Approval of these projects will leverage approximately $577 million in additional external funding sources, which is over four times the amount of NPLH funds invested.

The loan agreements and related documents for these projects will reflect the respective tenant population set-asides and indicate that the assisted units will be affordable to households earning no more than 30% of the median income for the Los Angeles-Long Beach Metropolitan Statistical Area, adjusted for family size, as established by the U.S. Department of Housing and Urban Development. The loan agreements will require that the affordable housing units be set aside for a period of 55 years. Subject to various underwriting requirements, the developers may be required by the LACDA or other lenders to create a single asset entity to designate ownership of the project. These “designees” will be LACDA-approved single asset entities created by the developers prior to execution of the loan agreements and all related loan documents.

This letter recommends that the Executive Director, in consultation with the Director DMH or designee and upon approval by County Counsel, have the authority to amend loan agreements with the recommended developers. Amendments may be necessary in cases where project specifics change after execution of the loan agreement. The recommended authority to reduce any loan below the amounts stated in this action is requested in cases where the financing shows the maximum loan amount is not needed by the project. In this case, any reduction in a loan amount would occur during project underwriting and would take place prior to execution of any loan agreement.

This letter also recommends that the Executive Director, in consultation with the Director of DMH or designee, have the authority to reallocate NPLH funds set aside for affordable housing development at the time of project funding to better align project funds with available resources. Any reallocation of funds will be made within each project’s approved funding limit, in line with project needs, and within the requirements for each funding source.

ENVIRONMENTAL DOCUMENTATION

The proposed projects identified in Attachment A have been reviewed by the LACDA pursuant to the

requirements of CEQA.

The Ingraham Apartments project was determined ministerially exempt from the requirements of CEQA by the City of Los Angeles in accordance with CEQA Guidelines Section 15268, SB35, and Government Code Section 65913.4. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The Cecil Residential Apartments project was determined ministerially exempt from the requirements of CEQA by the City of Los Angeles in accordance with CEQA Guidelines Section 15268. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The Ramona Metro Point project was determined exempt from the requirements of CEQA by the City of El Monte in accordance with CEQA Guidelines Sections 15192, 15194, and 15195. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The 67th and Main project was determined ministerially exempt from the requirements of CEQA by the City of Los Angeles in accordance with CEQA Guidelines Section 15268. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The Depot at Hyde Park project was determined exempt from the requirements of CEQA by the City of Los Angeles in accordance with CEQA Guidelines Section 15332. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The Weingart Tower 1A/1B project was determined to qualify for a Sustainable Communities Environmental Assessment by the City of Los Angeles in accordance with CEQA Statute Section 21155.2. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The Rose Apartments project was determined exempt from the requirements of CEQA by the City of Los Angeles in accordance with CEQA Guidelines Section 15332. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The Palm Vista Apartments project was determined exempt from the requirements of CEQA by the City of Los Angeles in accordance with CEQA Guidelines Section 15332. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The South Library project was determined ministerially exempt from the requirements of CEQA by the County of Los Angeles Department of Regional Planning in accordance with CEQA Guidelines Section 15268, SB35, and Government Code Section 65913.4. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The 68th and Main project was determined ministerially exempt from the requirements of CEQA by the City of Los Angeles in accordance with CEQA Guidelines Section 15268. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The Washington Arts Collective project was determined exempt from the requirements of CEQA by the City of Los Angeles in accordance with CEQA Guidelines Section 15332. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The 11408 South Central Avenue project was determined ministerially exempt from the requirements of CEQA by the City of Los Angeles in accordance with Government Code Section 65651 and Public Resources Code Section 21080(b)(1). The LACDA's consideration of this determination satisfies the

requirements of CEQA.

The Montecito II Senior Housing project was determined to qualify for a Sustainable Communities Environmental Assessment by the City of Los Angeles in accordance with CEQA Statute Section 21155.2. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The Reseda Theater Senior Housing project was determined exempt from the requirements of CEQA by the City of Los Angeles in accordance with CEQA Guidelines Section 15332. The LACDA's consideration of this determination satisfies the requirements of CEQA.

The Los Angeles County Development Authority determined that the West Los Angeles VA Campus Building 207 project is exempt from the requirements of CEQA in accordance with CEQA Guidelines Sections 15301 for existing facilities and 15331 for historical resource rehabilitation. The project involves renovation of a building that is on the National Register of Historic Places as a contributor to a historic district. The renovation will be done in a manner consistent with the Secretary of Interior's Standards for the Treatment of Historic Properties.

As a responsible agency, and in accordance with the requirements of CEQA, the LACDA reviewed the IS/MND and Initial Study Addendum prepared by the City of Lancaster for the Kensington Homes project and determined that this project will not have a significant adverse impact on the environment. The LACDA's consideration of the IS/MND, Initial Study Addendum and filing of the Notice of Determination satisfy the State CEQA Guidelines as stated in Article 7, Section 15096.

The PATH Villas at South Gate project was determined exempt from the requirements of CEQA by the City of South Gate in accordance with CEQA Guidelines Section 15332. The LACDA's consideration of this determination satisfies the requirements of CEQA.

Environmental documentation for the proposed projects are included in Attachment B.

IMPACT ON CURRENT SERVICES (OR PROJECTS)

The requested actions will increase the supply of Special Needs and affordable housing units in the County of Los Angeles.

Respectfully submitted,

MONIQUE KING-VIEHLAND
Executive Director

MKV:LK:ML:BL
Enclosures

ATTACHMENT A
No Place Like Home NOFA 2019-1
RECOMMENDED FUNDING ALLOCATIONS

Sup. Dist.	Jurisdiction	Development/ Applicant	Type of Housing	Total Project Units	NPLH Funds	Other Funding Resources	Total Development Cost	Funds Carried Forward from Prior NOFAs
1	Los Angeles	Cecil Residential Apartments/ Skid Row Housing Trus & Simon Bacon Development	Special Needs	294	$15,000,000	$27,587,777	$42,587,777	
1	El Monte	Ramona Metro Point/ Domus GP LLC	Mixed Population	51	$5,520,000	$23,767,971	$29,287,971	
1	Los Angeles	Ingraham Apartments/ Single Room Occupancy Housing Corporation	Special Needs	121	$15,000,000	$38,912,514	$58,912,514	$5,000,000
1	South Gate	PATH Villas at South Gate/ PATH Ventures	Special Needs	60	$1,400,000	$29,246,289	$35,227,289	$4,581,000
2	Los Angeles	67th & Main/ Coalition for Responsible Community Development	Special Needs	52	$4,000,000	$28,338,699	$32,338,699	
2	Los Angeles	Depot at Hyde Park/ WORKS & GTM Holdings	Mixed Population	43	$4,870,000	$20,803,902	$25,673,902	
2	Los Angeles	Weingart Tower 1A/ Chelsea Investment Corporation	Special Needs	278	$15,000,000	$133,032,649	$148,032,649	
2	Los Angeles	Weingart Tower 1B/ Chelsea Investment Corporation	Special Needs	104	$10,078,000	$49,370,835	$59,448,835	
2	Los Angeles	68th & Main/Coalition for Responsible Community Development	Special Needs	60	$6,440,000	$26,034,680	$32,474,680	
2	Los Angeles	Washington Arts Collective/ Meta Housing Corporation	Mixed Population	56	$4,660,000	$23,064,910	$27,724,910	
2	Los Angeles	11408 S. Central Ave/ LINC Housing Corporation	Special Needs	64	$7,130,000	$27,594,004	$34,724,004	
3	Los Angeles	Rose Apartments/ Venice Community Housing Corporation	Special Needs	35	$2,890,000	$16,919,726	$19,809,726	
3	Los Angeles	Palm Vista Apartments/ GTM Holdings	Mixed Population	91	$6,440,000	$41,967,176	$48,407,176	
3	Los Angeles	Montecito II Senior Housing/ Thomas Safran & Associates Development Inc.	Mixed Population	64	$2,910,000	$32,475,567	$35,385,567	
3	Los Angeles	Reseda Theater Senior Housing/ Thomas Safran & Associates Development Inc.	Mixed Population	26	$2,300,000	$14,249,383	$16,549,383	
3	Unincorporated Los Angeles	West LA VA Campus/ Thomas Safran & Associates Development Inc.	Special Needs	64	$5,750,000	$29,438,391	$35,188,391	
4	Unincorporated South Whittier	South Library/ LINC Housing Corporation	Special Needs	27	$5,980,000	$8,559,724	$14,539,724	
5	Lancaster	Kensington Homes/ InSite Development	Special Needs	51	$11,500,000	$6,591,366	$18,091,366	
			Totals	**1,541**	**$126,868,000**	**$577,955,563**	**$714,404,563**	**$9,581,000**

ATTACHMENT B
ENVIRONMENTAL DOCUMENTATION

INGRAHAM APARTMENTS

DEPARTMENT OF
CITY PLANNING

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

SAMANTHA MILLMAN
PRESIDENT

VAHID KHORSAND
VICE-PRESIDENT

DAVID H. J. AMBROZ
CAROLINE CHOE
HELEN LEUNG
KAREN MACK
MARC MITCHELL
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DANA M. PERLMAN

CITY OF LOS ANGELES
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MAYOR

EXECUTIVE OFFICES
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VINCENT P. BERTONI, AICP
DIRECTOR

KEVIN J. KELLER, AICP
EXECUTIVE OFFICER

SHANA M.M. BONSTIN
DEPUTY DIRECTOR

TRICIA KEANE
DEPUTY DIRECTOR

ARTHI L. VARMA, AICP
DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

DIRECTOR'S DETERMINATION
STREAMLINED INFILL PROJECT REVIEW, TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM REVIEW, AND CENTRAL CITY WEST SPECIFIC PLAN PROJECT PERMIT COMPLIANCE REVIEW

June 7, 2019

Applicant/Owner
Ingraham Apartments, L.P.
1055 W. 7th Street, Suite 3250
Los Angeles, CA 90017

Representative
Jamie Poster
Craig Lawson & Co., LLC
3221 Hutchison Avenue, Suite D
Los Angeles, CA 90034

Case No.	DIR-2019-1855-SIP-TOC-SPP
CEQA:	N/A
Specific Plan Subarea:	South (Wilshire Corridor District)
Location:	1218, 1220,1222, 1228, 1230, 1232 West Ingraham Street
Council District:	1 – Cedillo
Neighborhood Council:	Downtown Los Angeles
Community Plan Area:	Westlake
Land Use Designation:	High Density Residential
Zone:	CW
Legal Description:	Lots 4 Arb 1, 5 Arb 1, 6 Arb 1, 7; Tract 2905

Last Day to File an Appeal: June 24, 2019

DETERMINATION

I have reviewed the proposed project and as the designee of the Director of Planning, I hereby:

Determine, pursuant to Public Resources Code Section 21080(b)(1), that based on the whole of the administrative record, the project is statutorily exempt from CEQA as a ministerial project pursuant to Government Code Section 65913.4;

Determine, pursuant to Government Code Section 65913.4, that the project is a Streamlined Infill Project that satisfies all of the objective zoning standards set forth in Government Code Section 65913.4(a) and is therefore subject to the Streamlined Ministerial Approval Process;

Approve with Conditions, a **ministerial Transit Oriented Communities (TOC) Affordable Housing Incentive Program Compliance Review,** pursuant to Government Code Section 65913.4 and Los Angeles Municipal Code (LAMC)

Section 12.22 A.31, for a qualifying Tier 4 project, totaling 121 dwelling units, reserving 120 units for Low Income Household occupancy for a period of 55 years, with the following Base and Additional Incentives:

Base Incentive

a. **Residential Density.** A nine-percent increase in the maximum density to permit a total of 121 dwelling units in lieu of 111 units as otherwise permitted by Section 6.F.2 of the Central City West Specific Plan;

Additional Incentives

b. **Front and Rear Yard Setbacks.** A reduction in the minimum front yard setback to permit 12 feet (post-dedication) in lieu of 15 feet as otherwise required by LAMC Section 12.12 C.1, and a 35-percent reduction in the minimum rear yard setback to permit 12 feet, 4 inches in lieu of 19 feet as otherwise required by LAMC Section 12.12 C.3;

c. **Side Yard Setbacks.** A 35-percent reduction in the minimum side yard setbacks to permit six (6) feet, six (6) inches in lieu of 10 feet as otherwise required by LAMC Section 12.12 C.2;

d. **Usable Open Space.** A 25-percent reduction in the minimum usable open space to permit 9,075 square feet in lieu of 12,100 square feet as otherwise required by LAMC Section 12.21 G.2;

e. **Common Open Space.** A 25-percent reduction in the minimum common open space to permit 9,075 square feet in lieu of 12,100 square feet as otherwise required by Section C.1(a) of Appendix D of the Central City West Specific Plan;

f. **Common Open Space Dimension.** An 18-percent reduction in the minimum common open space dimension to permit 12 feet, 4 inches in lieu of 15 feet as otherwise required by LAMC Section 12.21 G.2(a)(1)(iii);

Approve with Conditions, a ministerial Project Permit Compliance Review, pursuant to Government Code Section 65913.4 and LAMC Section 11.5.7 C and the Central City West Specific Plan, Ordinance No. 173,455, for the construction of a seven-story multi-family residential building consisting of 121 dwelling units; and

Adopt the attached Findings and Conditions of Approval.

CONDITIONS OF APPROVAL

Streamlined Infill Project Conditions

1. **Affordable Units.** The project shall reserve 50 percent of 121 total units, that is 61 units, as affordable units as determined by the California Department of Housing and Community Development (HCD).

2. **Parking.** No automobile parking shall be required for all residential units.

3. **Automobile Parking Design Standards.** The project shall comply with all objective automobile parking design standards set forth in LAMC Section 12.21 A.5, including aisle widths, circulation driveway, stall widths, stall width increase for obstructions and end stalls condition, driveway slope, and double striping of stalls, to the satisfaction of the Department of Building and Safety.

4. **Bicycle Parking Facilities Standards.** The project shall comply with the objective bicycle parking facility standards set forth in LAMC Section 12.21 A.16 to the satisfaction of the Department of Building and Safety.

5. **Prevailing Wage Requirements**. In accordance with Government Code Section 65913.4(a)(8), the applicant shall confer with Department of Public Works, Bureau of Contract Administration, Office of Contract Compliance, and shall provide the following to the Department of City Planning:

    a. A signed Preconstruction Checklist Agreement between the applicant and the Bureau of Contract Administration (maintained in the case file), prior to clearing any Building Permit, which covers the following:

        i. All construction workers employed in the execution of the development will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the California Labor Code, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards shall be paid at least the applicable apprentice prevailing rate.

        ii. The development proponent shall ensure that the prevailing wage requirement is included in all contracts for the performance of the work.

        iii. All contractors and subcontractors shall pay to all construction workers employed in the execution of the work at least the general prevailing rate of per diem wages, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards shall be paid at least the applicable apprentice prevailing rate.

        iv. Except as provided in subclause (vi), all contractors and subcontractors shall maintain and verify payroll records pursuant to Section 1776 of the Labor Code and make those records available for inspection and copying as provided in Sections 1776 and 1812 of the Labor Code.

v. Except as provided in subclause (vi), the obligation of the contractors and subcontractors to pay prevailing wages may be enforced by the Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to Section 1741 of the Labor Code, which may be reviewed pursuant to Section 1742 of the Labor Code, within 18 months after the completion of the development, by an underpaid worker through an administrative complaint or civil action, or by a joint labor-management committee though a civil action under Section 1771.2 of the Labor Code. If a civil wage and penalty assessment is issued, the contractor, subcontractor, and surety on a bond or bonds issued to secure the payment of wages covered by the assessment shall be liable for liquidated damages pursuant to Section 1742.1 of the Labor Code.

vi. Subclauses (iv) and (v) shall not apply if all contractors and subcontractors performing work on the development are subject to a project labor agreement that requires the payment of prevailing wages to all construction workers employed in the execution of the development and provides for enforcement of that obligation through an arbitration procedure. For purposes of this clause, "project labor agreement" has the same meaning as set forth in paragraph (1) of subdivision (b) of Section 2500 of the Public Contract Code.

vii. Notwithstanding subdivision (c) of Section 1773.1 of the Labor Code, the requirement that employer payments not reduce the obligation to pay the hourly straight time or overtime wages found to be prevailing shall not apply if otherwise provided in a bona fide collective bargaining agreement covering the worker. The requirement to pay at least the general prevailing rate of per diem wages does not preclude use of an alternative workweek schedule adopted pursuant to Section 511 or 514 of the Labor Code.

b. A Bond may be required to ensure compliance.

TOC Affordable Housing Incentive Program Conditions

6. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the applicant, stamped Exhibit "A," and attached to the subject case file. No change to the plans shall be made without prior review by the Department of City Planning, Central Project Planning Division, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Municipal Code or the project conditions.

7. **Residential Density**. The project shall be limited to a maximum density of 121 residential dwelling units, including density bonus units.

8. **Affordable Units.** The project shall reserve 120 units as affordable units as follows: 61 units reserved for Low Income Households as determined by the HCD; and 59 units reserved for Low Income Households as determined by either HCD or the United States Department of Housing and Urban Development (HUD).

9. **Changes in On-Site Restricted Units**. Deviations that increase the number of restricted affordable units or that change the composition of units shall be consistent with SB 35, LAMC Section 12.22 A.31 and TOC Guidelines.

10. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute and record a covenant and agreement running with the land to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA). The covenant shall bind the owner to the following affordable units for rental for a period of 55 years: 61 units reserved for Low Income Households as determined by HCD; and 59 units reserved for Low Income Households as determined by either HCD or HUD. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with the TOC Guidelines and any monitoring requirements established by the HCIDLA.

11. **Front Yard.** The project shall provide a minimum front yard setback of 12 feet.

12. **Side Yards.** The project shall provide minimum side yard setbacks of 6 feet, 6 inches.

13. **Rear Yards.** The project shall provide a minimum rear yard setback of 12 feet, 4 inches.

14. **Usable Open Space.** The project shall provide a minimum of 9,075 square feet of usable open space.

15. **Common Open Space.** A minimum of 9,075 square feet of usable open space shall consist of common open space.

16. **Common Open Space Dimension.** Common open space shall have horizontal dimensions of at least 12 feet, 4 inches when measured perpendicular from any point on each of the boundaries of the open space area.

17. **Landscaping.** The landscape plan shall indicate landscape points for the project equivalent to **10% more than otherwise required** by LAMC 12.40 and Landscape Ordinance Guidelines "O". All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped, including an automatic irrigation system, and maintained in accordance with a landscape plan prepared by a licensed landscape architect or licensed architect, and submitted for approval to the Department of City Planning.

18. **Labor Requirement.** Pursuant to Los Angeles Municipal Code Section 11.5.11, the applicant shall confer with Department of Public Works, Bureau of Contract Administration, Office of Contract Compliance, and shall provide the following to the Department of City Planning:

    a. A signed Preconstruction Checklist Agreement between the Applicant and the Bureau of Contract Administration (maintained in the case file), prior to clearing any Building Permit, which covers the following:

        i. **Licenses.** All building and construction work on the project will be performed at all tiers by contractors that are licensed by the State of California and the City of Los Angeles. The project will employ only construction workers that possess all licenses and certifications required by the State of California and the City of Los Angeles.

        ii. **Local Hire.** At least 30% of all respective workforces' construction workers' hours of Project Work will be performed by permanent residents of the City of Los Angeles. Of these, at least 10% of all their respective workforces' construction workers' hours of Project Work shall be performed by Transitional Workers whose primary place of residence is within a 5-mile radius of the covered project. If such minimums are not met, evidence of a good faith effort to solicit such local workers shall be evidenced.

iii. **Wages.** The project will pay construction workers performing Project Work hourly wage rates for those classifications in compliance with the applicable prevailing wage rate determination established pursuant to the California Labor Code.

iv. **Training.** At least 60% of construction workforces employed on the project will be:

1. Workers who graduated from a Joint Labor Management apprenticeship training program approved by the State of California.

2. Alternatively, workers employed that have minimum hours of on-the-job experience in the applicable craft which would be required to graduate from such a state-approved apprenticeship training program.

3. Workers who are registered apprentices in an apprenticeship training program approved by the State of California or an out-of-state, federally-approved apprenticeship program.

v. **Bond.** A Bond may be required to ensure compliance.

b. After the project has completed construction, and prior to any Certificate of Occupancy, a signed report from the Bureau of Contract Administration that indicates compliance with the above licenses, local hire, wages and training requirements shall be added to the case file.

Project Permit Compliance Conditions

19. **Floor Area Ratio (FAR).** The project shall be permitted a maximum FAR of 6:1.

20. **Height.** The building height shall not exceed a maximum height of 1,218 feet above mean sea level.

21. **Open Space.** No more than 1,220 square feet of the rear yard area may be used to meet the minimum usable open space requirement. Interior courtyards shall have a minimum width of 10 feet, a minimum average width of 20 feet, and a minimum area of 400 square feet. A minimum of 25 percent of courtyards shall be landscaped.

22. **Trees.** There shall be a minimum of 121 trees planted in compliance with Section C.2 of Appendix D in the Specific Plan, of which a minimum of 62 shall be provided on-site. Trees shall be a minimum of 12 feet in height and three (3) inches in caliper at the time of planting. Final landscape plans shall show the location, height, and caliper of all trees. The remaining 59 trees that cannot be accommodated on-site shall be provided through the payment of the In-Lieu Fee – Development Tree Planting Requirement, as specified in Article 2, Chapter VI, Section 62.177(b)(1) of the Los Angeles Municipal Code for each tree to be planted off-site. The first priority for the location of off-site plantings shall be within the Specific Plan, and second, within the Westlake Community Plan Area, subject to the acceptance of a donor site. A receipt showing proof of payment shall be provided at the time of Building Permit Clearance. In the event that the number of dwelling units should be reduced, then no modification of this determination shall be necessary, and the number of trees shall be recalculated based upon the Specific Plan requirement of one tree per unit.

23. **Landscape Plans.** All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained in accordance with a landscape plan, including an automatic irrigation plan, prepared by a licensed landscape architect pursuant to Appendix D of the Specific Plan.

24. **Signs.** No signs have been approved for the proposed project. Any signage must be approved pursuant to a Project Permit Compliance Determination for the Central City West Specific Plan.

Administrative Conditions

25. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building & Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building & Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building & Safety shall be stamped by Department of City Planning staff "Final Plans". A copy of the Final Plans, supplied by the applicant, shall be retained in the subject case file.

26. **Notations on Plans.** Plans submitted to the Department of Building & Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet, and shall include any modifications or notations required herein.

27. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

28. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

29. **Department of Building & Safety.** The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building & Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building & Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

30. **Department of Water and Power.** Satisfactory arrangements shall be made with the Los Angeles Department of Water and Power (LADWP) for compliance with LADWP's Rules Governing Water and Electric Service. Any corrections and/or modifications to plans made subsequent to this determination in order to accommodate changes to the project due to the under-grounding of utility lines, that are outside of substantial compliance or that affect any part of the exterior design or appearance of the project as approved by the Director, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

31. **Enforcement.** Compliance with and the intent of these conditions shall be to the satisfaction of the Department of City Planning.

32. **Expiration.** In the event that this grant is not utilized within three years of its effective date (the day following the last day that an appeal may be filed), the grant shall be considered null and void. Issuance of a building permit, and the initiation of, and diligent continuation of, construction activity shall constitute utilization for the purposes of this grant.

33. **Indemnification and Reimbursement of Litigation Costs.**

Applicant shall do all of the following:

(i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

(ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out, in whole or in part, of the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the

defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the applicant otherwise created by this condition.

PROJECT BACKGROUND

The project site consists of four (4) contiguous parcels with approximately 197 feet of street frontage along the south side of West Ingraham Street and a depth of approximately 111 feet, for a total lot size of approximately 22,004 square feet. The project site is located within the Westlake Community Plan, which designates the site for High Density Residential land uses. The project site is also located within the South Subarea (Wilshire Corridor District) of the Central City West Specific Plan ("Specific Plan"). The project site is zoned CW "Central City West Specific Plan Zone," which indicates that the development regulations on the project site is established by the Specific Plan. The Specific Plan identifies land use categories and height/floor area ratio districts that guide development on-site. The project site has a land use category and height/floor area ratio district of R5(CW)-U/6 per the Specific Plan, which allows land use, density and setback regulations of the R5 Zone per LAMC Section 12.12 and a maximum height of 1,218 feet above mean sea level, and FAR of 6:1. The site is located within the City of Los Angeles Transit Priority Area and Tier 3 of the Transit Oriented Communities (TOC) Affordable Housing Incentive Program[1]. The site is not located within a hillside area, Community Redevelopment Agency area, coastal zone, farmland, Very High Fire Hazard Severity Zone, flood zone, hazardous waste site, methane zone, Bureau of Engineering Special Grading Area, Alquist-Priolo Fault Zone, landslide area, liquefaction area, preliminary fault rupture study area, or tsunami inundation zone.

The project site is currently improved with a surface parking lot. There are no trees on site or in the public right-of-way adjacent to the site per the Tree Report prepared by Land Images Landscape Architecture and dated April 30, 2019.

The surrounding area is characterized by residential and commercial uses. Land uses that immediately abut the project site include a six-story multi-family residential condominium building, seven-story office building and surface parking lot to the north, a five-story multi-family residential building to the east, a surface parking lot to the west, and a five-story multi-family residential building to the south.

The proposed project is for the demolition of an existing surface parking lot, and the construction, use and maintenance of a seven-story, multi-family residential building with a total of 121 dwelling units consisting of 120 housing units reserved for Low Income Households and a market-rate manager's unit. The building will have a maximum building height of 96 feet, 2 inches, as measured from grade to the roof structure, and 86,120 square feet of floor area with a 5.65:1 FAR. The project proposes 42 non-required automobile parking spaces within a two-level parking garage (one subterranean level and one at-grade level), nine (9) short-term bicycle parking spaces within the front yard near the lobby, and 85 long-term bicycle parking spaces at the southeast corner of the building on the first floor. The project will provide 9,075 square feet of usable open space, including a 1,018-square-foot recreation room and 50 percent (1,220 square feet) of the 2,440-square-foot rear yard at the ground level, a 2,263-square-foot courtyard and a 610-square-foot recreation room at the second floor level, and 3,324 square feet of roof deck and a 640-square-foot recreation room at the roof level.

The applicant requests a Streamlined Infill Project Review pursuant to Senate Bill (SB) 35, following Base and Additional Incentives of the Transit Oriented Communities (TOC) Affordable Housing Incentive Program, and a Project Permit Compliance Review for the proposed project located within the Central City West Specific Plan:

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[1] The project is eligible for one (1) increase in Tier from 3 to 4 for consisting of 100 percent On-Site Restricted Affordable Units, exclusive of a manager's unit per Section IV.9 of the TOC Guidelines.

- Base Incentives:
    - A nine-percent increase in the maximum density to permit a total of 121 dwelling units in lieu of 111 units.
- Additional Incentives:
    - A reduction in the minimum front yard setback to permit 12 feet (post-dedication) in lieu of 15 feet, and a 35-percent reduction in the minimum rear yard setback to permit 12 feet, 4 inches in lieu of 19 feet.
    - 35-percent reduction in the minimum side yard setbacks to permit six (6) feet, six (6) inches in lieu of 10 feet.
    - A 25-percent reduction in the minimum usable open space to permit 9,075 square feet in lieu of 12,100 square feet.
    - A 25-percent reduction in the minimum common open space to permit 9,075 square feet in lieu of 12,100 square feet.

SENATE BILL 35 STREAMLINED INFILL PROJECT BACKGROUND

California Senate Bill (SB) 35 became effective on January 1, 2018 as part of a 15-bill housing package aimed at addressing the state's housing shortage and high housing costs. The intent of SB 35 is to provide reforms and incentives to facilitate and expedite the construction of affordable housing. The State Department of Housing and Community Development (HCD) issued the Streamlined Ministerial Approval Process Guidelines dated November 29, 2018 to provide additional guidance on procedures and implementation of SB 35 (SB 35 Guidelines). The law adds Section 65913.4 to the Government Code requiring that cities streamline the approval of qualified housing projects through a ministerial approval process, removing the requirement for CEQA analysis and altering parking requirements. SB 35 streamlining remains in effect until January 1, 2026, and as of that date will be repealed per the provisions of the bill.

SB 35 applies in cities that are not meeting their state-mandated Regional Housing Need Allocation (RHNA) goals in certain categories. On February 1, 2018, HCD released maps showing which cities and counties in California are subject to SB 35. The information shows the City of Los Angeles has met its 2013-2021 RHNA goals for the "above market" income category; however, the City is not showing sufficient progress in meeting the RHNA for the lower income categories. Therefore, SB 35 will apply only to projects that include at least 50% of their units for lower income households (80% Area Median Income [AMI] or less).

To qualify to apply for the Streamlined Ministerial Approval Process and be considered a Streamlined Infill Project, the development must meet the Development Eligibility criteria set forth in SB 35 (Government Code Section 65913.4(a)), including housing type requirements, site requirements, affordability provisions, and labor provisions. In accordance with SB 35, the project qualifies as a Streamlined Infill Project that satisfies all of the objective planning standards and is therefore subject to the streamlined ministerial approval process provided by SB 35 (Government Code Sections 65913.4(b) and (c)). The proposed project's eligibility is described under the Streamlined Infill Project Review Findings Section.

Ministerial Review of Objective Zoning and Design Standards

Pursuant to SB 35, a local government must streamline the approval of a Streamlined Infill Project only based on objective zoning and design review standards, and the locality's process and application requirements shall not in any way inhibit, chill or preclude the ministerial approval process. When determining consistency with objective zoning and design review standards, the local government can only use those standards that meet the following definition set forth in SB 35:

> *"standards that involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official prior to submittal. These standards may be embodied in alternative objective land use specifications adopted by a city or county, and may include, but are not limited to, housing overlay zones, specific plans, inclusionary zoning ordinances, and density bonus ordinances"*

Design review standards that require subjective decision making cannot be applied as an objective standard unless the standards are defined in such a manner that is non-discretionary. In addition, a locality may not require a development proponent to meet any standard for which the locality typically exercises subjective discretion, on a case-by-case basis, about whether to impose that standard on similarly situated development proposals.

TOC Incentives in Relation to SB 35

As provided in SB 35, modifications to objective standards granted as part of a density bonus concession, incentive, parking reduction, or waiver of development standards pursuant to State Density Bonus Law (Government Code Section 65915) or a local density bonus ordinance, shall be considered consistent with objective standards.

As described in detail below under the TOC Affordable Housing Incentive Program Background Section, Measure JJJ, adopted by the City Council on December 13, 2016, created the TOC Affordable Housing Incentive Program and the TOC Affordable Housing Incentive Program Guidelines (TOC Guidelines), establishing a tier-based system with varying development bonuses and incentives for residential and mixed-use projects located within ½ mile of a major transit stop. Per SB 35, density bonus and incentives of development standards pursuant to a local density bonus ordinance is considered consistent with objective standards.

Limited Appeal Timeline

The project entitlements are being applied for under the timelines and procedures of Senate Bill 35 (Government Code Section 65913.4), which requires the City to complete design review or public oversight for a project of this size within 90 calendar days of submittal of the application. The applicant submitted a complete application for the development on May 24, 2019. Consequently, all design review or public oversight shall be completed within 90 days from May 24, 2019, or by August 22, 2019, and shall not in any way inhibit, chill or preclude the ministerial approval provided by Government Code Section 65913.4.

CEQA

The proposed Streamlined Infill Project that satisfies the objective planning standards set forth in SB 35 (Government Code Section 65913.4(a)) is subject to streamlined ministerial approval

provided by SB 35 (Government Code Sections 65913.4(b) and (c)). The proposed project is therefore a ministerial project that is statutorily exempt from CEQA pursuant to Public Resources Code Section 21080(b)(1).

HOUSING REPLACEMENT (AB 2556 DETERMINATION) BACKGROUND

On September 27, 2014, Governor Jerry Brown signed Assembly Bill (AB) 2222, as amended by AB 2556 on August 19, 2016, to amend sections of California's Density Bonus Law (Government Code Section 65915). AB 2556 requires applicants of Density Bonus projects filed as of January 1, 2015 to demonstrate compliance with the housing replacement provisions which require replacement of rental dwelling units that either exist at the time of application of a Density Bonus project, or have been vacated or demolished in the five-year period preceding the application of the project. This applies to all pre-existing units that have been subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income; subject to any other form of rent or price control; or occupied by Low or Very Low Income Households.

Pursuant to the AB 2556/SB 35 (TOC) Determination Letter dated June 4, 2019 and prepared by the Los Angeles Housing and Community Investment Department (HCIDLA), the property has been a commercial parking lot since February 22, 2009, and AB 2556 does not apply to commercial properties. Therefore, no AB 2556 replacement affordable units are required.

TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM BACKGROUND

Measure JJJ was adopted by the Los Angeles City Council on December 13, 2016. Section 6 of the Measure instructed the Department of City Planning to create the TOC Affordable Housing Incentive Program. The measure required that the Department adopt a set of TOC Guidelines, which establishes incentives for residential and mixed-use projects located within ½ mile of a major transit stop. Major transit stops are defined under existing State law.

The TOC Affordable Housing Incentive Program Guidelines (TOC Guidelines), released on September 22, 2017, establish a tier-based system with varying development bonuses and incentives based on a project's distance from different types of transit. The largest bonuses are reserved for those areas in the closest proximity to significant rail stops or the intersection of major bus rapid transit lines. Required affordability levels are increased incrementally in each higher tier. The incentives provided in the TOC Guidelines describe the range of bonuses from particular zoning standards that applicants may select.

The project site is located less than 2,640 feet from the 7th Street/Metro Center, which serves Metro Purple, Red, Blue and Expo lines. This qualifies the site as Tier 3 TOC Affordable Housing Incentive Area. However, per Section IV.9 of the TOC Guidelines, Eligible Housing Developments that consist of 100 percent On-Site Restricted Affordable Units, excluding a manger's unit, are eligible for one increase in Tier than otherwise would be provided. The project is an Eligible Housing Development that consists of 100 percent On-Site Restricted Affordable Units, excluding a manger's unit, reserving 120 of 121 dwelling units for Low Income Households. As such, the project is eligible for an increase to Tier 4 TOC Affordable Housing Incentive Area.

TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM ELIGIBILITY REQUIREMENTS

To be an eligible TOC Housing Development, a project must meet the Eligibility criteria set forth in Section IV of the TOC Guidelines. A Housing Development located within a TOC Affordable Housing Incentive Area shall be eligible for TOC Incentives if it meets all of the following requirements, which it does:

1. ***On-Site Restricted Affordable Units.*** *In each Tier, a Housing Development shall provide On-Site Restricted Affordable Units at a rate of at least the minimum percentages described below. The minimum number of On-Site Restricted Affordable Units shall be calculated based upon the total number of units in the final project.*

    a. *Tier 1 - 8% of the total number of dwelling units shall be affordable to Extremely Low Income (ELI) Households, 11% of the total number of dwelling units shall be affordable to Very Low (VL) Income Households, or 20% of the total number of dwelling units shall be affordable to Lower Income Households.*
    b. *Tier 2 - 9% ELI, 12% VL or 21% Lower.*
    c. *Tier 3 - 10% ELI, 14% VL or 23% Lower.*
    d. *Tier 4 - 11% ELI, 15% VL or 25% Lower.*

    As previously mentioned, the project is eligible for Tier 4 Incentives for consisting of 100 percent On-Site Restricted Affordable Units, excluding a manger's unit. As such, the project is required to set aside at least 25 percent, or 31 units, of 121 total units for Low Income Households. The project will reserve 120 units for Low Income Households. As such, the project meets the eligibility requirement for On-Site Restricted Affordable Units.

2. ***Major Transit Stop.*** *A Housing Development shall be located on a lot, any portion of which must be located within 2,640 feet of a Major Transit Stop, as defined in Section II and according to the procedures in Section III.2 of the TOC Guidelines.*

    A Major Transit Stop is a site containing a rail station or the intersection of two or more bus routes with a service interval of 15 minutes or less during the morning and afternoon peak commute periods. The project site is located less than 2,640 feet from the 7th Street/Metro Center, which serves Metro Purple, Red, Blue and Expo lines. As such, the project meets the eligibility requirement for proximity to a Major Transit Stop.

3. ***Housing Replacement.*** *A Housing Development must meet any applicable housing replacement requirements of California Government Code Section 65915(c)(3), as verified by the Department of Housing and Community Investment (HCIDLA) prior to the issuance of any building permit. Replacement housing units required per this section may also count towards other On-Site Restricted Affordable Units requirements.*

    Pursuant to the AB 2556/SB 35 (TOC) Determination Letter dated June 4, 2019 and prepared by the Los Angeles Housing and Community Investment Department (HCIDLA), the property has been a commercial parking lot since February 22, 2009, and AB 2556 does not apply to commercial properties. Therefore, no AB 2556 replacement affordable units are required.

4. ***Other Density or Development Bonus Provisions.*** *A Housing Development shall not seek and receive a density or development bonus under the provisions of California Government Code Section 65915 (State Density Bonus law) or any other State or local program that provides development bonuses. This includes any development bonus or other incentive granting additional residential units or floor area provided through a General Plan Amendment, Zone Change, Height District Change, or any affordable*

housing development bonus in a Transit Neighborhood Plan, Community Plan Implementation Overlay (CPIO), Specific Plan, or overlay district.

The project is not seeking any additional density or development bonuses under the provisions of the State Density Bonus Law or any other state or local program that provides development bonuses, including but not limited to a General Plan Amendment, Zone Change, Height District Change, or any affordable housing development bonus in a Transit Neighborhood Plan, Community Implementation Overlay (CPIO), Specific Plan, or overlay district. As such, the project meets this eligibility requirement.

5. ***Base Incentives and Additional Incentives.*** *All Eligible Housing Developments are eligible to receive the Base Incentives listed in Section VI of the TOC Guidelines. Up to three Additional Incentives listed in Section VII of the TOC Guidelines may be granted based upon the affordability requirements described below. For the purposes of this section below, "base units" refers to the maximum allowable density allowed by the zoning, prior to any density increase provided through these Guidelines. The affordable housing units required per this section may also count towards the On-Site Restricted Affordable Units requirement in the Eligibility Requirement No. 1 above (except Moderate Income units).*

    a. *One Additional Incentive may be granted for projects that include at least 4% of the base units for Extremely Low Income Households, at least 5% of the base units for Very Low Income Households, at least 10% of the base units for Lower Income Households, or at least 10% of the base units for persons and families of Moderate Income in a common interest development.*
    b. *Two Additional Incentives may be granted for projects that include at least 7% of the base units for Extremely Low Income Households, at least 10% of the base units for Very Low Income Households, at least 20% of the base units for Lower Income Households, or at least 20% of the base units for persons and families of Moderate Income in a common interest development.*
    c. *Three Additional Incentives may be granted for projects that include at least 11% of the base units for Extremely Low Income Households, at least 15% of the base units for Very Low Income Households, at least 30% of the base units for Lower Income Households, or at least 30% of the base units for persons and families of Moderate Income in a common interest development.*

    The project is seeking three (3) Additional Incentives, which requires at least 30 percent, or 34 units, of the 111 base units to be set aside for Low Income Households. The project will reserve 108 percent of the 111 base units, that is 120 units, for Low Income Households. As such, the project meets the eligibility requirement for three (3) Additional Incentives.

6. ***Projects Adhering to Labor Standards.*** *Projects that adhere to the labor standards required in LAMC 11.5.11 may be granted two Additional Incentives from the menu in Section VII of these Guidelines (for a total of up to five Additional Incentives).*

    The project is seeking one (1) Additional Incentive beyond the above-mentioned three (3) Additional Incentives permitted per Section IV.5 of the TOC Guidelines. As such, the project has been conditioned to adhere to the labor standards set forth in LAMC Section 11.5.11. As conditioned, the project meets the eligibility requirement for one (1) Additional Incentive beyond the three (3) Additional Incentives permitted per Section IV.5 of the TOC Guidelines.

7. ***Multiple Lots.*** *A building that crosses one or more lots may request the TOC Incentives that correspond to the lot with the highest Tier permitted by Section III above.*

   The project site consists of four (4) contiguous lots, all of which are located within a Tier 3 TOC Affordable Housing Incentive Area. As such, this eligibility requirement does not apply.

8. ***Request for a Lower Tier.*** *Even though an applicant may be eligible for a certain Tier, they may choose to select a Lower Tier by providing the percentage of On-Site Restricted Affordable Housing units required for any lower Tier and be limited to the Incentives available for the lower Tier.*

   The applicant has not selected a lower Tier and is not providing the percentage of On-Site Restricted Affordable Housing units required for any lower Tier. As such, this eligibility requirement does not apply.

9. ***100% Affordable Housing Projects.*** *Buildings that are Eligible Housing Developments that consist of 100% On-Site Restricted Affordable units, exclusive of a building manager's unit or units shall, for purposes of these Guidelines, be eligible for one increase in Tier than otherwise would be provided.*

   The project is an Eligible Housing Development that consists of 100 percent On-Site Restricted Affordable Units, excluding a manger's unit, reserving 120 of 121 dwelling units for Low Income Households. As such, the project meets the eligibility requirement for one increase in Tier to a Tier 4 TOC Affordable Housing Incentive Area.

FINDINGS

STREAMLINED INFILL PROJECT REVIEW FINDINGS

In accordance with SB 35 (Government Code Section 65913.4(a)), an applicant may submit an application for a development that is subject to the streamlined ministerial approval process if the development satisfies all of the objective planning standards of Government Code Section 65913.4(a) as follows:

1. **The development is a multifamily housing development that contains two or more residential units.**

   The project is a multi-family housing development with 121 dwelling units.

2. **The development is located on a site that satisfies all of the following:**

   A. **A site that is a legal parcel or parcels located in a city if, and only if, the city boundaries include some portion of either an urbanized area or urban cluster, as designated by the United States Census Bureau, or, for unincorporated areas, a legal parcel or parcels wholly within the boundaries of an urbanized area or urban cluster, as designated by the United States Census Bureau.**

   B. **A site in which at least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses. For the purposes of this section, parcels that are only separated by a street or highway shall be considered to be adjoined.**

   C. **A site that is zoned for residential use or residential mixed-use development, or has a general plan designation that allows residential use or a mix of residential and nonresidential uses, with at least two-thirds of the square footage of the development designated for residential use.**

   The Census Bureau identifies two types of urban areas:

   - Urbanized Areas of 50,000 or more people; and
   - Urban Clusters of at least 2,500 and less than 50,000 people.

   According to the U.S. Census Bureau, 2010 Census, Profile of General Population and Housing Characteristics, the City of Los Angeles population in 2010 was 3,792,621, thereby constituting an urbanized area. The project site consists of legal parcels located within the City of Los Angeles.

   The entire project site adjoins urban uses. Land uses that immediately abut the project site include a six-story multi-family residential condominium building, seven-story office building and surface parking lot to the north, a five-story multi-family residential building to the east, a surface parking lot to the west, and a five-story multi-family residential building to the south.

   The project site is designated for High Density Residential land uses by the Westlake Community Plan. The site is located within the South Subarea (Wilshire Corridor District) of the Central City West Specific Plan ("Specific Plan"). The project site is zoned CW "Central City West Specific Plan Zone," which indicates that the development regulations on the

project site is established by the Specific Plan. The project site has a land use category and height/floor area ratio district of R5(CW)-U/6 per the Specific Plan, which allows land use, density and setback regulations of the R5 Zone per LAMC Section 12.12. As such, both the High Density Residential Land Use Designation and Zone allow multi-family residential use. The applicant proposes a multi-family development with 121 dwelling units. As such, the entire development will be designated for residential use.

3. **If the development contains units that are subsidized, the development proponent already has recorded, or is required by law to record, a land use restriction for the following applicable minimum durations:**

    A. **Fifty-five years for units that are rented.**

    B. **Forty-five years for units that are owned.**

    The 2018 State Guidelines defines "subsidized" as "units that are price or rent restricted such that the units are permanently affordable to households meeting the definitions of very low and lower income, as defined in Sections 50079.5 and 50105 of the Health and Safety Code".

    The project is a multi-family housing development containing 120 units restricted to Low Income Households and one (1) market-rate manager's unit. The applicant is required per the Conditions of Approval to record a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make at least 50 percent, that is 61 units, of total 121 units affordable to households making at or below 80 percent area median income, which is equivalent to lower-income households per Health and Safety Code Section 50079.5, for a period of 55 years.

4. **The development satisfies both of the following:**

    A. **Is located in a locality that the department has determined is subject to this subparagraph on the basis that the number of units that have been issued building permits is less than the locality's share of the regional housing needs, by income category, for that reporting period. A locality shall remain eligible under this subparagraph until the department's determination for the next reporting period. A locality shall be subject to this subparagraph if it has not submitted an annual housing element report to the department pursuant to paragraph (2) of subdivision (a) of Section 65400 for at least two consecutive years before the development submitted an application for approval under this section.**

    B. **The development is subject to a requirement mandating a minimum percentage of below market rate housing based on one of the following:**

        i. **The locality did not submit its latest production report to the department by the time period required by Section 65400, or that production report reflects that there were fewer units of above moderate-income housing approved than were required for the regional housing needs assessment cycle for that reporting period. In addition, if the project contains more than 10 units of housing, the project seeking approval dedicates a minimum of 10 percent of the total number of units to housing affordable to households making below 80 percent of the area median income. If the locality has adopted a local ordinance that requires that greater than 10**

percent of the units be dedicated to housing affordable to households making below 80 percent of the area median income, that zoning ordinance applies.

ii. **The locality did not submit its latest production report to the department by the time period required by Section 65400, or that production report reflects that there were fewer units of housing affordable to households making below 80 percent of the area median income that were issued building permits than were required for the regional housing needs assessment cycle for that reporting period, and the project seeking approval dedicates 50 percent of the total number of units to housing affordable to households making below 80 percent of the area median income, unless the locality has adopted a local ordinance that requires that greater than 50 percent of the units be dedicated to housing affordable to households making below 80 percent of the area median income, in which case that ordinance applies.**

iii. **The locality did not submit its latest production report to the department by the time period required by Section 65400, or if the production report reflects that there were fewer units of housing affordable to any income level described in clause (i) or (ii) that were issued building permits than were required for the regional housing needs assessment cycle for that reporting period, the project seeking approval may choose between utilizing clause (i) or (ii).**

On February 1, 2018, the California Department of Housing and Community Development (HCD) released maps showing which cities and counties in California are subject to streamlined housing development under SB 35. The information shows the City of Los Angeles has met its 2013-2021 Regional Housing Need Allocation ("RHNA") goals for the "above market" income category; however, the City is not showing sufficient progress in meeting the RHNA for the lower income categories. Therefore, the City of Los Angeles is subject to SB 35.

5. **The development, excluding any additional density or any other concessions, incentives, or waivers of development standards granted pursuant to the Density Bonus Law in Section 65915, is consistent with objective zoning standards and objective design review standards in effect at the time that the development is submitted to the local government pursuant to this section. For purposes of this paragraph, "objective zoning standards" and "objective design review standards" mean standards that involve no personal or subjective judgment by a public official and are uniformly verifiable by reference to an external and uniform benchmark or criterion available and knowable by both the development applicant or proponent and the public official prior to submittal. These standards may be embodied in alternative objective land use specifications adopted by a city or county, and may include, but are not limited to, housing overlay zones, specific plans, inclusionary zoning ordinances, and density bonus ordinances, subject to the following:**

   A. **A development shall be deemed consistent with the objective zoning standards related to housing density, as applicable, if the density proposed is compliant with the maximum density allowed within that land use designation, notwithstanding any specified maximum unit allocation that may result in fewer units of housing being permitted.**

B. **In the event that objective zoning, general plan, or design review standards are mutually inconsistent, a development shall be deemed consistent with the objective zoning standards pursuant to this subdivision if the development is consistent with the standards set forth in the general plan.**

The project site is located within the Westlake Community Plan, which designates the site for High Density Residential land uses. The project site is also located within the South Subarea (Wilshire Corridor District) of the Central City West Specific Plan ("Specific Plan"). The project site is zoned CW "Central City West Specific Plan Zone," which indicates that the development regulations on the project site is established by the Specific Plan. The Specific Plan identifies land use categories and height/floor area ratio districts that guide development on-site. The project site has a land use category and height/floor area ratio district of R5(CW)-U/6 per the Specific Plan.

The project is in substantial conformance with all applicable objective zoning and design review standards of the Specific Plan in conjunction with density bonus and incentives of development standards pursuant to the TOC Affordable Housing Incentive Program and Conditions of Approval.

Density

The project site is permitted a maximum base density of 111 dwelling units. The applicant requests a density bonus of nine (9) percent pursuant to the TOC Affordable Housing Incentive Program to permit a total of 121 dwelling units in exchange for setting aside 120 dwelling units for Low Income Households.

Floor Area Ratio (FAR)

The project site is permitted a maximum FAR of 6:1 and a maximum floor area of 91,554 square feet on a site with a buildable area of 15,259 square feet. The project proposes a 5.65:1 FAR with 86,120 square feet of floor area. As such, the project complies with the FAR provision.

Building Height

The project site is permitted a maximum height of 1,218 feet above mean sea level. The project proposes a maximum building height of 96 feet, 2 inches, as measured from grade to the highest point of the roof structure, which is equivalent to 410 feet above mean sea level. As such, the project complies with the maximum building height provision.

Setbacks

The project is required to provide a 15-foot front yard setback, 10-foot side yard setbacks, and a 19-foot rear yard setback. The applicant requests incentives of development standards pursuant to the TOC Affordable Housing Incentive Program to permit a reduction in the required setbacks to allow a 12-foot front yard setback, 6-foot, 6-inch side yard setbacks, and a 12-foot, 4-inch rear yard setback. The proposed project will observe the reduced front, side and rear yard setbacks. Therefore, the project complies with the setback requirements.

Open Space

The project is required to provide a minimum of 12,100 square feet of usable open space, 100 percent of which must be common open space. The applicant requests an incentive of development standards pursuant to the TOC Affordable Housing Incentive Program to reduce the minimum usable open space and common open space requirements to permit 9,075 square feet. The applicant also requests an incentive pursuant to the TOC Affordable Housing Incentive Program to permit a reduced common open space dimension to permit 12 feet, 4 inches in lieu of 15 feet as otherwise required. The project will provide 9,075 square feet of usable open space, including a 1,018-square-foot recreation room and 50-percent (1,220 square feet) of the rear yard at the ground level, a 2,263-square-foot courtyard and a 610-square-foot recreation room at the second floor level, and 3,324 square feet of roof deck and a 640-square-foot recreation room at the roof level. All of these open space areas consist of common open space, thereby complying with both the minimum total usable open space and minimum common open space requirement of 9,075 square feet. Additionally, all common open space provides a minimum dimension of 12 feet, 4 inches as permitted by the TOC Affordable Housing Incentive Program. Therefore, the project complies with open space provisions.

Automobile Parking

The project is not required to provide any parking spaces for the residential units pursuant to SB 35. Nonetheless, the project will provide 42 non-required parking spaces on-site. As permitted by SB 35 Guidelines Section 301(a)(5), approval of ministerial processing does not preclude the City from imposing standard conditions of approval as long as those conditions are objective and broadly applicable to development within the locality regardless of streamline approval. The project has been conditioned to comply with the objective automobile parking design standards set forth in LAMC Section 12.21 A.5, including aisle widths, circulation driveway, stall widths, stall width increase for obstructions and end stalls condition, driveway slope, and double striping of stalls. As conditioned, the project complies with parking standards.

Bicycle Parking

The project will provide nine (9) short-term and 85 long-term bicycle parking spaces as required by LAMC. As previously mentioned, SB 35 does not preclude the City from imposing standard conditions of approval. The project has been conditioned to comply with the objective bicycle parking facility standards set forth in LAMC Section 12.21 A.16. As conditioned, the project complies with parking standards.

No other concessions, incentives, or waivers of development standards are requested or granted as part of the subject determination. The development, excluding any additional density or any other concessions, incentives, or waivers of development standards granted pursuant to TOC Guidelines, is consistent with objective zoning and design review standards in effect at the time that the development was submitted to the City.

6. **The development is not located on a site that is any of the following:**

    A. **A coastal zone, as defined in Division 20 (commencing with Section 30000) of the Public Resources Code.**

B. **Either prime farmland or farmland of statewide importance, as defined pursuant to United States Department of Agriculture land inventory and monitoring criteria, as modified for California, and designated on the maps prepared by the Farmland Mapping and Monitoring Program of the Department of Conservation, or land zoned or designated for agricultural protection or preservation by a local ballot measure that was approved by the voters of that jurisdiction.**

C. **Wetlands, as defined in the United States Fish and Wildlife Service Manual, Part 660 FW 2 (June 21, 1993).**

D. **Within a very high fire hazard severity zone, as determined by the Department of Forestry and Fire Protection pursuant to Section 51178, or within a high or very high fire hazard severity zone as indicated on maps adopted by the Department of Forestry and Fire Protection pursuant to Section 4202 of the Public Resources Code. This subparagraph does not apply to sites excluded from the specified hazard zones by a local agency, pursuant to subdivision (b) of Section 51179, or sites that have adopted fire hazard mitigation measures pursuant to existing building standards or state fire mitigation measures applicable to the development.**

E. **A hazardous waste site that is listed pursuant to Section 65962.5 or a hazardous waste site designated by the Department of Toxic Substances Control pursuant to Section 25356 of the Health and Safety Code, unless the Department of Toxic Substances Control has cleared the site for residential use or residential mixed uses.**

F. **Within a delineated earthquake fault zone as determined by the State Geologist in any official maps published by the State Geologist, unless the development complies with applicable seismic protection building code standards adopted by the California Building Standards Commission under the California Building Standards Law (Part 2.5 (commencing with Section 18901) of Division 13 of the Health and Safety Code), and by any local building department under Chapter 12.2 (commencing with Section 8875) of Division 1 of Title 2.**

G. **Within a flood plain as determined by maps promulgated by the Federal Emergency Management Agency, unless the development has been issued a flood plain development permit pursuant to Part 59 (commencing with Section 59.1) and Part 60 (commencing with Section 60.1) of Subchapter B of Chapter I of Title 44 of the Code of Federal Regulations.**

H. **Within a floodway as determined by maps promulgated by the Federal Emergency Management Agency, unless the development has received a no-rise certification in accordance with Section 60.3(d)(3) of Title 44 of the Code of Federal Regulations.**

I. **Lands identified for conservation in an adopted natural community conservation plan pursuant to the Natural Community Conservation Planning Act (Chapter 10 (commencing with Section 2800) of Division 3 of the Fish and Game Code), habitat conservation plan pursuant to the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), or other adopted natural resource protection plan.**

J. **Habitat for protected species identified as candidate, sensitive, or species of special status by state or federal agencies, fully protected species, or species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), or the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code).**

K. **Lands under conservation easement.**

The site is currently improved with a surface parking lot in an urbanized area of the Westlake Community Plan, which designates the site for High Density Residential land uses. The project site is also located within the South Subarea (Wilshire Corridor District) of the Central City West Specific Plan, which allows land use, density and setback regulations of the R5 Zone per LAMC Section 12.12. As such, the site is not located within a coastal zone, farmland, agricultural land, or wetland. Per the City's Zone Information and Map Access System (ZIMAS), the site is not located in a very high fire hazard severity zone. The California Department of Toxic Substances Control (DTSC) maintains a database (EnviroStor) that provides access to detailed information on hazardous waste permitted sites and corrective action facilities, as well as existing site cleanup information. A review of EnviroStor did not identify any records of hazardous waste facilities on the project site. The site is located approximately 0.78 kilometers of the Puente Hills Blind Thurst and will be subject to Building Code requirements. According to the Federal Emergency Management Agency's Flood Map, the project site is located within Zone X Area of Minimal Flood Hazard, and is not located within a floodway. The site is not identified for conservation or habitat conservation plan, or other adopted natural resource protection plan. The site is developed with a surface parking lot without any trees and surrounded by urban land uses and therefore has no value as a habitat for protected species. There is no conservation easement on site.

7. **The development is not located on a site where any of the following apply:**

A. **The development would require the demolition of the following types of housing:**

i. **Housing that is subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of moderate, low, or very low income.**

ii. **Housing that is subject to any form of rent or price control through a public entity's valid exercise of its police power.**

iii. **Housing that has been occupied by tenants within the past 10 years.**

B. **The site was previously used for housing that was occupied by tenants that was demolished within 10 years before the development proponent submits an application under this section.**

C. **The development would require the demolition of a historic structure that was placed on a national, state, or local historic register prior to the submission of an application.**

D. **The property contains housing units that are occupied by tenants, and units at the property are, or were, subsequently offered for sale to the general public by the subdivider or subsequent owner of the property.**

Pursuant to the AB 2556/SB 35 (TOC) Determination Letter dated June 4, 2019 and prepared by the Los Angeles Housing and Community Investment Department (HCIDLA), the proposed development does not: (1) require the demolition of the prohibited types of housing; (2) was not previously used for tenant occupied housing demolished within the past 10 years; (3) does not require the demolition of a historic structure; and (4) does not contain housing units occupied by tenants requiring a subdivision.

8. **The development proponent has done both of the following, as applicable:**

   A. **Certified to the locality that either of the following is true, as applicable:**

      i. **The entirety of the development is a public work for purposes of Chapter 1 (commencing with Section 1720) of Part 7 of Division 2 of the Labor Code.**

      ii. **If the development is not in its entirety a public work, that all construction workers employed in the execution of the development will be paid at least the general prevailing rate of per diem wages for the type of work and geographic area, as determined by the Director of Industrial Relations pursuant to Sections 1773 and 1773.9 of the Labor Code, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate. If the development is subject to this subparagraph, then for those portions of the development that are not a public work all of the following shall apply:**

         I. **The development proponent shall ensure that the prevailing wage requirement is included in all contracts for the performance of the work.**

         II. **All contractors and subcontractors shall pay to all construction workers employed in the execution of the work at least the general prevailing rate of per diem wages, except that apprentices registered in programs approved by the Chief of the Division of Apprenticeship Standards may be paid at least the applicable apprentice prevailing rate.**

         III. **Except as provided in subclause (V), all contractors and subcontractors shall maintain and verify payroll records pursuant to Section 1776 of the Labor Code and make those records available for inspection and copying as provided in therein.**

         IV. **Except as provided in subclause (V), the obligation of the contractors and subcontractors to pay prevailing wages may be enforced by the Labor Commissioner through the issuance of a civil wage and penalty assessment pursuant to Section 1741 of the Labor Code, which may be reviewed pursuant to Section 1742 of the Labor Code, within 18 months after the completion of the**

development, by an underpaid worker through an administrative complaint or civil action, or by a joint labor-management committee though a civil action under Section 1771.2 of the Labor Code. If a civil wage and penalty assessment is issued, the contractor, subcontractor, and surety on a bond or bonds issued to secure the payment of wages covered by the assessment shall be liable for liquidated damages pursuant to Section 1742.1 of the Labor Code.

V. **Subclauses (III) and (IV) shall not apply if all contractors and subcontractors performing work on the development are subject to a project labor agreement that requires the payment of prevailing wages to all construction workers employed in the execution of the development and provides for enforcement of that obligation through an arbitration procedure. For purposes of this clause, "project labor agreement" has the same meaning as set forth in paragraph (1) of subdivision (b) of Section 2500 of the Public Contract Code.**

VI. **Notwithstanding subdivision (c) of Section 1773.1 of the Labor Code, the requirement that employer payments not reduce the obligation to pay the hourly straight time or overtime wages found to be prevailing shall not apply if otherwise provided in a bona fide collective bargaining agreement covering the worker. The requirement to pay at least the general prevailing rate of per diem wages does not preclude use of an alternative workweek schedule adopted pursuant to Section 511 or 514 of the Labor Code.**

B.

i. **For developments for which any of the following conditions apply, certified that a skilled and trained workforce shall be used to complete the development if the application is approved:**

I. **On and after January 1, 2018, until December 31, 2021, the development consists of 75 or more units that are not 100 percent subsidized affordable housing and will be located within a jurisdiction located in a coastal or bay county with a population of 225,000 or more.**

II. **On and after January 1, 2022, until December 31, 2025, the development consists of 50 or more units that are not 100 percent subsidized affordable housing and will be located within a jurisdiction located in a coastal or bay county with a population of 225,000 or more.**

III. **On and after January 1, 2018, until December 31, 2019, the development consists of 75 or more units that are not 100 percent subsidized affordable housing and will be located within a jurisdiction with a population of fewer than 550,000 and that is not located in a coastal or bay county.**

IV. **On and after January 1, 2020, until December 31, 2021, the development consists of more than 50 units and will be located**

within a jurisdiction with a population of fewer than 550,000 and that is not located in a coastal or bay county.

V. **On and after January 1, 2022, until December 31, 2025, the development consists of more than 25 units and will be located within a jurisdiction with a population of fewer than 550,000 and that is not located in a coastal bay county.**

ii. **For purposes of this section, "skilled and trained workforce" has the same meaning as provided in Chapter 2.9 (commencing with Section 2600) of Part 1 of Division 2 of the Public Contract Code.**

iii. **If the development proponent has certified that a skilled and trained workforce will be used to complete the development and the application is approved, the following shall apply:**

I. **The applicant shall require in all contracts for the performance of work that every contractor and subcontractor at every tier will individually use a skilled and trained workforce to complete the development.**

II. **Every contractor and subcontractor shall use a skilled and trained workforce to complete the development.**

III. **Except as provided in subclause (IV), the applicant shall provide to the locality, on a monthly basis while the development or contract is being performed, a report demonstrating compliance with Chapter 2.9 (commencing with Section 2600) of Part 1 of Division 2 of the Public Contract Code. A monthly report provided to the locality pursuant to this subclause shall be a public record under the California Public Records Act (Chapter 3.5 (commencing with Section 6250) of Division 7 of Title 1) and shall be open to public inspection. An applicant that fails to provide a monthly report demonstrating compliance with Chapter 2.9 (commencing with Section 2600) of Part 1 of Division 2 of the Public Contract Code shall be subject to a civil penalty of ten thousand dollars ($10,000) per month for each month for which the report has not been provided. Any contractor or subcontractor that fails to use a skilled and trained workforce shall be subject to a civil penalty of two hundred dollars ($200) per day for each worker employed in contravention of the skilled and trained workforce requirement. Penalties may be assessed by the Labor Commissioner within 18 months of completion of the development using the same procedures for issuance of civil wage and penalty assessments pursuant to Section 1741 of the Labor Code, and may be reviewed pursuant to the same procedures in Section 1742 of the Labor Code. Penalties shall be paid to the State Public Works Enforcement Fund.**

IV. **Subclause (III) shall not apply if all contractors and subcontractors performing work on the development are subject to a project labor agreement that requires compliance with the**

skilled and trained workforce requirement and provides for enforcement of that obligation through an arbitration procedure. For purposes of this subparagraph, "project labor agreement" has the same meaning as set forth in paragraph (1) of subdivision (b) of Section 2500 of the Public Contract Code.

C. **Notwithstanding subparagraphs (A) and (B), a development that is subject to approval pursuant to this section is exempt from any requirement to pay prevailing wages or use a skilled and trained workforce if it meets both of the following:**

i. **The project includes 10 or fewer units.**

ii. **The project is not a public work for purposes of Chapter 1 (commencing with Section 1720) of Part 7 of Division 2 of the Labor Code.**

The project is conditioned to meet the labor requirements of Government Code Section 65913.4(a).

9. **The development did not or does not involve a subdivision of a parcel that is, or, notwithstanding this section, would otherwise be, subject to the Subdivision Map Act (Division 2 (commencing with Section 66410)) or any other applicable law authorizing the subdivision of land, unless either of the following apply:**

A. **The development has received or will receive financing or funding by means of a low-income housing tax credit and is subject to the requirement that prevailing wages be paid pursuant to subparagraph (A) of paragraph (8).**

B. **The development is subject to the requirement that prevailing wages be paid, and a skilled and trained workforce used, pursuant to paragraph (8).**

There is no subdivision entitlement requested as part of the project.

10. **The development shall not be upon an existing parcel of land or site that is governed under the Mobilehome Residency Law (Chapter 2.5 (commencing with Section 798) of Title 2 of Part 2 of Division 2 of the Civil Code), the Recreational Vehicle Park Occupancy Law (Chapter 2.6 (commencing with Section 799.20) of Title 2 of Part 2 of Division 2 of the Civil Code), the Mobilehome Parks Act (Part 2.1 (commencing with Section 18200) of Division 13 of the Health and Safety Code), or the Special Occupancy Parks Act (Part 2.3 (commencing with Section 18860) of Division 13 of the Health and Safety Code).**

The Mobilehome Residency Law and related regulations are not applicable to the site.

Therefore, as provided above, the development satisfies all of the objective planning standards of Government Code Section 65913.4(a), and is therefore subject to the streamlined, ministerial approval process provided in Government Code Sections 65913.4(b) and (c).

Additionally, Government Code Section 65913.4(d) states:

Notwithstanding any other law, a local government, whether or not it has adopted an ordinance governing parking requirements in multifamily developments, shall not impose parking standards for a streamlined development that was approved pursuant to this section in any of the following instances:

(A) The development is located within one-half mile of public transit.

(B) The development is located within an architecturally and historically significant historic district.

(C) When on-street parking permits are required but not offered to the occupants of the development.

(D) When there is a car share vehicle located within one block of the development.

The project site is located less than 2,640 feet from the 7th Street/Metro Center, which serves Metro Purple, Red, Blue and Expo lines. As such, the City shall not impose parking standards for the proposed Streamlined Infill Project.

TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM / AFFORDABLE HOUSING INCENTIVES COMPLIANCE FINDINGS

Pursuant to Section 12.22 A.31(e) of the LAMC, the Director shall review a Transit Oriented Communities (TOC) Affordable Housing Incentive Program project application in accordance with the procedures outlined in LAMC Section 12.22 A.25(g).

1. **Pursuant to Section 12.22 A.25(g) of the LAMC, the Director shall approve a density bonus and requested incentives unless the Director finds that:**

   a. **The incentives are not required to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.**

      The record does not contain substantial evidence that would allow the Director to make a finding that the requested incentives are not necessary to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for Very Low, Low, and Moderate Income Households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

      The list of incentives in the TOC Guidelines were pre-evaluated at the time the TOC Affordable Housing Incentive Program Ordinance was adopted to include types of relief that minimize restrictions on the size of the project. As such, the Director will always arrive at the conclusion that the on-menu incentives are required to provide for affordable housing costs because the incentives by their nature increase the scale of the project.

      The following incentives allow the developer to reduce front, side and rear yard

setbacks, usable open space, common open space, and common open space dimension requirements so that all 120 affordable housing units reserved for Low Income Households can be constructed and the overall space dedicated to residential uses is increased. These incentives are expressed in the TOC Guidelines which permit exceptions to zoning requirements that result in building design or construction efficiencies that facilitate affordable housing costs. These incentives also support the applicant's decision to reserve 120 of 121 total units for Low Income Households.

Front Yard Setback. A reduction in the minimum front yard setback to permit 12 feet (post-dedication) to align with the façade of the adjoining building to the east of the project site in lieu of 15 feet as otherwise required by LAMC Section 12.12 C.1;

Front and Rear Yard Setbacks. A 35-percent reduction in the minimum rear yard setback to permit 12 feet, 4 inches in lieu of 19 feet as otherwise required by LAMC Section 12.12 C.3;

Side Yard Setbacks. A 35-percent reduction in the minimum side yard setbacks to permit six (6) feet, six (6) inches in lieu of 10 feet as otherwise required by LAMC Section 12.12 C.2;

Usable Open Space. A 25-percent reduction in the minimum usable open space to permit 9,075 square feet in lieu of 12,100 square feet as otherwise required by LAMC Section 12.21 G.2;

Common Open Space. A 25-percent reduction in the minimum common open space to permit 9,075 square feet in lieu of 12,100 square feet as otherwise required by Section C.1(a) of Appendix D of the Central City West Specific Plan;

Common Open Space Dimension. An 18-percent reduction in the minimum common open space dimension to permit 12 feet, 4 inches in lieu of 15 feet as otherwise required by LAMC Section 12.21 G.2(a)(1)(iii);

b. The Incentives will not have a specific adverse impact upon public health and safety or the physical environment, or on any real property that is listed in the California Register of Historical Resources and for which there are no feasible method to satisfactorily mitigate or avoid the specific adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income Households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.

There is no substantial evidence in the record that the proposed incentives will have a specific adverse impact. A "specific adverse impact" is defined as, "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (LAMC Section 12.22 A.25(b)). The proposed project is an Eligible housing Development that meets all of the eligibility criteria set forth in the TOC Guidelines. The project is in substantial conformance with the General Plan Land Use Designation, Westlake Community Plan, and Central City West Specific Plan in conjunction with the Base and Additional Incentives of the TOC Guidelines. Additionally, the project site is improved with a surface parking lot and does not involve any property that is listed in the National or California Register of

Historical Resources or a designated Historic Preservation Overlay Zone or on the City of Los Angeles list of Historical-Cultural Monuments. Therefore, there is no substantial evidence that the proposed incentives will have a specific adverse impact on public health and safety.

PROJECT PERMIT COMPLIANCE FINDINGS

1. **The project substantially complies with the applicable regulations, findings, standards, and provisions of the specific plan.**

   a. **Use.** The subject site is designated R5(CW)-U/6 within the South Subarea (Wilshire Corridor District) of the Central City West Specific Plan ("Specific Plan"). Section 6.F.2 of the Specific Plan states that the use regulations of the R5 Zone, as specified in LAMC Section 12.12 "R5 Multiple Dwelling Zone," shall apply to all lots in the R5(CW) Category within the Specific Plan area. LAMC Section 12.12 allows multi-family residential uses with a base density of one (1) dwelling unit per 200 square feet of lot area, which results in a base density of 111 dwelling units for the subject site with 22,004 square feet of lot area. However, the applicant requests a Base Incentive per the TOC Affordable Housing Incentive Program for nine-percent increase in density to permit a total of 121 dwelling units in lieu of 111 dwelling units in exchange for setting aside 120 of 121 total units for Low Income Households. As such, in conjunction with the TOC Base Incentive request, the project complies with Section 6.F.2 of the Specific Plan.

   b. **Yards.** Section 6.F.2 of the Specific Plan states that the area regulations of the R5 Zone, as specified in LAMC Section 12.12 "R5 Multiple Dwelling Zone," shall apply to all lots in the R5(CW) Category within the Specific Plan area. LAMC Section 12.12 C states that the front yard setback in the R5 Zone shall comply with the 15-foot front yard setback required in the R3 Zone. LAMC Section 12.12 C requires a side yard setback of five (5) feet and one (1) additional foot for each additional story above the second story, which results in a minimum side yard setback of 10 feet for the proposed seven-story building. LAMC Section 12.12 C also requires a rear yard setback of 15 feet and one (1) additional foot for each additional story above the third story, which results in a minimum rear yard setback of 19 feet for the proposed seven-story building. However, the applicant requests two Additional Incentives[2] per the TOC Affordable Housing Incentive Program for a reduction in the front yard setback to permit 12 feet (post-dedication) in lieu of 15 feet, 35-reduction in the side yard setbacks to permit 6 feet, 6 inches in lieu of 10 feet, and a 35-percent reduction in the rear yard setback to permit 12 feet, 4 inches in lieu of 19 feet. As shown in the table below, the project proposes 12-foot front yard, 6-foot, 6-inch side yard, and 12-foot, 4-inch rear yard setbacks. As such, in conjunction with the TOC Additional Incentive request, the project complies with Section 6.F.2 of the Specific Plan.

	Required Setback per Specific Plan	Required Setback with TOC Incentive	Proposed Setback
Front Yard	15'	12'	12'
Side Yards	10'	6'-6"	6'-6"
Rear Yard	19'	12'-4"	12'-4"

[2] Per TOC Guidelines Section VII.1.a.ii.2, one Yard/Setback Additional Incentive includes a reduction in the required width of depth of two (2) individual yards or setbacks in Tier 4.

c. **Floor Area.** Section 6.I.1.a of the Specific Plan states that the Base Permitted Floor Area on a lot within the Specific Plan area shall be as shown by the Floor Area Ratio (FAR) specified on Map Nos. 2, 3, and 4. The project site is located on Map No. 4 and designated as R5(CW)-U/6, which permits a maximum FAR of 6:1 and a maximum floor area of 91,554 square feet on a site with a buildable area of 15,259 square feet. The project proposes a 5.65:1 FAR with 86,120 square feet of floor area. As such, the project complies with Section 6.I.1.a of the Specific Plan.

d. **Height.** Section 8.A.3 of the Specific Plan states that buildings or structures located on a lot with a "U" height designation between the centerline of Bixel Street on the east and the centerline of Witmer Street/Hartford Avenue/Blaine Street on the west shall not exceed a maximum height of 1,218 feet above mean sea level. The project proposes a maximum building height of 96 feet, 2 inches, as measured from grade to the highest point of the roof structure, which is equivalent to 410 feet above mean sea level. As such, the project complies with Section 8.A.3 of the Specific Plan.

e. **Open Space and Landscaping.** Section 8.D.2 of the Specific Plan requires that all multiple-family residential projects shall meet on-site per dwelling unit open space requirements as provided in the Urban Design Guidelines contained in Appendix D of the Specific Plan. Section C of Appendix D requires that a minimum of 100 square feet per unit of the required useable open space, as provided in Section 12.21 G of the LAMC, shall be provided as common open space. The project is subject to the total usable open space (common and private combined) requirement as set forth in LAMC Section 12.21 G as well as the minimum common open space required by the Specific Plan.

Per LAMC Section 12.21 G, the project must provide at a minimum the following usable open space per dwelling unit: 100 square feet for each unit having less than three habitable rooms; 125 square feet for each unit having three habitable rooms; and 175 square feet for each unit having more than three habitable rooms. The project proposes 120 studio and one (1) one-bedroom units, which require a minimum of 12,100 square feet of usable open space. In addition, per the Specific Plan, all 12,100 square feet of total usable common open space must consist of common open space.

However, the applicant requests Additional Incentives per the TOC Affordable Housing Incentive Program for a 25-percent reduction in the minimum usable open space required to permit 9,075 square feet in lieu of 12,100 square feet, and a 25-percent reduction in the minimum common open space required to permit 9,075 square feet in lieu of 12,100 square feet. Open space requirements for the project are as follows:

Type of Unit	Number of Units	Required OS per Unit per LAMC (sf)	Minimum Usable OS Required per LAMC (sf)	Required Common OS per Unit per Specific Plan (sf)	Minimum Common OS Required per Specific Plan (sf)
< 3 Hab. Rooms	121	100	12,100	100	12,100
= 3 Hab. Rooms	-	125	-	-	-
> 3 Hab. Rooms	-	175	-	-	-
Total	**121**	**-**	**12,100**	**-**	**12,100**
Total Required with TOC Incentive (sf)	**-**	**-**	**9,075**	**-**	**9,075**

As shown in the table below, the project will provide 9,075 square feet of usable open space, including a 1,018-square-foot recreation room and 50-percent (1,220 square feet) of the rear yard at the ground level, a 2,263-square-foot courtyard and a 610-square-foot recreation room at the second floor level, and 3,324 square feet of roof deck and a 640-square-foot recreation room at the roof level. All of these open space areas consist of common open space, thereby complying with both the minimum total usable open space and minimum common open space requirement of 9,075 square feet.

Level	Common Open Space Areas	Area (sf)
1st Floor	Recreation Room	1,018
1st Floor	Rear Yard	1,220
2nd Floor	Courtyard	2,263
2nd Floor	Recreation Room	610
7th Floor	Roof Deck	3,324
7th Floor	Recreation Room	640
	TOTAL USABLE/COMMON OPEN SPACE PROVIDED	**9,075**
	Total Usable OS Required with TOC	**9,075**
	Total Common OS Required with TOC	**9,075**

Section C.1(c) of Appendix D of the Specific Plan allows for up to 50 percent of the area contained within the rear yard area to be used to meet the open space per unit requirement. The project uses 50 percent, or 1,220 square feet, of the 2,440-square-

foot rear yard area to meet the open space per unit requirement, as shown in Exhibit "A." Section C.1(e) of Appendix D of the Specific Plan requires that interior courtyards have a minimum width of 10 feet, a minimum average width of 20 feet, and a minimum area of 400 square feet, and that a minimum of 25 percent of interior courtyards shall be landscaped. As illustrated in Exhibit "A," the courtyard on the 2nd Floor has widths of 25 feet, 3 inches and 89 feet, 7 inches totaling 2,263 square feet in size. Additionally, per Exhibit "A," 947 square feet, or 41.8 percent of the 2,263-square-foot courtyard will be landscaped.

In addition to the open space requirements, Section C.2 of Appendix D of the Specific Plan requires that a minimum of one (1) tree shall be provided on-site for every dwelling unit, a minimum of 50 percent of which shall be provided on site, and each of which shall be a minimum of 12 feet in height and three inches in caliper at the time of planting. The project is required to provide a total of 121 trees. As shown in Exhibit "A," 62 trees will be planted on-site and 59 trees will be planted off-site. The Condition of Approval requires the trees to be a minimum of 12 feet in height and three (3) inches in caliper at the time of planting. The remaining 59 trees that cannot be accommodated on-site shall be provided through the payment of an in-lieu fee as specified in Article 2, Chapter VI, Section 62.177(b)(1) of the LAMC for each tree to be planted off-site per the Condition of Approval.

Sections C.3 and C.4 of Appendix D of the Specific Plan requires that all open space areas not used for building driveways, parking areas, recreational facilities or walks shall be attractively landscaped and maintained, and all landscaped areas shall be maintained with an automatic irrigation system. As shown in Exhibit "A," all open areas not used for aforementioned purposes will be attractively landscaped with a variety of shrubs, groundcover and trees. Per the Condition of Approval, all such areas shall be properly landscaped, irrigated and maintained.

f. **Parking.** Section 10.B of the Specific Plan states that off-street parking requirements for all uses other than office use shall be as specified in Section 12.21 A.4 of the LAMC. However, per SB 35 (California Government Code Section 65913.4(d), a local government shall not impose parking standards for a streamlined development that is approved pursuant to SB 35 if the development is located within one-half mile of public transit. The project site is located less than one-half mile from the 7th Street/Metro Center, which serves Metro Purple, Red, Blue and Expo lines, and therefore not subject to any parking standards. Nonetheless, the project proposes 42 non-required automobile parking spaces within a two-level parking garage.

f. **Transportation Impact Fee.** Section 9.C of the Specific Plan requires that all projects within the Specific Plan area pay a Transportation Impact Mitigation Fee. However, Section 9.C.2 of the Plan states that residential uses are exempt from payment of the fee. The proposed project consists of 121 residential units. Therefore, Section 9.C of the Specific Plan is not applicable.

g. **Inclusionary Housing Requirement.** Section 11.C.2 of the Specific Plan states that all multiple-family residential projects are subject to either the Replacement Dwelling Unit or Inclusionary Housing requirement as follows, whichever results in the greater number of affordable dwelling units:

1. Document and replace, on a one-for-one basis in the form of new dwelling units construction, Low and Very Low Income Dwelling Units and/or guest rooms demolished on the lot or lots on or after February 14, 1988; or

2. If no dwelling units were demolished on the lot or lots on or after February 14, 1988, a Project Applicant shall reserve a total of 15 percent of the dwelling units within the project as Low Income Dwelling Units.

The project is a 121-unit multi-family residential development on a site that has been used for a surface parking lot with no residential units since 1972. Per the Specific Plan, the project is required to reserve at least 15 percent of the dwelling units for Low Income Households. The proposed project is a 100-percent affordable housing development, excluding a manger's unit, consisting of 120 dwelling units reserved for Low Income Households. Therefore, the project is in compliance with Section 11.C.2 of the Specific Plan.

2. **That the project incorporates mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review which would mitigate the negative environmental effects of the project, to the extent physically possible.**

Pursuant to SB 35, a project that satisfies all of the objective planning standards of Government Code Section 65913.4(a) is subject to the streamlined ministerial approval process. Therefore, pursuant to SB 35 and Public Resources Code Section 21080(b)(1), the project is statutorily exempt from CEQA as a ministerial project.

ENVIRONMENTAL FINDINGS

Pursuant to SB 35, a project that satisfies all of the objective planning standards of Government Code Section 65913.4(a) is subject to the streamlined ministerial approval process. Therefore, pursuant to SB 35 and Public Resources Code Section 21080(b)(1), the project is statutorily exempt from CEQA as a ministerial project.

TIME LIMIT – OBSERVANCE OF CONDITIONS

All terms and conditions of the Director's Determination shall be fulfilled before the use may be established. Pursuant to LAMC Section 12.25 A.2, the instant authorization is further conditional upon the privileges being utilized within **three years** after the effective date of this determination and, if such privileges are not utilized, building permits are not issued, or substantial physical construction work is not begun within said time and carried on diligently so that building permits do not lapse, the authorization shall terminate and become void.

TRANSFERABILITY

This determination runs with the land. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent that you advise them regarding the conditions of this grant. If any portion of this approval is utilized, then all other conditions and requirements set forth herein become immediately operative and must be strictly observed.

VIOLATIONS OF THESE CONDITIONS, A MISDEMEANOR

The applicant's attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any condition of this grant is violated or not complied with, then the applicant or his successor in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code, or the approval may be revoked.

Section 11.00 of the LAMC states in part (m): "It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this Code. Any person violating any of the provisions or failing to comply with any of the mandatory requirements of this Code shall be guilty of a misdemeanor unless that violation or failure is declared in that section to be an infraction. An infraction shall be tried and be punishable as provided in Section 19.6 of the Penal Code and the provisions of this section. Any violation of this Code that is designated as a misdemeanor may be charged by the City Attorney as either a misdemeanor or an infraction.

Every violation of this determination is punishable as a misdemeanor unless provision is otherwise made, and shall be punishable by a fine of not more than $1,000 or by imprisonment in the County Jail for a period of not more than six months, or by both a fine and imprisonment."

APPEAL PERIOD - EFFECTIVE DATE

The Determination in this matter will become effective and final fifteen (15) days after the date of mailing of the Notice of Director's Determination unless an appeal there from is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of this Determination, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. Forms are available on-line at http://planning.lacity.org.

Planning Department public offices are located at:

Figueroa Plaza
201 North Figueroa Street
4th Floor
Los Angeles, CA 90012
(213) 482-7077

Marvin Braude San Fernando
Valley Constituent Service Center
6262 Van Nuys Boulevard, Room 251
Van Nuys, CA 91401
(818) 374-5050

West Los Angeles
1828 Sawtelle Boulevard
2nd Floor
Los Angeles, CA 90025
(310) 231-2901

Only an applicant or any owner or tenant of a property abutting, across the street or alley from, or having a common corner with the subject property can appeal the Transit Oriented Communities Affordable Housing Incentives Program Review. Per Section 12.22 A.25 of the LAMC, appeals of Transit Oriented Communities Affordable Housing Incentives Program Review cases are heard by the City Planning Commission.

The project entitlements are being applied for under the timelines and procedures of Senate Bill 35 (Government Code Section 65913.4), which requires the City to complete design review or public oversight for a project of this size within 90 calendar days of submittal of the application. The applicant submitted a complete application for the development on May 24, 2019. Consequently, all design review or public oversight shall

be completed within 90 days from May 24, 2019, or by August 22, 2019, and shall not in any way inhibit, chill or preclude the ministerial approval provided by Government Code Section 65913.4.

Verification of condition compliance with building plans and/or building permit applications are done at the Development Services Center of the Department of City Planning at Figueroa Plaza in Downtown Los Angeles, Marvin Braude Constituent Service Center in the Valley, or in West Los Angeles. In order to assure that you receive service with a minimum amount of waiting, applicants are encouraged to schedule an appointment with the Development Services Center either through the Department of City Planning website at http://planning.lacity.org or by calling (213) 482-7077, (818) 374-5050, or (310) 231-2901. The applicant is further advised to notify any consultant representing you of this requirement as well.

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedures Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.

VINCENT P. BERTONI, AICP
Director of Planning

Christina Toy Lee, Senior City Planner

Reviewed by:

Kevin Golden, City Planner

Prepared by:

Nuri Cho, City Planning Associate
Nuri.Cho@lacity.org

CECIL RESIDENTIAL APARTMENTS

Donald Dean

From: Lisa Webber <lisa.webber@lacity.org>
Sent: Tuesday, July 23, 2019 4:20 PM
To: Matthew Lust
Cc: Donald Dean; Cindy Kha; Elizabeth Peterson
Subject: Re: Cecil Residential Apartments

Good afternoon Matt and thank you for your email. Yes, this email confirms that the Cecil Residential Apartments project is ministerial in nature and has not required any discretionary actions of the City of Los Angeles to date. As such, the Cecil Residential Apartments is not a Project as defined by the California Environmental Quality Act (CEQA) and is therefore not subject to CEQA review.

If you have any questions, please do not hesitate to contact me.

Lisa Webber

On Mon, Jul 22, 2019 at 3:48 PM Matthew Lust <Matthew.Lust@lacda.org> wrote:

> Hi Lisa,
>
> It was good talking to you today. As we discussed, we will be requesting project funding approval for the Cecil Residential Apartments project in August. As part of the financing approval, we request that projects show the CEQA process is complete. From our discussion, the project was by-right and was not subject to CEQA, as it was not a project under the statute.
>
> If you could confirm these facts so we can continue seeking funding approval for the Cecil Residential Apartments project, I'd appreciate it.
>
> Thanks and please let me know if you have any questions.
>
> Matt
>
> ---
>
> Matt Lust, Manager
>
> Finance & Development Unit
>
> Los Angeles County Development Authority

700 W. Main St., Alhambra, CA 91801

Phone: (626) 586-1809

Email: matt.lust@lacda.org

www.lacda.org

Disclaimer: PLEASE NOTE: This e-mail and any attachments, contains information that is, or may be, covered by electronic communications privacy laws, and is also confidential, private, privileged and proprietary in nature and is solely transmitted for the purposes of the intended recipient(s). If the reader of this message is not an intended recipient, or if this message has been inadvertently directed to your attention, you are hereby notified that you have received this message and any attached document(s) in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this message in error, please notify us immediately by return e-mail and delete and destroy all copies of the original message. You are hereby notified that the Los Angeles County Development Authority (LACDA) does not intend to waive any privilege or privacy rights that might ordinarily attach to this communication.

--

Lisa Webber, AICP
Deputy Director

DEPARTMENT OF CITY PLANNING
D 213.978.1274 | **C** 213.200.4382
E lisa.webber@lacity.org
200 N. Spring St., Suite 525
Los Angeles, CA. 90012

RAMONA METRO POINT

Attachment E.3 – CEQA Approvals

Ramona Metro Point received a NOTICE OF EXEMPTION from CEQA Approvals. The detailed report follows this statement page.

PROJECT SUMMARY

NAME: Ramona and Tyler Residential Development.

ADDRESS: Southeast corner of Ramona Boulevard and Tyler Avenue. El Monte, California 91731. Assessor's Parcel Numbers (APNs) include: 8579-014-901, 8579-014-902, and 8579-014-903.

CITY/COUNTY: City of El Monte, Los Angeles County.

APPLICANT: Domus Development Company, 3424 Wilshire Boulevard, Suite 1020, Los Angeles, CA 90010.

PROJECT: The City of El Monte Economic Development Department, in its capacity as Lead Agency, is reviewing an application that would allow for the development of a four-story residential development on a 0.83-acre site located on the southeast corner of the Ramona Boulevard and Tyler Avenue intersection. The new residential development will contain 51 affordable housing units. Of the total 51 units, 24 units will consist of one bedroom, 12 units will consist of two bedrooms, and the remaining 15 units will have three bedrooms. On-site amenities will include a tot lot, a public bicycle corral, and an indoor common space. Vehicular access to the proposed project will be provided by a 28-foot wide driveway located along Tyler Avenue towards the southern portion of the project. Parking will be provided as tuck-under parking and on surface parking areas along the south side of the project site for a total of 80 parking spaces. A total of approximately 9,026 square feet of common and private open space will be provided. In addition, a portion of the existing alley that separates the northern portion from the southern portion of the project site will be vacated.

Discretionary approvals that would be required as part of the proposed project's implementation include the following:

- Tentative Parcel Map (TPM) No. 82313 to consolidate the three separate parcels into one single parcel;
- Design Review (DR) No. 08-18 to review the architecture and landscaping for the proposed residential building;
- Modification (MOD) No. 23-18 to reduce the parking stall width requirement;
- Density Bonus (DB) No. 01-18 to increase density for the affordable housing project; and,
- A vacation for the segment of the existing alley that separates the northern portion from the southern portion of the project site.

Other permits will also be required, including permits for construction, grading, utility connections, and building occupancy.

CONCLUSIONS: The environmental analysis provided in the attached Notice of Exemption (NOE) indicates that the proposed project would not result in any significant adverse unmitigable impacts to the physical and human environment. For this reason, the City of El Monte has determined that a *Categorical Exemption* is the appropriate CEQA environmental determination.

The environmental analysis is provided in the attached NOE. The project is also described in greater detail in the attached NOE.

Signature _____ 10/2/18

City of El Monte Economic Development Department — Date

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SECTION 1
INTRODUCTION

1.1 PURPOSE AND SCOPE

The City of El Monte Economic Development Department, in its capacity as Lead Agency, is reviewing an application that would allow for the development of a four-story residential development on a 0.83-acre site located on the southeast corner of the Ramona Boulevard and Tyler Avenue intersection. The new residential development will contain 51 affordable housing units. Of the total 51 units, 24 units will consist of one bedroom, 12 units will consist of two bedrooms, and the remaining 15 units will have three bedrooms. On-site amenities will include a tot lot, a public bicycle corral, and indoor common space. Vehicular access to the proposed project will be provided by a 28-foot wide driveway located along Tyler Avenue towards the southern portion of the project. Parking will be provided as tuck-under parking and on surface parking areas along the south side of the project site for a total of 80 parking spaces. A total of approximately 9,026 square feet of common and private open space will be provided. In addition, a portion of the existing alley that separates the northern portion from the southern portion of the project site will be vacated.[1] The Assessor's Parcel Numbers (APNs) applicable to the project site include 8579-014-901, 8579-014-902 and 8579-014-903. The Applicant for the proposed project is Domus Development Company, 3424 Wilshire Boulevard, Suite 1020, Los Angeles, CA 90010.

For this project, the City of El Monte has reviewed the proposed project and has determined that it is categorically exempt and qualifies for an Affordable Housing Exemption (refer to [California Environmental Quality Act] CEQA Guidelines §15194) and a Residential Infill Housing Exemption (refer to CEQA Guidelines §15195). While this Notice of Exemption (NOE) has been prepared with the assistance of an environmental consultant, the findings of the analysis represent the independent judgment of the City of El Monte, in its capacity as Lead Agency for the project. Questions and/or comments should be submitted to the following contact person:

Mr. Benjamin Martinez, Interim Economic Development Director
City of El Monte, Economic Development Department, Planning Division
11333 Valley Boulevard
El Monte, California 91731

This environmental document and all comments received shall be a part of the Environmental Record and review of the project, and a request for Releasing of Funds shall be submitted to the Department of Housing Urban Development (HUD) for the project prior to the commencement of any work on the project.

[1] KTGY Architecture and Planning. *Ramona & Tyler, El Monte, California.* August 16, 2018.

1.2 NOTICE OF EXEMPTION'S ORGANIZATION

The following annotated outline summarizes the format and content of this NOE:

- *Section 1 - Introduction,* provides the procedural context surrounding this Notice of Exemption's preparation and insight into its composition.

- *Section 2 - Project Information,* provides an overview of the affected area along with a description of the proposed project.

- *Section 3 – CEQA Findings in Support of Categorical Exemptions,* identifies the applicable exemptions along with supporting justification for using this exemption.

1.3 CEQA EXEMPTION

Pursuant to the California Environmental Quality Act (CEQA) Guidelines, a Notice of Exemption (NOE) may be filed if the City of El Monte, in its capacity as the Lead Agency, determines that a proposed action or project is exempt from CEQA. According to the CEQA Guidelines §15062, a NOE must contain the following information:

(1) A brief description of the project;

(2) The location of the project (either by street address and cross street for a project in an urbanized area or by attaching a specific map, preferably a copy of a U.S.G.S. 15' or 7-1/2' topographical map identified by quadrangle name);

(3) A finding that the project is exempt from CEQA, including a citation to the State Guidelines section or statute under which it is found to be exempt;

(4) A brief statement of reasons to support the finding; and,

(5) The applicant's name.[2]

This NOE provides a description of the proposed project, indicates the applicable sections of CEQA that support the findings for the CEQA exemption, and discusses the Lead Agency's findings that are applicable to the proposed project. This NOE represents the independent judgment and position of the City of El Monte, acting as the Lead Agency. The Applicant is Domus Development Company, 3424 Wilshire Boulevard, Suite 1020, Los Angeles, CA 90010.

1.4 APPLICABLE CEQA EXEMPTIONS

The City of El Monte has reviewed the proposed project and has determined that it is categorically exempt and qualifies for an Affordable Housing Exemption (refer to CEQA Guidelines §15194) and a Residential

[2] CEQA Guidelines California Code of Regulations, Title 14, Division 6, Chapter 3, Article 19. Categorical Exemptions. (Section 15300).

Infill Housing Exemption (refer to CEQA Guidelines §15195). The Affordable Housing Exemption applies to residential projects that meet the following conditions:

- The project site is not more than five acres in area.
- The project site is located within an urbanized area with a population density of at least 5,000 persons per square mile.
- The project site has been previously developed for urban uses or the parcels immediately adjacent to the project site are developed with urban uses.
- The project site has not been developed for urban uses and at least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses.
- The project consists of the construction, conversion, or use of residential housing consisting of 100 or fewer units that are affordable to low-income households.
- The developer of the project provides sufficient legal commitments to the appropriate local agency to ensure the continued availability and use of the housing units for lower income households for specified period of at least 30 years.[3]

The Residential Infill Housing Exemption applies to residential projects that meet the following conditions:

- The site of the project is located on a site consisting of not more than four acres in total area.
- The project does not include any single level building that exceeds 100,000 square feet.
- The project is a residential project on an infill site and the project site is located within one-half mile of a major transit stop.
- The project does not contain more than 100 residential units and the project promotes higher density infill housing. A project with a density of at least 20 units per acre is presumed to promote higher density infill housing.
- The project would result in housing units being made available to moderate, low or very low income families.[4]

[3] CEQA Guidelines California Code of Regulations, Title 14, Division 6, Chapter 3, Article 19. Categorical Exemptions. (Section 15194).

[4] Ibid. (Section 15195).

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SECTION 2
PROJECT INFORMATION

2.1 PROJECT OVERVIEW

The City of El Monte Economic Development Department, in its capacity as Lead Agency, is reviewing an application that would allow for the development of a four-story residential development on a 0.83-acre site located on the southeast corner of the Ramona Boulevard and Tyler Avenue intersection. The new residential development will contain 51 affordable housing units. Of the total 51 units, 24 units will consist of one bedroom, 12 units will consist of two bedrooms, and the remaining 15 units will have three bedrooms. On-site amenities will include a tot lot, a public bicycle corral, and indoor common space. Vehicular access to the proposed project will be provided by a 28-foot wide driveway located along Tyler Avenue towards the southern portion of the project. Parking will be provided as tuck-under parking and on surface parking areas along the south side of the project site for a total of 80 parking spaces. A total of approximately 9,026 square feet of common and private open space will be provided. In addition, a portion of the existing alley that separates the northern portion from the southern portion of the project site will be vacated.[5]

2.2 PROJECT LOCATION

The project site is located within the City of El Monte. The City is located in the western portion of the San Gabriel Valley approximately 13.0 miles east of downtown Los Angeles. The proposed project site is located in the center-west portion of the City of El Monte. The City of El Monte is bounded on the north by Arcadia and Temple City; on the west by Rosemead; on the east by Irwindale, Baldwin Park, Industry, and unincorporated County areas; and on the south by South El Monte. Major physiographic features in the area include the concrete-lined Rio Hondo, located 0.68 miles west of the project site; the San Gabriel River, located two miles southeast of the project site; the Puente Hills, located 3.50 miles southeast of the project site; and the San Gabriel Mountains, located seven miles north of the project site.

Regional access to the project site is provided by the San Bernardino Freeway (I-10), located 0.21 miles south of the project site, and by the San Gabriel River Freeway (I-605), located 2.05 miles east of the project site. Major roadways in the vicinity of the project site include Ramona Boulevard, which extends along the project site's northern boundary in an east-west orientation; Tyler Avenue, which extends along the project site's western boundary in a north-south orientation; Valley Boulevard, located 0.18 miles to the east of the project site; and Santa Anita Avenue, located 0.36 miles to the west of the project site.[6]

The project site is located at the southeastern corner of the Ramona Boulevard and Tyler Avenue intersection. The corresponding Assessor's Parcel Numbers (APNs) include: 8579-014-901, 8579-014-902, and 8579-014-903.[7] The location of the City of El Monte in a regional context is shown in Exhibit 2-1. The

[5] KTGY Architecture and Planning. *Ramona & Tyler, El Monte, California.* August 16, 2018.

[6] Google Earth. Website accessed August 28, 2018.

[7] Los Angeles County Tax Assessor. *Parcel Viewer.* http://maps.assessor.lacounty.gov/mapping/viewer.asp. Website accessed August 28, 20018.

project site's location within the City of El Monte is shown in Exhibit 2-2 and a local map is provided in Exhibit 2-3.

2.3 ENVIRONMENTAL SETTING

The project site is located near the City's downtown and occupies frontage near a major intersection (Tyler Avenue and Ramona Boulevard). The project site is currently zoned as *SP-4 (Downtown)* and is one of the few remaining undeveloped parcels in this area of the City. An aerial photograph of the project site is shown in Exhibit 2-4. Surrounding land uses in the vicinity of the project site include the following:

- *North of the project site.* Ramona Boulevard extends along the site's northern boundary. A surface parking lot is located north of the project site, on the north side of Ramona Boulevard. The El Monte Comprehensive Health Center and a cluster of single-family homes are located approximately 150 feet northwest of the project site and 375 feet northwest of the project site, respectively. The Valley Mall is located further north, approximately 550 feet north of the project site. Various commercial uses and single- and multiple-family homes are located further north.

- *South of the project site.* A multiple-family residential complex is located directly south of the project site. Various single- and multiple-family homes are located south of the project site. Several commercial uses are also located south of the project site, along Tyler Avenue.

- *East of the project site.* A tire service business and two single-family homes are located adjacent to the project site to the east. Columbia School is located 200 feet east of the project site and the El Monte Courthouse is located 600 feet east of the project site. The El Monte Union High School District Office, the El Monte Police Department, El Monte City Hall and various commercial uses are located further east.

- *West of the project site.* Tyler Avenue extends along the west side of the project site. Various commercial uses are located along the west side of Tyler Avenue. Various single- and multiple-family homes are located further west.

The northern portion of the project site was previously developed with commercial auto-related uses and the southern portion of the project site was previously vacant. The auto-related uses that existed on the northern portion of the project site have now been demolished and the entire project site is now vacant. Photographs of the project site are provided in Exhibits 2-5 through 2-6.

Other notable uses within the vicinity of the project site include Tony Arceo Memorial Park, located 0.34 miles south of the project site; El Monte High School, located 0.35 miles south of the project site; the El Monte Metro transit center, located 0.37 miles west of the project site; the Nativity Catholic School, located 0.40 miles north of the project site; and, the San Gabriel Valley Airport, located 0.60 miles north of the project site.[8]

[8] Google Earth. Website accessed August 29, 2018.

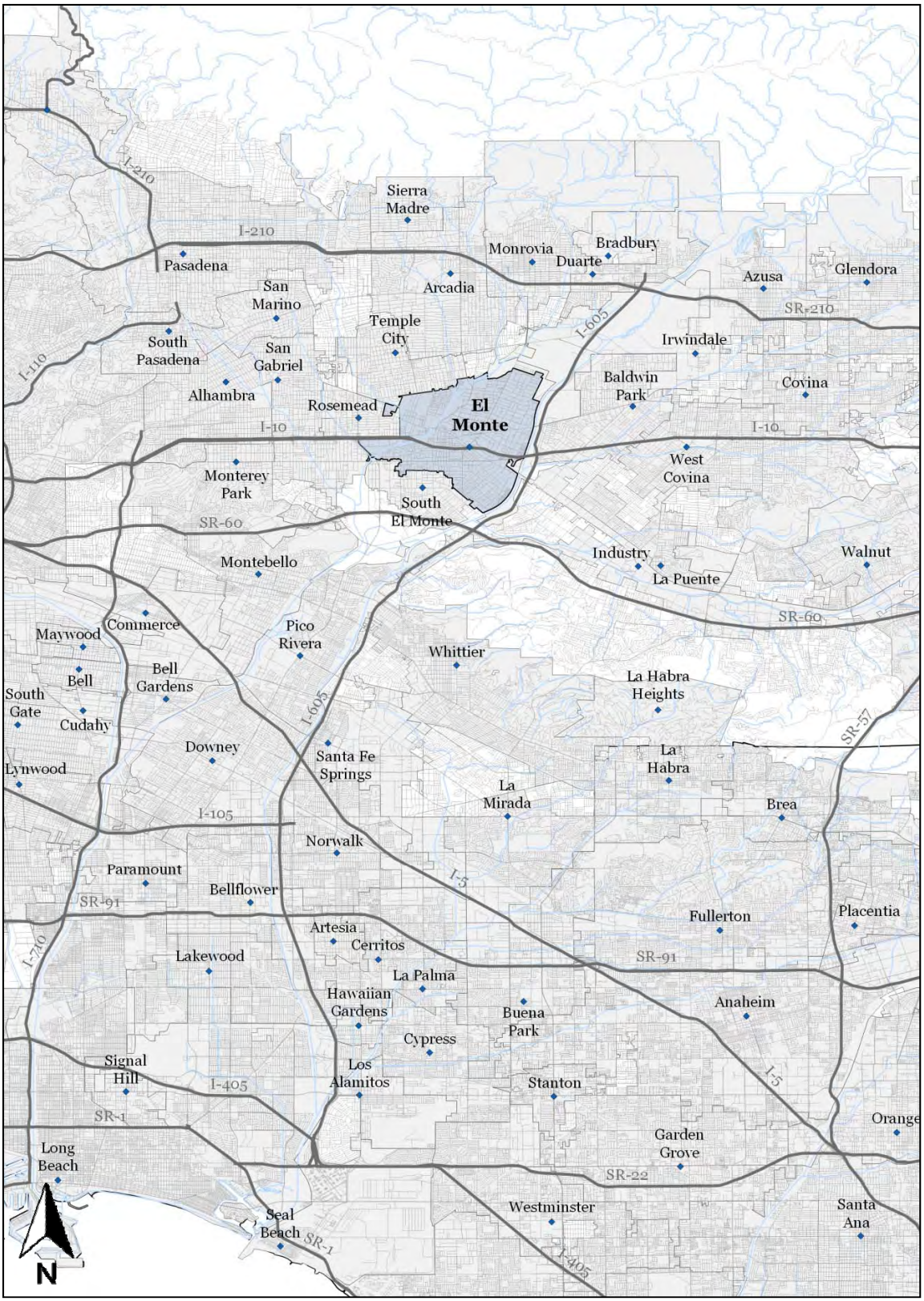

EXHIBIT 2-1
REGIONAL LOCATION MAP
Source: Quantum GIS

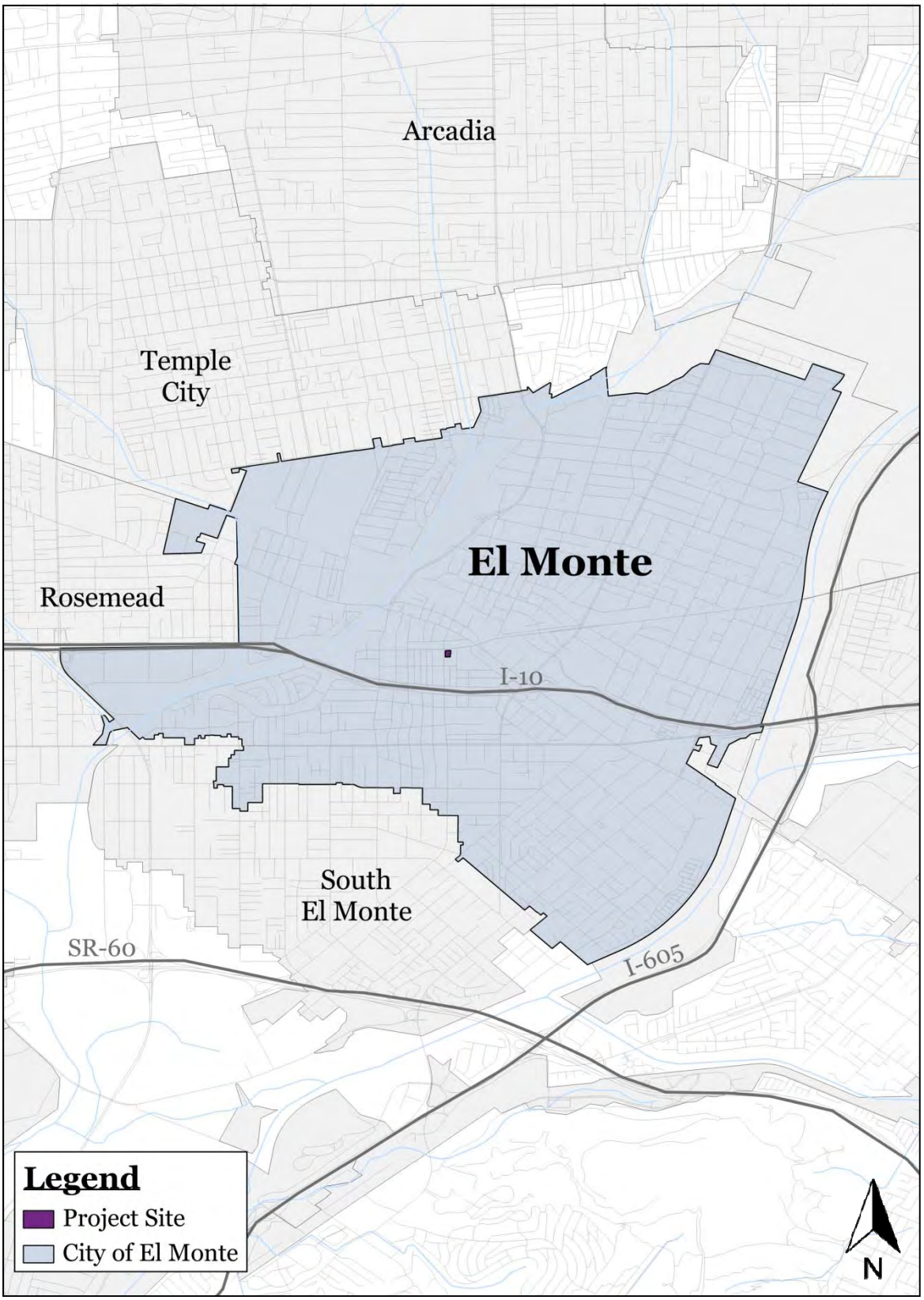

EXHIBIT 2-2
CITYWIDE MAP
Source: Quantum GIS

EXHIBIT 2-3
LOCAL MAP
Source: Quantum GIS

EXHIBIT 2-4
AERIAL PHOTOGRAPH
Source: Google Earth

View from northwestern corner of project site, facing southeast

View from northwestern corner of project site, facing south

EXHIBIT 2-5
PHOTOGRAPHS OF THE PROJECT SITE
Source: Blodgett Baylosis Environmental Planning

View of southern portion of project site, facing south

View of alley that divides the northern and southern portions of the project site, facing east

EXHIBIT 2-6
PHOTOGRAPHS OF THE PROJECT SITE

Source: Blodgett Baylosis Environmental Planning

2.4 PROJECT DESCRIPTION

2.4.1 PHYSICAL CHARACTERISTICS OF PROPOSED PROJECT

The proposed project will involve the construction of a 51-unit residential development. The proposed project will consist of the following elements described below:[9]

- *Site Plan*. The project site has a total area of 0.83 acres. The proposed residential building will have a maximum floor area ratio (FAR) of 2.2 and a lot coverage of 59%. Once complete, the building will consist of four stories and will have a maximum height of 50 feet. The new building will be located in the northern portion of the project site and a surface parking area will be located on the south side of the proposed residential building. Tuck-under parking will also be provided and will be located underneath the building at ground level.

- *Residential Building*. The new four-story building will have a total floor area of approximately 79,924 square feet. The new residential building will feature 51 affordable housing units. Of the total 51 units, 24 units will be one-bedroom units, 12 units will be two-bedroom units, and the remaining 15 units will be three-bedroom units. On-site amenities will include a tot lot, public bike corrals, and indoor common space.

- *Parking*. There will be a total of 80 parking spaces provided for the proposed project. Parking stalls will be provided using both surface parking and tuck-under parking. Of the 80 parking spaces, 11 spaces will be single-stall tuck-under parking, 54 spaces will be tuck-under tandem parking, and 15 spaces will be open parking stalls (the surface parking area will be located to the south of the new building). The proposed project will also provide approximately 51 bicycle parking spaces within a public bicycle corral that will be located on the northeastern corner of the project site.

- *Access*. Access to the proposed project will be provided by a 28-foot-wide driveway that will be located along Tyler Avenue towards the southern portion of the project site. A portion of the existing alley that separates the northern portion from the southern portion of the project site will be vacated.

- *Landscaping*. The project site will include approximately 9,026 square feet of common and private open space. The outdoor common space will include landscaping which will be concentrated on the eastern side of the building where the tot lot will be located, and along the project site's frontage along Ramona Boulevard and Tyler Avenue.

The proposed project is summarized in Table 2-1. The overall site plan is depicted in Exhibit 2-7. Conceptual elevations for the project are provided in Exhibits 2-8 through 2-9.

[9] KTGY Architecture and Planning. *Ramona & Tyler, El Monte, California*. August 16, 2018.

Table 2-1
Project Summary Table

Project Element	Description
Total Site Area	0.83 acres
Total Floor Area	79,924 square feet
Floor Area Ratio (FAR)	2.2
Lot Coverage	59%
Building Height	50 feet
One-Bedroom Units	24
Two-Bedroom Units	12
Three-Bedroom Units	15
Common and Private Open Space	9,026 square feet
Parking	
Total Parking	80 parking spaces
Standard Tuck-Under	11 parking spaces
Tandem Tuck-Under	54 parking spaces
Open (Surface) Parking	15 parking spaces
Bicycle Rack Spaces	51 bicycle rack spaces

Source: KTGY Architecture and Planning

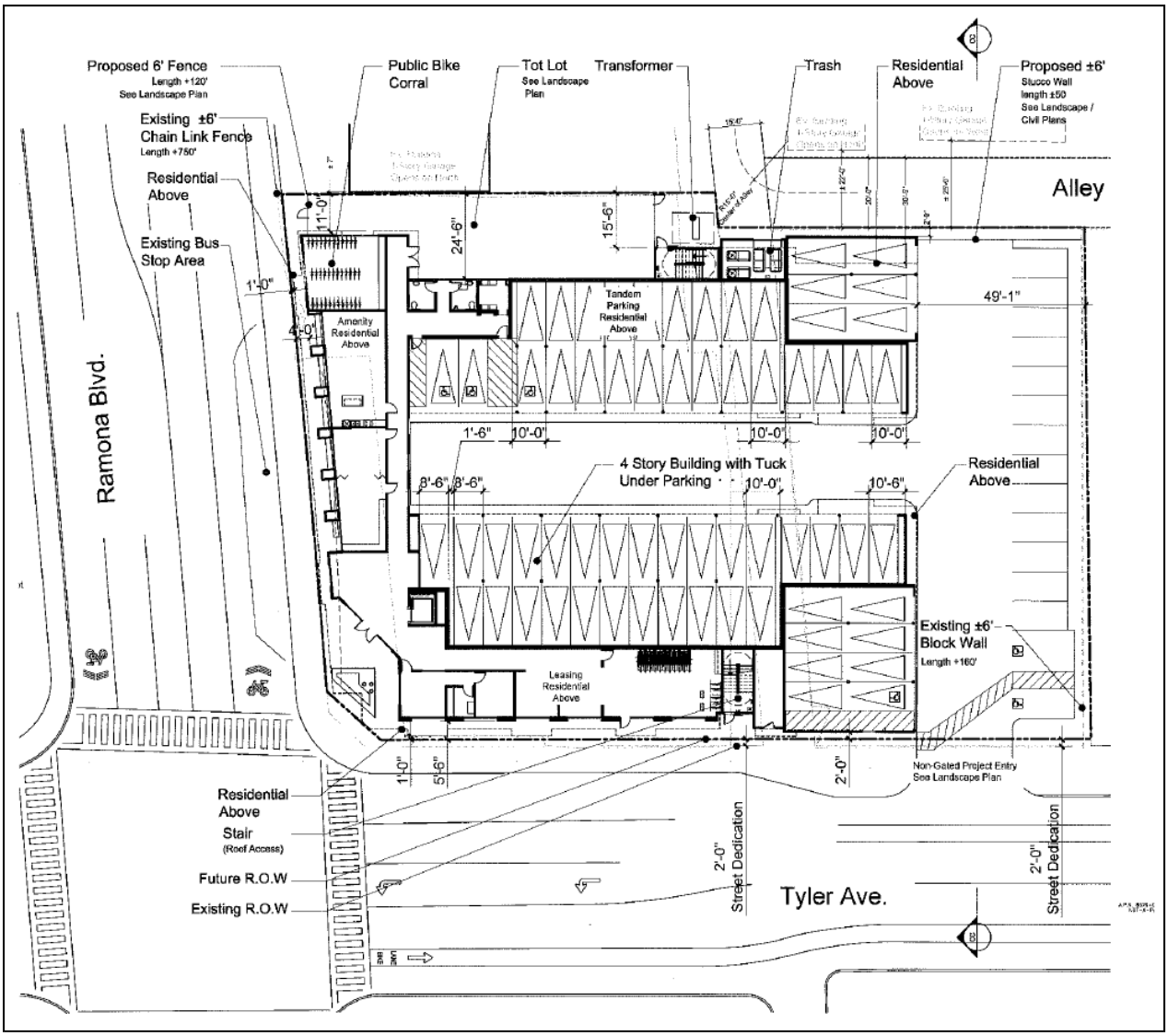

EXHIBIT 2-7
CONCEPTUAL SITE PLAN
Source: KTGY Architecture and Planning

1.North Elevation (Ramona Blvd.)

2.West Elevation (Tyler Ave.)

EXHIBIT 2-8
NORTH- AND WEST-FACING ELEVATIONS
Source: KTGY Architecture and Planning

3.South Elevation

4.East Elevation

EXHIBIT 2-9
SOUTH- AND EAST-FACING ELEVATIONS
Source: KTGY Architecture and Planning

2.4.3 CONSTRUCTION CHARACTERISTICS

The proposed 51-unit residential development will take approximately ten months to complete. The proposed project's construction will consist of the following phases:

- *Site Preparation.* The project site will be prepared for the construction of the proposed project. Equipment used during this phase will include graders, scrapers, tractors, loaders and backhoes. This phase will take approximately one month to complete.

- *Grading*. This phase will involve the grading of the site. The building's footings, utility lines, and other underground infrastructure will be placed during this phase. Equipment used during this phase will include graders, rubber tired dozers, tractors, loaders, and backhoes. This phase will take approximately two months to complete.

- *Construction.* The new residential building will be constructed during this phase. Equipment used during this phase will include cranes, forklifts, generator sets, tractors, loaders, backhoes, and welders. This phase will take approximately four months to complete.

- *Paving*. The project site will be paved during this phase. Equipment used during this phase will include cement and motor mixers, pavers, rollers, other paving equipment. This phase will take approximately one month to complete.

- *Landscaping and Finishing.* This phase will involve the planting of landscaping, painting of the new building, and the completion of other on-site improvements. Equipment used during this phase will include air compressors. This phase will last approximately two months.

2.5 OBJECTIVES OF THE PROJECT

The City of El Monte seeks to accomplish the following objectives with the proposed project:

- To provide housing for low-income residents in a central area that is accessible to public transit;

- To facilitate the integration of land uses and development;

- To facilitate the revitalization of the Downtown area;

- To ensure that the project is in conformance with the development policies included in the City of El Monte General Plan; and,

- To promote new infill development along with the more efficient use of underutilized properties in the City.

2.6 DISCRETIONARY ACTIONS

A Discretionary Action is an action taken by a government agency (for this project, the government agency is the City of El Monte) that calls for an exercise of judgment in deciding whether to approve a project. Discretionary approvals for this project include the following:

- Tentative Parcel Map (TPM) No. 82313 to consolidate the three separate parcels into one single parcel;
- Design Review (DR) No. 08-18 to review the architecture and landscaping for the proposed residential building;
- Modification (MOD) No. 23-18 to reduce the parking stall width requirement;
- Density Bonus (DB) No. 01-18 to increase density for the affordable housing project; and,
- A vacation for the segment of the existing alley that separates the northern portion from the southern portion of the project site.

Other permits will also be required, including permits for construction, grading, utility connections, and building occupancy.

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SECTION 3
CEQA FINDINGS IN SUPPORT OF CATEGORICAL EXEMPTIONS

3.1 DISCUSSION OF FINDINGS SUPPORTING THE APPLICABLE CEQA EXEMPTIONS

The City of El Monte determined, following a preliminary evaluation of the proposed project, that the proposed project would not result in any significant effects on the environment. The proposed improvements will not result in any significant adverse effects on the physical or human environment. This finding is supported by the analysis provided in the remainder of this section.

3.2 AFFORDABLE HOUSING EXEMPTION

The City of El Monte makes the following findings in support of the Affordable Housing Exemption (refer to CEQA Guidelines §15194).

The project site is not more than five acres in area.

Impact Determination. The project site has a total area of 0.83 acres. The project site is located at the southeastern corner of the Ramona Boulevard and Tyler Avenue intersection within the corporate boundaries of the City of El Monte.

The project site is located within an urbanized area with a population density of at least 5,000 persons per square mile.

Impact Determination. The project site is currently zoned as *SP-4 (Downtown)* and is one of the few undeveloped parcels in this area of the City. According to the United State Census Bureau, the City of El Monte has a total area of 9.56 square miles and has an estimated population of 116,109 residents. Therefore, the population density of the City is 12,145 persons per square mile, which is well over 5,000 persons per square mile.

The project site has been previously developed for urban uses or the parcels immediately adjacent to the project site are developed with urban uses.

Impact Determination. The project site is located at the southeastern corner of the Ramona Boulevard and Tyler Avenue intersection. The project site is located within the *SP-4 (Downtown)* zone and is one of the few undeveloped parcels in this area of the City. The site on which the proposed residential development will be constructed is presently vacant though it was previously occupied. The northern portion of the project site was previously developed with commercial auto-related uses and the southern portion of the project site was previously vacant. The commercial uses that existed on the northern portion of the project site have now been demolished. Arterial roadways extend along the site's northerly and westerly sides. The project site is completely surrounded by urban uses. A surface parking lot is located north of the project site, on the north side of Ramona Boulevard. Further north is the Valley Mall,

which serves as the City's traditional central business district. A multiple-family residential complex is located directly south of the project site. A tire service business and two single-family homes are located adjacent to the project site to the east. Various commercial uses are located to the west along the west side of Tyler Avenue. No undeveloped natural areas are located within one mile of the project site.

The project site has not been developed for urban uses and at least 75 percent of the perimeter of the site adjoins parcels that are developed with urban uses.

Impact Determination. The site on which the proposed residential development will be constructed is presently vacant though it was previously occupied. The northern portion of the project site was previously developed with commercial auto-related uses and the southern portion of the project site was previously vacant. The commercial uses that existed on the northern portion of the project site have now been demolished. Arterial roadways extend along the site's northerly and westerly sides. The project site is completely surrounded by urban uses. A surface parking lot is located north of the project site, on the north side of Ramona Boulevard. Further north is the Valley Mall, which serves as the City's traditional central business district. A multiple-family residential complex is located directly south of the project site. A tire service business and two single-family homes are located adjacent to the project site to the east. Various commercial uses are located to the west along the west side of Tyler Avenue. No undeveloped natural areas are located within one mile of the project site.

The project consists of the construction, conversion, or use of residential housing consisting of 100 or fewer units that are affordable to low-income households.

Impact Determination. The proposed project involves the construction and operation of a residential development. The new residential building will feature 51 units that are affordable to low-income households, and is below the 100 affordable units.

The developer of the project provides sufficient legal commitments to the appropriate local agency to ensure the continued availability and use of the housing units for lower income households for specified period of at least 30 years.

Impact Determination. The new residential building will feature 51 units that are affordable to low-income households.

3.3 RESIDENTIAL INFILL HOUSING EXEMPTION

The City of El Monte makes the following findings in support of the Residential Infill Housing Exemption (refer to CEQA Guidelines §15195).

The site of the project is located on a site consisting of not more than four acres in total area.

Impact Determination. The project site has a total area of 0.83 acres and is less than four (4.0) acres in size. The project site is located at the southeastern corner of the Ramona Boulevard and Tyler Avenue intersection within the corporate boundaries of the City of El Monte.

The project does not include any single level building that exceeds 100,000 square feet.

Impact Determination. The new four-story residential building will have a total floor area of 79,924 square feet. Therefore, the proposed project will not include a single level building that exceeds 100,000 square feet.

The project is a residential project on an infill site and the project site is located within one-half mile of a major transit stop.

Impact Determination. The California Code, Public Resources Code (PRC) Section 21099 defines an *infill site* as "a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses." The site on which the proposed residential development will be constructed is presently vacant though it was previously occupied. The northern portion of the project site was previously developed with commercial auto-related uses and the southern portion of the project site was previously vacant. The commercial uses that existed on the northern portion of the project site have now been demolished and the entire project site is now vacant. Arterial roadways extend along the site's northerly and westerly sides. The project site is completely surrounded by urban uses. A surface parking lot is located north of the project site, on the north side of Ramona Boulevard. Further north is the Valley Mall, which serves as the City's traditional central business district. A multiple-family residential complex is located directly south of the project site. A tire service business and two single-family homes are located adjacent to the project site to the east. Various commercial uses are located to the west along the west side of Tyler Avenue. No undeveloped natural areas are located within one mile of the project site. A *major transit stop* is defined within PRC Section 21064.3 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." The Ramona Boulevard and Tyler Avenue intersection serves as a bus stop for ten separate bus lines (including Metro buses, Foothill Transit buses and Norwalk Transit buses). However, this intersection is not considered a major transit stop because only the Metro Line 76 bus route has a frequency of service interval of 15 minutes of less during the peak commute periods. Although the Ramona Boulevard and Tyler Avenue intersection is not considered a major transit stop, the El Monte Metro transit center is located 0.37 miles west of the project site.

The project does not contain more than 100 residential units and the project promotes higher density infill housing. A project with a density of at least 20 units per acre is presumed to promote higher density infill housing.

Impact Determination. The new residential building will feature 51 units and will be located on a project site that has a total area of 0.83 acres. Therefore, the project has a density of 61 units per acre and therefore promotes higher density infill housing.

The project would result in housing units being made available to moderate, low or very low income families.

Impact Determination. The proposed project involves the construction and operation of a residential development. The new residential building will feature 51 units that are affordable to low-income households.

3.4 ADDITIONAL FINDINGS

Furthermore, the City of El Monte makes the following additional findings in support of a CEQA exemption for the proposed project.

No dislocation of on-site or off-site structural improvements will be required to accommodate the proposed project.

Determination of Finding. No business or housing dislocation or displacement will occur. Although the northern portion of the project site was previously developed, those uses have since been demolished and the entire project site is now vacant.

The project site does not contain any sensitive environmental resources. The surrounding areas have been disturbed as part of previous development.

Determination of Finding. There are two palm trees located on-site. These existing trees will be replaced by other trees and extensive landscaping as part of the proposed project. The site is surrounded on all sides by existing urban development. No natural or sensitive habitats are located within or adjacent to the property.

The project site is located within an urbanized area of the City of El Monte. No scenic resources or scenic corridor will be affected by the proposed project.

Determination of Finding. The project site is currently vacant and undeveloped. The site is surrounded on all sides by urban development. No natural or sensitive habitats are located within or adjacent to the property. The proposed project will result in a new four-story residential structure and attendant landscaping within a property that is currently underutilized. As a result, the project will not result in any impacts to sensitive visual resources in the area.

The project site is not located within an area, nor does it include a site, the Department of Toxic Substances Control (DTSC) and the Secretary for Environmental Protection has identified as being affected by hazardous wastes.

Determination of Finding. The project site is not included on a Cortese list. There are no impacts regarding the accidental release of hazardous materials such as lead paint or asbestos containing materials since the former use has been demolished and the site is now vacant. Due to the nature of the proposed project, the use of any hazardous materials will be limited to those that are commercially

available and typically used in a household setting. In addition, any accidental spills involving petroleum during construction will require immediate clean up per State and Federal standards and protocols.

The proposed project will not result in any adverse impacts on historic resources.

Determination of Finding. A review of the City's Cultural Resources Element was conducted to ensure that the development of the project site does not conflict with any of the goals and policies established in the General Plan. A review of the U.S. National Park Service's National Register of Historic Places and the State registrar indicated that there are no Federal- or State-recognized historic structures located within the project site. In addition, the project will not remove any existing structures. The project site is currently vacant and does not contain any structures that meet the aforementioned criteria.

The proposed project will not require any review by a State trustee or responsible agency.

Determination of Finding. No State trustee and responsible agencies are required as part of this project's environmental review. The proposed project will involve financial assistance from the U.S. Department of Housing and Urban Development. Separate environmental review pursuant to the National Environmental Policy Act (NEPA) is required and has been completed in a separate Environmental Assessment document.

City of El Monte

Date

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APPENDIX A
ENVIRONMENTAL ANALYSIS AND CHECKLIST

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AESTHETICS

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project have a substantial adverse effect on a scenic vista?				✖
b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?				✖
c) Would the project substantially degrade the existing visual character or quality of public view of the site and its surroundings? If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?				✖
d) Would the project create a new source of substantial light or glare which would adversely affect day- or night-time views in the area?			✖	

Discussion of Findings

A. The proposed project involves the construction and subsequent occupancy of 51 rental units within a 0.83-acre site. The project site is currently vacant. The proposed project will represent an improvement over the existing on-site conditions because the project will involve new residential development within the underutilized lot. In addition, the project's implementation will not result in the loss of scenic views. A field survey conducted around the project site indicated that there are no scenic view sheds located within the project site or in the surrounding area. Therefore, the proposed project will not obstruct any significant views or view sheds in the area and no impacts will occur.

B. According to the California Department of Transportation (Caltrans), none of the surrounding roadways are designated scenic highways. There are two palm trees located on-site. Palm trees are not protected per the Tree Protection and Preservation Ordinance. The existing trees will be replaced by other trees and extensive landscaping as part of the proposed project. The project site does not contain any scenic rock outcroppings. As a result, no impacts will occur.

C. As previously mentioned, the project site is currently vacant. Once constructed, the proposed residential development will improve the visual quality of the site and the surrounding area. The new building will consist of four levels and will be comparable in height to the multiple-family residential development adjacent to the south. As a result, no impacts will occur.

D. All lighting must adhere to the equipment and illumination standards of the City to the satisfaction of the Economic Development Department. Conformance with the standard conditions required within the City's Municipal Code will reduce the potential light and glare impacts to levels that are less than significant.

Sources

- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.

- California Department of Transportation. *California Scenic Highway Mapping System*. http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

- *Google Earth*. Website accessed September 10, 2018.

- KTGY Architecture and Planning. *Ramona & Tyler, El Monte, California*. August 16, 2018.

AGRICULTURE & FORESTRY RESOURCES

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				✖
b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act Contract?				✖
c) Would the project conflict with existing zoning for or cause rezoning of, forest land (as defined in Public Resources Code section §12220(g)), timberland (as defined by Public Resources Code section §4526), or timberland zoned Timberland Production (as defined by Government Code section §51104(g))?				✖
d) Would the project result in the loss of forest land or the conversion of forest land to a non-forest use?				✖
e) Would the project involve other changes in the existing environment which, due to their location or nature, could result in the conversion of farmland to non-agricultural use or the conversion of forest land to a non-forest use?				✖

Discussion of Findings

A. According to the California Department of Conservation, the City of El Monte does not contain any areas of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. No agricultural activities are located within the project site or in the surrounding area. As a result, no impacts to important farmland soils will occur with the implementation of the proposed project.

B. The proposed project will not result in any loss in the amount of land zoned for agriculture since the project site is vacant and not zoned for agricultural uses. In addition, according to the California Department of Conservation Division of Land Resource Protection, the project site is not subject to a Williamson Act Contract. As a result, no impacts will occur.

C. The City's General Plan and Zoning Ordinance do not specifically provide for any forest land preservation. As a result, no impacts on forest lands or timber resources will result from the proposed project's implementation.

D. No loss or conversion of existing forest lands will result from the implementation of the proposed project. As a result, no impacts are anticipated with the proposed project's implementation.

E. No agricultural activities or farmland uses are located on the project site. The proposed residential development will not involve the conversion of any existing producing farmland area to an urban use and no impacts will occur.

Sources

- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.

- California Department of Conservation. *State of California Williamson Act Contract Land*. ftp://ftp.consrv.ca.gov/pub/dlrp/WA/2012%20Statewide%20Map/WA_2012_8x11.pdf.

- California Department of Conservation, Division of Land Resource Protection. Farmland Mapping, and Monitoring Program. *California Important Farmland Finder*. https://maps.conservation.ca.gov/DLRP/CIFF/.

AIR QUALITY

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project conflict with or obstruct implementation of the applicable air quality plan?				✖
b) Would the project violate any air quality standard or contribute substantially to result in a cumulatively considerable net increase in an existing or projected air quality violation?			✖	
c) Would the project expose sensitive receptors to substantial pollutant concentrations?			✖	
d) Would the project result in substantial emissions (such as odors or dust) adversely affecting a substantial number of people?			✖	

Discussion of Findings

A. The proposed project involves the construction and subsequent occupancy of 51 rental units within a 0.83-acre site. The proposed project will not adversely affect any regional population, housing, and employment projections prepared for the City by the Southern California Association of Governments (SCAG). Specific criteria for determining a project's conformity with the Air Quality Management Plan (AQMP) is defined in Section 12.3 of the South Coast Air Quality Management District's (SCAQMD's) CEQA Air Quality Handbook. *Criteria 1* considers whether or not a project results in an increase in the frequency or severity of an existing air quality violation or contributes to the continuation of an existing air quality violation. *Criteria 2* considers whether a project will exceed the assumptions included in the AQMP or other growth projections relevant to the AQMP's implementation. The growth associated with the project has already been accounted for in the latest growth forecast projections released by SCAG for the 2016 Regional Transportation Plan. As a result, no impacts will occur.

B. An air quality analysis determined that the project's long-term (operational) emissions will be less than significant. In addition, the air quality impacts associated with the proposed project's implementation may include very limited short-term emissions related to construction. The potential construction and operational emissions from the proposed project were estimated using the computer model CalEEMod (V.2016.3.2) developed for the SCAQMD (the worksheets are included in Appendix B). The project's construction and operational emissions for the criteria pollutants identified by the SCAQMD are listed below. These emissions are compared to the thresholds of significance established by the SCAQMD for the designated criteria pollutants.

- *Reactive Organic Gases (ROG).* Estimated construction emissions: 7.55 pounds per day; threshold of significance: 75 pounds per day. Estimated operational emissions: 1.99 pounds per day; threshold of significance: 55 pounds per day.

- *Nitric Oxide (NO_x).* Estimated construction emissions: 10.52 pounds per day; threshold of significance: 100 pounds per day. Estimated operational emissions: 4.00 pounds per day; threshold of significance: 55 pounds per day.

- *Carbon Monoxide (CO).* Estimated construction emissions: 9.34 pounds per day; threshold of significance: 550 pounds per day. Estimated operational emissions: 14.27 pounds per day; threshold of significance: 550 pounds per day.

- *Sulfur Dioxide (SO_2).* Estimated construction emissions: 0.02 pounds per day; threshold of significance: 150 pounds per day. Estimated operational emissions: 0.04 pounds per day; threshold of significance: 150 pounds per day.

- *Particulate Matter (PM_{10}).* Estimated construction emissions: 1.40 pounds per day; threshold of significance: 150 pounds per day. Estimated operational emissions: 2.73 pounds per day; threshold of significance: 150 pounds per day.

- *Particulate Matter ($PM_{2.5}$).* Estimated construction emissions: 0.96 pounds per day; threshold of significance: 55 pounds per day. Estimated operational emissions: 0.78 pounds per day; threshold of significance: 55 pounds per day.

C. Sensitive receptors refer to land uses and/or activities that are especially sensitive to poor air quality. Residential uses to the south and east abut the project site. The project will generate minimal traffic and, as a result, is not expected to result in the creation of any hot-spots that would exceed the State's one-hour or eight-hour standards for carbon monoxide. As a result, less than significant impacts are anticipated.

D. The Applicant will be required to ensure that the grading and building contractors adhere to all pertinent provisions of SCAQMD Rule 403 pertaining to the generation of fugitive dust during grading and/or the use of equipment on unpaved surfaces. Construction truck drivers must adhere to Title 13 - §2485 of the California Code of Regulations, which limits the idling of diesel powered vehicles to less than five minutes. Adherence to the aforementioned standard condition will minimize odor impacts from diesel trucks. Adherence to Rule 403 Regulations and Title 13 - §2485 of the California Code of Regulations will reduce potential impacts to levels that are less than significant.

Sources

- Blodgett Baylosis Environmental Planning. Calculation of Air Emissions (The computer model, *California Emission Estimator Model Version 2016 V3.2 [CalEEMod]*, developed by the California Air Resources Board was used in the analysis).

- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.

- South Coast Air Quality Management District. *CEQA Air Quality Handbook*. April 1993 [as amended 2009]. Table 11-4.

- South Coast Air Quality Management District. *Final 2016 Air Quality Plan*. Adopted March 2017.

- South Coast Air Quality Management District. *Rule 403, Fugitive Dust.* As amended June 3, 2005.

- Southern California Association of Governments. *Growth Forecast. Regional Transportation Plan 2016-2040*. Adopted on April 7, 2016.

The Air Quality Worksheets are included in Appendix B.

BIOLOGICAL RESOURCES

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project, either directly or through habitat modifications, have a substantial adverse effect on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✖
b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural communities identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				✖
c) Would the project have a substantial adverse effect on State or Federally protected wetlands as defined (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				✖
d) Would the project interfere substantially with the movement of any native resident or migratory fish, wildlife species or with established native resident or migratory life corridors, or impede the use of native wildlife nursery sites?				✖
e) Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				✖
f) Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plans?				✖

Discussion of Findings

A. A review of the California Department of Fish and Wildlife California Natural Diversity Database (CNDDB) Bios Viewer indicated that there are six threatened or endangered species located within the El Monte Quadrangle. These species include the Swainson's hawk, bank swallow, light-footed Ridgway's rail, coastal California gnatcatcher, southwestern willow flycatcher, least Bell's vireo, Santa Ana sucker, willow flycatcher, western yellow-billed cuckoo, and Nevin's barberry. The EIR prepared for the City's General Plan does not identify any protected species within the vicinity of the project site. In addition, the project site contains no natural marsh/riparian habitat and the project site is surrounded by development. The site is currently covered over in ruderal vegetation. As a result, no impacts are anticipated to occur.

B. The field survey that was conducted for the property indicated that there are no wetlands or riparian habitat present on-site or in the surrounding areas. This conclusion is also supported by a review of the U.S. Fish and Wildlife Service National Wetlands Inventory, Wetlands Mapper. Therefore, no impacts are anticipated.

C. As indicated in Section B above, there are no wetlands or riparian habitat present on-site. In addition, there are no bodies of water located within or around the project site. As a result, no impacts will occur.

D. The animal species common to the site and the surrounding area are typical of those found in an urbanized setting. No areas of the immediate vicinity of the project site function as a wildlife movement corridor since the project site does not connect natural open space areas. Since the project site does not function as a wildlife corridor, no impacts will occur.

E. Title 14 (Sustainable Development) Chapter 14.03 (Tree Protection and Preservation) of the City of El Monte municipal code and the Tree Protection and Preservation Ordinance establish guidelines regarding the removal or tampering of trees. There are two palm trees located on-site (palm trees are not protected per the Tree Protection and Preservation Ordinance). These existing trees will be replaced by new trees as part of the proposed development. As a result, the proposed residential development will not violate the City's current tree ordinance and, as a result, no impacts will occur.

F. The project site is not located within an area governed by a habitat conservation or community conservation plan. As a result, no impacts on local, regional, or State habitat conservation plans will result from the proposed project's implementation.

Sources:

- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.
- California Department of Fish and Wildlife. *Bios Viewer*. https://map.dfg.ca.gov/bios/?tool=cnddbQuick.
- El Monte, City of. *Municipal Code, Title 14 (Sustainable Development) Chapter 14.03 (Tree Protection and Preservation).*
- El Monte, City of, Economic Development Planning Division. *Tree Protection and Preservation Ordinance.*
- U.S. Fish and Wildlife Service. *Wetlands Mapper*. http://www.fws.gov/wetlands/data/mapper.HTML.

CULTURAL RESOURCES

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5 of the CEQA Guidelines?				✖
b) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5 of the CEQA Guidelines?			✖	
c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?				✖

Discussion of Findings

A. The proposed project involves the construction and subsequent occupancy of 51 rental units within a 0.83-acre site. A review of the City's Cultural Resources Element was conducted to ensure that the development of the project site does not conflict with any of the goals and policies established in the General Plan. The project site does not have any historical significance. A review of the U.S. National Park Service's National Register of Historic Places and the State registrar indicated that there are no Federal- or State-recognized historic structures located within the project site. As a result, no impacts will occur.

B. The City of El Monte (and the greater Los Angeles Basin) was previously inhabited by the Gabrieleño-Kizh people, named after the San Gabriel Mission. Although the project area has been subject to disturbance to accommodate the existing buildings, the project site is situated in an area of high archaeological significance. As a result, the project Applicant will be required to obtain the services of a qualified Native American Monitor(s) during construction-related ground disturbance activities. The monitor(s) must be approved by the tribal representatives and will be present on-site during the construction phases that involve any ground-disturbing activities. This requirement will be listed as a condition of approval by the City of El Monte. Adherence to the abovementioned regulation will reduce potential impacts to levels that are less than significant.

C. There are no cemeteries located in the immediate area that would be affected by the proposed project. In addition, the proposed construction is not likely to neither discover nor disturb any on-site burials due to the level of urbanization present and the amount of disturbance sustained to accommodate the surrounding development. In the unlikely event that remains are uncovered by construction crews, all excavation and grading activities shall be halted and the City of El Monte Police Department will be contacted (the Department will then contact the County Coroner). As a result, no impacts are anticipated to occur.

Sources

- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.
- California Department of Parks and Recreation. *California Historical Resources.* http://ohp.parks.ca.gov/ListedResources.

- McCawley. The First Angelinos, The Gabrieleño Indians of Los Angeles County. 1996.

- Tongva People of Sunland-Tujunga. *Introduction.* http://www.lausd.k12.ca.us/Verdugo_HS/classes/multimedia/intro.html. Website accessed August 30, 2018.

- U. S. Department of the Interior, National Park Service. *National Register of Historic Places.* http://focus.nps.gov/nrhp. Secondary Source: California State Parks, Office of Historic Preservation. *Listed California Historical Resources.* Website accessed July 9, 2018.

ENERGY

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy, resources, during project construction or operation?			✖	
b) Would the project conflict with or obstruct a State or local plan for renewable energy or energy efficiency?			✖	

Discussion of Findings

A. The proposed project will be a 51-unit residential development. The proposed residential building will be consistent with the City's Building Code and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. The project will include new light standards and fixtures that will be used as operational and security lighting and interior lighting and appliances. The estimated electrical consumption is projected to be 786 kilowatts (kwh) per day and 561 cubic feet per day of natural gas. These levels are comparable to typical residential uses. Therefore, the impacts will be less than significant.

B. The California Public Utilities Commission prepared an updated Energy Efficiency Strategic Plan in 2011 with the goal of promoting energy efficiency and a reduction in Greenhouse Gases (GHG). Assembly Bill 1109, which was adopted in 2007, also serves as a framework for lighting efficiency. The proposed residential building will be consistent with the City's Building Code and with Part 6 and Part 11 of Title 24 of the California Code of Regulations. The project will include new light standards and fixtures that will be used as operational and security lighting and interior lighting and appliances. The estimated electrical consumption is projected to be 786 kwh per day and 561 cubic feet per day of natural gas. These levels are comparable to typical residential uses. Therefore, the impacts will be less than significant.

Sources

- California Public Utilities Commission. *Energy Efficiency Strategic Plan*. Plan updated January 2011.

The Utility Worksheets are provided in Appendix C.

GEOLOGY & SOILS

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, including liquefaction, or landslides?			✖	
b) Would the project result in substantial soil erosion or the loss of topsoil?			✖	
c) Would the project be located on a soil or geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			✖	
d) Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (2012) creating substantial direct or indirect risks to life or property?			✖	
e) Would the project be located on soils that are incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				✖
f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geological feature?			✖	

Discussion of Findings

A. According to the California Department of Conservation website, the City of El Monte is not located within an Alquist-Priolo Fault Zone. The project site is not located near an active fault and no impacts regarding fault rupture and ground shaking will occur. The project site is located within a liquefaction zone; however, the risk is no greater at the project site than for the rest of the City. Lastly, the project site is not located in an area that is at risk of landslides. As a result, the impacts are anticipated to be less than significant.

B. The project site is underlain with soils of the Urban land-Pico-Metz complex soils association. The United States Department of Agriculture classifies soils based on their limitations or hazard risk. The Urban land-Pico-Metz complex soils are at a low risk for erosion and have a low shrink-swell potential. In addition, Urban land-Pico-Metz complex soils are described as being used almost exclusively for urban development, as evident by the current level of urbanization present within the surrounding areas. As a result, less than significant impacts will occur.

C. Lateral spreading is a phenomenon that is characterized by the horizontal, or lateral, movement of the ground. Lateral spreading could be liquefaction-induced or can be the result of excess moisture within the underlying soils. Liquefaction-induced lateral spreading will not affect the proposed

project since the new building will be constructed with the strict adherence to the most pertinent State and City building codes. In addition, the project site is not prone to subsidence. The soils that underlie the project site are not prone to significant shrinking and swelling, thus no impacts related to unstable soils and subsidence are expected. While the site is located in an area that is subject to liquefaction the effects are expected to be less than significant with conformance with the most stringent building standards. As a result, the impacts will be less than significant.

D. The Web Soil Survey, which is available on the United States Geological Survey website, was consulted to identify the soils that underlie the project site. According to the Web Soil Survey, the project site is underlain by Urban land-Pico-Metz complex soils. Shrinking and swelling is influenced by the amount of clay present in the underlying soils. In addition, this soils association possesses a low shrink-swell potential. As a result, less than significant impacts will occur.

E. No septic tanks will be used as part of the proposed project. As a result, no impacts associated with the use of septic tanks will occur as part of the proposed project's implementation.

F. The northern portion of the project site was previously developed with commercial uses and the southern portion of the project site was previously vacant. The commercial uses that existed on the northern portion of the project site have now been demolished and the entire project site is now vacant. The project site and the surrounding area are fully developed and have undergone disturbance. For this reason, the likelihood of discovering near surface paleontological resources is considered remote. Furthermore, the on-site soils that underlie the property are Holocene-aged deposits that have a low potential for the discovery of paleontological resources. As a result, the impacts are considered to be less than significant.

Sources

- California Department of Conservation. *Regulatory Maps.* http://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps.
- California Department of Conservation. *Table 4, Cities and Counties Affected by Alquist Priolo Earthquake Fault Zones as of January 2010.* http://www.conservation.ca.gov/cgs/rghm/ap/Pages/affected.aspx.
- Subsidence Support. *What Causes House Subsidence?* http://www.subsidencesupport.co.uk/what-causes-subsidence.html.
- University of California Division of Agriculture and Natural Resources. *SoilWeb.* https://casoilresource.lawr.ucdavis.edu/gmap/.
- United States Geological Survey. *Web Soil Survey*. http://websoilsurvey.sc.egov.usda.gov/App/WebSoilSurvey.aspx.

GREENHOUSE GAS EMISSIONS

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			✖	
b) Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases?			✖	

Discussion of Findings

A. Greenhouse gas (GHG) emissions or gases that trap heat in the atmosphere are emitted by both natural processes and human activities. Examples of GHG include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). Carbon dioxide equivalent, or CO_2E, is a term that is used for describing different greenhouses gases in a common and collective unit. The Southern California Air Quality Management District (SCAQMD) has established a single quantified threshold of 10,000 metric tons of CO_2E ($MTCO_2E$) per year for new development. The CO_2E total for the project is 3,745.44 pounds per day or 1.70 $MTCO_2E$ per day. This translates into a generation of approximately 620.5 $MTCO_2E$ per year, which is well below the threshold of 10,000 $MTCO_2E$ per year. These emissions were calculated using the computer model CalEEMod V.2016.3.2. Therefore, the project's GHG impacts are less than significant.

B. The City of El Monte does not have a Climate Action Plan. However, the proposed project will not involve or require any variance from the State's Climate Action Plan policies. There will also be a regional benefit in terms of a reduction in vehicle miles traveled (VMT) because it is an infill project that is consistent with the regional and the State's sustainable growth objectives identified in the State's Strategic Growth Council (SGC). As a result, the impacts related to a potential conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing emissions of greenhouse gases are less than significant.

Sources

- Blodgett Baylosis Environmental Planning. Calculation of Air Emissions (The computer model, California Emission Estimator Model Version 2016.V. 3.2. [CalEEMod], developed by the California Air Resources Board was used in the analysis).

- California, State of. OPR Technical Advisory – *CEQA and Climate Change: Addressing Climate Change through the California Environmental Quality Act (CEQA) Review*. June 19, 2008.

- California Strategic Growth Council. http://www.sgc.ca.gov/Initiatives/infill-development.html.

- SCAQMD. *Greenhouse Gas CEQA Significance Threshold Stakeholder Working Group Meeting #15.* https://planning.lacity.org/eir/8150Sunset/References/4.E.%20Greenhouse%20Gas%20Emissions/GHG.39_SCAQMD%20GHG%20Meeting%2015.pdf.

The Air Quality Worksheets are included in Appendix B.

HAZARDS & HAZARDOUS MATERIALS

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			✖	
b) Would the project create a significant hazard to the public or the environment or result in reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			✖	
c) Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances or waste within one-quarter mile of an existing or proposed school?				✖
d) Would the project be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code §65962.5, and as a result, would it create a significant hazard to the public or the environment?				✖
e) For a project located within an airport land use plan, or where such a plan has not been adopted, within two miles of a public airport or a public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				✖
f) Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?				✖
g) Would the project expose people or structures, either directly or indirectly**,** to a significant risk of loss, injury, or death involving wildland fires?				✖

Discussion of Findings

A. The proposed project involves the construction and subsequent occupancy of 51 rental units within a 0.83-acre site. Given the nature of the proposed development, the use of any hazardous materials will be limited to those that are commercially available and typically used in a household setting for routine cleaning and maintenance. Since the project will not require the transport or disposal of hazardous materials, less than significant impacts will result from the project's implementation.

B. Due to the nature of the proposed project, the use of any hazardous materials will be limited to those that are commercially available and typically used in a household setting. There are no impacts regarding the accidental release of hazardous materials such as lead paint or asbestos containing materials since the former use has been demolished and the site is vacant. The project site is not located on the California Department of Toxic Substances Control's Hazardous Waste and Substances database or on the US EPA's Envirofacts database. A Phase I Environmental Site Assessment (ESA) was prepared on March 20, 2006 for the project site by Aqua Science Engineers, Inc.

Recommendations within the Phase I ESA state that a Phase II subsurface investigation should be prepared for the project site focusing on potential VOC-contamination, petroleum fuels, and below-ground features. A Phase II report is currently being prepared to address the abovementioned issues. The Phase II report will provide recommendations if contamination is determined to be present on-site. The City will require the Applicant to adhere to all recommendations listed within the Phase II report as a condition of the project's approval. As a result, less than significant impacts will occur.

C. Columbia School is located 200 feet east of the project site. Due to the nature of the proposed use, no hazardous or acutely hazardous materials will be emitted that may affect the nearby school. As a result, no impacts will occur.

D. The *Cortese List*, also referred to as the Hazardous Waste and Substances Sites List, is a planning document used by the State and other local agencies to comply with CEQA requirements that require the provision of information regarding the location of hazardous materials release sites. A search was conducted through the California Department of Toxic Substances Control Envirostor database to identify whether the project site is listed in the database as a Cortese site. The project site is not identified as a Cortese site. Therefore, no impacts will occur.

E. The project site is located approximately 0.60 miles south of the San Gabriel Valley Airport. However, the project site is not located within the designated Runway Protection Zone and the proposed units will not penetrate the airport's 20-1 slope. The 20-1 ratio refers to the slope of an airplane's descent as it approaches the runway. As a result, no impacts are anticipated to occur.

F. None of the surrounding roadways will be blocked during construction and access to neighboring properties will be maintained at all times. As a result, no impacts on emergency response or evacuation are expected with the implementation of the proposed project.

G. The project site and the surrounding properties are developed with no risk of wildfire associated with natural vegetation. No areas of native vegetation are found in the surrounding parcels and, as a result, there is no wildfire risk from off-site locations.

Sources

- Aqua Science Engineers, Inc. *Phase I Environmental Site Assessment of Sites to be Redeveloped, SEC of Ramona Boulevard and Tyler Avenue, El Monte, California 91731.* March 20, 2006.
- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.
- CalEPA. *DTSC's Hazardous Waste and Substances Site List - Site Cleanup (Cortese List*). *http://www.dtsc.ca.gov/SiteCleanup/Cortese_List.cfm*.
- *Google Earth*. Website accessed September 17, 2018.
- United States Environmental Protection Agency. *Envirofacts Database, Multisystem Search*. www.epa.gov/envirofw/.

HYDROLOGY & WATER QUALITY

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			✖	
b) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?				✖
c) Would the project substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner in which would result in flooding on- or off-site, create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows?			✖	
d) Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?			✖	
e) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?				✖

Discussion of Findings

A. The proposed project would be required to implement storm water pollution control measures pursuant to the National Pollutant Discharge Elimination System (NPDES) requirements. The Applicant would also be required to prepare a Water Quality Management Plan (WQMP) utilizing Best Management Practices (BMPs) to control or reduce the discharge of pollutants to the maximum extent practicable. The WQMP will also identify post-construction BMPs that will be the responsibility of the Applicant to implement over the life of the project. The implementation of operational BMPs will reduce potential impacts to levels that are less than significant.

B. The City of El Monte overlies a portion of the 225-square mile San Gabriel Valley (groundwater) Basin that encompasses most of eastern Los Angeles County. Grading-related activities are not anticipated to encounter and deplete groundwater supplies from the underlying San Gabriel Valley Groundwater Basin. A search was conducted through the Regional Water Quality Control Board's online database Geotracker to identify the presence of any natural underground water wells. The search yielded no results. As a result, no impacts will occur.

C. The project site is currently vacant and covered over in dirt and ruderal vegetation. Although the impervious surfaces (asphalt, building slabs, etc.) that will be constructed will result in the generation of storm water runoff, the project will be properly drained and is not expected to result in erosion or

siltation on- or off-site. Pursuant to the City's Low Impact Development (LID) requirements, any additional water will be contained on-site. Any additional runoff will discharge into the local storm drains. As a result, less than significant impacts are anticipated.

D. According to the Federal Emergency Management Agency (FEMA) map, the project site is located in Zone X. This flood zone has an annual probability of flooding of less than two percent and represents areas outside the 500-year flood plain. As a result, flooding is not expected to occur. The City of El Monte is located inland from the Pacific Ocean, and thus, the project site will not be exposed to the effects of a tsunami. There are no bodies of water located in the immediate area that would present a seiche hazard. Adherence to the BMPs will reduce the potential for water quality impacts to levels that are less than significant.

E. As previously mentioned, the proposed project would be required to implement storm water pollution control measures pursuant to NPDES requirements. The Applicant would also be required to prepare a WQMP utilizing BMPs to control or reduce the discharge of pollutants to the maximum extent practicable. As a result, no impacts are anticipated.

Sources

- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.

- California Water Boards. *GAMA Groundwater Information System*. http://geotracker.waterboards.ca.gov/gama/gamamap/public/default.asp?findaddress=True&city=Davis.

- Los Angeles County Public Works. *Flood Zone Determination Website.* http://dpw.lacounty.gov/floodzone/.

The Utility Worksheets are included in Appendix C.

LAND USE & PLANNING

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project physically divide an established community?				✖
b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				✖

Discussion of Findings

A. The proposed project will be restricted to the project site and will not divide or disrupt any residential neighborhood. In addition, the proposed project will not result in an incompatible land use since the Downtown Specific Plan encourages the introduction of a higher density residential uses. Finally, the proposed project is consistent with the existing General Plan and zoning designations. The implementation of the proposed project will not result in incompatible land uses and no impacts will occur.

B. The proposed project will not conflict with the applicable General Plan or Zoning designation. No general plan amendment or zone change will be required. As a result, no impacts are anticipated.

Sources

- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.
- El Monte, City of. *Municipal Code, Title 17 Zoning*.

The Land Use Maps are included in Appendix D.

MINERAL RESOURCES

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?				✖
b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				✖

Discussion of Findings

A. According to the California Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR) Well Finder, there are no existing or former oil wells and/or oil extraction activities located within the project site or in the nearby area. Additionally, the project area is not an area with active mineral extraction activities. As a result, no impacts on existing mineral resources will result from the proposed project's implementation.

B. The resources and materials used as part of the proposed project's construction will not include any materials that are considered rare or unique. The proposed project is also relatively small in terms of the affected land area. Thus, the proposed project will not result in any impacts on mineral resources in the region.

Sources

- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.
- California, State of. Department of Conservation. *Update of Mineral Land Classification of Portland Cement Concrete Aggregate in Ventura, Los Angeles, and Orange Counties, California, Part III: Orange County*. Report dated 1994. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_94-15/OFR_94-15_Text.pdf.
- California, State of. Department of Conservation, Division of Oil, Gas, and Geothermal Resources (DOGGR). *Well Finder*. http://maps.conservation.ca.gov/doggr/#close.

NOISE

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			✖	
b) Would the project result in generation of excessive ground-borne vibration or ground-borne noise levels?			✖	

Discussion of Findings

A. The ambient noise environment within the project area is dominated by traffic noise emanating from Ramona Boulevard and Tyler Avenue, both of which are major arterial roadways. The ambient noise levels at the project site ranged from 53.8 dBA up to 74.3 dBA, with average noise levels of 62.21 dBA. The City limits the use of power construction tools or equipment for outside construction work and repair to between 6:00 AM and 7:00 PM Monday through Friday, or 8:00 AM to 7:00 PM Saturdays and Sundays. The project is anticipated to generate approximately 296 daily vehicle trips. The average daily traffic volumes along both Ramona Boulevard and Tyler Avenue are over 22,000 vehicle trips per day. Therefore, the project will not result in any significant mobile noise impacts because it typically requires a doubling in traffic volumes to result in a perceptible change in traffic noise levels. Residential uses to the south and east abut the project site. Once the project is completed, the proposed project will be a residential use and will not be a significant source of noise to the surrounding residential uses. As a result, the impacts are anticipated to be less than significant.

B. The noisiest phases of construction are anticipated to be 89 dBA as measured at a distance of 50 feet from the construction activity. However, construction activities will be in compliance with City noise standards. As previously mentioned, the operation of equipment or the construction of projects is prohibited in between the hours of 7:00 PM and 6:00 AM Monday through Friday and 7:00 PM, and 8:00 AM Saturday and Sunday. Compliance with City noise standards will decrease any potential adverse impacts to the nearby residential uses. As previously mentioned, the project is anticipated to generate approximately 296 daily vehicle trips. The average daily traffic volumes along both Ramona Boulevard and Tyler Avenue are over 22,000 vehicle trips per day. Therefore, the project will not result in any significant mobile noise impacts because it typically requires a doubling in traffic volumes to result in a perceptible change in traffic noise levels. As a result, the potential groundborne noise impacts are considered to be less than significant.

Sources

- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.
- El Monte, City of. *Municipal Code, Title 8 Health and Safety, Chapter 8.36 Noise Control.*
- El Monte, City of. *Traffic Count Map*. December 22, 2015.

POPULATION & HOUSING

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project induce substantial unplanned population growth in an area, either directly or indirectly?			✖	
b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				✖

Discussion of Findings

A. The proposed project involves the construction and subsequent occupancy of 51 rental units within a 0.83-acre site. Of the total 51 units, 24 units will consist of one bedroom, 12 units will consist of two bedrooms, and the remaining 15 units will have three bedrooms. Assuming an average household size of 3.8 persons per unit, the potential population of the new residential development will be 194 persons. The growth associated with the project has already been accounted for in the latest growth forecast projections released by SCAG for the 2016 Regional Transportation Plan. As a result, less than significant impacts will result.

B. The northern portion of the project site was previously developed with commercial uses and the southern portion of the project site was previously vacant. The commercial uses that existed on the northern portion of the project site have now been demolished and the entire project site is now vacant and undeveloped. There are no dwelling units located on, or persons residing within, the project site and no homes will be demolished as part of the project's implementation. As a result, no impacts will occur.

Sources

- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.
- Southern California Association of Governments. *Growth Forecast. Regional Transportation Plan 2016-2040*. Adopted on April 7, 2016.
- United States Census Bureau. *Quickfacts, El Monte city, California*. https://www.census.gov/quickfacts/fact/table/elmontecitycalifornia/PST045217.

PUBLIC SERVICES

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in *fire protection services?*			✖	
b) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in *police protection services?*			✖	
c) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in *school services?*			✖	
d) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, the construction of which would cause significant environmental impacts in order to maintain acceptable service ratios, response times, or other performance objectives in o*ther public facilities?*				✖

Discussion of Findings

A. The Los Angeles County Fire Department (LACFD) provides fire protection services in the City of El Monte. The new 51-unit residential development will be subject to any conditions prescribed by the LACFD (compliance with applicable codes and ordinances including those related to emergency access, fire flows, etc.). The proposed project's implementation will result in an incremental increase in the demand for police and fire service calls. However, the developer will be required to pay all pertinent development impact fees. The proposed project will also be required to adhere to all pertinent site and building design regulations. As a result, the impacts to fire protection service and facilities are anticipated to be less than significant.

B. Law enforcement services within the City are provided by the El Monte Police Department, which serves the community from one police station. This station is located at 11333 Valley Boulevard. The El Monte Police Department is staffed with 161 police officers, 91 civilian staff, and four K-9 units. The proposed project's implementation will result in an incremental increase in the demand for police calls. The developer will be required to pay all pertinent development impact fees and as a result, the proposed project will result in impacts that are less than significant.

C. The City is served by the El Monte City School District and the El Monte Union High School District. Student generation rates were obtained from the State of California Office of Public School Construction and these rates are used by both the El Monte Union High School District and the El Monte City Schools District. The proposed project would result in a potential 35 new students (grades K-12). Finally, the project developer will be required to pay all required school development fees at the time of Building Permit issuance. As a result, less than significant impacts are anticipated to occur.

D. No new public facilities will be needed to implement the proposed project. As a result, the proposed project will not result in any impacts on existing public facilities.

Sources

- El Monte, City of. *General Plan and Zoning Code Update and EIR Existing Conditions Report.* May 24, 2006.

- El Monte, City of. *Los Angeles County Fire Department.* http://www.ci.el-monte.ca.us/GovernmentLACountyFireDept.aspx.

- El Monte, City of. *Police, Field Services, Patrol.* https://www.ci.el-monte.ca.us/264/Patrol.

RECREATION

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			✖	
b) Would the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				✖

Discussion of Findings

A. The City of El Monte's Parks and Recreation Division is responsible for recreational services in the City. There are 12 City facilities available to City residents. No existing or proposed parks would be physically impacted by the project. The nearest park is Tony Arceo Park, located 0.34 miles to the south. The proposed residential development would not result in any development that would physically alter any public park facility or services. As a result, the impacts will be less than significant.

B. As previously indicated, the implementation of the proposed project would not affect any existing parks and recreational facilities in the City. No such facilities are located adjacent to the project site and, as a result, no impacts will occur.

Sources

- City of El Monte. *Community Park Information*. http://www.ci.el-monte.ca.us/Government/ParksandRecreation/ParksRecreation.aspx.
- *Google Earth*. Website accessed September 18, 2018.

TRANSPORTATION & CIRCULATION

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project conflict with a plan, ordinance, or policy establishing measures addressing the circulation system, including transit, roadways, bicycle lanes and pedestrian paths?			✖	
b) For a land use project, would the project conflict or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(1)?			✖	
c) For a transportation project, would the project conflict with or be inconsistent with CEQA Guidelines §15064.3 subdivision (b)(2)?			✖	
d) Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				✖
e) Would the project result in inadequate emergency access?				✖

Discussion of Findings

A. The proposed project will consist of 51 affordable housing units. Of the total 51 units, 24 units will be one-bedroom units, 12 units will be two-bedroom units, and the remaining 15 units will be three-bedroom units. Access to the proposed project will be provided by a 28-foot-wide driveway that will be located along Tyler Avenue towards the southern portion of the project. A portion of the existing alley that separates the northern portion from the southern portion of the project site will be vacated, connecting the two portions of the project site. On-site amenities will include a tot lot, public bike corrals, and an indoor common space.

There will be a total of 80 parking spaces provided for the proposed project. Parking stalls will be provided using both surface parking and tuck-under parking. Of the 80 parking spaces, 11 spaces will be single-stall tuck-under parking, 54 spaces will be tuck-under tandem parking, and 15 spaces will be open parking stalls (the surface parking area will be located to the south of the new building). The proposed project will also include a public bicycle corral that will be located on the northeastern corner of the project site.

As indicated previously, the proposed project will consist of 51 affordable housing units that will result in a reduction of vehicle traffic as compared to market rate conventional housing units. The population residing in the units is typically more dependent on public transit. Trip generation estimates for the project were developed using the trip rates contained in the Institute of Transportation Engineers' (ITE) Trip Generation, 10th Edition based on the Mid-Rise Apartment land use category (ITE Code 221). The evening peak hour trip generation rate for this land use category is 0.44 trips per unit. This translates into 24 PM peak hour trips. Assuming the PM peak hour represents ten percent of the average daily traffic, the proposed project would result in approximately 240 average daily trips. The AM peak hour would generate a maximum of 24 to 30 trips.

The existing bus stop located on Tyler Avenue will be incorporated into the building's west facing elevation. As a result, bus patrons will be provided shelter and other amenities while they are waiting for the bus. In addition, the project is in close proximity to the El Monte bus station which is located approximately ½ mile west of the project itself. Finally, as mentioned previously, the project will include a bicycle corral for the residents. These amenities will further reduce the need for the use of private automobiles.

B. According to CEQA Guidelines §15064.3 subdivision (b)(1), vehicle miles traveled exceeding an applicable threshold of significance may indicate a significant impact. Projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant impact. It is important to note that the project is an "infill" development. Infill development reduces VMT by recycling existing undeveloped or underutilized properties located in established urban areas. VMT is reduced when development is located in urban areas since employment, entertainment, and population centers tend to be set in more established communities and residents do not have to travel far. As a result, the potential impacts are considered to be less than significant.

C. CEQA Guidelines §15064.3 subdivision (b)(2) focuses on impacts that result from certain transportation projects. Subdivision (b)(2) clarifies that projects that reduce VMT, such as pedestrian, bicycle and transit projects, should be presumed to have a less than significant impact. As previously mentioned, projects that decrease vehicle miles traveled in the project area compared to existing conditions should be considered to have a less than significant impact. The proposed project involves the construction and operation of a residential building. It is important to note that the project is an "infill" development, which will reduce VMT by recycling an underutilized parcel located in an established urban area. As a result, less than significant impacts will occur.

D. Vehicular access to the proposed project will provided by a 28-foot wide driveway located along Tyler Avenue towards the southern portion of the project. The existing public streets would remain unchanged except for the vacation of the segment of the existing alley that separates the northern portion from the southern portion of the project site. No modifications resulting in an increased hazard will be made to the existing street system and, as a result, no impacts will result.

E. The proposed project would not impede emergency access to any neighboring properties. At no time will the surrounding roadways be closed to traffic during the project's construction. The Los Angeles County Fire Department will review the on-site circulation to ensure that sufficient emergency access and clearance is provided. As a result, no impacts related to emergency access will occur.

Sources

- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.

- Institute of Transportation Engineers (ITE). *Trip Generation Manual, 9th edition.*

TRIBAL CULTURAL RESOURCES

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?			✖	
b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1.?				✖

Discussion of Findings

A. The project site is located within the cultural area that was formerly occupied by the Gabrieleño-Kizh. The project site is located within an urbanized area of the City that has been disturbed due to past development and there is a limited likelihood that artifacts will be encountered. The grading and excavation will involve the clearance of the site, shallow excavation, and the installation of the new building footings and utility connections. In addition, the project area is not located within an area that is typically associated with habitation sites, foraging areas, ceremonial sites, or burials. Although the project area has been subject to disturbance to accommodate the existing surrounding buildings, the project site is situated in an area of high archaeological significance. As a result, the project Applicant will be required to obtain the services of a qualified Native American Monitor(s) during construction-related ground disturbance activities. The monitor(s) must be approved by the tribal representatives and will be present on-site during the construction phases that involve any ground-disturbing activities. This requirement will be listed as a condition of approval by the City of El Monte. Adherence to the abovementioned regulation will reduce potential impacts to levels that are less than significant.

B. As previously mentioned, the project site is located within the cultural area that was formally occupied by the Gabrieleño-Kizh and it was determined that the site may be situated in an area of high archaeological significance. With the implementation of the abovementioned requirement, tribal cultural impacts will be reduced to levels that are considered to be less than significant.

Sources

- McCawley. The First Angelinos, The Gabrieleño Indians of Los Angeles County. 1996.

- Tongva People of Sunland-Tujunga. *Introduction*. http://www.lausd.k12.ca.us/Verdugo_HS/classes/multimedia/intro.html. Website accessed August 30, 2018.

UTILITIES & SERVICE SYSTEMS

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) Would the project require or result in the relocation or construction of new or expanded water or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental impacts?			✖	
b) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?			✖	
c) Would the project result in a determination by the wastewater treatment provider, which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				✖
d) Would the project generate solid waste in excess of State or local standards or in excess of the capacity of local infrastructure?			✖	
e) Would the project negatively impact the provision of solid waste services or impair the attainment of solid waste reduction goals?				✖
f) Would the project comply with Federal, State, and local management and reduction statutes and regulations related to solid waste?				✖

Discussion of Findings

A. Wastewater collection facilities that serve the City are owned, operated, and maintained by the City of El Monte Public Works Department. The City's present wastewater system includes a total of 135 miles of pipeline and six pump stations. The proposed project will connect to an existing sewer line located in either Ramona Boulevard or Tyler Avenue. The proposed residential development is projected to generate 7,956 gallons of effluent on a daily basis. Wastewater treatment for the City is provided by the Whittier Narrows Water Reclamation Plant. The Whittier Narrows Water Reclamation Plant has a total treatment capacity of 15 million gallons per day (mgd) and a residual capacity of approximately seven mgd. The proposed project will not result in the remaining capacity being exceeded and the impacts will be less than significant.

B. The proposed project is anticipated to consume approximately 11,934 gallons of water on a daily basis. The new homes will be required to install water conserving plumbing, appliances, and fixtures that will translate into a reduction in water consumption. In addition, the homes will not have any swimming pools and the landscaping will be required to comply with local water conservation requirements.

There are sufficient water resources available via the City's local groundwater supply and the Metropolitan Water District of Southern California. As a result, the impacts are less than significant.

C. As previously mentioned, the proposed residential development is projected to generate 7,956 gallons of effluent on a daily basis. The Whittier Narrows Water Reclamation Plant has a total treatment capacity of 15 million gallons per day (mgd) and a residual capacity of approximately seven mgd. The proposed project will not result in the remaining capacity being exceeded. As a result, no impacts will occur.

D. American Reclamation and Phoenix Waste collect and recycle trash from the multiple family residential (apartments, town-homes, etc.) developments. Waste is disposed at the Mesquite Regional Landfill in Imperial County which has a 100-year capacity at 8,000 tons per day. In addition, the nearby Puente Hills Transfer Station/Materials Recovery Facility (MRF) is able to accept 4,440 tons per day of solid waste. The proposed project is anticipated to result in 624 pounds per day of solid waste, which is within the capacity of the aforementioned facilities. These levels are comparable to typical residential uses and the impacts will be less than significant.

E. As previously mentioned, the proposed project is anticipated to result in 624 pounds per day of solid waste, which is within the capacity of the aforementioned waste facilities. As a result, no impacts will occur.

F. The proposed project, like all other development in El Monte, will be required to adhere to City and County ordinances related to waste reduction and recycling. As a result, no impacts will occur.

Sources

- El Monte, City of. *El Monte General Plan, Chapter 6, Infrastructure Element.*

The Utility Worksheets are included in Appendix C.

WILDFIRE

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project impair an adopted emergency response plan or emergency evacuation plan?				✖
b) Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?				✖
c) Would the project require the installation of maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?				✖
d) Would the project expose people or structure to significant risks, including down slope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?				✖

Discussion of Findings

A. The proposed project involves the construction and operation of a residential building within an urban area of the City of El Monte. The proposed project site is located within an urbanized area and no areas prone to wildfires are located near the project site. Furthermore, the proposed project would not involve the closure or alteration of any existing evacuation routes. As a result, no impacts will occur.

B. There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. In addition, the proposed residential building will replace a vacant site within an urban area and will therefore not change the nature of the project area. As a result, no impacts will occur.

C. The proposed building will replace a vacant site within an urban area and will therefore not change the nature of the project site. There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. As a result, no impacts will occur.

D. There is no risk from wildfire within the project site or the surrounding area given the project site's distance from any area that may be subject to a wildfire event. In addition, the surrounding area is level and completely developed. As a result, no impacts will occur.

Sources

- Blodgett Baylosis Environmental Planning. *Site Survey*. The survey was conducted on August 30, 2018.

- *Google Earth*. Website accessed September 19, 2018.

MANDATORY FINDINGS OF SIGNIFICANCE

Environmental Issues Area Examined	Potentially Significant Impact	Less Than Significant Impact With Mitigation	Less Than Significant Impact	No Impact
a) The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory?				✖
b) The proposed project *will not* have impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and other effects or probable future projects)?				✖
c) The proposed project *will not* have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly?				✖

Discussion of Findings

A. The proposed project *will not* have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare or threatened species or eliminate important examples of the major periods of California history or prehistory.

B. The proposed project *will not* have impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and other effects or probable future projects).

C. The proposed project *will not* have environmental effects which will cause substantially adverse effects on human beings, either directly or indirectly.

APPENDIX B
AIR QUALITY WORKSHEETS

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Ramona and Tyler Residential

South Coast AQMD Air District, Summer

1.0 Project Characteristics

1.1 Land Usage

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
Apartments Low Rise	51.00	Dwelling Unit	0.75	51,000.00	194

1.2 Other Project Characteristics

Urbanization	Urban	**Wind Speed (m/s)**	2.2	**Precipitation Freq (Days)**	31
Climate Zone	9			**Operational Year**	2020
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	**CH4 Intensity (lb/MWhr)**	0.029	**N2O Intensity (lb/MWhr)**	0.006

1.3 User Entered Comments & Non-Default Data

Project Characteristics -

Land Use - Lot size is 0.75 acres. According to the US Census Bureau, average household size in El Monte is 3.80 persons per household.

Construction Phase - per ISMND

Woodstoves - No woodstover or fireplaces

Construction Off-road Equipment Mitigation -

Area Mitigation -

Water Mitigation -

Table Name	Column Name	Default Value	New Value
tblConstructionPhase	NumDays	5.00	44.00

Ramona and Tyler Residential - South Coast AQMD Air District, Summer

tbiConstructionPhase	NumDays	100.00	88.00
tbiConstructionPhase	NumDays	2.00	41.00
tbiConstructionPhase	NumDays	5.00	22.00
tbiConstructionPhase	NumDays	1.00	23.00
tbiConstructionPhase	PhaseEndDate	8/20/2019	10/31/2019
tbiConstructionPhase	PhaseEndDate	6/6/2019	7/31/2019
tbiConstructionPhase	PhaseEndDate	1/17/2019	3/31/2019
tbiConstructionPhase	PhaseEndDate	6/13/2019	8/31/2019
tbiConstructionPhase	PhaseEndDate	1/15/2019	1/31/2019
tbiConstructionPhase	PhaseStartDate	6/14/2019	9/1/2019
tbiConstructionPhase	PhaseStartDate	1/18/2019	4/1/2019
tbiConstructionPhase	PhaseStartDate	1/16/2019	2/1/2019
tbiConstructionPhase	PhaseStartDate	6/7/2019	8/1/2019
tbiConstructionPhase	PhaseStartDate	1/15/2019	1/1/2019
tbiFireplaces	FireplaceDayYear	25.00	0.00
tbiFireplaces	FireplaceHourDay	3.00	0.00
tbiFireplaces	FireplaceWoodMass	1,019.20	0.00
tbiFireplaces	NumberGas	43.35	0.00
tbiFireplaces	NumberNoFireplace	5.10	0.00
tbiFireplaces	NumberWood	2.55	0.00
tbiGrading	AcresOfGrading	11.50	0.50
tbiLandUse	LotAcreage	3.19	0.75
tbiLandUse	Population	146.00	194.00
tbiWoodstoves	NumberCatalytic	2.55	0.00
tbiWoodstoves	NumberNoncatalytic	2.55	0.00
tbiWoodstoves	WoodstoveDayYear	25.00	0.00
tbiWoodstoves	WoodstoveWoodMass	999.60	0.00

2.0 Emissions Summary

2.1 Overall Construction (Maximum Daily Emission)

Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	7.5534	10.5189	9.3440	0.0171	0.8645	0.6124	1.4025	0.4434	0.5635	0.9567	0.0000	1,702.7454	1,702.7454	0.3796	0.0000	1,712.2351
Maximum	7.5534	10.5189	9.3440	0.0171	0.8645	0.6124	1.4025	0.4434	0.5635	0.9567	0.0000	1,702.7454	1,702.7454	0.3796	0.0000	1,712.2351

Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2019	7.5534	10.5189	9.3440	0.0171	0.4456	0.6124	1.0580	0.1910	0.5635	0.7043	0.0000	1,702.7454	1,702.7454	0.3796	0.0000	1,712.2351
Maximum	7.5534	10.5189	9.3440	0.0171	0.4456	0.6124	1.0580	0.1910	0.5635	0.7043	0.0000	1,702.7454	1,702.7454	0.3796	0.0000	1,712.2351

CalEEMod Version: CalEEMod.2016.3.2 Page 4 of 24 Date: 8/30/2018 4:08 PM

Ramona and Tyler Residential - South Coast AQMD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	48.46	0.00	24.57	56.92	0.00	26.38	0.00	0.00	0.00	0.00	0.00	0.00

2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2258	0.0488	4.2216	2.2000e-004		0.0232	0.0232		0.0232	0.0232	0.0000	7.5762	7.5762	7.3900e-003	0.0000	7.7609
Energy	0.0246	0.2104	0.0895	1.3400e-003		0.0170	0.0170		0.0170	0.0170		268.5990	268.5990	5.1500e-003	4.9200e-003	270.1951
Mobile	0.7400	3.7394	9.9627	0.0341	2.6532	0.0333	2.6865	0.7100	0.0312	0.7412		3,463.2017	3,463.2017	0.1713		3,467.4843
Total	**1.9904**	**3.9987**	**14.2737**	**0.0356**	**2.6532**	**0.0735**	**2.7267**	**0.7100**	**0.0714**	**0.7814**	**0.0000**	**3,739.3769**	**3,739.3769**	**0.1838**	**4.9200e-003**	**3,745.4402**

Mitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	1.2258	0.0488	4.2216	2.2000e-004		0.0232	0.0232		0.0232	0.0232	0.0000	7.5762	7.5762	7.3900e-003	0.0000	7.7609
Energy	0.0246	0.2104	0.0895	1.3400e-003		0.0170	0.0170		0.0170	0.0170		268.5990	268.5990	5.1500e-003	4.9200e-003	270.1951
Mobile	0.7400	3.7394	9.9627	0.0341	2.6532	0.0333	2.6865	0.7100	0.0312	0.7412		3,463.2017	3,463.2017	0.1713		3,467.4843
Total	**1.9904**	**3.9987**	**14.2737**	**0.0356**	**2.6532**	**0.0735**	**2.7267**	**0.7100**	**0.0714**	**0.7814**	**0.0000**	**3,739.3769**	**3,739.3769**	**0.1838**	**4.9200e-003**	**3,745.4402**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N20	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

3.0 Construction Detail

Construction Phase

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Site Preparation	Site Preparation	1/1/2019	1/31/2019	5	23	
2	Grading	Grading	2/1/2019	3/31/2019	5	41	
3	Building Construction	Building Construction	4/1/2019	7/31/2019	5	88	
4	Paving	Paving	8/1/2019	8/31/2019	5	22	
5	Architectural Coating	Architectural Coating	9/1/2019	10/31/2019	5	44	

Acres of Grading (Site Preparation Phase): 0.5

Acres of Grading (Grading Phase): 0

Acres of Paving: 0

Residential Indoor: 103,275; Residential Outdoor: 34,425; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)

OffRoad Equipment

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Architectural Coating	Air Compressors	1	6.00	78	0.48
Paving	Cement and Mortar Mixers	4	6.00	9	0.56
Grading	Concrete/Industrial Saws	1	8.00	81	0.73
Building Construction	Cranes	1	4.00	231	0.29
Building Construction	Forklifts	2	6.00	89	0.20
Site Preparation	Graders	1	8.00	187	0.41
Paving	Pavers	1	7.00	130	0.42
Paving	Rollers	1	7.00	80	0.38
Grading	Rubber Tired Dozers	1	1.00	247	0.40
Building Construction	Tractors/Loaders/Backhoes	2	8.00	97	0.37
Grading	Tractors/Loaders/Backhoes	2	6.00	97	0.37
Paving	Tractors/Loaders/Backhoes	1	7.00	97	0.37
Site Preparation	Tractors/Loaders/Backhoes	1	8.00	97	0.37

Trips and VMT

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Site Preparation	2	5.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Grading	4	10.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Building Construction	5	37.00	5.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Paving	7	18.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT
Architectural Coating	1	7.00	0.00	0.00	14.70	6.90	20.00	LD_Mix	HDT_Mix	HHDT

3.1 Mitigation Measures Construction

Use Soil Stabilizer

Water Exposed Area

3.2 Site Preparation - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0231	0.0000	0.0231	2.4900e-003	0.0000	2.4900e-003			0.0000			0.0000
Off-Road	0.7195	8.9170	4.1407	9.7500e-003		0.3672	0.3672		0.3378	0.3378		965.1690	965.1690	0.3054		972.8032
Total	0.7195	8.9170	4.1407	9.7500e-003	0.0231	0.3672	0.3903	2.4900e-003	0.3378	0.3403		965.1690	965.1690	0.3054		972.8032

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0245	0.0170	0.2247	5.9000e-004	0.0559	4.3000e-004	0.0563	0.0148	4.0000e-004	0.0152		59.0495	59.0495	1.8500e-003		59.0956
Total	0.0245	0.0170	0.2247	5.9000e-004	0.0559	4.3000e-004	0.0563	0.0148	4.0000e-004	0.0152		59.0495	59.0495	1.8500e-003		59.0956

3.2 Site Preparation - 2019

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					8.9900e-003	0.0000	8.9900e-003	9.7000e-004	0.0000	9.7000e-004			0.0000			0.0000
Off-Road	0.7195	8.9170	4.1407	9.7500e-003		0.3672	0.3672		0.3378	0.3378	0.0000	965.1690	965.1690	0.3054		972.8032
Total	0.7195	8.9170	4.1407	9.7500e-003	8.9900e-003	0.3672	0.3762	9.7000e-004	0.3378	0.3388	0.0000	965.1690	965.1690	0.3054		972.8032

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0245	0.0170	0.2247	5.9000e-004	0.0559	4.3000e-004	0.0563	0.0148	4.0000e-004	0.0152		59.0495	59.0495	1.8500e-003		59.0956
Total	0.0245	0.0170	0.2247	5.9000e-004	0.0559	4.3000e-004	0.0563	0.0148	4.0000e-004	0.0152		59.0495	59.0495	1.8500e-003		59.0956

3.3 Grading - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.7528	0.0000	0.7528	0.4138	0.0000	0.4138			0.0000			0.0000
Off-Road	0.9530	8.6039	7.6917	0.0120		0.5371	0.5371		0.5125	0.5125		1,159.6570	1,159.6570	0.2211		1,165.184 7
Total	0.9530	8.6039	7.6917	0.0120	0.7528	0.5371	1.2898	0.4138	0.5125	0.9263		1,159.6570	1,159.6570	0.2211		1,165.184 7

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0490	0.0341	0.4493	1.1900e-003	0.1118	8.7000e-004	0.1127	0.0296	8.0000e-004	0.0305		118.0989	118.0989	3.6900e-003		118.1912
Total	0.0490	0.0341	0.4493	1.1900e-003	0.1118	8.7000e-004	0.1127	0.0296	8.0000e-004	0.0305		118.0989	118.0989	3.6900e-003		118.1912

3.3 Grading - 2019

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.2936	0.0000	0.2936	0.1614	0.0000	0.1614			0.0000			0.0000
Off-Road	0.9530	8.6039	7.8917	0.0120		0.5371	0.5371		0.5125	0.5125	0.0000	1,159.657 0	1,159.657 0	0.2211		1,165.184 7
Total	**0.9530**	**8.6039**	**7.8917**	**0.0120**	**0.2936**	**0.5371**	**0.8307**	**0.1614**	**0.5125**	**0.6738**	**0.0000**	**1,159.657 0**	**1,159.657 0**	**0.2211**		**1,165.184 7**

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0490	0.0341	0.4493	1.1900e-003	0.1118	8.7000e-004	0.1127	0.0296	8.0000e-004	0.0305		118.0989	118.0989	3.6900e-003		118.1912
Total	**0.0490**	**0.0341**	**0.4493**	**1.1900e-003**	**0.1118**	**8.7000e-004**	**0.1127**	**0.0296**	**8.0000e-004**	**0.0305**		**118.0989**	**118.0989**	**3.6900e-003**		**118.1912**

3.4 Building Construction - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9576	9.8207	7.5432	0.0114		0.6054	0.6054		0.5569	0.5569		1,127.669 6	1,127.669 6	0.3568		1,136.589 2
Total	0.9576	9.8207	7.5432	0.0114		0.6054	0.6054		0.5569	0.5569		1,127.669 5	1,127.669 6	0.3568		1,136.589 2

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0193	0.5721	0.1385	1.3000e-003	0.0320	3.7900e-003	0.0358	9.2100e-003	3.6300e-003	0.0128		138.1099	138.1099	9.1400e-003		138.3383
Worker	0.1812	0.1261	1.8625	4.3900e-003	0.4136	3.2200e-003	0.4168	0.1097	2.9700e-003	0.1127		436.9659	436.9659	0.0137		437.3076
Total	0.2005	0.6982	1.9009	5.6900e-003	0.4456	7.0100e-003	0.4526	0.1189	6.6000e-003	0.1255		575.0758	575.0758	0.0228		575.6459

3.4 Building Construction - 2019

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.9576	9.8207	7.5432	0.0114		0.6054	0.6054		0.5569	0.5569	0.0000	1,127.669 6	1,127.669 6	0.3568		1,136.589 2
Total	0.9576	9.8207	7.5432	0.0114		0.6054	0.6054		0.5569	0.5569	0.0000	1,127.669 6	1,127.669 6	0.3568		1,136.589 2

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0193	0.5721	0.1385	1.3000e-003	0.0320	3.7900e-003	0.0358	9.2100e-003	3.6300e-003	0.0128		138.1099	138.1099	9.1400e-003		138.3383
Worker	0.1812	0.1261	1.8625	4.3900e-003	0.4136	3.2200e-003	0.4168	0.1097	2.9700e-003	0.1127		436.9659	436.9659	0.0137		437.3076
Total	0.2005	0.6982	1.9009	5.6900e-003	0.4456	7.0100e-003	0.4526	0.1189	6.6000e-003	0.1255		575.0758	575.0758	0.0228		575.6459

3.5 Paving - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8300	7.8446	7.1478	0.0113		0.4425	0.4425		0.4106	0.4106		1,055.1823	1,055.1823	0.3016		1,062.7231
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	**0.8300**	**7.8446**	**7.1478**	**0.0113**		**0.4425**	**0.4425**		**0.4106**	**0.4106**		**1,055.1823**	**1,055.1823**	**0.3016**		**1,062.7231**

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442
Total	**0.0882**	**0.0613**	**0.8088**	**2.1400e-003**	**0.2012**	**1.5700e-003**	**0.2028**	**0.0534**	**1.4400e-003**	**0.0548**		**212.5780**	**212.5780**	**6.6500e-003**		**212.7442**

3.5 Paving - 2019

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Off-Road	0.8300	7.8446	7.1478	0.0113		0.4425	0.4425		0.4106	0.4106	0.0000	1,055.182 3	1,055.182 3	0.3016		1,062.723 1
Paving	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Total	0.8300	7.8446	7.1478	0.0113		0.4425	0.4425		0.4106	0.4106	0.0000	1,055.182 3	1,055.182 3	0.3016		1,062.723 1

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442
Total	0.0882	0.0613	0.8088	2.1400e-003	0.2012	1.5700e-003	0.2028	0.0534	1.4400e-003	0.0548		212.5780	212.5780	6.6500e-003		212.7442

3.6 Architectural Coating - 2019

Unmitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.2527					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238		282.0423
Total	7.5192	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288		281.4481	281.4481	0.0238		282.0423

Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0343	0.0239	0.3145	8.3000e-004	0.0782	6.1000e-004	0.0789	0.0208	5.6000e-004	0.0213		82.6692	82.6692	2.5900e-003		82.7339
Total	0.0343	0.0239	0.3145	8.3000e-004	0.0782	6.1000e-004	0.0789	0.0208	5.6000e-004	0.0213		82.6692	82.6692	2.5900e-003		82.7339

3.6 Architectural Coating - 2019

Mitigated Construction On-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Archit. Coating	7.2527					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Off-Road	0.2664	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	261.4481	261.4481	0.0238		262.0423
Total	7.5192	1.8354	1.8413	2.9700e-003		0.1288	0.1288		0.1288	0.1288	0.0000	261.4481	261.4481	0.0238		262.0423

Mitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0343	0.0239	0.3145	8.3000e-004	0.0782	6.1000e-004	0.0789	0.0208	5.6000e-004	0.0213		82.6692	82.6692	2.5900e-003		82.7339
Total	0.0343	0.0239	0.3145	8.3000e-004	0.0782	6.1000e-004	0.0789	0.0208	5.6000e-004	0.0213		82.6692	82.6692	2.5900e-003		82.7339

4.0 Operational Detail - Mobile

4.1 Mitigation Measures Mobile

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.7400	3.7394	9.9627	0.0341	2.6532	0.0333	2.6865	0.7100	0.0312	0.7412		3,463.2017	3,463.2017	0.1713		3,467.4843
Unmitigated	0.7400	3.7394	9.9627	0.0341	2.6532	0.0333	2.6865	0.7100	0.0312	0.7412		3,463.2017	3,463.2017	0.1713		3,467.4843

4.2 Trip Summary Information

	Average Daily Trip Rate			Unmitigated	Mitigated
Land Use	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
Apartments Low Rise	336.09	365.16	309.57	1,149,715	1,149,715
Total	336.09	365.16	309.57	1,149,715	1,149,715

4.3 Trip Type Information

	Miles			Trip %			Trip Purpose %		
Land Use	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
Apartments Low Rise	14.70	5.90	8.70	40.20	19.20	40.60	86	11	3

4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
Apartments Low Rise	0.547828	0.043645	0.199892	0.122290	0.016774	0.005862	0.020637	0.032653	0.002037	0.001944	0.004771	0.000705	0.000956

5.0 Energy Detail

Historical Energy Use: N

5.1 Mitigation Measures Energy

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0246	0.2104	0.0895	1.3400e-003		0.0170	0.0170		0.0170	0.0170		268.5990	268.5990	5.1500e-003	4.9200e-003	270.1951
NaturalGas Unmitigated	0.0246	0.2104	0.0895	1.3400e-003		0.0170	0.0170		0.0170	0.0170		268.5990	268.5990	5.1500e-003	4.9200e-003	270.1951

5.2 Energy by Land Use - NaturalGas

Unmitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	228.309	0.0246	0.2104	0.0895	1.3400e-003		0.0170	0.0170		0.0170	0.0170		268.5990	268.5990	5.1500e-003	4.9200e-003	270.1951
Total		0.0246	0.2104	0.0895	1.3400e-003		0.0170	0.0170		0.0170	0.0170		268.5990	268.5990	5.1500e-003	4.9200e-003	270.1951

Mitigated

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
Apartments Low Rise	228.309	0.0246	0.2104	0.0895	1.3400e-003		0.0170	0.0170		0.0170	0.0170		268.5990	268.5990	5.1500e-003	4.9200e-003	270.1951
Total		0.0246	0.2104	0.0895	1.3400e-003		0.0170	0.0170		0.0170	0.0170		268.5990	268.5990	5.1500e-003	4.9200e-003	270.1951

6.0 Area Detail

6.1 Mitigation Measures Area

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Ramona and Tyler Residential - South Coast AQMD Air District, Summer

Use Low VOC Paint - Residential Interior
Use Low VOC Paint - Residential Exterior
No Hearths Installed

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day															
Mitigated	1.2258	0.0488	4.2216	2.2000e-004		0.0032	0.0032		0.0032	0.0032	0.0000	7.5762	7.5762	7.3900e-003	0.0000	7.7609
Unmitigated	1.2258	0.0488	4.2216	2.2000e-004		0.0032	0.0032		0.0032	0.0032	0.0000	7.5762	7.5762	7.3900e-003	0.0000	7.7609

6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0874					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0098					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.1286	0.0488	4.2216	2.2000e-004		0.0232	0.0232		0.0232	0.0232		7.5762	7.5762	7.3900e-003		7.7609
Total	1.2258	0.0488	4.2216	2.2000e-004		0.0232	0.0232		0.0232	0.0232	0.0000	7.5762	7.5762	7.3900e-003	0.0000	7.7609

6.2 Area by SubCategory

Mitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0874					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	1.0098					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Hearth	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.1286	0.0488	4.2216	2.2000e-004		0.0232	0.0232		0.0232	0.0232		7.5762	7.5762	7.3900e-003		7.7609
Total	1.2258	0.0488	4.2216	2.2000e-004		0.0232	0.0232		0.0232	0.0232	0.0000	7.5762	7.5762	7.3900e-003	0.0000	7.7609

7.0 Water Detail

7.1 Mitigation Measures Water

Install Low Flow Bathroom Faucet

Install Low Flow Kitchen Faucet

Install Low Flow Toilet

Install Low Flow Shower

8.0 Waste Detail

8.1 Mitigation Measures Waste

9.0 Operational Offroad

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type

10.0 Stationary Equipment

Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type

Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type

User Defined Equipment

Equipment Type	Number

11.0 Vegetation

APPENDIX C
UTILITY WORKSHEETS

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INTRODUCTION TO UTILITY SCREENING TABLES

The following worksheets are used to evaluated the potential impacts of a project.

Table 1 Definition of Project

This Table is used to establish the proposed development parameters that are used the calculation of utilities usage. The independent variable to be entered is identified by shading. For residential development, the number of housing units should be entered in the shaded area. For non-residential development, the total floor area of development should be entered in the shaded area.

Tables 2 Summary of Project Impacts

Consumption/Generation Rates. This table indicates the development's projected electrical consumption, natural gas consumption, water consumption, effluent generation, and solid waste generation. No modifications should be made to this table.

Tables 3 through 7 Calculation of Project Impacts

Tables 3 through 7 indicate the results of the analysis.

Table 3 Electrical Consumption - This Table calculates the projected electrical consumption for new development. Default generation rates provided in the shaded areas may be changed.

Table 4 Natural Gas Consumption - This Table calculates the projected natural gas useagefor new development. Default generation rates provided in the shaded areas may be changed.

Table 5 Water Consumption - This Table calculates the projected water consumption ratesfor new development. Default generation rates provided in the shaded areas may be changed.

Table 6 Sewage Generation - This Table calculates the projected effluent generation rates for new development. Default generation rates provided in the shaded areas may be changed.

Table 7 Solid Waste Generation - This Table calculates the projected waste generation for new development. Default generation rates provided in the shaded areas may be changed.

Table 1 Project Name: Ramona and Tyler Residential Development

Definition of Project Parameters - Enter independent variable (no. of units or floor area) in the shaded area. The independent variable to be entered is the number of units (for residential development) or the gross floor area (for non-residential development).

Land Use	Independent	Factor
Residential Uses	**Variable**	**Total Units**
Single-Family Residential	No. of Units	0
Medium Density Residential	No. of Units	0
Multiple-Family Residential	No. of Units	51
Mobile Home	No. of Units	0
Office Uses	**Variable**	**Total Floor Area**
Office	Sq. Ft.	0
Medical Office Building	Sq. Ft.	0
Office Park	Sq. Ft.	0
Bank/Financial Services	Sq. Ft.	0
Commercial Uses	**Variable**	**Floor Area/Rooms**
Specialty Retail Commercial	Sq. Ft.	0
Convenience Store	Sq. Ft.	0
Movie Theater	Sq. Ft.	0
Shopping Center	Sq. Ft.	0
Sit-Down Restaurant	Sq. Ft.	0
Fast-Food Restaurant	Sq. Ft.	0
Hotel	Rooms	0
Manufacturing Uses	**Variable**	**Total Floor Area**
Industrial Park	Sq. Ft.	0
Manufacturing	Sq. Ft.	0
General Light Industry	Sq. Ft.	0
Warehouse	Sq. Ft.	0
Public/Institutional	**Variable**	**Total Floor Area**
Public/Institutional	Sq. Ft.	0
Open Space	Sq. Ft.	0

Table 2: Projected Utility Consumption and Generation

Summary of Project Impacts - Results of analysis identified below. No modifications should be made to this Table.

Utilities Consumption and Generation	Factor	Rates
Electrical Consumption	kWh/day	786
Natural Gas Consumption	cubic feet/day	561
Water Consumption	gallons/day	11,934
Sewage Generation	gallons/day	7,956
Solid Waste Generation	pounds/day	624

Table 3: Electrical Consumption

Project Component	Units of Measure	Consumption Factor		Projected Consumption
Residential Uses	**No. of Units**	**kWh**	**Variable**	**kWh/Unit/Day**
Single-Family Residential	0	5,625.00	kWh/Unit/Year	0.0
Medium Density Residential	0	5,625.00	kWh/Unit/Year	0.0
Multiple-Family Residential	51	5,625.00	kWh/Unit/Year	786.0
Mobile Home	0	4,644.00	kWh/Unit/Year	0.0
Office Uses	**Sq. Ft.**	**kWh**	**Variable**	**kWh/Sq. Ft./Day**
Office	0	20.80	kWh/Sq. Ft./Year	0.0
Medical Office Building	0	14.20	kWh/Sq. Ft./Year	0.0
Office Park	0	20.80	kWh/Sq. Ft./Year	0.0
Bank/Financial Services	0	20.80	kWh/Sq. Ft./Year	0.0
Commercial Uses	**Sq. Ft./Rooms**	**kWh**	**Variable**	**kWh/Sq. Ft./Day**
Specialty Retail Commercial	0	16.00	kWh/Sq. Ft./Year	0.0
Convenience Store	0	16.00	kWh/Sq. Ft./Year	0.0
Movie Theater	0	16.00	kWh/Sq. Ft./Year	0.0
Shopping Center	0	35.90	kWh/Sq. Ft./Year	0
Sit-Down Restaurant	0	49.10	kWh/Sq. Ft./Year	0.0
Fast-Food Restaurant	0	49.10	kWh/Sq. Ft./Year	0.0
Hotel	0	8,955.00	kWh/Sq. Ft./Year	0.0
Manufacturing Uses	**Sq. Ft.**	**kWh**	**Variable**	**kWh/Sq. Ft./Day**
Industrial Park	0	4.80	kWh/Sq. Ft./Year	0.0
Manufacturing	0	4.80	kWh/Sq. Ft./Year	0.0
General Light Industry	0	4.80	kWh/Sq. Ft./Year	0.0
Warehouse	0	4.80	kWh/Sq. Ft./Year	0.0
Public/Institutional	**Sq. Ft.**	**kWh**	**Variable**	**kWh/Sq. Ft./Day**
Public/Institutional	0	4.80	kWh/Sq. Ft./Year	0.0
Open Space	0	0.00	kWh/Sq. Ft./Year	0.0
Total Daily Electrical Consumption (kWh/day)				786.0

Sources:
Residential rates were derived from the SCAQMD's CEQA Air Quality Handbook (April 1993).
All other rates are from Common Forecasting Methodology VII Demand Forms, 1989

Table 4: Natural Gas Consumption

Project Component	Units of Measure	Consumption Factor		Projected Consumption
Residential Uses	**No. of Units**	**Cu. Ft. of Nat. Gas**	**Variable**	**Cu. Ft./Day**
Single-Family Residential	0	6,665.00	Cu. Ft./Mo./Unit	0.0
Medium Density Residential	0	4,011.50	Cu. Ft./Mo./Unit	0.0
Multiple-Family Residential	51	4,011.50	Cu. Ft./Mo./Unit	560.5
Mobile Home	0	4,011.50	Cu. Ft./Mo./Unit	0.0
Office Uses	**Sq. Ft.**	**Cu. Ft. of Nat. Gas**	**Variable**	**Cu. Ft./Day**
Office	0	2.00	Cu. Ft./Mo./Sq. Ft.	0.0
Medical Office Building	0	2.00	Cu. Ft./Mo./Sq. Ft.	0.0
Office Park	0	2.00	Cu. Ft./Mo./Sq. Ft.	0.0
Bank/Financial Services	0	2.00	Cu. Ft./Mo./Sq. Ft.	0.0
Commercial Uses	**Sq. Ft./Rooms**	**Cu. Ft. of Nat. Gas**	**Variable**	**Cu. Ft./Day**
Specialty Retail Commercial	0	2.90	Cu. Ft./Mo./Sq. Ft.	0.0
Convenience Store	0	2.90	Cu. Ft./Mo./Sq. Ft.	0.0
Movie Theater	0	2.90	Cu. Ft./Mo./Sq. Ft.	0.0
Shopping Center	0	2.90	Cu. Ft./Mo./Sq. Ft.	0.0
Sit-Down Restaurant	0	2.90	Cu. Ft./Mo./Sq. Ft.	0.0
Fast-Food Restaurant	0	2.90	Cu. Ft./Mo./Sq. Ft.	0.0
Hotel	0	2.90	Cu. Ft./Mo./Room	0.0
Manufacturing Uses	**Sq. Ft.**	**Cu. Ft. of Nat. Gas**	**Variable**	**Cu. Ft./Day**
Industrial Park	0	4.70	Cu. Ft./Mo./Sq. Ft.	0.0
Manufacturing	0	4.70	Cu. Ft./Mo./Sq. Ft.	0.0
General Light Industry	0	4.70	Cu. Ft./Mo./Sq. Ft.	0.0
Warehouse	0	4.70	Cu. Ft./Mo./Sq. Ft.	0.0
Public/Institutional Use	**Sq. Ft.**	**Cu. Ft. of Nat. Gas**	**Variable**	**Cu. Ft./Day**
Public/Institutional	0	2.90	Cu. Ft./Mo./Sq. Ft.	0.0
Open Space	0	2.90	Cu. Ft./Mo./Sq. Ft.	0.0
Total Daily Natural Gas Consumption (cubic feet/day)				560.5

Sources:
South Coast Air Quality Management District, CEQA Air Quality Handbook. April 1993

Table 5: Water Consumption

Project Component	Units of Measure	Consumption Factor		Projected Consumption
Residential Uses	**No. of Units**	**Gals. of Water**	**Variable**	**Gals./Day**
Single-Family Residential	0	390.00	Gals./Day/Unit	0.0
Medium Density Residential	0	300.00	Gals./Day/Unit	0.0
Multiple-Family Residential	51	234.00	Gals./Day/Unit	11,934.0
Mobile Home	0	234.00	Gals./Day/Unit	0.0
Office Uses	**Sq. Ft.**	**Gals. of Water**	**Variable**	**Gals./Day**
Office	0	0.30	Gals./Day/Sq. Ft.	0.0
Medical Office Building	0	0.30	Gals./Day/Sq. Ft.	0.0
Office Park	0	0.30	Gals./Day/Sq. Ft.	0.0
Bank/Financial Services	0	0.15	Gals./Day/Sq. Ft.	0.0
Commercial Uses	**Sq. Ft./Room**	**Gals. of Water**	**Variable**	**Gals./Day**
Specialty Retail Commercial	0	0.15	Gals./Day/Sq. Ft.	0.0
Convenience Store	0	0.15	Gals./Day/Sq. Ft.	0.0
Movie Theater	0	0.20	Gals./Day/Sq. Ft.	0.0
Shopping Center	0	0.50	Gals./Day/Sq. Ft.	0.0
Sit-Down Restaurant	0	1.50	Gals./Day/Sq. Ft.	0.0
Fast-Food Restaurant	0	0.12	Gals./Day/Sq. Ft.	0.0
Hotel	0	187.50	Gals./Day/Room.	0.0
Manufacturing Uses	**Sq. Ft.**	**Gals. of Water**	**Variable**	**Gals./Day**
Industrial Park	0	0.30	Gals./Day/Sq. Ft.	0.0
Manufacturing	0	0.30	Gals./Day/Sq. Ft.	0.0
General Light Industry	0	0.30	Gals./Day/Sq. Ft.	0.0
Warehouse	0	0.05	Gals./Day/Sq. Ft.	0.0
Public/Institutional Use	**Sq. Ft.**	**Gals. of Water**	**Variable**	**Gals./Day**
Public/Institutional	0	0.12	Gals./Day/Sq. Ft.	0.0
Open Space	0	0.12	Gals./Day/Sq. Ft.	0.0
Total Daily Water Consumption (gallons/day)				11,934.0

Sources:

Source: Derived from Los Angeles County Sanitation District rates (150% of effluent generation).

Table 6: Sewage Generation

Project Component	Units of Measure	Generation Factor		Projected Consumption
Residential Uses	**No. of Units**	**Gals. of Effluent**	**Variable**	**Gals./Day**
Single-Family Residential	0	260.00	Gals./Day/Unit	0.0
Medium Density Residential	0	200.00	Gals./Day/Unit	0.0
Multiple-Family Residential	51	156.00	Gals./Day/Unit	7,956.0
Mobile Home	0	156.00	Gals./Day/Unit	0.0
Office Uses	**Sq. Ft.**	**Gals. of Effluent**	**Variable**	**Gals./Day**
Office	0	0.20	Gals./Day/Sq. Ft.	0.0
Medical Office Building	0	0.20	Gals./Day/Sq. Ft.	0.0
Office Park	0	0.20	Gals./Day/Sq. Ft.	0.0
Bank/Financial Services	0	0.10	Gals./Day/Sq. Ft.	0.0
Commercial Uses	**Sq. Ft./Rooms**	**Gals. of Effluent**	**Variable**	**Gals./Day**
Specialty Retail Commercial	0	0.10	Gals./Day/Sq. Ft.	0.0
Convenience Store	0	0.10	Gals./Day/Sq. Ft.	0.0
Movie Theater	0	0.13	Gals./Day/Sq. Ft.	0.0
Shopping Center	0	0.33	Gals./Day/Sq. Ft.	0.0
Sit-Down Restaurant	0	1.00	Gals./Day/Sq. Ft.	0.0
Fast-Food Restaurant	0	0.08	Gals./Day/Sq. Ft.	0.0
Hotel	0	125	Gals./Day/Room.	0.0
Manufacturing Uses	**Sq. Ft.**	**Gals. of Effluent**	**Variable**	**Gals./Day**
Industrial Park	0	0.20	Gals./Day/Sq. Ft.	0.0
Manufacturing	0	0.20	Gals./Day/Sq. Ft.	0.0
General Light Industry	0	0.20	Gals./Day/Sq. Ft.	0.0
Warehouse	0	0.03	Gals./Day/Sq. Ft.	0.0
Public/Institutional Use	**Sq. Ft.**	**Gals. of Effluent**	**Variable**	**Gals./Day**
Public/Institutional	0	0.10	Gals./Day/Sq. Ft.	0.0
Open Space	0	0.10	Gals./Day/Sq. Ft.	0.0
Total Daily Sewage Generation (gallons/day)				7,956.0

Source: Los Angeles County Sanitation Districts.

Table 7: Solid Waste Generation

Project Component	Units of Measure	Generation Factor		Projected Generation
Residential Uses	**No. of Units**	**Lbs.of Waste**	**Variable**	**Lbs./Day**
Single-Family Residential	0	12.23	Lbs./Day/Unit	0.0
Medium Density Residential	0	12.23	Lbs./Day/Unit	0.0
Multiple-Family Residential	51	12.23	Lbs./Day/Unit	623.7
Mobile Home	0	12.23	Lbs./Day/Unit	0.0
Office Uses	**Sq. Ft.**	**Lbs.of Waste**	**Variable**	**Lbs./Day**
Office	0	6.00	Lbs./Day/1,000 Sq. Ft.	0.0
Medical Office Building	0	6.00	Lbs./Day/1,000 Sq. Ft.	0.0
Office Park	0	6.00	Lbs./Day/1,000 Sq. Ft.	0.0
Bank/Financial Services	0	6.00	Lbs./Day/1,000 Sq. Ft.	0.0
Commercial Uses	**Sq. Ft./Rooms**	**Lbs.of Waste**	**Variable**	**Lbs./Day**
Specialty Retail Commercial	0	42.00	Lbs./Day/1,000 Sq. Ft.	0.0
Convenience Store	0	42.00	Lbs./Day/1,000 Sq. Ft.	0.0
Movie Theater	0	6.00	Lbs./Day/1,000 Sq. Ft.	0.0
Shopping Center	0	6.00	Lbs./Day/1,000 Sq. Ft.	0.0
Sit-Down Restaurant	0	6.00	Lbs./Day/1,000 Sq. Ft.	0.0
Fast-Food Restaurant	0	42.00	Lbs./Day/1,000 Sq. Ft.	0.0
Hotel	0		Lbs./Day/Room	0.0
Manufacturing Uses	**Sq. Ft.**	**Lbs.of Waste**	**Variable**	**Lbs./Day**
Industrial Park	0	8.93	Lbs./Day/1,000 Sq. Ft.	0.0
Manufacturing	0	8.93	Lbs./Day/1,000 Sq. Ft.	0.0
General Light Industry	0	8.93	Lbs./Day/1,000 Sq. Ft.	0.0
Warehouse	0	8.93	Lbs./Day/1,000 Sq. Ft.	0.0
Public/Institutional Use	**Sq. Ft.**	**Lbs.of Waste**	**Variable**	**Lbs./Day**
Public/Institutional	0	4.00	Lbs./Day/1,000 Sq. Ft.	0.0
Open Space	0	3.00	Lbs./Day/1,000 Sq. Ft.	0.0
Total Daily Solid Waste Generation				623.7

Source: City of Los Angeles CEQA Thresholds Guide, 2006, and
City of Los Angeles Average Solid Waste Generation Rates, April 1981

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APPENDIX D
LAND USE MAPS

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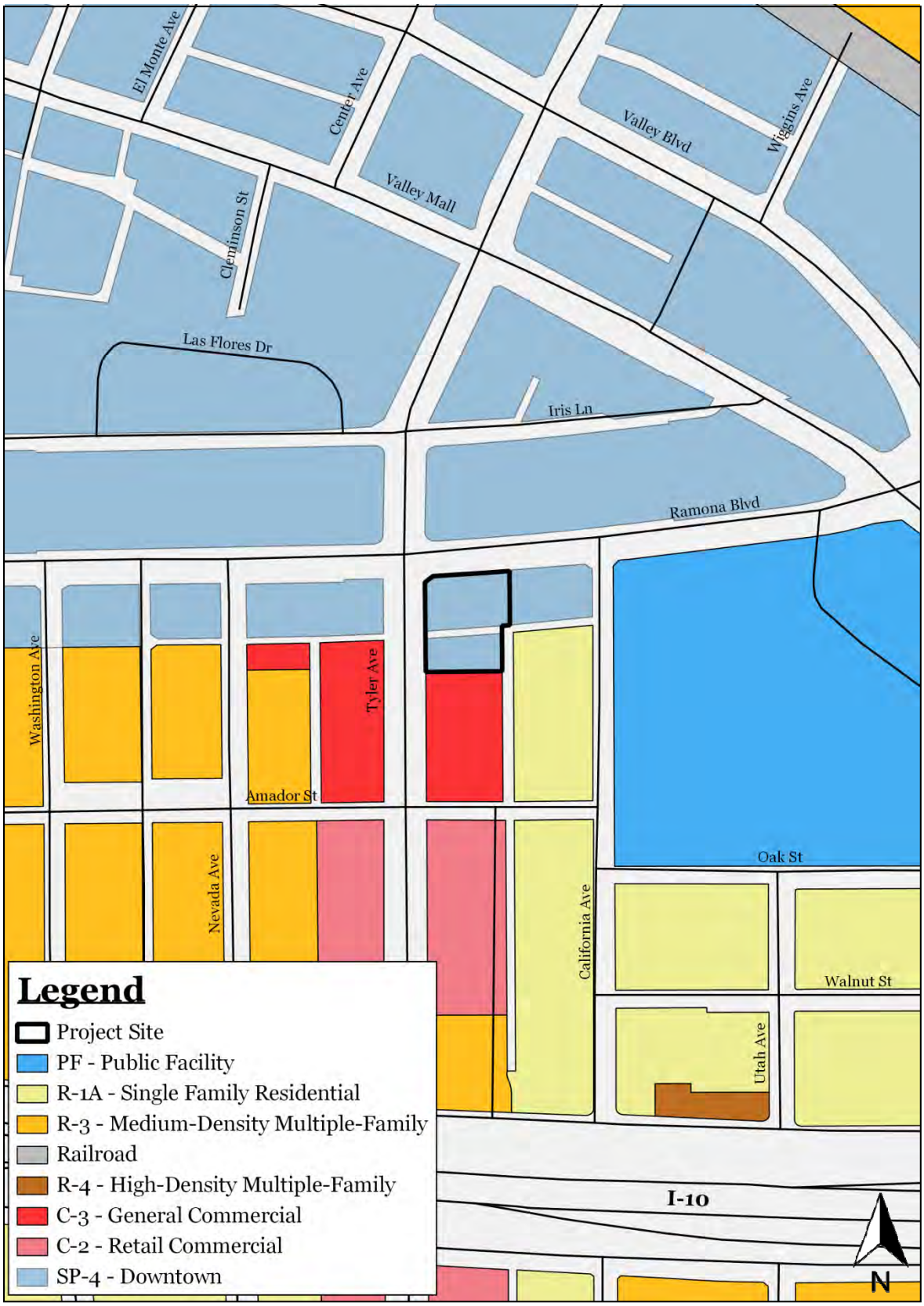
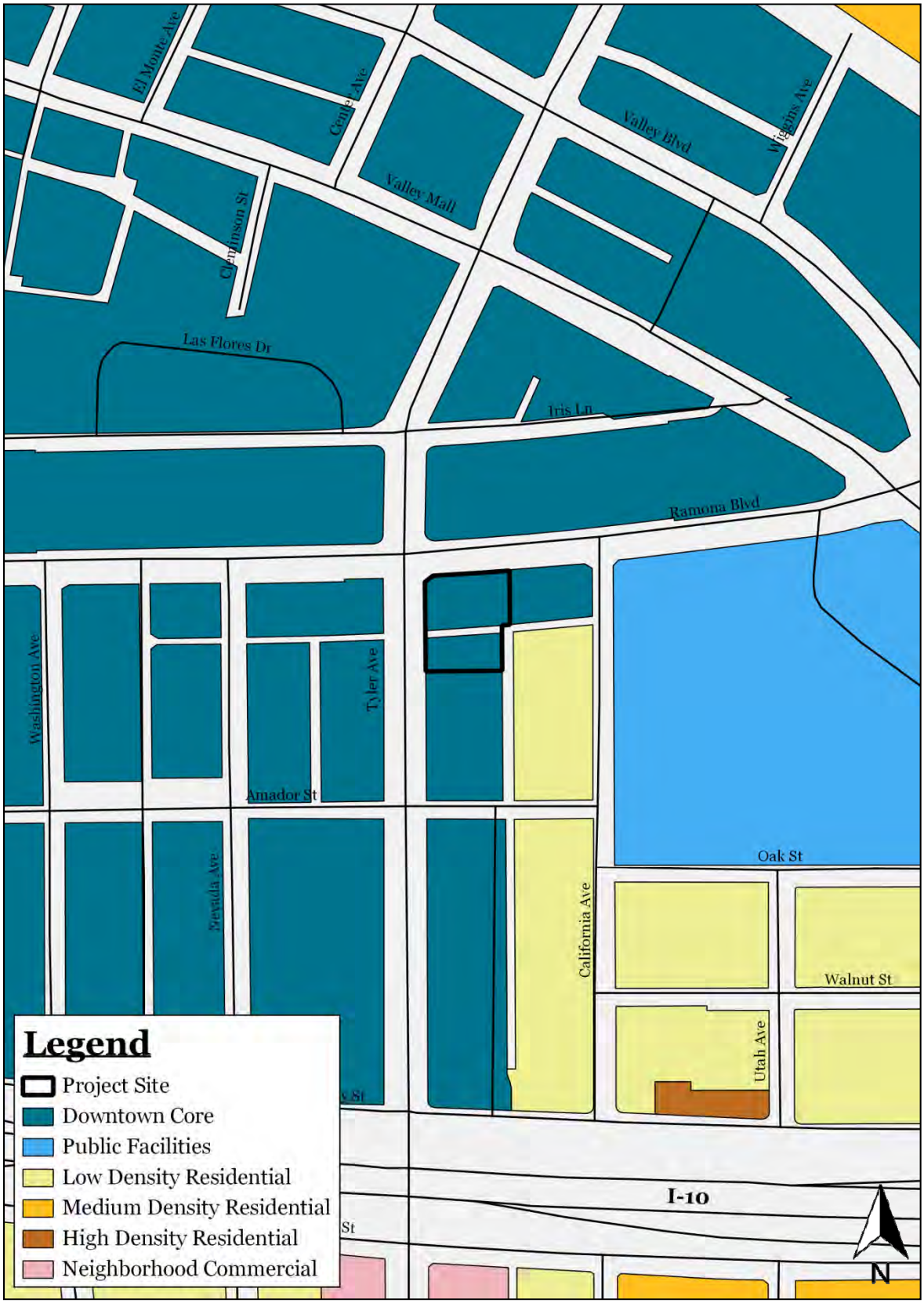


ZONING MAP

Source: City of El Monte and QGIS



GENERAL PLAN LAND USE MAP

Source: City of El Monte and QGIS

Dean C. Logan
Los Angeles County Registrar / Recorder
12400 Imperial Highway, Norwalk, CA
(800)201-8999

BUSINESS FILINGS REGISTRATION

NORWALK DEPARTMENT HEADQUARTER

Cashier: I. CORREA

20181011122001 4

Thursday, October 11, 2018 11:16 AM

Item(s)

Fee	Qty	Total
NoE - County Posting Fee 2018257634	1	$75.00

Total **$75.00**

Total Documents: 1

Customer payment(s):

Check $75.00

Check List:
#7590 $75.00

67TH & MAIN

State of California

Tax Credit Allocation Committee

ATTACHMENT 26
Approvals Necessary to Begin Construction

Project Name:	67th and Main	Housing Type:	Mixed Use Multi-Family
Site Address:	6700 – 6710 Main St., 110 - 126 67th St.	City:	Los Angeles
County:	Los Angeles	Number Of Units:	52
Census Tract Number:	2393.20	APN(s):	6011-003-(004-007 and 062-063, 065)

Note: Multiple forms may be needed. Each agency with individual responsibility for the items below must complete the particular item(s) under its jurisdiction.

This letter is to confirm that the following public or tribal approvals (except building permits) and all land use environmental clearances for this project are issued or are unnecessary and the expiration dates of all required appeal periods for each item are listed and have expired, or will expire no later than 30 days beyond the application deadline date.

Check All Required Items	Approval Date	Appeal Expiration Date*	X if N/A	If N/A, MUST provide a detailed explanation**
☐ CEQA			☒	Ministerial TOC
☐ NEPA***(see note below)			☒	Ministerial TOC
☐ Site Plan Review Completed			☒	Not needed
☐ Conditional Use Permit			☒	Not needed
☐ Variance Approval			☒	Not needed
☐ Toxic Report			☒	Not needed
☐ Soils Report			☒	Not needed
☐ Other Discretionary Review: _____			☒	No discretionary approval
☐ Streamlined Ministerial Approval (SB35)			☒	Not needed
☐ Article 34 of State Constitution			☐	
☐ Coastal Commission Approval			☒	Not needed
☐ Tribal Land Environmental Review			☒	No CEQA required
☐ Other Requirements: _____			☐	

**A detailed explanation must be provided for each of the above items that have been checked, "N/A." Please attach an extra sheet of paper if unable to fit entire explanation, as this is important for the review process.

☒ ***By checking box, THE APPLICANT acknowledges responsibility to re-submit Attachment 26, Approvals Necessary to Begin Construction form, due to a final appeal period permitted to run up to 30 days beyond the application due date (by July 31, 2019). The applicant is aware that in order to garner these readiness points, the applicant must provide proof/documentation that either no appeals were received, or that any appeals received during that time period were resolved within that 30-day period. The updated/re-submitted Attachment 26 and documentation must be provided within 7 days of the expiration of the 30-day appeal period (by August 7, 2019).**

☐ *****By checking box, THE LOCAL AGENCY is confirming that for the "Approval Date" proof/documentation, the Request for Release of Funds (HUD Form 7015.15) or equivalent is/was submitted to the federal entity by the application due date (by July 1, 2019) – Please attach proof/documentation and for the "Appeal Expiration Date" proof/documentation, the Authority to Use Grant Funds (HUD Form 7015.16) or equivalent is/was issued no later than 30 days beyond the application due date (by July 31, 2019) – Please attach proof/documentation. For projects exempt from NEPA, the appropriate documentation verifying exemption must be attached.**

I/We, as the local jurisdiction/agency, certify and guarantee, under penalty of perjury, that each of the above items identified have been met and all appeals have been exhausted or all time limits of those appeals have or will expire no later than 30 days beyond the application deadline date.

City of Los Angeles – Dept. of City Planning	213-202-5448	
PRINT AGENCY / JURISDICTION NAME	PHONE	
Eric Claros	eric.claros@lacity.org	
PRINT NAME	EMAIL	
City Planner		06/28/2019
PRINT TITLE	SIGNATURE	DATE

DEPOT AT HYDE PARK

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

DAVID H. J. AMBROZ
PRESIDENT

RENEE DAKE WILSON
VICE-PRESIDENT

CAROLINE CHOE
RICHARD KATZ
JOHN W. MACK
SAMANTHA MILLMAN
MARC MITCHELL
VERONICA PADILLA-CAMPOS
DANA M. PERLMAN

ROCKY WILES
COMMISSION OFFICE MANAGER
(213) 978-1300

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
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LOS ANGELES, CA 90012-4801

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EXECUTIVE OFFICER
(213) 978-1272

LISA M. WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1274

JAN ZATORSKI
DEPUTY DIRECTOR
(213) 978-1273

http://planning.lacity.org

DIRECTOR'S DETERMINATION

DENSITY BONUS & AFFORDABLE HOUSING INCENTIVES

August 2, 2017

Applicant / Owner
Depot at Hyde Park, LP
21515 Hawthorne Blvd. Ste. 200
Torrance, CA 90503

Representative
Dana Sayles, AICP
three6ixty
4309 Overland Ave.
Culver City, CA 90230

Case No.	DIR-2017-689-DB-SPP
CEQA:	ENV-2017-690-CE
Specific Plan Subarea:	Subarea H – Crenshaw Corridor; South Los Angeles Alcohol Sales
Location:	6527 – 6549 S. Crenshaw Blvd.
Council District:	8 – Marqueece Harris – Dawson
Neighborhood Council:	Park Mesa Heights
Community Plan Area:	West Adams-Baldwin Hills-Leimert
Land Use Designation:	Neighborhood Commercial
Zone:	C2-2D-SP
Legal Description:	Supplemental Map of Hyde Park Tract, Lot 418, 419
Last Day to File an Appeal:	August 17, 2017

Pursuant to the Los Angeles Municipal Code (LAMC) Section 12.22 A.25 and 11.5.7, I have reviewed the proposed project and as the designee of the Director of Planning, I hereby:

APPROVE a **Density Bonus Compliance Review** for a project totaling 43 dwelling units, reserving 5 units for Very Low Income and 37 for Low Income Household occupancy for a period of 55 years, and one (1) market rate manager's unit, with the following requested incentive:

1. **Yard/Setback.** A 20 percent decrease in the required width of the northern side yard setback, allowing 6-feet, 5-inches in lieu of the otherwise required 8 feet.

APPROVE a **Project Permit Compliance Review** for the construction, use and maintenance of a five-story, 60-foot tall residential Affordable Housing building that contains approximately 52,423 square feet of residential area and 1,500 square feet of commercial floor area, with 43 dwelling units, and 25 parking spaces located at-grade in the C2-2D-SP Zone in the Crenshaw Corridor Specific Plan.

DETERMINED, based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to CEQA Guidelines, Article 19, Section 15332, Class 32, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

Adopt the attached Findings.

CONDITIONS OF APPROVAL

1. **Site Development**. Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped "Exhibit A," and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning, West/South/Coastal Project Planning Division, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Municipal Code, the project conditions, or the project permit authorization.

2. **Commercial Uses**. The commercial floor area is limited to 1,500 square feet within the C2-2D-SP Zone.

3. **Residential Density**. The project shall be limited to a maximum density of 43 residential units including Density Bonus Units.

4. **Affordable Units**. A minimum of five (5) units shall be reserved as rent-restricted affordable units for Very Low Income Households, and thirty-seven (37) units shall be reserved as rent-restricted affordable units for Low Income Households, as defined by the State Density Bonus Law 65915(C)(1).

5. **Changes in Restricted Units**. Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Section 12.22 A.25 (9a-d).

6. **Housing Requirements**. Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make 5 units available to Very Low Income Households, and 37 units available to Low Income Households, for rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The Applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with any monitoring requirements established by the HCIDLA. Refer to the Density Bonus Legislation Background section of this determination.

7. **Automobile Parking**. Based upon the number of dwelling units proposed 25 parking spaces shall be provided for the project. Residential automobile parking shall be provided consistent with LAMC 12.22 A.25, or California Government Code Sections 65915-65918. Manager's unit shall provide parking consistent with LAMC Section 12.21 A.4. Commercial automobile parking shall be provided consistent with LAMC Section 12.21.A.4.

8. **Adjustment of Parking**. In the event that the number of Restricted Affordable Units should increase, or the composition of such units should change (i.e. the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), or the applicant selects another Parking Option (including Bicycle Parking Ordinance) and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth above.

9. **Bicycle Parking**. Residential and commercial bicycle parking shall be provided consistent with LAMC Section 12.21.A.16.

10. **Setbacks**. The project qualifies for a 20 percent reduction in the required side yard setback per LAMC Section 12.22.A.25. The northerly side yard setback shall be no less than 6 feet 5 inches.

11. **Open Space**. Open Space shall be provided consistent with 12.21 G, which requires approximately 5,400 square feet of Open Space on the Project Site.

12. **Floor Area Ratio (FAR)**. The maximum floor area ratio for the project shall be 2.5:1.

13. **Height / Transitional Height**. The project shall be limited to 60 feet in height, and shall comply with the Transitional Height Requirement per the Crenshaw Corridor Specific Plan. The building shall be stepped back 17 feet on the second level and 20 feet 6 inches on the third level to the western property line. The building shall be stepped back 30 feet 5 inches on the fourth level and 41 feet on the fifth level to the western property line.

14. **Landscape Plan**. All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped, including an automatic irrigation system, and maintained in accordance with a landscape plan prepared by a licensed landscape architect or licensed architect, and submitted for approval to the Department of City Planning. The landscape plan shall indicate landscape points for the project equivalent to 10% more than otherwise required by LAMC 12.40 and Landscape Ordinance Guidelines "O".

15. **Lighting**. All pedestrian walkways and vehicle access points shall be well-lit. All outdoor lighting will be shielded to prevent excessive illumination and mitigate light impacts on adjacent residential properties and the public right-of-way.

16. **Covenant**. Prior to the issuance of any building permits, the applicant shall record a covenant showing compliance with the Crenshaw Corridor Specific Plan pertaining to Use Limitations in Pedestrian-Oriented Areas. The Project's ground floor commercial space shall be limited to neighborhood retail or neighborhood services, as defined by LAMC Section 13.07.C.

Administrative Conditions

17. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Plans Approved". A copy of the Plans Approved, supplied by the applicant, shall be retained in the subject case file.

18. **Notations on Plans.** Plans submitted to the Department of Building and Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet, and shall include any modifications or notations required herein.

19. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

20. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

21. **Department of Building and Safety**. The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

22. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.

23. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the file.

24. **Indemnification and Reimbursement of Litigation Costs.**

Applicant shall do all of the following:

(i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

(ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

PROJECT BACKGROUND

The project site is located near the intersection of Crenshaw Boulevard and Hyde Park Boulevard in the West Adams – Baldwin Hills – Leimert Community Plan area. The updated West Adams – Baldwin Hills – Leimert Community Plan was adopted by the City Council on June 29, 2016. The Community Plan Map designates the subject property for Neighborhood Commercial use with a corresponding zone of C2. The property is zoned C2-2D-SP and is located in Subarea H of the Crenshaw Corridor Specific Plan (Specific Plan). The property is also located within the South Los Angeles Alcohol Sales Specific Plan Area. Lastly, the Property is within a designated Los Angeles State Enterprise Zone and Fast Food Establishments Zone.

The project site consists of two contiguous parcels, totaling approximately 21,408 square feet. The site is currently improved with a 10-unit multi-family apartment building and a vacant structure formerly operated as a public library. All 10 of the existing residential units are regulated under the Rent Stabilization Ordinance (RSO). All existing structures and two trees are proposed to be removed.

The proposed project is a 43-unit mixed-use affordable apartment building that is 60 feet in height and encompasses approximately 53,923 square feet of floor area. The project provides 25 automobile and 52 bicycle parking spaces at grade, with vehicular and pedestrian access off Crenshaw Boulevard to the east. The Project includes 1,500 square feet of ground floor commercial area reserved for neighborhood serving uses.

The Applicant proposes to utilize Los Angeles Municipal Code (LAMC) Section 12.22 A 25 (Density Bonus) to set aside 5 units for Very Low Income Households and 37 units for Low Income Households. The Density Bonus Ordinance grants an increase in the permitted density in exchange for the Applicant setting aside a portion of their by-right dwelling units. The project site zoning of C2 allows for 54 residential units based on a lot square footage of 21,408. Pursuant to the Density Bonus Ordinance, the project is allowed a 35 percent increase for up to 73 dwelling units. The Applicant is not requesting any density bonus units.

The Applicant is requesting one "on-menu" incentive in order to facilitate the provision of affordable housing at the site. Per the Specific Plan, a maximum FAR of 3:1 is permitted for mixed-use projects in Subarea H. Per the underlying zone, the project is required to provide eight (8) foot side yard setback. The applicant is requesting a 20 percent decrease in the required width of the northern side yard to allow for 6-feet, 5 inches.

In accordance with California State Law (including Senate Bill 1818, and Assembly Bills 2280 and 2222), the applicant is proposing to utilize Section 12.22 A.25 (Density Bonus) of the Los Angeles Municipal Code (LAMC), which permits a density bonus of 35 percent. This allows for 73 total dwelling units in lieu of the otherwise maximum density limit of 54 dwelling units on the property. A density bonus is automatically granted in exchange for the applicant setting aside a portion of dwelling units, in this case 42 units, for habitation by Very Low and Low Income Households for a period of 55 years. Consistent with the Density Bonus Ordinance, the Applicant is also automatically granted a reduction in required parking spaces. The Applicant is providing automobile parking pursuant to AB 744 (California Government Code Sections 65915 (p)(2)), for a total of 25 parking spaces located at grade. The proposed mixed income project consists of a minimum of 5 units set aside for Very Low Income Households, and 37 units set aside for Low Income Households, situated on a site that is located within one-half mile of a major transit stop.

FINDINGS

Density Bonus/Affordable Housing Incentives Program Findings

Pursuant to LAMC Section 12.22 A.25 (e)(2), in order to be eligible for any on-menu incentives, a Housing Development Project (other than an Adaptive Reuse Project) shall comply with the following criteria, which it does:

a. The façade of any portion of a building that abuts a street shall be articulated with a change of material or a break in plane, so that the façade is not a flat surface.

The proposed Affordable Housing project includes 53,923 square feet of floor area and 43 residential dwelling units within five levels above grade. The proposed mixed-use development has one street-facing façade, located along the westerly side on Crenshaw Boulevard. As shown on Exhibit A, the street facing façade will have articulation in the form of juliet balconies and utilization of several types of materials and colors. The ground floor commercial area utilizes glass walls with storefront glazing.

b. All buildings must be oriented to the street by providing entrances, windows architectural features and/or balconies on the front and along any street facing elevation.

The proposed project has one street facing façade along Crenshaw Boulevard. As depicted in the plans marked as Exhibit "A", the mixed-use building is oriented toward Crenshaw Boulevard, which is a designated Avenue I in the Mobility Plan 2035. The Crenshaw Boulevard façade measures approximately 110 feet, which provides the main pedestrian entrance to the residential lobby and neighborhood serving commercial area. The commercial space on the ground floor along the street is punctuated by large window openings and clear aluminum storefront glazing. An open-air entry foyer and staircase that opens to Crenshaw Boulevard is incorporated to enhance the pedestrian experience along the street.

A vehicular driveway located north of the residential lobby provides both ingress and egress to the site. As shown on Exhibit A, the main residential entrance is delineated by vertical elements and large windows.

c. The Housing Development Project shall not involve a contributing structure in a designated Historic Preservation Overlay Zone (HPOZ) and shall not involve a structure that is a City of Los Angeles designated Historic-Cultural Monument (HCM).

The proposed project is not located within a designated Historic Preservation Overlay Zone, nor does it involve a property that is designated as a City Historic-Cultural Monument.

d. The Housing Development Project shall not be located on a substandard street in a Hillside Area or in a Very High Fire Hazard Severity Zone as established in Section 57.25.01 of the LAMC.

The project is not located on a substandard street in a Hillside Area, nor is it located in a Very High Fire Hazard Severity Zone.

Pursuant to Section 12.22 A.25(c) of the LAMC, the Director shall approve a density bonus and requested incentive(s) unless the director finds that:

1. ***The incentives are not required to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.***

   The record does not contain substantial evidence that would allow the Director to make a finding that the requested incentives are not necessary to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for Very Low, Low, and Moderate Income Households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

   The list of on-menu incentives in 12.22 A.25 was pre-evaluated at the time the Density Bonus Ordinance was adopted to include types of relief that minimize restrictions on the size of the project. As such, the Director will always arrive at the conclusion that the density bonus on-menu incentives are required to provide for affordable housing costs because the incentives by their nature increase the scale of the project.

   The requested decrease in the required northern side yard setback is expressed in the Menu of Incentives per LAMC 12.22 A.25(f) and, as such, permit exceptions to zoning requirements that result in building design or construction efficiencies that provide for affordable housing costs. The requested incentive allow the developer to expand the building envelope so the additional units can be constructed and the overall space dedicated to residential uses is increased. The incentive supports the applicant's decision to set aside 5 units for Very Low Income and 37 units for Low Income Households for 55 years.

   Side Yard Setback Reduction: The Project would be required to provide an 8-feet side yard setback. The requested incentive allows for a 20 percent decrease of the side yard setback requirement, which is approximately 6-feet, 5 inches. The proposed Project is providing an 8-feet southern side yard setback and a 6-feet, 5 inches northern side yard setback. This requested reduction of the northern side yard setback allows for an expanded building envelope.

   The requested incentive to decrease the required northerly side yard setback is expressed in the Menu of Incentives per LAMC 12.22 A.25(f) and, as such, permit exceptions to zoning requirements that result in building design or construction efficiencies that provide for affordable housing costs. The requested incentive allows the developer to expand the building envelope so the additional units can be constructed and the overall space dedicated to residential uses is increased. The incentive supports the Applicant's decision to set aside 5 Very Low Income and 37 Low Income dwelling units for 55 years.

2. ***The Incentive will have specific adverse impact upon public health and safety or the physical environment, or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.***

There is no evidence that the proposed incentives will have a specific adverse impact. A "specific adverse impact" is defined as, "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (LAMC Section 12.22.A.25(b)). The project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA), pursuant to Article 19, Section 15332, Class 32. Categorical Exemption No. ENV-2017-690-CE was issued for an in-fill development. It was determined that the proposed project does not fall within the six (6) exceptions to the Categorical Exemptions identified in the State CEQA Guidelines Section 15300.2.0

Housing Replacement

With Assembly Bill 2222, applicants of Density Bonus projects filed as of January 1, 2015 must demonstrate compliance with the housing replacement provisions which require replacement of rental dwelling units that either exist at the time of application of a Density Bonus project, or have been vacated or demolished in the five-year period preceding the application of the project. This applies to all pre-existing units that have been subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income; subject to any other form of rent or price control; or occupied by Low or Very Low Income Households. Pursuant to the Determination made by the Housing and Community Investment Department (HCIDLA) dated June 12, 2017, seven (7) dwelling units are subject to replacement.

Density Bonus Legislation Background

The California State Legislature has declared that "[t]he availability of housing is of vital statewide importance," and has determined that state and local governments have a responsibility to "make adequate provision for the housing needs of all economic segments of the community." Section §65580, subds. (a), (d). Section 65915 further provides that an Applicant must agree to, and the municipality must ensure, the "continued affordability of all Low and Very Low Income units that qualified the Applicant" for the density bonus.

With Senate Bill 1818 (2004), state law created a requirement that local jurisdictions approve a density bonus and up to three "concessions or incentives" for projects that include defined levels of affordable housing in their projects. In response to this requirement, the City created an ordinance that includes a menu of incentives (referred to as "on-menu" incentives) comprised of eight zoning adjustments that meet the definition of concessions or incentives in state law (California Government Code Section 65915). The eight on-menu incentives allow for: 1) reducing setbacks; 2) reducing lot coverage; 3) reducing lot width, 4) increasing floor area ratio (FAR); 5) increasing height; 6) reducing required open space; 7) allowing for an alternative density calculation that includes streets/alley dedications; and 8) allowing for "averaging" of FAR, density, parking or open space. In order to grant approval of an on-menu incentive, the City utilizes the same findings contained in state law for the approval of incentives or concessions.

California State Assembly Bill 2222 went into effect January 1, 2015, and with that Density Bonus projects filed as of that date must demonstrate compliance with the housing replacement provisions which require replacement of rental dwelling units that either exist at the time of application of a Density Bonus project, or have been vacated or demolished in the five-year period preceding the application of the project. This applies to all pre-existing units that have been subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income; subject to any other form of rent or price control (including Rent Stabilization Ordinance); or is occupied by Low or Very Low Income Households (i.e., income levels less than 80 percent of the area median income [AMI]). The replacement units must be equivalent in size, type, or both and be made available at affordable rent/cost to, and

occupied by, households of the same or lower income category as those meeting the occupancy criteria. Prior to the issuance of any Director's Determination for Density Bonus and Affordable Housing Incentives, the Housing and Community Investment Department (HCIDLA) is responsible for providing the Department of City Planning, along with the Applicant, a determination letter addressing replacement unit requirements for individual projects. The City also requires a Land Use Covenant recognizing the conditions be filed with the County of Los Angeles prior to granting a building permit on the project.

Assembly Bill 2222 also increases covenant restrictions from 30 to 55 years for projects approved after January 1, 2015. This determination letter reflects these 55 year covenant restrictions.

Under Government Code Section § 65915(a), § 65915(d)(2)(C) and § 65915(d)(3) the City of Los Angeles complies with the State Density Bonus law by adopting density bonus regulations and procedures as codified in Section 12.22 A.25 of the Los Angeles Municipal Code. Section 12.22 A.25 creates a procedure to waive or modify Zoning Code standards which may prevent, preclude or interfere with the effect of the density bonus by which the incentive or concession is granted, including legislative body review. The Ordinance must apply equally to all new residential development.

In exchange for setting aside a defined number of affordable dwelling units within a development, applicants may request up to three incentives in addition to the density bonus and parking relief which are permitted by right. The incentives are deviations from the City's development standards, thus providing greater relief from regulatory constraints. Utilization of the Density Bonus/Affordable Housing Incentives Program supersedes requirements of the Los Angeles Municipal Code and underlying ordinances relative to density, number of units, parking, and other requirements relative to incentives, if requested.

For the purpose of clarifying the Covenant Subordination Agreement between the City of Los Angeles and the United States Department of Housing and Urban Development (HUD) note that the covenant required in the Conditions of Approval herein shall prevail unless pre-empted by State or Federal law.

Project Permit Compliance Findings

3. The project substantially complies with the applicable regulations, findings, standards, and provisions of the specific plan.

a. **Use**. The Crenshaw Corridor Specific Plan Map No. 4 designates the subject property as located in Subarea H. The Crenshaw Corridor Specific Plan provides for area-specific development standards along Crenshaw Boulevard and adjacent properties, and provides design guidelines and design review for certain areas within the Specific Plan.

Section 6.A.1, 6.A.2, and 6.B of the Crenshaw Corridor Specific Plan prohibits certain uses in the Specific Plan Area. The proposed project is a mixed-use Affordable Housing project located in Subarea H and does not contain any of the prohibited uses. Therefore, the project is in compliance of the aforementioned sections.

Sections 6.C and 7 of the Crenshaw Corridor Specific Plan contains use limitations and Development Standards for projects located within Pedestrian-Oriented and TOD Areas. The subject site is not located within a Pedestrian-Oriented or TOD area. Therefore, these provisions are not applicable to the proposed project.

Section 8.A. of the Crenshaw Corridor Specific Plan requires Mixed-Use Projects in Subareas D, F, and G to provide neighborhood services on the ground floor with residential uses on the floors above. The proposed project is located in Subarea H and not subject to the provisions in this section.

b. **Floor Area Ratio and Height for Mixed Use Development**. Section 9.A.1. permits a FAR of 3:1 for mixed-use projects. Section 9.F. limits the maximum building height as indicated in Maps 6, 7, and 8. Per Map No. 8 of the Specific Plan, the project site is allowed a maximum building height of 60 feet. The project proposes a maximum FAR of 2.5:1 and a maximum building height of 60 feet. Therefore, the project is in compliance with Section 9.

c. **Building Setbacks and Open Space Areas**. Sections 10.A, B, and C pertains to projects located in Pedestrian-Oriented and TOD Areas. The subject property is not located within a Pedestrian-Oriented or TOD area. Therefore, provisions in Sections 10.A, B, and C are not applicable to the proposed project.

   Section 10.D. of the Crenshaw Corridor Specific Plan pertains to Transitional Height Requirements in all Subareas on land zoned commercial or industrial that directly abuts land zoned residential. The subject property is zoned C2 and directly abuts parcels zoned R3-1 to the west. There are no rear yard setback requirements for the ground floor as the first floor contains commercial uses. As depicted in Exhibit A, proposed mixed-use structure maintains a 17-foot rear yard setback at the lowest residential level (second floor). The building is stepped back 20 feet 6 inches on the third level and 30 feet 5 inches on the fourth level. The building is stepped back 41 feet on the fifth level to the western property line abutting the R3 zone. Therefore, the project is in compliance of Section 10.D. of the Specific Plan.

d. **Sign Regulations**. Section 11 A through J of the Crenshaw Corridor Specific Plan provides extensive guidance related to prohibited signs, permitted signs, sign area, height of signs, projection signs and sign exceptions. Exhibit A does not identify specific sign details.

e. **Parking**. Section12.F of the Crenshaw Corridor Specific Plan pertains to projects located within Subareas D, F, and G for new construction projects. Proposed project is a mixed-use Affordable Housing development and does not contain mini-shopping centers. Therefore, this provision of the Specific Plan does not apply.

f. **Design and Development Guidelines**. Projects within the Crenshaw Corridor Specific Plan shall comply with the Crenshaw Corridor Specific Plan Design Manual. The building design incorporates façade cutouts in edge pattern to provide breaks in the building wall. The ground floor has been designed to maximize transparency through the use of glass, vibrant colors, and various architectural materials. The project is in compliance with the Specific Plan Design Manual.

4. **The project incorporates mitigation measures, monitoring measures when necessary, or alternatives identified in the environmental review, which would mitigate the negative environmental effects of the project, to the extent physically feasible.**

Mitigation measures are not necessary for the subject project, and there are no potentially significant negative environmental effects associated with the project. Analysis of the proposed Project determined that it is Categorically Exempt from environmental review

pursuant to Article III, Section I, and Class 32 of the CEQA Guidelines. The Class 32 Exemption is intended to promote infill development within urbanized areas.

CEQA FINDINGS

5. The project is categorically exempt from the provisions of the California Environmental Quality Act (CEQA), pursuant to Article 19, Section 15332, Class 32. Categorical Exemption No. ENV-2017-690-CE was issued for an in-fill development meeting the conditions described in this section.

The proposed Project qualifies for a Categorical Exemption because it conforms to the definition of "In-fill Projects" as follows:

(a) The Project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations:

The Project is located within the West Adams – Baldwin Hills – Leimert Community Plan area, and has a General Plan Land Use designation of Neighborhood Commercial, with a corresponding zone of C2. The property is zoned C2-2D-SP, which allows residential uses subject to the density regulations of the R4 Zone. The R4 Zone density regulations allows up to 73 dwelling units on the Project site through the Density Bonus Ordinance. The Project meets parking, yard, open space, and landscaping requirements, with modifications to reduce one side yard setback through an On-Menu incentive.

Consistent with the Community Plan, the proposed 43-unit mixed-use affordable development will provide new, affordable housing to Los Angeles' housing supply, in a neighborhood which is conveniently located to a variety of community services.

(b) The proposed development occurs within city limits on a Project site of no more than five acres substantially surrounded by urban uses:

The subject site is wholly within the City of Los Angeles, on a site that is approximately 0.49 acres. Lots adjacent to the subject site are maintained with residential and commercial developments. Properties to the west are zoned R3-1 and improved with multi-family dwellings. Properties along Crenshaw Boulevard to the north and south are zoned C2-2D-SP and occupied by commercial and residential uses. Properties to the west across from subject site are zoned C2-1-SP and developed with commercial uses. The project site is also located within one-half mile to the Hyde Park Station of the Metro Crenshaw/LAX line that is currently under construction.

(c) The Project site has no value as habitat for endangered, rare or threatened species:

The project site is situated in an established neighborhood adjacent to commercial corridors and medium density residential developments. The subject property is currently improved with a multi-family apartment building and a vacant structure formerly operated as a public library. The existing site has no value has a habitat for endangered, rare, or threatened species.

(d) Approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality:

The project will be subject to a variety of Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance; pollutant discharge, dewatering, stormwater mitigations; and Best Management Practices for stormwater runoff. These RCMs will ensure the project will not have significant impacts on noise and water. The project is beneath the threshold criteria established by LADOT for preparing a traffic study.

(e) The site can be adequately served by all required utilities and public services:

The site is currently and adequately served by the City's Department of Water and Power, the City's Bureau of Sanitation, the Southern California (SoCal) Gas Company, the Los Angeles Police Department, the Los Angeles Fire Department, Los Angeles Unified School District, Los Angeles Public Library, and other public services. These utilities and public services have continuously served the neighborhood for more than 50 years. In addition, the California Green Code requires new construction to meet stringent efficiency standards for both water and power, such as high-efficiency toilets, dual-flush water closets, minimum irrigation standards, LED lighting, etc. As a result of these new building codes, which are required of all Projects, it can be anticipated that the proposed Project will not create any impact on existing utilities and public services through the net addition of 33 dwelling units. The project site will be adequately served by all public utilities and services given that the construction of a 43-unit mixed-use project will be on a site surrounded by similar uses and is consistent with the general plan.

The Project can be characterized as in-fill development within urban areas for the purpose of qualifying for Class 32 Categorical Exemption as a result of meeting the five conditions listed above.

OBSERVANCE OF CONDITIONS - TIME LIMIT - LAPSE OF PRIVILEGES

All terms and conditions of the Director's Determination shall be fulfilled before the use may be established. The instant authorization is further conditioned upon the privileges being utilized within three years after the effective date of this determination and, if such privileges are not utilized, building permits are not issued, or substantial physical construction work is not begun within said time and carried on diligently so that building permits do not lapse, the authorization shall terminate and become void.

TRANSFERABILITY

This determination runs with the land. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent that you advise them regarding the conditions of this grant. If any portion of this approval is utilized, then all other conditions and requirements set forth herein become immediately operative and must be strictly observed.

VIOLATIONS OF THESE CONDITIONS, A MISDEMEANOR

The Applicant's attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any condition of this grant is violated or not complied with, then the Applicant or his successor in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code, or the approval may be revoked.

Section 11.00 of the LAMC states in part (m): "It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this Code. Any person violating any of the provisions or failing to comply with any of the mandatory requirements of this Code shall be guilty of a misdemeanor unless that violation or failure is declared in that section to be an infraction. An infraction shall be tried and be punishable as provided in Section 19.6 of the Penal Code and the provisions of this section. Any violation of this Code that is designated as a misdemeanor may be charged by the City Attorney as either a misdemeanor or an infraction.

Every violation of this determination is punishable as a misdemeanor unless provision is otherwise made, and shall be punishable by a fine of not more than $1,000 or by imprisonment in the County Jail for a period of not more than six months, or by both a fine and imprisonment."

APPEAL PERIOD - EFFECTIVE DATE

The Determination in this matter will become effective and final fifteen (15) days after the date of mailing of the Notice of Director's Determination unless an appeal there from is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of this Determination, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. Forms are available on-line at http://planning.lacity.org.

Planning Department public offices are located at:

Downtown	**San Fernando Valley**	**West Los Angeles**
Figueroa Plaza 201 North Figueroa Street, 4th Floor Los Angeles, CA 90012 (213) 482-7052	Marvin Braude San Fernando Valley Constituent Service Center 6262 Van Nuys Boulevard, Rm 251 Van Nuys, CA 91401 (818) 374-5050	West Los Angeles Development Services Center 1828 Sawtelle Boulevard, 2nd Floor Los Angeles, CA 90025 (310) 231-2598

*Please note the cashiers at the public counters close at 3:30 PM.

Only an applicant or any owner or tenant of a property abutting, across the street or alley from, or having a common corner with the subject property can appeal this Density Bonus Compliance Review Determination. Per the Density Bonus Provision of State Law (Government Code Section §65915) the Density Bonus increase in units above the base density zone limits and the appurtenant parking reductions are not a discretionary action and therefore cannot be appealed. Only the requested incentives are appealable. Per Section 12.22 A.25 of the LAMC, appeals of Density Bonus Compliance Review cases are heard by the City Planning Commission.

Verification of condition compliance with building plans and/or building permit applications are done at the Development Services Center of the Department of City Planning at either Figueroa Plaza in Downtown Los Angeles or the Marvin Braude Building in the Valley. In order to assure

that you receive service with a minimum amount of waiting, applicants are encouraged to schedule an appointment with the Development Services Center either through the Department of City Planning website at http://planning.lacity.org or by calling (213) 482-7052 or (818) 374-5050. The applicant is further advised to notify any consultant representing you of this requirement as well.

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedures Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.

VINCENT P. BERTONI, AICP
Director of Planning

Approved by:

Faisal Roble, Principal Planner

Reviewed by:

Debbie Lawrence, AICP, Senior City Planner

Reviewed by:

Michelle Singh, City Planner

Prepared by:

Iris Wan, City Planning Associate

WEINGART TOWER 1A/1B

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

LEAD CITY AGENCY	**COUNCIL DISTRICT**
City of Los Angeles	14 – Jose Huizar
PROJECT TITLE	**CASE NO.**
Weingart Projects	**ENV-2017-615-SCEA** **Site 1: CPC-2017-614-GPAJ-ZCJ-HD-SPR** **Site 2: CPC-2017-589-GPAJ-ZCJ-HD-SPR**

PROJECT LOCATION
Site 1: 554-562 South San Pedro Street, 555-561 South Crocker Street, Los Angeles, CA 90013;
Site 2: 600-628 South San Pedro Street, 611-615 South Crocker Street, 518-522 East 6th Street, Los Angeles, CA 90013.

PROJECT DESCRIPTION

The Project includes development of two distinct affordable housing projects that would provide permanent supportive housing (i.e., long term housing with supportive services) designed to enable homeless persons and individuals/families at risk of homelessness to ensure that they remain housed and live as independently as possible, as well as to provide affordable housing.

The Site 1 Project (to be developed on Site 1, as described in the Environmental Setting below) includes demolition and removal of the existing 7,000-square-foot food service building and surface parking area from Site 1 and development of the site with 222,574 square feet of mixed residential, philanthropic institution, and commercial retail land uses in two towers (Tower 1A and Tower 1B) and one level of subterranean parking garage with 32 vehicle parking spaces, long-term bicycle parking, and storage. The Site 1 Project would include a total of 382 residential dwelling units (378 Very Low Income affordable units and 4 manager units), a total of 25,493 square feet of philanthropic institution land uses, 2,250 square feet of commercial retail land uses, and approximately 26,060 square feet of common indoor and outdoor open space.

The Site 2 Project (to be developed on Site 2, as described in the Environmental Setting below) includes demolition and removal of the existing surface parking lot and development of the site with 164,875 square feet of mixed-use residential and commercial land uses in two buildings (Building 1 and Building 2). The Site 2 Project would include a total of 303 residential dwelling units (298 Very Low Income affordable units and 5 manager units), 3,200 square feet of commercial retail land uses, 17,100 square feet of office land uses, 33,000 square feet of open space, and 212 vehicle parking spaces.

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

Weingart Tower, LP
6339 Paseo Del Lago
Carlsbad, CA 92011

FINDING:
The City Planning Department of the City of Los Angeles finds that the Project would NOT have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is NOT required.

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

THE SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT PREPARED FOR THIS PROJECT IS ATTACHED.

NAME OF PERSON PREPARING THIS FORM	**TITLE**	**TELEPHONE NUMBER**
May Sirinopwongsagon	City Planner	213-978-1372

ADDRESS	**SIGNATURE (Official)**	**DATE**
200 N. SPRING STREET, 6th FLOOR LOS ANGELES, CA. 90012		10/15/18

MITIGATION MEASURES

Cultural Resources

CULT-MM-1: Prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project Sites. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment. Construction activities could continue in other areas of the Project Sites. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law.

CULT-MM-2: Before ground disturbance, field observations regarding the geo-archaeological setting shall be conducted by a qualified archaeologist to determine the presence of undisturbed sediments capable of preserving archaeological remains, and the depth at which these sediments would no longer be capable of containing archaeological material. An archaeological monitor shall be present during initial excavation activities. The duration and timing of the monitoring shall be determined by the qualified archaeologist in consultation with the Department of City Planning and the Project Applicant. The qualified archaeologist may designate an archaeologist to conduct the monitoring under their direction.

CULT-MM-3: Prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying paleontological or unique geologic resources or sites from the Project Sites. In addition, in the event that paleontological resources or sites, or unique geologic features are exposed during Project construction, work within 50 feet of the find shall stop until a qualified paleontologist, can identify and evaluate the significance of the discovery and develop recommendations for treatment. Construction activities could continue in other areas of the Project Sites. Recommendations could include a preparation of a Treatment Plan, which could require recordation, collection, and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any paleontological resources or sites, or unique geologic features shall be treated in accordance with state law.

Hazards and Hazardous Materials

HAZ-MM-1: During excavation of Site 1 for the subterranean parking garage and prior to issuance of a Building Permit, if a UST is encountered, the Project Applicant shall procure a Division 5 Permit from the Los Angeles Fire Department for removal of a UST and shall comply with the requirements of the permit.

Land Use and Planning

MM-LU-1(b): Where an inconsistency with the adopted general plan is identified at the proposed Project location, determine if the environmental, social, economic, and engineering benefits of the Project warrant a variance from adopted zoning or an amendment to the general plan.

Noise

NOISE-MM-1: All diesel-powered construction vehicles shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA.

NOISE-MM-2: Temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA shall be erected along the Project's boundaries.

Public Services – Police

POLICE-MM-1: Prior to issuance of a Certificate of Occupancy, the Project Applicant shall provide the Central Area Commanding Area Officer with diagrams of each portion of the Project Sites. The diagrams shall include access routes and additional information that might facilitate police response.

Transportation/Traffic

TRAFFIC-MM-1: Construction Staging and Traffic Management Plan

Prior to issuance of a demolition permit, in coordination with LADOT and the Department of Building and Safety, the Project Applicant shall prepare a detailed Construction Staging and Traffic Management Plan (CSTMP), including street closure information, detour plans, haul routes, and staging plans. The CSTMP shall outline how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The CSTMP shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include the following elements as appropriate:

- Provide for temporary traffic control during all construction activities within public rights-of-way to improve traffic flow on public roadways (e.g., flagmen);
- Schedule of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Reroute construction trucks to reduce travel on congested streets to the extent feasible;
- Prohibit construction-related vehicles from parking on surrounding public streets;
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers in compliance with LAMC Section 62.45;
- Accommodate all equipment on-site; and
- Prepare a haul truck route program for the Project that specifies the routes to and from the Project Sites.

6. SUSTAINABLE COMMUNITIES ENVIRONMENTAL IMPACT ANALYSIS

This section of the SCEA contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix H to the State CEQA Guidelines, CCR Title 14, Chapter 3, 15000-15387) (refer to Section 5 [Initial Study Checklist]). The analytical methodology and thresholds of significance are based in part on the L.A. CEQA Thresholds Guide.

Pursuant to PRC Section 21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of a transit priority project, other than those impacts that do not need to be reviewed pursuant to Section 21159.28, based on substantial evidence in light of the whole record. Additionally, the SCEA is required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified EIRs (refer to Section 4 [2016-2040 RTP/SCS Program EIR Mitigation Measures]).

1. AESTHETICS

In 2013, the State of California enacted Senate Bill 743 (SB 743), which made several changes to the California Environmental Quality Action (CEQA) for projects located in areas served by transit. Specifically, Public Resources Code Section 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Public Resources Code Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." Public Resources Code Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." Public Resources Code Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins, or is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This state law supersedes the aesthetic impact thresholds set forth in the L.A. CEQA Thresholds Guide.

The Project includes the development of two sites in Downtown Los Angeles. Site 1 development includes 222,574 square feet of mixed residential (382 dwelling units), philanthropic institution, and commercial retail land uses in two towers (Tower 1A and Tower 1B) and one level of subterranean parking garage with 32 vehicle parking spaces. Site 2 development includes 164,875 square feet of mixed-use residential (303 dwelling units) and commercial retail land uses in two buildings (Building 1 and Building 2) and 212 vehicle parking spaces in a parking garage. Extensive public bus and rail transit service is provided within the area of the Project Sites that provide regular service intervals of 15 minutes or less near the sites during the peak hours. Public bus transit service in the immediate Project study area

is currently provided by Metro, City of Gardena Transit, and City of Montebello bus lines. Additional public bus transit service in the Downtown Los Angeles area is provided by Foothill Transit, LADOT DASH Transit Service, Orange County Transportation Authority, and Torrance Transit Service. The Metro Red and Gold rail lines also are provided in proximity to the Project Sites. Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted in Section 2 (Project Description), the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction.

On February 10, 2016, the City issued Zoning Information File No. 2452 to clarify the locations of transit priority areas within the City, which restate that aesthetic impacts shall not be considered a significant impact on the environment under the provisions of SB 743 (refer to Appendix D). Specifically, Zoning Information File No. 2452 states that impacts to visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact, as defined in the City's L.A. CEQA Thresholds Guide, shall not be considered an impact for infill projects within transit priority areas pursuant to CEQA. A map of transit priority areas is attached to Zoning Information File No. 2452 in Appendix D. As shown on that map, and as confirmed by the City's Zone Information and Map Access System (ZIMAS) website, the Project Sites are located in a transit priority area.

Thus, the Project's aesthetic (and parking) impacts are not considered significant impacts on the environment pursuant to Public Resources Code Section 21099. Therefore, an assessment of the Project's potential aesthetics impacts is not required. However, an evaluation of aesthetics impacts is provided in Appendix D for **informational purposes only and not as an impact analysis**.

2. AGRICULTURE AND FORESTRY RESOURCES

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

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

No Impact. The Extent of Important Farmland Map Coverage maintained by the Division of Land Resource Protection indicates that the Project Sites are not included in the Important Farmland category.[1] Therefore, the Project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to non-agricultural use, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. No impacts would occur.

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

No Impact. The Project Sites are zoned M2 (Light Industrial Zone) and located in the Central City Community Plan area. The General Plan land use designated for the Project Sites is Light Manufacturing. The Project Sites are not zoned for agricultural use, and the site is not under and is not eligible for enrollment under a Williamson Act Contract.[2] There are no Williamson Act Contracts in the City of Los Angeles. Therefore, the Project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract, and no impacts would occur.

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

No Impact. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. The Project Sites do not include any forest or timberland and are not zoned as forest land or timberland. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Sites are located in a developed area of the City and do not contain any forest land. Additionally, forest land is defined as "land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."[3] Timberland is defined as "land…which is available for, and capable of, growing a

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[1] *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County Important Farmland, 1998. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf.*

[2] *Ibid.*

[3] *California Public Resources Code Section 1222 [g].*

crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."[4] There are a total of 20 trees located on the Project Sites (including 6 street trees). None of these trees or the level of tree coverage on the Project Sites are within the definitions of forest land or timberland. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Sites and surrounding area are developed with urban land uses. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. No agricultural uses are located on the Project Sites or within the area. Therefore, no impacts related to this issue would occur.

Cumulative Impacts

Neither the Project Sites nor any of the related projects' sites are used or designated as agricultural land or forest land. Therefore, no cumulative impacts related to agricultural resources would occur.

3. AIR QUALITY

Introduction

The information and analysis in this section is based primarily on the following technical information, which is included in Appendix F:

- *Air Quality and Greenhouse Gas Emissions technical modeling results, DKA Planning April 2018.*

Pollutants and Effects

State and Federal Criteria Pollutants

Air quality is defined by ambient air concentrations of seven specific pollutants identified by the United States Environmental Protection Agency (USEPA) to be of concern with respect to health and welfare of the general public. These specific pollutants, known as "criteria air pollutants," are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants include carbon monoxide (CO), ground-level ozone (O_3), nitrogen oxides (NO_X), sulfur oxides (SO_X), particulate matter ten microns or less in diameter (PM_{10}), particulate matter 2.5 microns or less in diameter ($PM_{2.5}$), and lead (P_b). The descriptions below of each criteria air pollutant and their health effects are based on information provided by the South Coast Air Quality Management District (SCAQMD).[5]

[4] *California Public Resources Code Section 4526.*

[5] *SCAQMD, Final Program Environmental Impact Report for the 2012 AQMP, December 7, 2012.*

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

Ozone (O_3). O_3 is a gas that is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_X)—both byproducts of internal combustion engine exhaust—undergo slow photochemical reactions in the presence of sunlight. O_3 concentrations are generally highest during the summer months when direct sunlight, light wind, and warm temperature conditions are favorable. An elevated level of O_3 irritates the lungs and breathing passages, causing coughing and pain in the chest and throat, thereby increasing susceptibility to respiratory infections and reducing the ability to exercise. Effects are more severe in people with asthma and other respiratory ailments. Long-term exposure may lead to scarring of lung tissue and may lower lung efficiency.

Nitrogen Dioxide (NO_2). NO_2 is a byproduct of fuel combustion and major sources include power plants, large industrial facilities, and motor vehicles. The principal form of nitrogen oxide produced by combustion is nitric oxide (NO), which reacts quickly to form NO_2, creating the mixture of NO and NO_2 commonly called NO_X. NO_2 absorbs blue light and results in a brownish-red cast to the atmosphere and reduced visibility. NO_2 also contributes to the formation of PM_{10}. Nitrogen oxides irritate the nose and throat, and increase one's susceptibility to respiratory infections, especially in people with asthma. The principal concern of NO_X is as a precursor to the formation of ozone.

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

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

Lead (P_b). Lead is emitted from industrial facilities and from the sanding or removal of old lead-based paint. Smelting or processing the metal is the primary source of lead emissions, which is primarily a

regional pollutant. Lead affects the brain and other parts of the body's nervous system. Exposure to lead in very young children impairs the development of the nervous system, kidneys, and blood forming processes in the body.

State-only Criteria Pollutants

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

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

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

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

Toxic Air Contaminants

Toxic air contaminants (TACs) refer to a diverse group of "non-criteria" air pollutants that can affect human health but have not had ambient air quality standards established for them. This is not because they are fundamentally different from the pollutants discussed above but because their effects tend to be local rather than regional. TACs are classified as carcinogenic and noncarcinogenic, where carcinogenic TACs can cause cancer and noncarcinogenic TACs can cause acute and chronic impacts to different target organ systems (e.g., eyes, respiratory, reproductive, developmental, nervous, and cardiovascular).

The California Air Resources Board (CARB) and the Office of Environmental Health Hazard Assessment (OEHHA) determine if a substance should be formally identified (or "listed) as a TAC in California. A complete list of these substances is maintained on CARB's website.[6]

Diesel particulate matter (DPM), which is emitted in the exhaust from diesel engines, was listed by the state as a TAC in 1998. DPM has historically been used as a surrogate measure of exposure for all diesel exhaust emissions. DPM consists of fine particles (fine particles have a diameter less than 2.5 micrometer [µm]), including a subgroup of ultrafine particles (ultrafine particles have a diameter less than 0.1 µm). Collectively, these particles have a large surface area that makes them an excellent medium for absorbing organics. The visible emissions in diesel exhaust include carbon particles or "soot." Diesel exhaust also contains a variety of harmful gases and cancer-causing substances.

Exposure to DPM may be a health hazard, particularly to children whose lungs are still developing and the elderly who may have other serious health problems. DPM levels and resultant potential health effects may be higher in close proximity to heavily traveled roadways with substantial truck traffic or near industrial facilities. According to CARB, DPM exposure may lead to the following adverse health effects: (1) aggravated asthma; (2) chronic bronchitis; (3) increased respiratory and cardiovascular hospitalizations; (4) decreased lung function in children; (5) lung cancer; and (6) premature deaths for people with heart or lung disease.[7,8]

Volatile Organic Compounds

VOCs are typically formed from combustion of fuels and/or released through evaporation of organic liquids. Some VOCs are also classified by the state as toxic air contaminants. While there are no specific VOC ambient air quality standards, VOC is a prime component (along with NO_X) of the photochemical processes by which such criteria pollutants as ozone, nitrogen dioxide, and certain fine particles are formed. They are, thus, regulated as "precursors" to the formation of those criteria pollutants.

Regulatory Setting

Federal

Clean Air Act

The Federal Clean Air Act (CAA) was first enacted in 1955 and has been amended numerous times in subsequent years, with the most recent amendments in 1990. At the federal level, the USEPA is responsible for implementation of some portions of the CAA (e.g., certain mobile source and other

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

[7] *CARB, Overview: Diesel Exhaust and Health, www.arb.ca.gov/research/diesel/diesel-health.htm, last reviewed by CARB April 12, 2016.*

[8] *CARB, Fact Sheet: Diesel Particulate Matter Health Risk Assessment Study for the West Oakland Community: Preliminary Summary of Results, March 2008.*

requirements). Other portions of the CAA (e.g., stationary source requirements) are implemented by state and local agencies.

The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the National Ambient Air Quality Standard (NAAQS). These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. The sections of the CAA most applicable to the Project include Title I (Nonattainment Provisions) and Title II (Mobile Source Provisions). The NAAQS have been established for seven major air pollutants: CO, NO_2, O_3, $PM_{2.5}$, PM_{10}, SO_2, and P_b. These air pollutants are referred to as criteria pollutants. The CAA requires the USEPA to designate areas as attainment, nonattainment, or maintenance (previously nonattainment and currently attainment) for each criteria pollutant based on whether the NAAQS have been achieved. Title I provisions are implemented for the purpose of attaining NAAQS. The federal standards are summarized on Table 6-1.

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

The USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. The USEPA has jurisdiction over emission sources outside state waters (e.g., beyond the outer continental shelf) and establishes various emission standards, including those for vehicles sold in states other than California (automobiles sold in California must meet stricter emission standards established by CARB). The USEPA adopted multiple tiers of emission standards to reduce emissions from non-road diesel engines (e.g., diesel-powered construction equipment) by integrating engine and fuel controls as a system to gain the greatest emission reductions. The first federal standards (Tier 1) for new non-road (or off-road) diesel engines were adopted in 1994 for engines over 50 horsepower, to be phased-in from 1996 to 2000. On August 27, 1998, the USEPA introduced Tier 1 standards for equipment under 37 kilowatt (kW) (50 horsepower) and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. The Tier 1 through Tier 3 standards were met through advanced engine design, with no or only limited use of exhaust gas after-treatment (oxidation catalysts). Tier 3 standards for NO_X and hydrocarbon are similar in stringency to the 2004 standards for highway engines. However, Tier 3 standards for particulate matter were never adopted. On May 11, 2004, the USEPA signed the final rule introducing Tier 4 emission standards, which were phased-in between 2008 and 2015. The Tier 4 standards require that emissions of particulate matter and NO_X be further reduced by about 90 percent. Such emission reductions are achieved through the use of control technologies—including advanced exhaust gas after-treatment—similar to those required by the 2007 to 2010 standards for highway engines.

Table 6-1
State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin

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

[1] *N/A = CARB has not determined 8-hour O_3 attainment status*
Source: CARB, Ambient Air Quality Standards, and attainment status, 2018. (www.arb.ca.gov/desig/adm/adm.htm).

State

California Clean Air Act

In addition to being subject to the requirements of the federal CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). In California, CCAA is administered by the California Air Resources Board (CARB) at the state level and by the air quality management districts and air pollution control districts at the regional and local levels. CARB, which became part of the California Environmental Protection Agency (Cal-EPA) in 1991, is responsible for meeting the state requirements of the CAA, administering the CCAA, and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to endeavor to achieve and maintain the CAAQS. The CAAQS are generally more stringent than

the corresponding federal standards and incorporate additional standards for sulfates, H_2S, vinyl chloride, and visibility-reducing particles.

CARB regulates mobile air pollution sources, such as motor vehicles. CARB is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The state standards are summarized on Table 6-1.

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

Toxic Air Contaminant Identification and Control Act

The public's exposure to TACs is a significant public health issue in California. CARB's statewide comprehensive air toxics program was established in the early 1980s. The Toxic Air Contaminant Identification and Control Act created California's program to reduce exposure to air toxics. Under the Toxic Air Contaminant Identification and Control Act, CARB is required to use certain criteria in the prioritization for the identification and control of air toxics. In selecting substances for review, CARB must consider criteria relating to "the risk of harm to public health, amount or potential amount of emissions, manner of, and exposure to, usage of the substance in California, persistence in the atmosphere, and ambient concentrations in the community" [Health and Safety Code Section 39666(f)].

The Toxic Air Contaminant Identification and Control Act also requires CARB to use available information gathered from the Air Toxics "Hot Spots" Information and Assessment Act program to include in the prioritization of compounds. CARB identified particulate emissions from diesel-fueled engines (i.e., DPM) TACs in August 1998. Following the identification process, CARB was required by law to determine if there is a need for further control, which led to the risk management phase of the program. For the risk management phase, CARB formed the Diesel Advisory Committee to assist in the development of a risk management guidance document and a risk reduction plan. With the assistance of the Diesel Advisory Committee and its subcommittees, CARB developed the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles and the Risk Management Guidance for the Permitting of New Stationary Diesel-Fueled Engines. CARB approved these documents on September 28, 2000, paving the way for the next step in the regulatory process: the control measure phase. During the control measure phase, specific statewide regulations designed to further reduce DPM emissions from diesel-fueled engines and vehicles have and continue to be evaluated and developed. The goal of each regulation is to make diesel engines as clean as possible by establishing state-of-the-art

technology requirements or emission standards to reduce DPM emissions. Breathing H_2S at levels above the state standard could result in exposure to a disagreeable rotten eggs odor. The state does not regulate other odors.

California Air Toxics Program

The California Air Toxics Program was established in 1983, when the California Legislature adopted Assembly Bill (AB) 1807 to establish a two-step process of risk identification and risk management to address potential health effects from exposure to toxic substances in the air.[9] In the risk identification step, as stated previously, CARB and OEHHA determine if a substance should be formally identified (or "listed") as a TAC in California. Since inception of the program, a number of such substances have been listed, including benzene, chloroform, formaldehyde, and particulate emissions from diesel-fueled engines, among others.[10] In 1993, the California Legislature amended the program to identify the 189 federal hazardous air pollutants as TACs.

In the risk management step, CARB reviews emission sources of an identified TAC to determine whether regulatory action is needed to reduce risk. Based on results of that review, CARB has promulgated a number of airborne toxic control measures (ATCMs), both for mobile and stationary sources. In 2004, CARB adopted an ATCM to limit heavy-duty diesel motor vehicle idling in order to reduce public exposure to DPM and other TACs. The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than five minutes at any given time.

In addition to limiting exhaust from idling trucks, CARB adopted regulations on July 26, 2007 for off-road diesel construction equipment such as bulldozers, loaders, backhoes, and forklifts, as well as many other self-propelled off-road diesel vehicles to reduce emissions by installation of DPM filters and encouraging the replacement of older, dirtier engines with newer emission controlled models. Implementation is staggered based on fleet size, with the largest operators beginning compliance in 2014.[11]

Assembly Bill 2588 Air Toxics "Hot Spots" Program

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

[9] *CARB, California Air Toxics Program, www.arb.ca.gov/toxics/toxics.htm, last reviewed by CARB September 24, 2015.*

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

[11] *CARB, In-Use Off-Road Diesel-Fueled Fleets Regulation, www.arb.ca.gov/msprog/ordiesel/ordiesel.htm, last reviewed by CARB July 28, 2016.*

pose a significant health risk to the community to reduce their risk through implementation of a risk management plan.

Air Quality and Land Use Handbook: A Community Health Perspective

The *Air Quality and Land Use Handbook: A Community Health Perspective* provides important air quality information about certain types of facilities (e.g., freeways, refineries, rail yards, ports, etc.) that should be considered when siting sensitive land uses such as residences.[12] CARB provides recommended site distances from certain types of facilities when considering siting new sensitive land uses. The recommendations are advisory and should not be interpreted as defined "buffer zones." If a project is within the siting distance, CARB recommends further analysis. Where possible, CARB recommends a minimum separation between new sensitive land uses and existing sources.

California Code of Regulations

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

Regional

South Coast Air Quality Management District

The SCAQMD was created in 1977 to coordinate air quality planning efforts throughout Southern California. The SCAQMD is the agency principally responsible for comprehensive air pollution control in the region. Specifically, the SCAQMD is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to attain and maintain the NAAQS and the CAAQS in the district. The SCAQMD has jurisdiction over an area of 10,743 square miles consisting of Orange County; the non-desert portions of Los Angeles, Riverside, and San Bernardino counties; and the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin. The South Coast Air Basin portion of SCAQMD's jurisdiction covers an area of 6,745 square miles. The South Coast Air Basin includes all of Orange County and the non-desert portions of Los Angeles (including the Project Sites), Riverside, and San Bernardino counties. The South Coast Air Basin is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south.

Programs that were developed by SCAQMD to attain and maintain the NAAQS and CAAQS include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain

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

mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases. All projects in the SCAQMD jurisdiction are subject to SCAQMD rules and regulations, including, but not limited to the following:

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

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

- Rule 403 Fugitive Dust – This rule requires that future projects reduce the amount of particulate matter entrained in the ambient air as a result of fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions from any active operation, open storage pile, or disturbed surface area.

Air Quality Management Plan

SCAQMD's 2016 Air Quality Management Plan (2016 AQMP) was adopted in April 2017 and represents the most updated regional blueprint for achieving federal air quality standards. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour $PM_{2.5}$ NAAQS for the South Coast Air Basin. Additionally, the 2016 AQMP relied upon a comprehensive analysis of emissions, meteorology, atmospheric chemistry, regional growth projections, and the impact of existing control measures to evaluate strategies for reducing NO_X emissions sufficiently to meet the upcoming ozone deadline standards.

Multiple Air Toxics Exposure Study IV

To date, the most comprehensive study on air toxics in the South Coast Air Basin is the Multiple Air Toxics Exposure Study IV (MATES-IV). The monitoring program measured more than 30 air pollutants, including both gases and particulates. The monitoring study was accompanied by a computer modeling study in which SCAQMD estimated the risk of cancer from breathing toxic air pollution throughout the region based on emissions and weather data. MATES-IV found that the cancer risk in the region from carcinogenic air pollutants ranges from about 320 to 480 in a million. About 90 percent of the risk is attributed to emissions associated with mobile sources, with the remainder attributed to toxics emitted from stationary sources, which include large industrial operations, such as refineries and metal processing facilities, as well as smaller businesses such as gas stations and chrome plating. The results indicate that DPM is the major contributor to air toxics risk, accounting on average for about 68 percent of the total risk.

Southern California Association of Governments

The Southern California Association of Governments (SCAG) is the regional planning agency for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties, and addresses regional issues relating to transportation, the economy, community development and the environment. SCAG coordinates with various air quality and transportation stakeholders in Southern California to ensure compliance with the federal and state air quality requirements, including the Transportation Conformity Rule and other applicable federal, state, and air district laws and regulations. As the federally designated Metropolitan Planning Organization (MPO) for the six-county Southern California region, SCAG is required by law to ensure that transportation activities "conform" to, and are supportive of, the goals of regional and state air quality plans to attain the NAAQS. In addition, SCAG is a co-producer with SCAQMD of the transportation strategy and transportation control measure sections of the AQMP for the South Coast Air Basin.

SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS) on April 7, 2016.[13] [14] The 2016–2040 RTP/SCS reaffirms the land use policies that were incorporated into SCAG's 2012–2035 RTP/SCS. These foundational policies, which guided the development of the plan's land use strategies, include the following:

- Identify regional strategic areas for infill and investment;
- Structure the plan on a three-tiered system of centers development;[15]
- Develop "Complete Communities";
- Develop nodes on a corridor;
- Plan for additional housing and jobs near transit;
- Plan for changing demand in types of housing;
- Continue to protect stable, existing single-family areas;
- Ensure adequate access to open space and preservation of habitat; and
- Incorporate local input and feedback on future growth.

[13] *SCAG, Final 2016–2040 RTP/SCS.*

[14] *CARB, Executive Order G-16-066, SCAG 2016 SCS ARB Acceptance of GHG Quantification Determination, June 2016.*

[15] *Complete language: "Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment." A more detailed description of these strategies and policies can be found on pp. 90–92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.*

The 2016–2040 RTP/SCS recognizes that transportation investments and future land use patterns are inextricably linked, and continued recognition of this close relationship will help the region make choices that sustain existing resources and expand efficiency, mobility, and accessibility for people across the region. In particular, the 2016–2040 RTP/SCS draws a closer connection between where people live and work, and it offers a blueprint for how Southern California can grow more sustainably. The 2016–2040 RTP/SCS also includes strategies focused on compact infill development and economic growth by building the infrastructure the region needs to promote the smooth flow of goods and easier access to jobs, services, educational facilities, healthcare and more.

The 2016–2040 RTP/SCS states that the SCAG region was home to about 18.3 million people in 2012 and included approximately 5.9 million homes and 7.4 million jobs.[16] By 2040, the integrated growth forecast projects these figures will increase by 3.8 million people, with nearly 1.5 million more homes and 2.4 million more jobs. High Quality Transit Areas (HQTAs) will account for 3 percent of regional total land but are projected to accommodate 46 percent and 55 percent of future household and employment growth respectively between 2012 and 2040.[17] The 2016–2040 RTP/SCS overall land use pattern reinforces the trend of focusing new housing and employment in the region's 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, create local jobs, and have the potential to improve public health and housing affordability. As discussed further below, the Project Sites are located within an HQTA.

Local

City of Los Angeles General Plan Air Quality Element

The Air Quality Element of the City's General Plan was adopted on November 24, 1992, and sets forth the goals, objectives, and policies, which guide the City in the implementation of its air quality improvement programs and strategies. The Air Quality Element acknowledges the interrelationships among transportation and land use planning in meeting the City's mobility and air quality goals. The Air Quality Element includes the following six key goals:

> **Goal 1**: Good air quality in an environment of continued population growth and healthy economic structure.
>
> **Goal 2**: Less reliance on single-occupant vehicles with fewer commute and non-work trips.

[16] *The SCAG 2016–2040 RTP/SCS is based on year 2012 demographic data with growth forecasts developed for 2020, 2035, and 2040.*

[17] *Defined by the 2016–2040 RTP/SCS as generally walkable transit villages or corridors located within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.*

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

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

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

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

Clean Up Green Up Ordinance

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

Existing Conditions

South Coast Air Basin

The Project Sites are located within the South Coast Air Basin, named so because of its geographical formation is that of a basin, with the surrounding mountains trapping the air and its pollutants in the valleys or basins below. As noted above, the 6,745-square-mile South Coast Air Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. It is bounded by the Pacific Ocean to the west; the San Gabriel, San Bernardino and San Jacinto Mountains to the north and east; and the San Diego County line to the south. Ambient pollution concentrations recorded in Los Angeles County portion of the South Coast Air Basin are among the highest in the four counties comprising the South Coast Air Basin. USEPA has classified Los Angeles County as nonattainment areas for O_3, PM_{10}, $PM_{2.5}$, and Pb. This classification denotes that the South Coast Air Basin does not meet the NAAQS for these pollutants. In addition, under the CCAA, the Los Angeles County portion of the South Coast Air Basin is designated as a nonattainment area for O_3, PM_{10}, and $PM_{2.5}$. The air quality within the South Coast Air Basin is primarily influenced by a wide range of emissions sources, such as dense population centers, heavy vehicular traffic, industry, and meteorology.

Air pollutant emissions are generated in the local vicinity by stationary and area-wide sources, such as commercial activity, space and water heating, landscaping maintenance, consumer products, and mobile sources primarily consisting of automobile traffic.

Air Pollution Climatology[18]

The topography and climate of Southern California combine to make the South Coast Air Basin an area of high air pollution potential. During the summer months, a warm air mass frequently descends over the cool, moist marine layer produced by the interaction between the ocean's surface and the lowest layer of the atmosphere. The warm upper layer forms a cap over the cooler surface layer, which inhibits the pollutants from dispersing upward. Light winds during the summer further limit ventilation. Additionally, abundant sunlight triggers photochemical reactions, which produce O_3 and the majority of particulate matter.

Local Climate

The mountains and hills within the South Coast Air Basin contribute to the variation of rainfall, temperature, and winds throughout the region. Meteorological conditions at the Project Sites are best represented by meteorological data from the Los Angeles Downtown USC campus meteorological station, which is located 2.5 miles southwest of the Project Sites. The average wind speed in the vicinity of the Project Sites as recorded during the time period spanning 2012–2016 was 3.0 miles per hour. Wind direction in the vicinity of the Project Sites predominantly blows from the west and southwest.[19]

Climatological temperature and precipitation data spanning 1877 to 2016 is available from the Los Angeles Downtown USC Campus location. The averages represent a contemporary description of the climate in the region. According to the data, the annual mean temperature in the vicinity of the Project Sites was 64.9 degrees Fahrenheit (°F). The Project Sites and surrounding area experience a mean winter temperature of 58.0°F and a mean summer temperature of 71.5°F. Total precipitation at the Project Sites and in the surrounding area averages 14.8 inches annually. Precipitation occurs mostly during the winter and relatively infrequently during the summer. Precipitation averages 8.99 inches during the winter, 3.66 inches during the spring, 2.00 inches during the fall, and less than one inch during the summer.[20] These conditions are typical of temperate coastal climates.

Air Monitoring Data

The SCAQMD monitors air quality conditions at 38 source receptor areas (SRAs) throughout the South Coast Air Basin. The Project Sites are located in SCAQMD's Central Los Angeles receptor area (SRA 1). Historical data from the area was used to characterize existing conditions in the vicinity of the Project Sites. Table 6-2 shows pollutant levels, state, and federal standards, and the number of exceedances recorded in the area from 2014 through 2016. The one-hour State standard for O_3 was exceeded seven times during this three-year period, the daily State standard for PM_{10} was exceeded 76 times, while the daily federal standard for $PM_{2.5}$ was exceeded 15 times. CO and NO_2 levels did not exceed the CAAQS from 2014 to 2016.

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[18] *AQMD, Final Program Environmental Impact Report for the 2012 AQMP, December 7, 2012.*

[19] *SCAQMD, Meteorological Data for AERMOD, accessed March 25, 2018.*

[20] *Western Regional Climate Center, local Climate Data Summaries for Western US, accessed April 12, 2018.*

Sensitive Receptors

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

Table 6-2
2014-2016 Ambient Air Quality Data in the Vicinity of the Project Sites

Pollutant	Pollutant Concentration & Standards	Central Los Angeles		
		2014	2015	2016
Ozone	Maximum 1-hour Concentration (ppm)	0.113	0.104	0.103
	Days > 0.09 ppm (State 1-hour standard)	3	2	2
	Days > 0.075 ppm (Federal 8-hour standard)	2	0	1
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	3.0	3.2	1.9
	Days > 20 ppm (State 1-hour standard)	N/A	N/A	N/A
	Maximum 8-hour Concentration (ppm)	2.0	1.8	1.4
	Days > 9.0 ppm (State 8-hour standard)	0	0	0
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.0821	0.0791	0.0647
	Days > 0.18 ppm (State 1-hour standard)	0	0	0
PM_{10}	Maximum 24-hour Concentration ($\mu g/m^3$)	87	88	67
	Days > 50 $\mu g/m^3$ (State 24-hour standard)	32	26	18
$PM_{2.5}$	Maximum 24-hour Concentration ($\mu g/m^3$)	0	56.4	44.39
	Days > 35 $\mu g/m^3$ (Federal 24-hour standard)	6	7	2
Sulfur Dioxide	Maximum 24-hour Concentration (ppb)	5.4	12.6	13.4
	Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A

Source: SCAQMD annual monitoring data http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year, accessed April 12, 2018.
N/A: Not available at this monitoring station.

Given the Project Sites' location in Skid Row, there are a number of residential, transitional services, and health-related services that represent sensitive receptors, which include but are not limited to the following (refer to Figure 6-1):[21]

- 555 South San Pedro Street, apartments and the Central City Community Church, west of Site 1
- Weingart Center Association, 566 South San Pedro Street, apartments, directly south of and adjacent to Site 1.
- Union Rescue Mission; 545 South San Pedro Street, slightly northwest of Site 1.
- Emmanuel Baptist Rescue Mission; 530 East 5th Street, north of the Project Sites at the southwestern corner of East 5th Street and Crocker Street.
- Charles Cobb Apartments; 521 South San Pedro Street, northwest of Site 1.
- Midnight Mission; 601 South San Pedro Street, west of Site 2.
- 505 South San Pedro Street; Single Room Occupancy Housing Corporation, northwest of Site 1 at the southwest corner of 5th Street and South San Pedro Street.

The location of these sensitive receptors in relation to the Project Sites is shown on Figure 6-1.

[21] *The "Skid Row" area of Downtown Los Angeles was defined in a decision in Jones v. City of Los Angeles (104 Cal. App. 2d 212 [1951]) as the area east of Main Street, south of 3rd Street, west of Alameda Street, and north of 7th Street, and contains a large population of homeless people.*

Figure 6-1
Location of Air Quality Sensitive Receptors near the Project Sites

Source: CAJA Environmental Services, LLC, 2018.

Existing Emissions from the Project Sites

Site 1 includes a 7,000 square-foot food service building and a surface parking lot. Site 2 includes a 133-space surface parking lot. Because the parking lots themselves do not generate vehicle traffic or emissions, the sole source of anthropogenic emissions is the food service building. The estimated emissions associated with the food service building is shown on Table 6-3.

Table 6-3
Estimated Existing Daily Emissions

Emission Source	Pounds per Day					
	VOC	**NO_X**	**CO**	**SO_X**	**PM_{10}**	**$PM_{2.5}$**
Area Sources	<1	<1	9	<1	<1	<1
Energy Sources	<1	1	<1	<1	<1	<1
Mobile Sources	<1	1	2	<1	<1	<1
Total Operations	**<1**	**2**	**11**	**<1**	**<1**	**<1**
Source: DKA Planning, 2018. Based on CalEEMod 2016.3.2 model runs. Refer to Appendix F.						

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

Less Than Significant Impact. The discussion below addresses the Project's consistency with applicable SCAQMD and SCAG policies, including the SCAQMD's 2016 AQMP and growth projections within the SCAG 2016–2040 RTP/SCS. In accordance with the procedures established in the SCAQMD's *CEQA Air Quality Handbook*, the following criteria are required to be addressed in order to determine the Project's consistency with applicable SCAQMD and SCAG policies:

- Would the project result in any of the following?
    - An increase in the frequency or severity of existing air quality violations; or
    - Cause or contribute to new air quality violations; or
    - Delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.
- Would the project exceed the assumptions utilized in preparing the AQMP?
    - Is the Project consistent with the population and employment growth projections upon which AQMP forecasted emission levels are based;
    - Does the Project include air quality mitigation measures; or
    - To what extent is Project development consistent with the AQMP land use policies?

With respect to the first criterion, as discussed below, localized concentrations of NO_2 as NO_X, CO, PM_{10}, and $PM_{2.5}$ have been estimated for the Project. SO_2 emissions would be negligible during construction and

long-term operations and thus, would not have the potential to cause or affect a violation of the SO_2 ambient air quality standard. Since VOCs are not a criteria pollutant, there is no ambient standard or localized threshold for VOCs. Due to the role VOCs play in O_3 formation, VOCs are classified as a precursor pollutant, and only a regional emissions threshold has been established.

Particulate matter is the primary pollutant of concern during construction activities and thus, the Project's PM_{10} and $PM_{2.5}$ emissions during construction were estimated in order to: (1) ascertain potential effects on localized concentrations, and (2) determine if there is a potential for such emissions to cause or affect a violation of the ambient air quality standards for PM_{10} and $PM_{2.5}$. As demonstrated in the discussion and accompanying Tables 6-6 and 6-7 later in this section, the Project's generation of PM_{10} and $PM_{2.5}$ emissions during construction would not exceed the SCAQMD significance thresholds at the location of the sensitive receptors in proximity to the Project Sites.

Additionally, the Project's maximum potential NO_X and CO daily emissions during construction were estimated to ascertain potential effects on localized concentrations and to determine if there is a potential for such emissions to cause or affect a violation of an applicable ambient air quality standard. As shown by Tables 6-6 and 6-7, the Project's generation of NO_X and CO emissions would not exceed the SCAQMD localized significance thresholds. Therefore, the Project's construction-related localized air quality impacts would be less than significant.

Because the Project would not introduce any substantial stationary sources of emissions (e.g., industrial-type equipment associated with TACs), CO is the preferred benchmark pollutant for assessing local area air quality impacts from post-construction motor vehicle operations.[22] As indicated in response to Checklist Question 3(d) discussed later in this section, no intersections would require a CO hotspot analysis, and associated impacts would be less than significant. Thus, the Project would not increase the frequency or severity of an existing CO violation or cause or contribute to new CO violations.

As discussed below, an analysis of potential localized operational impacts from on-site activities was conducted. As demonstrated in the analysis below (refer to Table 6-10 later in this section), the Project's generation of localized NO_2 as NO_X, CO, PM_{10}, and $PM_{2.5}$ operational emissions would not exceed the SCAQMD's significance thresholds. Thus, the Project would not increase the frequency or severity of an existing violation or cause or contribute to new violations for these pollutants. Because the Project would not exceed any of the state and federal standards, the Project also would not delay timely attainment of air quality standards or interim emission reductions specified in the AQMP.

With respect to the determination of consistency with the 2016 AQMP growth assumptions, the projections in the 2016 AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and employment growth trends. Determining whether or not a project exceeds the assumptions reflected in the AQMP involves the evaluation of three criteria: (1) consistency with applicable population, housing, and employment growth projections; (2) project

[22] *SCAQMD, CEQA Air Quality Handbook, Chapter 12, Assessing Consistency with Applicable Regional Plans, 1993.*

mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies. The discussion below provides an analysis with respect to each of these three criteria.

- Is the project consistent with the population, housing, and employment growth projections upon which AQMP forecasted emission levels are based?

A project is consistent with the AQMP, in part, if the project is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. In the case of the 2016 AQMP, two sources of data form the basis for the projections of air pollutant emissions: the City of Los Angeles General Plan, which serves as a comprehensive long-term plan for future development of the City, and SCAG's 2016-2040 RTP/SCS.

The 2016–2040 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on local plans and policies applicable to the specific area and are used by SCAG in all phases of implementation and review. Based on SCAG population projections in the 2016-2040 RTP/SCS, the City's projected 2017 population was 3,981,910.[23] In 2025 (Project buildout year), the City is anticipated to have a population of approximately 4,200,166 persons and in 2040, the City is anticipated to have a population of approximately 4,609,400 persons.[24]

The Project includes the development of up to 685 new multi-family units, including 451 permanent supportive units, 225 individual/family units, and 9 manager units, and up to a maximum of 5,450 square feet of retail, 25,493 square feet of philanthropic, and 17,100 square feet of office uses. The maximum residential occupancy for the Project would be 1,420, limited by requirements set forth in the regulatory agreement between the Project Applicant and the HCIDLA. Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City.[25] Accordingly, assuming an approximately 2.07 persons-per-unit rate, approximately 887 of the Project's future residents already reside in the City.[26] It is probable that the remaining 533 future Project residents already live in the City, as well, as discussed in more detail below. However, for purposes of a conservative analysis, it is assumed that the Project could add 533 new residents to the City. In addition, according to the Project Applicant the Project would generate approximately 74 employees. The Project's new residential population of 533 people would represent approximately 0.24 percent of the population growth forecasted by SCAG in the City between 2017 and 2025, and approximately 0.08 percent of the population growth forecasted by SCAG in the City between 2017 and 2040.

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[23] *The "baseline" year for the Project is 2017. The 2016-2040 RTP/SCS included a 2012 population for the City of approximately 3,845,500, with a projected 2040 population of approximately 4,609,400, for a straight-line average growth of approximately 27,282 people per year. Based on this, the estimated 2017 population for the City is 3,981,910.*

[24] *SCAG, 2016-2040 RTP/SCS.*

[25] *The People Concern/OPCC & Lamp Community United, Hazel Lopez, Director of CES and Community Engagement, May 21, 2018.*

[26] *1,420 maximum residents/685 units = 2.07 persons per unit.*

The Project includes development of a combined total of 685 dwelling units at Sites 1 and 2. Based on the 2016–2040 RTP/SCS, the City had approximately 1,390,645 dwelling units in 2017. In 2025, the City is anticipated to have approximately 1,494,877 dwelling units, and in 2040, the City is anticipated to have approximately 1,690,300 dwelling units. Thus, the Project's 685 dwelling units would constitute approximately 0.66 percent of the housing growth forecasted between 2017 and 2025 for the City, and constitute approximately 0.23 percent of the housing growth forecasted between 2017 and 2040 for the City.

Implementation of the Project also would result in approximately 74 employment positions on-site.[27] Based on the 2016–2040 RTP/SCS, the City employed 1,780,810 workers in 2017. In 2025, the City is anticipated to have approximately 1,915,866 employees, and in 2040, the City is anticipated to have approximately 1,915,866 workers. Thus, the Project's estimated 74 employees would constitute approximately 0.06 percent of the employment growth forecasted between 2017 and 2025 for the City, and approximately 0.02 percent of the employment growth forecasted between 2017 and 2040 for the City.

Because the Project's resulting residential, housing, and employment growth would fall well within the growth forecasts for the City and similar projections form the basis of the 2016 AQMP, the Project would be consistent with the projections in the AQMP. As such, the Project meets this AQMP consistency criterion.

- Does the project implement feasible air quality mitigation measures?

As discussed below in response to Checklist Questions 3(b), 3(c), and 3(d), the Project would not result in any significant air quality impacts, and no mitigation measures would be required. In addition, the Project would comply with all applicable regulatory standards as required by SCAQMD and the City, such as SCAQMD's Rule 403, which includes measures to reduce the amount of fugitive PM_{10} and $PM_{2.5}$ emissions created by construction activities. As such, the Project meets this AQMP consistency criterion.

- To what extent is project development consistent with the land use policies set forth in the AQMP?

With regard to land use developments such as the Project, the AQMP's air quality policies focus on the reduction of vehicle trips and vehicle miles traveled (VMT). The Project would be designed and constructed to support and promote environmental sustainability. The Project represents an infill development within an existing urbanized area that would concentrate new residential, office, and retail commercial uses within a transit priority area and an HQTA that is well served by multiple existing bus lines, and is proximate to existing rail service.

[27] *Employment number provided by Project Applicant. Includes approximately 58 service staff and 16 management staff.*

"Green" principles are incorporated throughout the Project to comply with the City of Los Angeles Green Building Code and the California Green Building Standards Code (CALGreen) through energy conservation, water conservation, and waste reduction features.

As stated previously, the AQMP applicable to the Project is the 2016 AQMP, which is the SCAQMD's plan for improving regional air quality in the South Coast Air Basin. The 2016 AQMP is the current management plan for continued progression toward clean air and compliance with state and federal requirements. It includes a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, on- and off-road mobile sources and area sources. The 2016 AQMP also incorporates current scientific information and meteorological air quality models and updates the federally approved 8-hour O_3 control plan with new commitments for short-term NO_x and VOC emissions reductions.

The 2016 AQMP includes short-term control measures related to facility modernization, energy efficiency, good management practices, market incentives, and emissions growth management.

As demonstrated in the analysis below, the Project would not result generate regional emissions in excess of SCAQMD's significance thresholds. The 2016 AQMP adapts previously conducted regional air quality analyses to account for the recent unexpected drought conditions and presents a revised approach to demonstrated attainment of the 2006 24-hour $PM_{2.5}$ NAAQS for the South Coast Air Basin. Directly applicable to the Project, the 2016 AQMP proposes robust NO_x reductions from commercial cooking and residential and commercial appliances, as well as commercial space heating. The Project would be required to comply with all new and existing regulatory measures set forth by the SCAQMD. Implementation of the Project would not interfere with air pollution control measures listed in the 2016 AQMP.

The Project implements the City and SCAQMD's objectives of reducing VMT and related vehicular air emissions, as well as implementing various sustainability measures intended to further reduce Project-related emissions. Therefore, Project impacts related to consistency with the 2016 AQMP's land use policies would be less than significant.

City of Los Angeles Policies

In addition to the Project's consistency with the 2016 AQMP, as shown on Table 6-4, the Project would be consistent with the applicable policies of the City's General Plan Air Quality Element. The Project would provide 444 long-term bicycle parking spaces and 49 short-term bicycle parking spaces and would offer convenient access to public transit and opportunities for walking and biking, thereby facilitating a reduction in VMT. In addition, the Project would be consistent with the existing land use pattern in the vicinity of the Project Sites that concentrates urban density along major arterials and near transit options. The Project also includes primary entrances for pedestrians and bicyclists that would be safe, easily accessible, and a short distance from transit stops. Therefore, Project impacts related to consistency with the City's General Plan Air Quality Element would be less than significant.

As shown on Table 6-4, the Project would be consistent with applicable policies of the General Plan's Air Quality Element. The Project would implement sustainability features that would reduce vehicular trips, reduce VMT, and encourage use of alternative modes of transportation.

Table 6-4
Project Consistency with the City's General Plan Air Quality Element

Policies	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	**Consistent.** As discussed later in this section, the Project would not generate construction-related regional or localized PM_{10} or $PM_{2.5}$ emissions in excess of the SCAQMD's significance thresholds, and the Project's construction-related air quality impacts would be less than significant. Additionally, during the Project's construction phase, the Project Development would be required by the City to minimize particulate emissions during construction through application of best practices required under SCAQMD Rule 403 (Fugitive Dust).
Policy 1.3.2. Minimize particulate emissions from unpaved roads and parking lots associated with vehicular traffic.	**Consistent.** Roads and parking facilities within the Project Site area are paved. Additionally, during the Project's construction phase, the Project would be required by the City to minimize particulate emissions during construction through application of best practices required under SCAQMD Rule 403 (Fugitive Dust).
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Consistent.** The Project would be located in Downtown Los Angeles, an urban area with significant infrastructure to provide alternative transportation modes, including proximity to Metro bus routes and Metro Rail stations. Additionally, the provision of a total of 49 short-term and 44 long-term bicycle parking spaces on the Project Sites would reduce the need for employees to drive a vehicle to the Project Sites.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans and ridesharing subsidies.	**Consistent.** The provision of a total of 49 short-term and 444 long-term bicycle parking spaces on the Project Sites would reduce the need for employees to drive a vehicle to the Project Sites. Additionally, the Project's location in a dense urban downtown area and the nature of Project as primarily serving the homeless population, who generally do not have vehicles, would further minimize single-occupancy driving.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Consistent.** The provision of a total of 49 short-term and 444 long-term bicycle parking spaces on the Project Sites could reduce demand for auto parking. Additionally, the Project's location in a dense urban downtown area and the nature of Project as primarily serving the homeless population, who generally do not have vehicles, would further minimize single-occupancy driving.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the	**Consistent.** The Project is being entitled through the City, which coordinates with SCAG, Metro, and other

Table 6-4
Project Consistency with the City's General Plan Air Quality Element

Policies	Project Consistency
integration of land use, transportation, and air quality policies.	regional agencies on the coordination of land use, air quality, and transportation policies.
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	**Consistent.** The City is the lead agency for the Project and has prepared this SCEA as part of the Project's review process.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers and other establishments.	**Consistent.** The Project is an infill development that would provide housing and services to a homeless population currently living on the streets, thereby facilitating greater access to places of employment for the Project's residents.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Project would be located in an urban area with significant infrastructure to facilitate alternative transportation modes, including close proximity to bus routes and local rail service operated by Metro. Additionally, the Project would include a total of 49 short-term bicycle parking spaces and 444 long-term bicycle parking spaces.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The Project's air quality impacts will be analyzed and minimized through the environmental review process.
Policy 4.2.5. Emphasize trip reduction, alternative transit and congestion management measures for discretionary projects.	**Consistent.** The Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including close proximity to bus routes and rail services operating by Metro. Additionally, the Project would include a total of 49 short-term bicycle parking spaces and 444 long-term bicycle parking spaces.
Source: DKA Planning, 2018.	

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

Less Than Significant Impact. The Project's grading and construction would result in short-term air pollutant emissions associated with construction worker vehicle trips, haul truck trips, stationary source emissions, and site grading. In addition, operational activities associated with the Project would generate long-term air pollutant emissions.

Construction

Construction-related emissions for the Project were estimated using SCAQMD's CalEEMod 2016.3.2 model using assumptions from the Project's developer. The Project would be constructed over three phases, as shown on Table 6-5.

Table 6-5
Approximate Project Construction Schedule

Phase	Duration	Notes
Phase 1: Site 1 – Tower 1A		
Demolition	Approximately 3 weeks	Demolition of approximately 18,360 square feet of asphalt parking lot
Grading	Approximately 2 week	10,244 cubic yards of export, hauled to off-site location within a 50-mile radius.
Site Preparation	Approximately 1.5 months	-
Building Construction	Approximately 1 year	No overlap with grading or site preparation phase.
Finishing (Architectural Coating)	Approximately 1 year	Some overlap with building construction phase.
Phase 2: Site 1 – Tower 1B		
Demolition	Approximately 1 month	Some overlap with the finishing (architectural coating) phase of Tower 1A. Demolition of approximately 4,870 cubic yards of material.
Grading	Approximately 2 weeks	4,800 cubic yards of export, hauled to off-site location within a 50-mile radius.
Site Preparation	Approximately 1.5 months	-
Building Construction	Approximately 1 year	No overlap with grading or site preparation phase.
Finishing (Architectural Coating)	Approximately 1 year	Some overlap with building construction phase. (Tower 1B becomes operational.)
Site 2		
Demolition	Approximately 1 month	Demolition of approximately 20,244 cubic yards of material.
Grading	Approximately 2 weeks	10,200 cubic yards of export, hauled to off-site location within a 50-mile radius.
Site Preparation	Approximately 2 months	-
Building Construction	Approximately 1 year	No overlap with grading or site preparation phase.
Finishing (Architectural Coating)	Approximately 1 year	Some overlap with building construction phase.
Note: The approximate construction schedule assumes a 5-day workweek.		

The Project would be required by the City to comply with the following regulations:

- SCAQMD Rule 403, reduces the amount of particulate matter entrained in ambient air as a result of anthropogenic fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions.

- SCAQMD Rule 1113, limits the VOC content of architectural coatings.

- SCAQMD Rule 402, states that a person shall not discharge from any source whatsoever such quantities of air contaminants or other materials which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.

- In accordance with Section 2485 in Title 13 of the CCR, the idling of all diesel-fueled commercial vehicles (with gross vehicle weight over 10,000 pounds) during construction would be limited to five minutes at any location.

- In accordance with Section 93115 in Title 17 of the CCR, operation of any stationary, diesel-fueled, compression-ignition engines would meet specific fuel and fuel additive requirements and emissions standards.

Regional Emissions

Construction activity has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated by construction workers traveling to and from the Project Sites. Fugitive dust emissions would primarily result from grading activities. NO_x emissions would primarily result from the use of construction equipment and truck trips. During the building finishing phase, paving and the application of architectural coatings (e.g., paints) would potentially release VOCs (regulated by SCAQMD Rule 1113). The assessment of construction air quality impacts considers each of these potential sources. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation and, for dust, and prevailing weather conditions.

As stated previously, it is mandatory for all construction projects in the South Coast Air Basin to comply with SCAQMD Rule 403 for Fugitive Dust. Rule 403 control requirements include measures to prevent the generation of visible dust plumes. Measures include, but are not limited to, applying water and/or soil binders to uncovered areas, reestablishing ground cover as quickly as possible, utilizing a wheel washing system or other control measures to remove bulk material from tires and vehicle undercarriages before vehicles exit the Project Sites, and maintaining effective cover over exposed areas. Compliance with Rule 403 reduces regional $PM_{2.5}$ and PM_{10} emissions associated with construction activities by approximately 61 percent.[28]

As shown on Table 6-6, the construction of Site 1 would not produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions in excess of the SCAQMD's regional thresholds. It should be noted that these emissions conservatively assume the development of Towers 1A and 1B to include overlap of the initial stages of Tower 1B as construction of Tower 1A is finishing. Construction of Site 1 of the Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g.,

[28] *SCAQMD, Mitigation Measure Examples: Fugitive Dust from Construction and Demolition, 2006.*

ozone). Therefore, the Project's construction-related regional emissions impacts associated with development of Site 1 would be less than significant.

Table 6-6
Estimated Daily Construction Emissions – Site 1

Construction Phase Year	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2019	4	79	27	<1	7	3
2020	12	71	43	<1	9	4
2021	9	21	25	<1	3	2
2022	6	1	3	<1	<1	<1
Maximum Regional Total	**12**	**79**	**43**	**<1**	**9**	**4**
Regional Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	**9**	**18**	**16**	**<1**	**1**	**1**
Localized Significance Threshold	**--**	**74**	**680**	**--**	**5**	**3**
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning, 2018, based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area. Refer to Appendix F.

As shown on Table 6-7, the subsequent construction of Site 2 would not produce VOC, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ emissions in excess of the SCAQMD's regional thresholds. It should be noted that construction of this site would begin after construction of Site 1 is complete. Construction of Site 2 would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). Therefore, the Project's construction-related regional emissions impacts associated with development of Site 2 would be less than significant.

Table 6-7
Estimated Daily Construction Emissions – Site 2

Construction Phase Year	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2022	8	83	79	<1	13	5
2023	7	18	23	<1	3	1
Maximum Regional Total	**8**	**83**	**79**	**<1**	**13**	**5**
Regional Significance Threshold	**75**	**100**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	**8**	**17**	**14**	**<1**	**3**	**1**
Localized Significance Threshold	**--**	**74**	**680**	**--**	**5**	**3**
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning, 2018, based on CalEEMod 2016.3.2 model runs. LST analyses based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area. Refer to Appendix F.

Localized Emissions

In addition to maximum daily regional emissions, maximum localized (on-site) emissions were quantified for each construction activity. The localized construction air quality analysis was conducted using the methodology promulgated by the SCAQMD. Look-up tables provided by the SCAQMD were used to determine localized construction emissions thresholds for the Project.[29] SCAQMD's Localized Thresholds (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 standard and are based on the most recent background ambient air quality monitoring data (2014–2016) for the Project area.

Maximum on-site daily localized construction emissions for NO_X, CO, PM_{10}, and $PM_{2.5}$ were calculated for the Project using CalEEMod and were compared to the applicable SCAQMD LSTs for the Central LA SRA based on construction site acreage that is less than or equal to one acre. Potential impacts were evaluated at the closest off-site sensitive receptor, which is the Weingart Association building, directly south of Site 1. The closest receptor distance on the SCAQMD mass rate LSTs look-up tables is 25 meters, which per SCAQMD guidance, is to be used for receptors located within 0 meters to 25 meters of the construction activities.

As shown on Tables 6-6 and 6-7**,** the Project would not produce emissions in excess of the SCAQMD's recommended localized standards of significance for NO_2 and CO at any part of the 49-month construction phase. Similarly, construction activities would not produce PM_{10} and $PM_{2.5}$ emissions that exceed localized thresholds recommended by the SCAQMD.

These estimates assume the use of Best Available Control Measures (BACM) that address fugitive dust emissions of PM_{10} and $PM_{2.5}$ through SCAQMD Rule 403, as required by the City. This would include watering portions of the sites that are disturbed during grading activities and minimizing tracking of dirt onto local streets. Therefore, the Project's construction-related localized emissions impacts would be less than significant.

Operation

The Project would produce long-term emissions, primarily from motor vehicles associated with the Project. The Project could add up to approximately 2,038 net daily vehicle trips to and from the Project Sites on a weekday at the start of full operation of the Project in 2025.[30] The air quality analysis conservatively accounts for all daily trips as new emissions. As shown on Table 6-8, the Project's Site 1 operational emissions would not exceed SCAQMD's regional or localized significance thresholds.

[29] *SCAQMD, LST Methodology Appendix D-Mass Rate LST Look-up Table, revised October 2009.*

[30] *Linscott, Law & Greenspan Engineers, Traffic Impact Study – Weingart Projects, March 2018.*

Table 6-8
Estimated Daily Project Operations Emissions – Site 1

Emission Source	Pounds per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	6	<1	32	<1	<1	<1
Energy Sources	<1	1	<1	<1	<1	<1
Mobile Sources	2	9	25	<1	7	2
Total Operations	8	10	57	<1	8	2
Less Existing Operations	-<1	-1	-2	-<1	-<1	-<1
Net Regional Total	**8**	**9**	**55**	**<1**	**8**	**2**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	**6**	**<1**	**32**	**<1**	**<1**	**<1**
Localized Significance Threshold	**--**	**74**	**680**	**--**	**4**	**1**
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning, 2018, based on CalEEMod 2016.3.2 model runs. LST analysis based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area. Refer to Appendix F.

Similarly, as shown on Table 6-9, the Project's development of Site 2 would not produce pollutant emissions in excess of the SCAQMD's regional or localized significance thresholds.

Table 6-9
Estimated Daily Project Operations Emissions – Site 2

Emission Source	Pounds per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	5	<1	32	<1	<1	<1
Energy Sources	<1	1	<1	<1	<1	<1
Mobile Sources	2	6	20	<1	7	2
Total Operations	7	8	52	<1	7	2
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	**5**	**1**	**32**	**<1**	**<1**	**<1**
Localized Significance Threshold	**--**	**74**	**680**	**--**	**4**	**1**
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning, 2018, based on CalEEMod 2016.3.2 model runs. LST analysis based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area. Refer to Appendix F.

As shown on Table 6-10, the aggregate pollutant emissions of the development of both Sites 1 and 2 would not exceed the SCAQMD's recommended thresholds of significance.

Table 6-10
Estimated Daily Project Operations Emissions – Sites 1 and 2

Emission Source	Pounds per Day					
	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
Area Sources	11	<1	64	<1	<1	<1
Energy Sources	<1	2	<1	<1	<1	<1
Mobile Sources	4	15	45	<1	14	4
Total Operations	15	18	109	<1	15	7
Less Existing Operations	-<1	-1	-2	-<1	-<1	-<1
Net Regional Total	**15**	**17**	**107**	**<1**	**15**	**7**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	**11**	**2**	**64**	**<1**	**<1**	**<1**
Localized Significance Threshold	**--**	**74**	**680**	**--**	**4**	**1**
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning, 2018, based on CalEEMod 2016.3.2 model runs. LST analysis based on 1-acre site with 25-meter distances to receptors in Central LA source receptor area. Refer to Appendix F.

For these reasons, the Project's operation-related regional and localized air quality impacts would be less than significant.

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

Less Than Significant Impact. SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also be considered cumulatively considerable.[31] Individual projects that do not generate emissions in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. The SCAQMD neither recommends quantified analyses of the emissions generated by a set of cumulative development projects nor provides thresholds of significance to be used to assess the impacts associated with these emissions.

As shown on Tables 6-6 and 6-7, the Project's daily construction emissions would not exceed any of the SCAQMD's regional or localized thresholds. Therefore, the Project's contribution to cumulative construction-related regional or localized emissions impacts would not be cumulatively considerable.

As shown on Tables 6-8, 6-9, and 6-10, the Project's daily operational emissions would not exceed any of the SCAQMD's regional or localized thresholds. Because the Project's pollutant emissions would not exceed the SCAQMD's operational thresholds of significance, the Project's contribution to cumulative operation-related regional or localized emissions would not be cumulatively considerable.

[31] *White Paper on Regulatory Options for Addressing Cumulative Impacts from Air Pollution Emissions, SCAQMD Board Meeting, September 5, 2003, Agenda No. 29, Appendix E, p. D-3.*

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

Less Than Significant Impact. As discussed previously, sensitive receptors in the vicinity of the Project Sites include the following:

- 555 South San Pedro Street, apartments and the Central City Community Church, west of Site 1
- Weingart Center Association, 566 South San Pedro Street, apartments, directly south of and adjacent to Site 1.
- Union Rescue Mission; 545 South San Pedro Street, slightly northwest of Site 1.
- Emmanuel Baptist Rescue Mission; 530 East 5th Street, north of the Project Sites at the southwestern corner of East 5th Street and Crocker Street.
- Charles Cobb Apartments; 521 South San Pedro Street, northwest of Site 1.
- Midnight Mission; 601 South San Pedro Street, west of Site 2.
- 505 South San Pedro Street; Single Room Occupancy Housing Corporation, northwest of Site 1 at the southwest corner of 5th Street and South San Pedro Street.

Construction

Construction of a project could expose sensitive receptors to substantial pollutant concentrations, if a project's maximum daily emissions of regulated pollutants generated by sources located on and/or near a project site exceeded the applicable LSTs values presented in Tables 6-6 and 6-7, or if construction activities generated significant emissions of TACs that could result in carcinogenic risks or non-carcinogenic hazards exceeding the SCAQMD Air Quality Significance Thresholds of 10 excess cancers per million or non-carcinogenic Hazard Index greater than 1.0, respectively. The LSTs values were derived by the SCAQMD for the criteria pollutants NO_X, CO, PM_{10}, and $PM_{2.5}$ to prevent the occurrence of concentrations exceeding the air quality standards at sensitive receptor locations based on proximity and construction site size.

As shown on Tables 6-6 and 6-7, during construction of the Project, maximum localized daily emissions of NO_2, CO, PM_{10}, and $PM_{2.5}$ from sources on the Project Sites would not exceed any of the respective LST values. Thus, based on SCAQMD guidance, the Project's localized emissions of criteria pollutants would not have the potential to expose sensitive receptors to substantial concentrations that would present a public health concern.

The primary TAC that would be generated by the Project's construction activities is diesel PM, which would be released from the exhaust stacks of construction equipment. The construction emissions modeling conservatively assumed that all equipment present on the Project Sites would be operating simultaneously and continuously throughout most of the day, while in all likelihood this would rarely be the case. Average daily emissions of diesel PM would be less than one pound per day throughout the

course of Project construction. Thus, the magnitude of daily diesel PM emissions, would not be sufficient to result in substantial pollutant concentrations at off-site residential locations nearby.

Furthermore, according to SCAQMD methodology, health risks from carcinogenic air toxics are usually described in terms of individual cancer risk. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of TACs over a 30-year lifetime will contract cancer based on the use of standard risk-assessment methodology. The entire duration of construction activities associated with implementation of the Project is anticipated to be approximately 49 months, far shorter than a 30-year exposure timeframe and as discussed above, the magnitude of daily diesel PM emissions would not be sufficient to result in substantial pollutant concentrations. Accordingly, no residual emissions and corresponding individual cancer risk are anticipated after construction. Because there is such a short-term exposure period, the Project's construction-related impact on sensitive receptors would be less than significant.

Operation

As noted above, the Project would not produce operational pollutant emissions in excess of SCAQMD's significance thresholds. In addition, the Project Sites would be developed with land uses that are not typically associated with TAC emissions. Typical sources of acutely and chronically hazardous TACs include industrial manufacturing processes (e.g., chrome plating, electrical manufacturing, petroleum refinery). The Project would not include these types of potential industrial manufacturing process sources. It is expected that quantities of hazardous TACs occurring on-site (e.g., those resulting from typical use of cleaning solvents, paints, landscape pesticides, etc.) for the types of proposed land uses would be below thresholds warranting further study under the California Accidental Release Program.

The primary sources of potential air toxics associated with Project operations include diesel PM from delivery trucks (e.g., truck traffic on local streets and idling on adjacent streets) and to a lesser extent, facility operations (e.g., natural gas fired boilers). However, these activities and the land uses associated with the Project are not considered land uses that generate substantial TAC emissions. It should be noted that the SCAQMD recommends that a health risk assessment (HRA) be conducted for substantial individual sources of diesel PM (e.g., truck stops and warehouse distribution facilities that generate more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units) and has provided guidance for analyzing such types of mobile source diesel emissions.[32] Based on this guidance, the Project would not include these types of land uses and is not considered to be a substantial source of diesel PM warranting a HRA since daily truck trips to the Project Sites would not exceed 100 trucks per day or more than 40 trucks with operating transport refrigeration units. In addition, the CARB-mandated ATCM limits diesel-fueled commercial vehicles (delivery trucks) to idle for no more than 5 minutes at any given time, which would further limit diesel particulate emissions.

[32] *SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis, 2002.*

Because the Project would not contain substantial sources of TACs and is consistent with the CARB and SCAQMD guidelines, the Project would not result in the exposure of off-site sensitive receptors to carcinogenic or TACs that exceed the maximum incremental cancer risk of 10 in one million or an acute or chronic hazard index of 1.0.

The Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO_2, $PM_{2.5}$, or PM_{10} at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, the Project's traffic-related emissions would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to area of the Project Sites. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, as discussed in response to Checklist Question 16(a), the Project would not result in any significant traffic impacts at any study intersection and thus, would not contribute to the levels of traffic congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.[33] For these reasons, the Project's operational-related air quality impacts on sensitive receptors would be less than significant.

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

Less Than Significant Impact. Potential sources that may emit odors during construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the immediate area surrounding the Project Sites. The Project would utilize typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Construction of the Project would not cause an odor nuisance.

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's proposed land uses would not result in activities that create objectionable odors. Therefore, Project impacts related to odors would be less than significant.

Cumulative Impacts

Cumulative air quality impacts are discussed in response to Checklist Question 3(c). As discussed there, SCAQMD recommends that any construction-related emissions and operational emissions from individual development projects that exceed the project-specific mass daily emissions thresholds identified above also would be considered cumulatively considerable. Individual projects that generate emissions below SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. As the Project's emissions during construction and operation would not exceed any applicable significance threshold, the Project's contribution to any cumulative air quality impacts would not be considerable, and cumulative impacts related to air quality would be less than significant.

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

4. BIOLOGICAL RESOURCES

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

Less Than Significant Impact. The Project Sites are located in an urbanized and developed area of the City. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. However, there are 20 trees located on Site 1 and Site 2 (including 6 street trees), all of which are non-protected trees per the City's Tree Ordinance, would be removed as part of the Project (refer to the Tree Reports included in Appendix E). Additionally, 27 trees are located within the courtyard associated with the Weingart Association Center building to the south of Site 1, the site of the proposed transformer relocation. These trees could potentially provide nesting sites for migratory birds. Thus, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations would ensure impacts related to nesting birds would be less than significant.

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

No Impact. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. Neither site contains any riparian habitat or sensitive natural community. Development of the Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. Therefore, no impacts related to this issue would occur.

c) Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. Neither site contains wetlands or other areas subject to the jurisdiction of the US Army Corps of Engineers, California Department of Fish and Wildlife, or State Water Resources Control Board under the Clean Water Act. Therefore, no impacts related to this issue would occur.

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

Less Than Significant Impact. The Project Sites are located in an urbanized area of the City and are surrounded by existing development. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. Neither site is part of a significant wildlife corridor. Additionally, there are no waterways located in the vicinity of the Project Sites that are used by migratory fish, and there are no wildlife nursery sites in the area. Also, as discussed previously, the Project would be required to comply with the MBTA, to reduce potential impacts to migratory bird species that could potentially nest in trees that would be removed as part of the Project. Thus, the Project would not interfere substantially with the movement of any native resident or migratory fish, wildlife species, or with established native resident or migratory wildlife corridors, and/or impede the use of native wildlife nursery sites. Therefore, Project impacts related to this issue would be less than significant.

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

Less Than Significant Impact. In accordance with the LAMC Section 17.02 protected trees are defined as follows:

Any of the following Southern California native tree or shrub species:

- Oak tree including Valley Oak *(Quercus lobata)* and California Live Oak *(Quercus agrifolia),* or any other tree of the oak genus indigenous to California but excluding the Scrub Oak *(Quercus dumosa)*
- Southern California Black Walnut *(Juglans californica var. californica)*
- Western Sycamore *(Platanus racemosa)*
- California Bay *(Umbellularia californica)*
- Mexican Elderberry (*Sambucus Mexicana*)
- Toyon (*Heteromeles arbutifolia*)

As stated previously, a total of 20 trees are located on the Site 1 and Site 2 (including 6 street trees). Additionally, 27 trees are located within the courtyard associated with the Weingart Association Center building to the south of Site 1, the site of the proposed transformer relocation. These trees include the following:

- 7 Indian Laurel Fig (*Ficus nitida*)[34]
- 6 Tipu Tree (*Tipuanan tipu*)
- 7 Apricot Tree (*Prunus armeniaca*)
- 3 Weeping Fig (*Ficus benjamina*)

[34] *Six of these trees are street trees.*

- 1 Tree of Heavan (*Ailanthus altissima*)
- 3 Canary Island Pine (*Pinus canariensis*)
- 9 Redbud Tree (*Cercis Canadensis*)
- 10 Australian Tea Tree (*Leptospermum laevigatum*)
- 1 Crape Myrtle (*Lagerstroemia indica*)

None of these trees are protected species as defined above (refer to the Tree Reports in Appendix E). The 20 trees (including the 6 street trees) associated with Site 1 and Site 2 would be removed during construction of the Project. Also, it is possible that all 27 trees in the courtyard (the site of the proposed transformer relocation) would be removed, although it is anticipated that fewer trees would be removed. However, for those trees removed from the Project Sites, the Project Applicant would be required to plant replacement trees at a minimum of a one-to-one ratio on or adjacent to the Project Sites in conformance with the City's Urban Forestry Division requirements for Project landscaping and street tree replacement and planting. For street trees that would be removed, the Project Applicant would be required to plant replacement street trees at a two-to-one ratio in accordance with the requirements of the City's Urban Forestry Division.

Prior to the removal of trees located within the public right-of-way, the Project Applicant would be required to obtain approval from the Board of Public Works for the removal and replacement of said trees. Street trees would be required to be removed and replaced as required by the Urban Forestry Division and the Board of Public Works. The landscape plans for the Project shall identify the all trees that would be removed. Compliance with the City's requirements would ensure no significant impacts related to biological resources, in particular trees, would occur.

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

No Impact. The Project Sites are located in an urbanized area of the City. There are no identified Significant Ecological Areas (SEAs) within the vicinity of the Project Sites, and neither site is subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan.[35] There are no adopted conservation plans in the City. Therefore, the Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan or other approved local, regional, or state habitat conservation plan.

Cumulative Impacts

As discussed, 20 non-protected trees are located on the Project Sites (including 6 street trees); no other significant biological resources are located on the Project Sites. The Project Applicant would be required to plant replacement trees at and adjacent to the Project Sites in conformance with the City's Urban Forestry Division requirements for Project landscaping and street tree replacement and planting. All of the related projects listed on Table 2-2 in Section 2 (Project Description) are located in highly urban areas

[35] *City of Los Angeles General Plan Conservation Element, Exhibit B2.*

and likely do not contain significant biological resources, such as candidate, sensitive or special status species, riparian habitat, sensitive natural communities, and wetlands, and are not part of a wildlife corridor or SEA or subject to a Habitat Conservation Plan, a Natural Community Conservation Plan, or other such plan. All related projects with existing trees would be required to comply with the requirements of the MBTA. Because the Project would not result in any impacts related to biological resources, the Project does not have the potential to contribute to any cumulative biological resources impacts. Therefore, cumulative impacts related to biological resources would be less than significant.

5. CULTURAL RESOURCES

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

Less Than Significant Impact. The information and analysis of the Project's potential impacts to historical resources is based primarily on the following (refer to Appendix G):

- *Historical Resources Memo, 554-562 South San Pedro Street, Los Angeles, CA, Jenna Snow, May 25, 2018 (revised August 3, 2018).*

No structures are currently located on Site 2, and no significant historical structures are located adjacent to Site 2. As such, this analysis focuses on potential impacts associated with Site 1 development.

Site 1 is currently developed with a 7,000-square-foot food service building and surface parking lot, which was constructed in 1922.[36] The building on Site 1 has not been previously surveyed; it was not included in the City's citywide survey (SurveyLA), nor is it included in the Historic Property Data File for Los Angeles County, updated to 2011. Based on a site visit, review of building and alteration permits, and available information on the building's history, the building on Site 1 has not been listed nor does it appear eligible for listing in the National Register of Historic Places (National Register), the California Register of Historical Resources (California Register), or as a local City of Los Angeles Historic Cultural Monument (HCM).

Site 1 is located adjacent to 511 East 6th Street, the former El Rey Hotel, which was identified in SurveyLA as appearing eligible for listing in the National and California Registers, and as a local HCM as "an excellent example of a 1920s hotel in Downtown Los Angeles, exhibiting essential characteristics of the property type; reflects early patterns of commercial development to the east of Los Angeles' central business district." The El Rey Hotel is considered for the purposes of this analysis a historical resource under the California Environmental Quality Act (CEQA). As discussed in more detail below, Site 1 is located adjacent to the northern elevation, which is not the primary, street-facing elevation, of the El Rey Hotel, it does not appear that the Project would result in any direct or indirect impacts on the historical resource.

[36] *City of Los Angeles, Department of Building and Safety, Permit #27664, August 15, 1922.*

Historical Assessment of Site 1

Eligibility criteria for the National Register, California Register and local HCM generally align. Properties are eligible for designation if they meet one or more of the four criteria. The discussion below focuses on those aspects of the criteria relevant to evaluation of Site 1.

Criterion A/1/1: Are associated with events that have made a significant contribution to the broad patterns of our history.

The Site 1 is located in what is described as "Central City East" in SurveyLA. The area has been known as "Skid Row" since the late nineteenth century. The following description of the area is excerpted from SurveyLA:[37]

> *Central City East is generally located to the east of the Historic Core and to the south of Little Tokyo. Spanning a diverse area that encompasses Skid Row, the Toy District, and adjacent industrial zones, the neighborhood contains a mix of industrial and institutional uses. Notably, it contains many Single-Room Occupancy (SRO) hotels, social service facilities, and warehousing sites that are associated with food processing. Development in this area is of a notably lower scale than in other parts of the [Community Plan Area]….*
>
> *Homelessness and other social problems were even more rampant in the area located to the east of Main Street and the Historic Core, which had become known as Los Angeles' "Skid Row." Since the late nineteenth century, this area had been the domain of an indigent population because of its abundance of residential hotels adjacent to early rail terminals. These hotels provided cheap, short-term accommodations and were accompanied by several missions that had long operated nearby to provide "a sermon and a cup of soup for the population of hard-drinking single men." The area's reputation as a bastion of urban disorder was solidified by a "policy of containment" that was adopted by the city in 1975, which sought to concentrate social service agencies and homeless individuals in an area bounded by 3rd, 7th, and Main Streets and Central Avenue. Despite the best efforts of social service organizations and not-for-profit agencies such as the Skid Row Housing Trust, which has converted thousands of dilapidated Single-Room Occupancy (SRO) hotel rooms in the area into affordable housing units, Skid Row continues to house one of the largest stable populations of homeless individuals in the United States.*

The pattern of development described above of generally low-scale buildings that combine residential with industrial uses is evident in historic Sanborn Fire Insurance maps of the area.

As stated previously, the existing food service building on Site 1 was constructed in 1922. Since 1937, Site 1 has been owned by Ben Weingart; corporations controlled by Ben Weingart; one of his favorite

[37] *Architectural Resources Group, "Historic Resources Survey Report; Central City Community Plan Area," prepared for the City of Los Angeles Department of City Planning, Office of Historic Resources, September 2016, 4 & 28-29.*

charities, Volunteers of America; or a foundation that bears his name, successively.[38] Table 6-11 shows a history of ownership.

Table 6-11
History of Ownership

Year	Owner
1922	Francesca W. Shepherd
1924	Security Trust & Savings Bank
1926	Title Insurance and Trust Company
1929	Citizens Trust and Savings Bank
1930	William H. Anderson
1936	Mortgage Guarantee Co.
1937	Consolidated Hotels, Inc.
1948	Ben Weingart
1957	Tragniew Inc
1980	Volunteers of America of Los Angeles
1984	Weingart Center Association
Source: Jenna Snow, May 2018.	

The building was divided into at least four spaces that were leased to different tenants. For a period of at least four years, the building was divided into five spaces. Table 6-12 lists tenants between 1925 and 1987.

Based on Table 6-12, most tenants were agents selling a variety of industrial products. However, it does not appear any of the products were produced at Site 1.

As a low-scale, one-story building housing a variety of agents selling industrial products, the food service building appears as a typical property type in the area, and it does not appear to have made any significant contributions to the broad patterns of development of the area. Thus, the building on Site 1 is not eligible for designation under criterion A/1/1.

Criterion B: Are associated with the lives of significant persons in our past.

Site 1, purchased by Ben Weingart in 1937, was one of many properties in his portfolio. Ben Weingart was a real estate developer who co-founded the community of Lakewood, as well as a major stockholder in the Fedmart discount department stores. Ben Weingart arrived in Los Angeles in 1911, initially delivered laundry on Skid Row and, soon thereafter, started purchasing boarding houses on Skid Row. Beginning in 1949, Weingart, in partnership with Louis Boyer and Mark Taper, purchased 3,500 acres south of Los Angeles, and built 17,000 new homes, along with the Lakewood Shopping Center.

[38] *John Farrell, Ben Weingart & Weingart Foundation, (Los Angeles, CA: Weingart Foundation, 2002), 137.*

Lakewood became the largest planned city in the United States.[39] The Weingart Foundation was founded in 1951 and has focused on "serv[ing] the underserved," since that date.[40]

Table 6-12
Tenants Between 1925 and 1987

Date	554 S. San Pedro	556 S. San Pedro	558 S. San Pedro	560 S. San Pedro	562 S. San Pedro
1925	William A. Winsboro Mfrs agent, h 1466 W 47th (1923 directory: Air Compressor & Equipment Co, 504 S San Pedro)	Don Lincoln, printer h 773 Cahuenga Ave		Stewart Electric Co. (Emmett A. Stewart) Jobbers and Distributors of Electrical Supplies	Lake View Creamery Co., W. F. Sperry, v-pres and mgr (1923 directory: 805 E 8th St
	JJ McBride				
1930	Murry Jacobs, HC Kimes dist mgr mfrs agts Jacobs Murray Co, manufacturing agents	Merco Nordstrom Valve Co		Edwin G Nelson (electrical equipment, manufacturers agent)	William Wahl Co (William and William Wahl Jr), wholesale beverages
1935	Bassett-Lundstrom Co (AB Bassett & JT Lundstrom), belting dealer	Clinton H Smart (blue point supplies) h3522 Linda Vista ter	Far West Distributing Co, Charles Love manager new dealers	Cutler-Hammer, Inc (Electrical Equipment and supplies – Dealers)	JC Millett Co (winery supplies), Frank Kissling manager
	Robert L Whitham manufacturers agent (metals)				
1940	Bassett-Lundstrom Co (AB Bassett & JT Lundstrom), belting dealer	Clinton H Smart (Olive C) CS [Christian Science pract[itioner] 610 S Bway R324 and engraves supplies and blue prints h914 S Kingsley dr	Abrasive Products Co A E MacAfee manager	Strickland & Davis (JM Strickland and JS Davis) manufacturers agents	Frank Kissling (Liquor Distributors)
	Robert L Whitham manufacturers agent (metals)				
1942	Bassett-Lundstrom Co (AB Bassett & JT Lundstrom), belting dealer (Chicago Belting Co.)	Clinton H Smart (Olive C) CS pract 610 S Bway R324 and engravers supplies and blue prints Pasadenta		Strickland & Davis (JM Strickland and JS Davis) wholesale auto parts	Samuel Zane (candles)
1956		Smart Clinton H, Smart Supply Co		J.W. Lewis Co., Max Elsner	Carroll Machry
1960	Leseco Metals and Supply	CC Lithograph Co		J.W. Lewis Co., Max Elsner	Carroll Machry
1965	RA Schmitz	Midway Tool Supply		JJ Optics	Carroll Machinery

[39] *Ted O. Thackery and Anne LaRiviere, "Ben Weingardt, 92, Philanthropist, Financier, Dies," Los Angeles Times, December 23, 1980, A1.*

[40] *Weingart Foundation, "About Us: Foundation Overview," www.weingartfnd.org/Foundation-Overview.*

Table 6-12
Tenants Between 1925 and 1987

Date	554 S. San Pedro	556 S. San Pedro	558 S. San Pedro	560 S. San Pedro	562 S. San Pedro
1973	No Listings				
1987	Morrison's Management Service				
Source: Jenna Snow, 2018.					

None of the tenants have had an especially long tenure. The longest tenant was Clinton H. Smart, who provided blueprint and engraver supplies between 1935 and 1956. Clinton H. Smart was also listed in the directory as a Christian Science practitioner. His obituary notes that he was "president of a Los Angeles art supply company…a member of the Balboa Yacht Club and a director of the Christian Science Visiting Nurse Service."[41] While Clinton Smart appears to have been an upstanding citizen, he does not appear to be a significant person in our past.

In contrast, Frank Kissling does not appear to have been an upstanding citizen. Frank Kissling, who leased a space for liquor distribution in the late 1930s-1940, was arrested for smuggling alcohol from Mexico. In addition, he was accused of cutting the alcohol. In an article appearing the *Los Angeles Times*, "officials disclosed that the breaking of the smuggling case-biggest of its kind since prohibition days-had resulted in receipt of information that much of the smuggled alcohol was distributed in the Skid Row area here in refilled liquor bottles bearing fake labels. The original supply was 'cut' drastically in alcoholic content and sold as domestic bourbon with the aid of synthetic flavoring, it was reported."[42] Frank Kissling was later acquitted.[43]

Established in 1914, J.W. Lewis Co. mostly sold and leased industrial spaces. With its main office located at the Security Building, at 510 South Spring Street, Site 1 was a satellite office for the company.[44] The company sold properties in the vicinity of Site 1, including the El Rey Hotel, located adjacent to Site 1, as well as a property on the southeast corner of 5th and South San Pedro Streets.[45] Max Elsner worked at J.W. Lewis Co. from as early as 1922.

Although Site 1 can be associated with several individuals, specifically Ben Weingart, Clinton Smart, Frank Kissling, and Max Elsner, Site 1 does not appear eligible under criterion B/2/2 for its association with the lives of significant persons in our past. While Ben Weingart was a significant person in Southern

[41] *"Obituary," Los Angeles Times, October 18, 1957, B2.*

[42] *"Inquiry Turns to Skid Row," Los Angeles Times, July 28, 1939, A1.*

[43] *"Five Acquitted in Alcohol Case," Los Angeles Times, November 4, 1939, A16.*

[44] *California State Real Estate Division, Directory of Brokers and Salesmen, Volumes 3-4, (Sacramento: California State Printing Office, 1922).*

[45] *"Sales in Wholesale Area," Los Angeles Times, February 17, 1924, D8; "Classified Ad," Los Angeles Times, May 7, 1950, A9.*

California, Site 1 was one of his many property holdings and is not most closely associated with his important work. Neither Clinton Smart, Frank Kissling, nor Max Elsner appears to have been significant persons in our past.

Criterion 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.

Located on the east side of South San Pedro Street, Site 1 is bounded on the north by East 5th Street and the south by East 6th Street in the Skid Row area of Central City Community Plan Area of Los Angeles. The site contains one building that occupies approximately half of the parcel. A driveway at the north elevation separates the building from the parcel to the north, while a narrow walkway separates the building from the El Rey Hotel, which is located on the adjacent parcel to the south.

A one-story masonry building with no discernable architectural style, the one building on Site 1 has a flat roof with visible through-bolts at the parapet. The west façade, facing east toward South San Pedro Street, is five bays wide. Brick piers separate each bay. The main entrance is located in the second bay from the north, articulated by a contemporary canvas awning. The entrance is slightly inset at an angle and consists of a single, contemporary glass and metal door with a glass transom above. Three, tall, fixed sash windows are located adjacent to the main entrance above a low bulkhead. The center bay contains three, fixed, metal sash windows above a low bulkhead, flush with the infilled stucco. Three of the bays have been infilled with smooth stucco. The southern-most bay contains a contemporary tile mural and a secondary entrance. The secondary entrance is a contemporary, solid metal door. North and south side elevations are unarticulated and unadorned. The rear, east elevation has two entrances, a pair of metal doors toward the south side of the elevation and a single glass and metal door toward the north side of the elevation. The glass door is sided by a tall, fixed sash sidelight that is covered by a metal screen. A glass transom spans across the door and sidelight. It is also covered by a metal screen. A contemporary canvas awning spans the entrance and sidelight above the transom. A single window, covered by a metal screen, is located adjacent to the door. A number of additional openings along the elevation have been infilled.

The interior of the building functions as a café. The south half of the interior consists of one, large open space roughly divided by thin metal posts. A skylight is located toward the center of the space. The north half consists of a large commercial kitchen. All finishes on the interior, including floor tiles and suspended ceiling are contemporary.

Constructed in 1922, the one building on Site 1 has undergone substantial alterations. Table 6-13 lists all available alterations permits.

Figure 3 on page 7 of the Historical Resource Memo (refer to Appendix G) shows a historic image of the subject property from the 1940s. The building appears as an unremarkable one-story building with glass storefronts along the west façade. The first notable alteration occurred in 1952 with a "parapet correction." It is difficult to determine in the historic image if the building ever had a decorative parapet. It is possible bays on the west façade were infilled in 1981, when the building changed use from stores to a café. Through bolts were likely installed as part of the Division 88 work, completed in 1988, which

required seismic stabilization of unreinforced masonry buildings. Finally, in 1995, substantial work was completed on the interior and most, if not all, interior features appear to date from this time.

As noted on Table 6-13, the building on Site 1 was designed by John Cooper. Born in Ohio, John Montgomery Cooper (1884-1950) graduated from Yale University and worked on the Panama Canal as an engineer. He arrived in Los Angeles in 1910. John Cooper was a noted southern California architect who was responsible for the design of the Hollywood Knickerbocker Hotel (1714 Ivar Avenue, 1929, contributing resource to a National Register-listed historic district), Grether & Grether Building (730 South Los Angeles Street, 1924, listed in the National Register), Roxie Theater (815 South Broadway, 1931, listed in the National Register), and NuWilshire Theater (1314 Wilshire Boulevard, Santa Monica, 1931, Santa Monica Landmark).

The building on Site 1 does not embody the distinctive characteristics of a type, period, or method of construction, nor does it possess high artistic values. The building has no discernible architectural style, nor does it appear that it ever was a high-style building. With the parapet removed and three of the five bays infilled, the building appears as a shell of how it originally looked. While the building was designed by John Cooper, a notable architect, this is not among his important work. Thus, Site 1 does not appear eligible for designation under criterion C/3/3.

Criterion D: Have yielded or may be likely to yield, information important in history or prehistory.

Site 1 cannot be reasonably expected to yield information important in prehistory or history. Thus, Site 1 is not eligible under Criterion D/4.

Site 1 is located adjacent to the former El Rey Hotel, which was identified in SurveyLA as appearing eligible for listing in the National and California Registers, as well as a local HCM. The survey found 511 East 6th Street eligible as "an excellent example of a 1920s hotel in Downtown Los Angeles, exhibiting essential characteristics of the property type; reflects early patterns of commercial development to the east of Los Angeles' central business district." 566 South San Pedro Street is considered to be a historical resource under CEQA for purposes of this analysis.

Table 6-13
Alterations Permits

Date	Permit No.	Work	Owner	Architect/Builder	Valuation
8/15/1922	27664	New building	B*** H. Jones & Francis H. Green	John M. Cooper	$15,000
1/31/1923	4641	Located at 554 So San Pedro. No alterations. Wish to install "wood" fixtures + office partitions of wood boards and sidings 8" high. Building is cement floor + walls brick." Building used for manufacturing + Jobing	J. W. Lewis Co., 518-519 Security Bldg	$175	1/31/1923
4/16/1923	16774	"Put in partition above ice box- of wood and glass – ¼ glass"	Lakeview Creamery Co	Lake View Creamery Co, 562 S. San Pedro St	$40
3/30/1937	9766	"1 Rope Pull Up Awing Complete"	Smart Supply Company, 556 S. San Pedro St.	A. Hoegee & Sons, Inc.	$25
2/27/1940	6995	"To build open joist construction mezzanine for storage purposes only" (556 So. San Pedro Street)	Consolidated Hotels, El Rey Hotel 6th & San Pedro Sts	Arthur C. Munson	$200
7/16/1942	8684	"one Rope awning complete"	The Smart Shop, 558 S. San Pedro St	D** of Soft Awning Co, 3103 So. Main St	$35
4/25/1945	5683	Not legible. Bottom line: "to store blueprint paper"	Clinton Smart, 556 S. San Pedro	$900	4/25/1945
8/13/1951	12905	"Recover existing awnings. Rope pull-up (retractable) (canvas covered)	Smart Supply Co., 556 So. San Pedro	$104	8/13/1951
12/9/1952	48778	"parapet wall correction along S. San Pedro & alley" – 554-62 S. San Pedro, used as a store for 20 years	Consolidated Hotels, 1301 Wilshire	Lopez & Crecghton, 1257 E. 25 St	$1100
1/11/1957	61747	"Enlarge Doors"- 562 S. San Pedro. Used as a machine shop	Consolidated Hotels, 1301 Wilshire Blvd	Kenneth Thompson	$700
11/10/1964	81828	"Toilet rm add (interior)" – 554 S. San Pedro St. used as stores	Tragneiw Inc. 1301 Wilshire Blvd	$800	11/10/1964
1/27/1981	35664	"1 story 34'x76' portion of existing 88'x84' office/warehouse converted to a kitchen (no assembly use)	Volunteers of America, 1501 Wilshire Blvd		
4/8/1983	61612	"Generator Cover Bldg" with chain link exterior walls, metal roof, concrete floor. 554-562 S. San Pedro	Volunteers of America, 1501 Wilshire Blvd	Stuart E. Greenfield, 2300 Westwood Blvd/	$2500
7/26/1988	5144	"Division 88 Full Compliance," 554-62 S. San Pedro St., used as a kitchen & Dining room	Weingart Center Assn, 511 E. 6th St, LA, CA	Engineer – Wheeler & Gray, 7462 North Figueroa St	$48,000
2/10/1995	3118	"interior modifications for café. Change of use to dining room & deli"	Weingart Center	Terry Downing, 31220 la Baga Dr., Ste 235, Westlake Village	$85,000

Source: Jenna Snow, 2018.

The El Rey Hotel was constructed in 1925, designed by Charles F. Whittlesey with elements of Beaux Arts style.[46] Charles Frederick Whittlesey (1867-1941) started his professional career in Chicago, working as a draftsman for Louis Sullivan prior to opening his own practice. Around the turn of the twentieth century, Charles Whittlesey became chief architect for the Atchison Topeka and Santa Fe Railroad Company, working with noted architect Mary Colter. During that time, he designed the El Tovar Hotel at Grand Canyon National Park (1905) and Alvarado Hotel in Albuquerque, New Mexico (1904). Around the same time as he designed the El Rey Hotel, Charles Whittlesey was also responsible for the design of the Padre Hotel (1955 North Cahuenga Boulevard, 1925) and the Mayflower Hotel (now the Hilton Checkers Hotel, 535 South Grand Avenue, 1927).[47]

When the hotel opened in 1927, it was operated by Stillwell Hotel Company and advertised for its "strictly fireproof" construction. Its 620 rooms were available for $1.00 a day or $5.00 to $10.00 a week.[48] The hotel appears to have been one of the inexpensive, short-term accommodations common in this area. It appears in several newspaper articles as the site of tragic suicides.[49]

The El Rey was one of the first hotels purchased by Ben Weingart in 1937, through a holding company named Consolidated Hotels Corporation.[50] The building transferred to the Weingart Foundation by 1980. When the Weingart Center opened in 1983, it was one of the first, and was the nation's largest facility at the time providing housing and services for alcoholics on Skid Row. A one-million-dollar remodeling effort was completed prior to opening as a rehabilitation center.[51] A new garden on the parcel east of the El Rey was dedicated in 2010 on the site of a formerly vacant lot.[52] The garden is enclosed along East 6th Street by a contemporary concrete block wall and fence and consists of concrete and brick walkways, raised concrete planters, a central fountain, and a variety of seating.

While the exterior of the El Rey looks very similar to how it appeared historically in 1927, there is little historic fabric remaining on the interior apart from the circulation system. SurveyLA identified the subject property as appearing eligible under criterion A/1/1 as a 1920s hotel, as well as for its architecture under criterion C/3/3. Character-defining features of the exterior include the following:

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[46] *City of Los Angeles, Department of Building and Safety, Permit #43928, December 31, 1925.*

[47] *Pacific Coast Architecture Database, "Charles Frederick Whittlesey," PCAD id: 102, pcad.lib.washington.edu/person/102/; Los Angeles Conservancy, "Hilton Checkers," www.laconservancy.org/locations/hilton-checkers.*

[48] *"Display Ad," Los Angeles Times, June 12, 1927, 6.*

[49] *"Mystery Girl Takes Poison, Cuts Wrists," Los Angeles Times, December 29, 1927, A12; "Photo," Harold Examiner, USC Digital Library, 1951; "Man Threatens 12-Story Leap; Foiled by Police," Los Angeles Times, April 9, 1964, 2.*

[50] *County of Los Angeles, Deed Books, Instrument No. 15323, Page 198.*

[51] *"Alcoholism Center Gets New Owner, $2-Million Grant," Los Angeles Times, November 30, 1 984, D1.*

[52] *"Dedication of the Weingart Center Garden Project," Press Release July 8, 2010, Congresswoman Lucille Roybal-Allard, https://roybal-allard.house.gov/news/documentsingle.aspx?DocumentID=19800.*

- Beaux Arts composition of a clearly delineated base-shaft-capitol composition
- Articulated corner column
- Arched bays at the ground floor
- Regularly spaced fenestration along the shaft
- Classical cornice details

The Project includes development of Site 1, adjacent to the north elevation of the El Rey Hotel. Specifically, the Project includes construction of two towers, designed in a contemporary style: one 12-stories facing South San Pedro Street and the other 18-stories high to the east. New mechanical equipment, including two new electrical transformers, is proposed to be located within the garden east of the El Rey Hotel and service the two new buildings as well as the El Rey Hotel. As the building on Site 1 does not meet any of the four criteria for listing in the National or California Registers or for local designation, it is not a historical resource under CEQA. Therefore, its demolition would not be a significant impact.

As the Project consists of new construction immediately adjacent to a historical resource, the El Rey Hotel, there is the potential for indirect impacts to the setting of the historical resources. In general, CEQA describes an *indirect* impact as one that results from the "…alteration of the resource or *its immediate surroundings* such that the significance of an historical resource would be materially impaired" (emphasis added - CEQA Guidelines §15064.5[b][1]). While the setting of the El Rey Hotel, including the garden to the east and its associated features, is not a character-defining feature and does not contribute to its significance, the proposed project nevertheless does not appear to impact its setting. The proposed project is located adjacent to the north elevation, a secondary elevation. The tower adjacent to the El Rey Hotel is proposed to be 12-stories tall, which is only two stories higher than the El Rey Hotel. It is interesting to note that at one time, a four-story building may have been contemplated for the subject property (refer to Figure 6 on page 9 of the Historical Resource Memo in Appendix G). Although the second tower would be almost twice as tall as the El Rey Hotel, it is not located immediately adjacent to it. Thus, the Project would not alter the setting of the El Rey Hotel, including the garden to the east that was dedicated in 2010, in such a manner that it would be materially impaired.

Based on this analysis, Project impacts related to historical resources would be less than significant.

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

Less Than Significant With Mitigation Incorporated. Section 15064.5(a)(3)(D) of the CEQA Guidelines generally defines archaeological resources as any resource that "has yielded, or may be likely to yield, information important in prehistory or history." Archaeological resources are features, such as tools, utensils, carvings, fabric, building foundations, etc., that document evidence of past human endeavors and that may be historically or culturally important to a significant earlier community.

The Project Sites are located within an urbanized area of Downtown Los Angeles and have been subject to grading and development in the past. Based on a records search conducted by the South Central Coast Information Center (SCCIC), 4 archaeological sites have been recorded within a 0.5-mile radius of the

Project Sites. No archaeological sites and/or resources have been recorded at the Project Sites (refer to Appendix G). However, unknown buried remains of the Zanja Madre (a historical water conveyance system) could potentially fall within the boundaries of the Project Sites.[53] As such, it is possible that unknown archaeological resources could exist at the Project Sites. Although the Project Sites have been subject to grading and development in the past, the Project would require excavations at a depth of approximately 17 feet below ground surface, and unknown archaeological resources could potentially be encountered during grading and excavation activities associated with development of the Project. Nonetheless, the Project Applicant would be required to implement Mitigation Measures CULT-MM-1 and CULT-MM-2, which would ensure that Project impacts related to unknown archaeological resources would be less than significant.

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

Less Than Significant With Mitigation Incorporated. Paleontological resources are the fossilized remains of organisms that have lived in a region in the geologic past and whose remains are found in the accompanying geologic strata. This type of fossil record represents the primary source of information on ancient life forms, since the majority of species that have existed on earth from this era are extinct. Section 5097.5 of the California Public Resources Code specifies that any unauthorized removal of paleontological remains is a misdemeanor. Furthermore, California Penal Code Section 622.5 includes penalties for damage or removal of paleontological resources.

A records search was conducted with the Los Angeles County Natural History Museum to determine the likelihood for unique paleontological resources to occur at the Project Sites (refer to Appendix G). The records search revealed that no vertebrate fossil localities are been identified at the Project Sites. However, fossils have been found in the sedimentary deposits that exist within the Project Sites' area and at the Project Sites. Although the Project Sites have been subject to grading and development in the past, the Project would require excavations at a depth of approximately 17 feet below ground surface. As such, there is a possibility for unknown paleontological resources to be encountered within the underlying alluvium during grading and excavation activities associated with development of the Project. Nonetheless, the Project Applicant would be required to implement Mitigation Measure 6-3, which would ensure that Project impacts related to unknown paleontological resources would be less than significant.

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

Less Than Significant Impact. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. Although the Project Sites have been subject to grading and development in the past, the Project would require excavations at a depth of approximately 17 feet below ground surface. A significant adverse effect could occur if grading or excavation activities associated with a project could disturb human remains. However, no human remains are known to exist

[53] *Record Search Results for the Weingart Project, South Central Coast Information Center, December 4, 2017. Refer to Appendix G.*

at the Project Sites. In accordance with the State's Health and Safety Code Section 7050.5, in the event of discovery or recognition of any human remains at the Project Sites, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American, or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Through compliance with the regulatory standards described above, potential Project impacts to human remains would be less than significant.

Mitigation Measures (Cultural Resources)

CULT-MM-1: Prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the Project Sites. In addition, in the event that buried archaeological resources are exposed during Project construction, work within 50 feet of the find shall stop until a professional archaeologist, meeting the standards of the Secretary of the Interior, can identify and evaluate the significance of the discovery and develop recommendations for treatment. Construction activities could continue in other areas of the Project Sites. Recommendations could include preparation of a Treatment Plan, which could require recordation, collection and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any Native American remains shall be treated in accordance with state law.

CULT-MM-2: Before ground disturbance, field observations regarding the geo-archaeological setting shall be conducted by a qualified archaeologist to determine the presence of undisturbed sediments capable of preserving archaeological remains, and the depth at which these sediments would no longer be capable of containing archaeological material. An archaeological monitor shall be present during initial excavation activities. The duration and timing of the monitoring shall be determined by the qualified archaeologist in consultation with the Department of City Planning and the Project Applicant. The qualified archaeologist may designate an archaeologist to conduct the monitoring under their direction.

CULT-MM-3: Prior to Project construction, the prime contractor and any subcontractor(s) shall be advised of the legal and/or regulatory implications of knowingly destroying paleontological or unique geologic resources or sites from the Project Sites. In addition, in the event that paleontological resources or sites, or unique geologic features are exposed during Project construction, work within 50 feet of the find shall stop until a qualified paleontologist, can identify and evaluate the significance of the discovery and develop recommendations for treatment. Construction activities could continue in other areas of the Project Sites. Recommendations could include a preparation of a Treatment Plan, which could require recordation, collection, and analysis of the discovery; preparation of a technical report; and curation of the collection and supporting documentation in an appropriate depository. Any paleontological resources or sites, or unique geologic features shall be treated in accordance with state law.

Cumulative Impacts

As discussed above, the Project would not result in indirect or direct impacts to any significant historical resource. Thus, the Project would not have the potential to contribute toward any significant cumulative impacts related to historical resources. Impacts related to archaeological and paleontological resources and human remains are site-specific and are assessed on a site-by-site basis. All development in the City (including the proposed Project and the related projects) that involves ground-disturbing activities is required to implement standard City conditions of approval and/or mitigation similar to Mitigation Measures CULT-MM-1 through CULT-MM-3 related to the discovery of archaeological resources, as well as existing state and City regulations related to discovery of paleontological resources and human remains. For these reasons, cumulative impacts related to archaeological and paleontological resources and human remains would not be cumulatively considerable and less than significant.

6. GEOLOGY AND SOILS

In 2015, the California Supreme Court in the California Building Industry Association v. Bay Area Air Quality Management District (62 Cal.4th 369 [Case No. S213478]) (CBIA v. BAAQMD), 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 the project. The City's revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project physically exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix H of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts to future residents or users in the Central City Community Plan Area.

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

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

No Impact. Fault rupture occurs when movement on a fault deep within the earth breaks through to the surface. Based on criteria established by the California Geological Survey (CGS), faults can be classified as active, potentially active, or inactive. Active faults are those having historically produced earthquakes or shown evidence of movement within the past 11,000 years (during the Holocene Epoch). Potentially active faults have demonstrated displacement within the last 1.6 million years (during the Pleistocene Epoch) while not displacing Holocene Strata. Inactive faults do not exhibit displacement more recently than 1.6 million years before the present. In addition, there are buried thrust faults, which are faults with no surface exposure. Due to their buried nature, the existence of buried thrust faults is usually not known until they produce an earthquake.

The CGS establishes regulatory zones around active faults, called Alquist-Priolo Earthquake Fault Zones (previously called Special Study Zones). These zones, which extend from 200 to 500 feet on each side of the known fault, identify areas where a potential surface fault rupture could prove hazardous for buildings used for human occupancy. Development projects located within an Alquist-Priolo Earthquake Fault Zone are required to prepare special geotechnical studies to characterize hazards from any potential surface ruptures. In addition, the City designates Fault Rupture Study Areas along the sides of active and potentially active faults to establish areas of potential hazard due to fault rupture.

According to the Geotechnical Investigations prepared for Sites 1 and 2, neither Project site is located within an Alquist-Priolo Earthquake Fault Zone, and no known faults exist on the Project Sites.[54] The Hollywood Fault, located approximately 5.0 miles from the sites, is the closest fault with the potential for surface rupture. Thus, the Project would not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault on the Project Sites. Furthermore, given that no active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Sites, the Project would not exacerbate existing fault rupture conditions. Construction of the Project would be subject to the compliance with the existing state and local regulations, including the 2016 California Building Code and the Los Angeles Building Code (LABC) and with the recommendations contained in the Final Geotechnical Reports prepared for the Project by a licensed engineer and approved by the City of Los Angeles Department of Building and Safety's

[54] *Geotechnical Investigation (554-562 South San Pedro Street and 555-561 South Crocker Street), GEOCON West, Inc., May 24, 2017. Geotechnical Investigation (600 South San Pedro Street), GEOCON West, Inc., March 7, 2018. Both investigations are included in Appendix H.*

(LADBS) and the conditions contained within the LADBS Geology and Soils Approval Letters (Log Nos. 102203 and 102409), which would ensure the Project would be consistent with applicable seismic design criteria and with existing seismic safety regulations and would minimize potential impacts associated with rupture of a known fault or groundshaking.[55] Further, the LABC, with which the Project would be required to comply, contains construction requirements to ensure that structures are built to a level such that they can withstand acceptable seismic risk. Therefore, the Project would not expose people or structures to substantial adverse effects associated with fault rupture, and would not cause or exacerbate seismic conditions on the Project Sites. No impacts with respect to fault rupture would occur.

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

Less Than Significant Impact. The Project Sites are located in a seismically active Southern California region. Known regional active faults that could produce significant ground shaking at the Project Sites include the Puente Hills Blind Thrust Fault, Hollywood Fault, the Raymond Fault, the Newport-Inglewood Fault Zone, the Verdugo Fault and the Whittier Fault located approximately 0.7, 5.0, 5.5, 6.4, 7.3 and 9.1 miles from the closest of the Project Sites, respectively. A partial list of moderate to major earthquakes that have occurred in Southern California in the last 100 years is shown on Table 6-14. The closest potentially active faults include the MacArthur Park Fault, the Coyote Pass Fault, the Overland Fault, and the Charnock Fault, located approximately 0.4, 2.4, 8.6, and 9.4 miles from the closest of the Project Sites, respectively. The Puente Hills Blind Thrust underlies the Project Sites, at a depth of approximately 0.7 miles.

Given the Project Sites' location in a seismically active region, the Project Sites could experience seismic groundshaking in the event of an earthquake. However, as with any new development in the State of California, building design and construction for the Project would be required to conform to the current seismic design provisions of the California Building Code. The 2016 California Building Code 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. Additionally, construction of the Project would be required to adhere to the seismic safety requirements contained in the LABC, as well as the applicable recommendations provided in the geotechnical investigations required by the City to minimize seismic-related hazards. In addition, the Project would not exacerbate existing environmental conditions with regard to seismic ground shaking. Adherence to current building codes and engineering practices would ensure that the Project would not expose people, property or infrastructure to seismically induced ground shaking hazards that are greater than the average risk associated with locations in the Southern California region, and would minimize the potential to expose people or structures to substantial risk, loss, or injury. Based on the above, development of the Project would not exacerbate seismic conditions on the Project Sites. With compliance with regulatory requirements, Project impacts associated with seismic ground shaking would be less than significant.

[55] *The Geotechnical Investigations for the Projects have been reviewed by the Los Angeles Department of Building and Safety, which concurred with the conclusions and recommendations of the report. Refer to the LADBS approval letters in Appendix H.*

Table 6-14
List of Historic Earthquakes

Earthquake (Oldest to Youngest)	Date of Earthquake	Magnitude	Distance to Epicenter (Miles)	Direction to Epicenter
San Jacinto-Hemet area	April 21, 1918	6.8	74	ESE
Near Redlands	July 23, 1923	6.3	57	E
Long Beach	March 10, 1933	6.4	33	SE
Tehachapi	July 21, 1952	7.5	79	NW
San Fernando	February 9, 1971	6.6	27	NNW
Whittier Narrows	October 1, 1987	5.9	10	E
Sierra Madre	June 28, 1991	5.8	21	NE
Landers	June 28, 1992	7.3	104	E
Big Bear	June 28, 1992	6.4	82	E
Northridge	January 17, 1994	6.7	20	NW
Hector Mine	October 16, 1999	7.1	119	ENE
Source: Geotechnical Investigation, GEOCON West, Inc., March 2018.				

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

Less Than Significant Impact. Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. Liquefaction can occur when these types of soils lose their shear strength due to excess water pressure that builds up during repeated seismic shaking. A shallow groundwater table, the presence of loose to medium dense sand and silty sand, and a long duration and high acceleration of seismic shaking are factors that contribute to the potential for liquefaction. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials.

As discussed in the Geotechnical Investigations prepared for the Project Sites (refer to Appendix H), the State of California Seismic Hazard Zone Map for the Los Angeles Quadrangle (California Department of Mines and Geology [CDMG"], 1999; CGS, 2016) indicates that the Project Sites are not located in an area designated as having a potential for liquefaction. In addition, a review of the County of Los Angeles Safety Element (Leighton, 1990) indicates that the sites are not located within an area identified as having a potential for liquefaction. The historic high groundwater level in the vicinity of the Project Sites is reported to be at a depth of approximately 85 feet beneath the existing ground surface for Site 1 and 90 to 95 feet beneath the existing ground surface for Site 2 (CDMG, 1998). Based on these considerations, the potential for liquefaction and associated ground deformations beneath the Project Sites is very low.

Construction of the Project would be subject to the City's current Building Code requirements, recommendations included in the Final Geotechnical Reports, and the conditions contained within the LADBS Geology and Soils Approval Letters (Log Nos. 102203 and 102409), which would minimize all potential impacts associated with liquefaction. As such and as stated previously, liquefaction potential for the Project Sites is considered low. Based on the above, development of the Project would not cause or

exacerbate geologic hazards, including liquefaction. Therefore, Project impacts related to liquefaction would be less than significant.

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

No Impact. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. The Project Sites and adjacent properties are flat and do not contain any slopes or hillside areas.[56] The Project Sites are not located within a City of Los Angeles Hillside Grading Area or a Hillside Ordinance Area (City of Los Angeles, 2017). The City of Los Angeles Safety Element indicates the site is not within an area identified as having a potential for slope instability or landslides. Thus, the Project would not result in any impacts related to landslides. Based on the above, development of the Project would not cause or exacerbate geologic hazards, including landslides.

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

Less Than Significant Impact. The Project Sites are currently completely developed with impervious surfaces and do not contain any topsoil. During the Project's construction phase, activities such as excavation to depths of up to approximately 17 feet below ground surface (bgs), grading, and site preparation could leave soils at the Project Sites susceptible to soil erosion. The Project Applicant would be required to comply with SCAQMD Rule 403 – Fugitive Dust to minimize wind and water-borne erosion at the site, as well as prepare and implement a Stormwater Pollution Prevention Plan (SWPPP), in accordance with the National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during Project construction. The SWPPP would include best management practices (BMPs) and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all Project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Through compliance with these existing regulations, the Project would not result in any significant impacts related to soil erosion during the construction phase. Additionally, during the Project's operational phase, most of the Project Sites would be developed with impervious surfaces,

[56] *Geotechnical Investigation (554-562 South San Pedro Street and 555-561 South Crocker Street), GEOCON West, Inc., May 24, 2017. Geotechnical Investigation (600 South San Pedro Street), GEOCON West, Inc., March 7, 2018. Both investigations are included in Appendix H.*

and all stormwater flows would be directed to storm drainage features and would not come into contact with bare soil surfaces. Therefore, with compliance with applicable regulatory requirements, development of the Project would not cause or exacerbate soil erosion or loss of topsoil, and impacts regarding soil erosion or the loss of topsoil would be less than significant.

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

Less Than Significant Impact. As discussed previously, liquefaction potential at the Project Sites is considered low. Subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The Project Sites are not located within an area of known ground subsidence. No large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the Project Sites or in the general site vicinity. Thus, the potential for subsidence due to withdrawal of fluids or gases to adversely impact the sites is considered low.[57] The Geotechnical Investigations prepared for the Project (refer to Appendix H) include lateral earth pressure estimates to be considered in the design of the retaining structures that would be part of the Project building.[58] The Project Applicant would be required by the LADBS, as part of the permitting process, to prepare (or have prepared) a Final Geotechnical Investigation that would address the building standards and recommendations that shall be followed in order to construct the proposed structure in accordance with building standards that apply to building within the types of soils found at the site, including areas prone to geologic or soil instability. Through compliance with the LABC, recommendations included in the Final Geotechnical Reports, and the conditions contained within the LADBS's Geology and Soils Approval Letters (Log Nos. 102203 and 102409), impacts related to geologic and soil instability would be less than significant. Based on the above, development of the Project would not cause or exacerbate geologic hazards.

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

No Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. According to the Geotechnical Investigation prepared for Site 1, based on depth of the proposed subterranean level and granular nature of the site soils, the proposed structure would not be prone to the effects of expansive soils.[59] According to the Geotechnical Investigation prepared for Site 2, the upper 5 feet of existing site soils encountered as

[57] *Ibid.*

[58] *The Geotechnical Investigations for the Projects have been reviewed by the Los Angeles Department of Building and Safety, which concurred with the conclusions and recommendations of the report. Refer to the LADBS approval letters in Appendix H.*

[59] *Geotechnical Investigation (554-562 South San Pedro Street and 555-561 South Crocker Street), GEOCON West, Inc., May 24, 2017. Refer to Appendix H.*

part of the investigation are considered to have a "low" expansive potential (EI = 0) and are classified as "non-expansive" based on the 2016 California Building Code Section 1803.5.3. Based on the depth of the proposed subterranean level on Site 1 (approximately 15 feet below ground surface) and granular nature of the site soils, the proposed building would not be prone to the effects of expansive soil. In addition, the Project would be designed and constructed in conformance with current LABC requirements. Thus, the Project would not be constructed on expansive soil and would not create a substantial risk to individuals and/or property. Based on the above, development of the Project would not cause or exacerbate geologic hazards. Therefore, no impacts related to expansive soils would occur as a result of the Project.

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

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

Cumulative Impacts

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

7. GREENHOUSE GAS EMISSIONS

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

Less Than Significant Impact. The information and analysis in this section is primarily based on the following (refer to Appendix F):

- *Air Quality and Greenhouse Gas Emissions technical modeling results, DKA Planning April 2018.*

Environmental Setting

Greenhouse gas (GHG) emissions refer to a group of emissions that are generally believed to affect global climate conditions. The greenhouse effect compares the Earth and the atmosphere surrounding it to a greenhouse with glass panes. The glass panes in a greenhouse let heat from sunlight in and reduce the

amount of heat that escapes. GHGs, such as carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O), keep the average surface temperature of the Earth close to 60°F. Without the natural greenhouse effect, the Earth's surface would be about 61°F cooler.[60]

In addition to CO_2, CH_4, and N_2O, GHG emissions include hydrofluerocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), black carbon, and water vapor.[61] CO_2 is the most abundant pollutant that contributes to climate change through fossil fuel combustion. The other GHG emissions are less abundant but have higher global warming potential than CO_2. To account for this higher potential, emissions of other GHG emissions are frequently expressed in the equivalent of CO_2, denoted as CO_2e. CO_2e is a measurement used to account for the fact that different GHG emissions have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential (GWP) of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

Table 6-15 presents the most common GHGs with their atmospheric residence times and associated GWP values.

Table 6-15
Global Warming Potentials for Selected Greenhouse Gases

Greenhouse Gas	Global Warming Potential Factor (100-Year)
Carbon Dioxide (CO_2)	1
Methane (CH_4)	28
Nitrous Oxide (N_2O)	265
Perfluorocarbons (PFCs)	7,390-12,200
Hydrofluerocarbon (HFCs)	124-14,800
Sulfur Hexafluoride (SF_6)	22,800
Note: Global warming potential measures how much heat a GHG traps in the atmosphere, in this case, over a 100-year period. *Source: SCAG, Draft Program EIR for 2016 RTP/SCS.*	

GHG emissions are the result of both natural and human-influenced activities. Volcanic activity, forest fires, decomposition, industrial processes, landfills, consumption of fossil fuels for power generation, transportation, heating, and cooling are the primary sources of GHG emissions. Without human activity, the Earth would maintain an approximate, but varied, balance between the GHG emissions into the atmosphere and the storage of GHG emissions in oceans and terrestrial ecosystems. Increased combustion of fossil fuels (e.g., gasoline, diesel, coal, etc.) has contributed to a rapid increase in atmospheric levels of GHG emissions over the last 150 years. The primary effect of rising global concentrations of atmospheric GHG levels is a rise in the average global temperature of approximately 0.2 degrees Celsius per decade, determined from meteorological measurements worldwide between 1990 and 2005. Climate change

[60] *California Environmental Protection Agency Climate Action Team, Climate Action Report to Governor Schwarzenegger and the California Legislator, March 2006.*

[61] *Black carbon is the most strongly light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass.*

modeling using 2000 emission rates shows that further warming is likely to occur given the expected rise in global atmospheric GHG emissions concentrations from innumerable sources of GHG emissions worldwide (including from economically developed and developing countries and deforestation), which would induce further changes in the global climate system during the current century.[62]

Adverse impacts from global climate change worldwide and in California include the following:

- Declining sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates with a corresponding increase in atmospheric water vapor due to the atmosphere's ability to hold more water vapor at higher temperatures;[63]

- Rising average global sea levels primarily due to thermal expansion and the melting of glaciers, ice caps, and the Greenland and Antarctic ice sheets;[64]

- Changing weather patterns, including changes to precipitation, ocean salinity, and wind patterns, and more energetic aspects of extreme weather including droughts, heavy precipitation, heat waves, extreme cold, and the intensity of tropical cyclones;[65]

- Declining Sierra Mountains snowpack levels, which account for approximately half of the surface water storage in California, by 70 percent to as much as 90 percent over the next 100 years;[66]

- Increasing the number of days conducive to ozone formation (e.g., clear days with intense sun light) by 25 percent to 85 percent (depending on the future temperature scenario) in high ozone areas located in the Southern California area and the San Joaquin Valley by the end of the 21st Century;[67] and

- Increasing the potential for erosion of California's coastlines and seawater intrusion into the Sacramento Delta and associated levee systems due to the rise in sea level.[68]

Scientific understanding of the fundamental processes responsible for global climate change improved over the past decade. However, there remain significant scientific uncertainties; for example, in

[62] *USEPA, Draft Endangerment Finding, 74 Fed. Reg. 18886, 18904, April 24, 2009.*

[63] *Ibid.*

[64] *Intergovernmental Panel on Climate Change, Climate Change 2013: The Physical Science Basis, Fifth Assessment Report, ISBN 978 1 107 05799-1 Hardback; 978 1 66182-0 Paperback. 2013.*

[65] *Intergovernmental Panel on Climate Change, Climate Change 2013: The Physical Science Basis, Fifth Assessment Report, ISBN 978 1 107 05799-1 Hardback; 978 1 66182-0 Paperback. 2013.*

[66] *California Environmental Protection Agency Climate Action Team, Climate Action Report to Governor Schwarzenegger and the California Legislator, March 2006.*

[67] *Ibid.*

[68] *Ibid.*

predictions of local effects of climate change, occurrence of extreme weather events, and effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, volcanic activity, and changes in oceanic circulation. Due to the complexity of the climate system, the uncertainty surrounding the implications of climate change may never be completely eliminated. Because of these uncertainties, there continues to be significant debate as to the extent to which increased concentrations of GHG emissions have caused or will cause climate change, and with respect to the appropriate actions to limit and/or respond to climate change. Given the scale over which climate change occurs, as well as the uncertainties described above, it is not possible to link specific development projects to future specific climate change impacts; though estimating project-specific emissions is possible.

CARB has prepared a statewide emissions inventory covering 2000 to 2014, which demonstrates that GHG emissions have decreased by 7.9 percent over that period.[69] Emissions in 2014 from the transportation sector, which represents California's largest source of GHG emissions and contributed 37 percent of total annual emissions, declined marginally relative to 2011 while the economy and population continued to grow over that three year time period.[70] The long-term direction of transportation-related GHG emissions is another clear trend, with a 13 percent drop over the past ten years.

Table 6-16 shows GHG emissions from 2010 to 2014 in California. As noted, the majority of the statewide emissions are transportation related. Other direct sources of emissions include electricity generation, industrial uses, and to a lesser extent, solid waste decomposition, haul trucks, and the use of refrigerant compounds.

Table 6-16
California Greenhouse Gas Emissions Inventory

Sector	Annual CO_2e Emissions (million metric tons)				
	2010	**2011**	**2012**	**2013**	**2014**
Transportation	163	159	159	158	160
Industrial	91	91	91	93	93
Electric Power	90	88	95	90	88
Commercial and Residential	45	45	43	43	38
Agriculture	35	36	37	35	36
High Global Warming Potential	12	14	15	16	17
Recycling and Waste	9	9	9	9	9
Emissions Total	**445**	**442**	**449**	**444**	**441**

Source: CARB, California Greenhouse Gas Inventory 2000-2014, October 18, 2016.

[69] *CARB, California Greenhouse Gas Inventory 2000-2014, March 30, 2016.*

[70] *Ibid.*

Regulatory Framework

International

U.S.–China Climate Agreement

In November 2014, the United States (U.S.) and China made a joint announcement to cooperate on combating climate change and promoting clean energy. In the U.S., President Barack Obama announced a climate target to reduce GHG emissions by 26 to 28 percent below 2005 levels by 2025. In China, President Xi Jinping announced a climate target to reduce peak CO_2 emissions by 2030 and to increase the renewable energy share across all sectors to 20 percent by 2030. China will need to build an additional 800 to 1,000 gigawatts of nuclear, wind, solar, and other zero emission generation capacity by 2030 to reach this target. Together, the U.S. and China have agreed to: expand joint clean energy research and development at the U.S.-China Clean Energy Research Center (CERC); advance major carbon capture; use and storage demonstrations; enhance cooperation on HFCs; launch a climate-smart/low-carbon cities initiative; promote trade in green goods; and demonstrate clean energy on the ground.[71]

Paris United Nations Framework Convention on Climate Change

A new international climate change agreement was adopted at the Paris United Nations Framework Convention on Climate Change climate conference in December 2015. The last two climate conferences in Warsaw (2013) and Lima (2014) decided that countries were to submit their proposed emissions reduction targets for the 2015 conference as "intended nationally determined contributions" prior to the Paris conference. The European Union has committed to an economy-wide, domestic GHG reduction target of 40 percent below 1990 levels by 2030. The U.S. has set its intended nationally determined contribution to reduce its GHG emissions by 26 to 28 percent below its 2005 level in 2025 and to make best efforts to reduce its emissions by 28 percent. These targets are set with the goal of limiting global temperature rise to well below 2.0 degrees Celsius and getting to the 80 percent emission reduction by 2050.

North American Climate, Clean Energy, and Environment Partnership Action Plan

The North American Climate, Clean Energy, and Environment Partnership Action Plan was announced by Prime Minister Justin Trudeau, President Barack Obama, and President Enrique Peña Nieto on June 29, 2016, at the North American Leaders Summit in Ottawa, Canada.[72] This action plan identifies the deliverables to be achieved and activities to be pursued by the three countries as part of this enduring Partnership. The three leaders declared their common vision in a historic North American Climate, Clean Energy, and Environment Partnership, described in a Leaders' Statement and Action Plan that details the actions our leaders will pursue. These actions include the following:

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[71] *The White House, Fact Sheet: U.S.-China Joint Announcement on Climate Change and Clean Energy Cooperation, November 11, 2014.*

[72] *The White House, Fact Sheet: United States Key Deliverables for the 2016 North American Leaders' Summit, June 29, 2016.*

- Setting a target to increase clean power to 50 percent of the electricity generated across North America by 2025.

- Reducing methane emissions from the oil and gas sector by 40 to 45 percent by 2025.

- Strengthening standards for energy efficiency and vehicle emissions, including aligning energy efficiency standards that will amount to over $4 billion per year in annual savings for United States businesses and consumers by 2025.

- Strengthening vehicle efficiency, improving fuel quality, and reducing tailpipe pollutants.

- Affirming their support for joining and implementing the Paris Agreement this year and committing to work together to address climate issues through the Montreal Protocol, International Civil Aviation Organization, G-20, and other forums.

- Celebrating our strong environmental cooperation, including expanding cooperation on early warning systems for natural disasters, supporting habitat for migratory species including Monarchs and birds, and developing action plans to combat wildlife trafficking.

Federal

Supreme Court Ruling

The U.S. Supreme Court ruled in Massachusetts v. Environmental Protection Agency, 127 S. Ct. 1438 (2007), that CO_2 and other GHG emissions are pollutants under the Clean Air Act (CAA), which the United States Environmental Protection Agency (USEPA) must regulate if it determines they pose an endangerment to public health or welfare. On December 7, 2009, the USEPA Administrator made two distinct findings: 1) the current and projected concentrations of the six key GHG emissions in the atmosphere (i.e., CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) threaten the public health and welfare of current and future generations; and 2) the combined emissions of these GHG emissions from motor vehicle engines contribute to GHG emissions pollution, which threatens public health and welfare.

On June 23, 2014, the U.S. Supreme Court ruled in Utility Air Regulatory Group. v. EPA that the USEPA exceeded its statutory authority under the CAA when it determined that stationary source emissions of GHGs would trigger permitting obligations under the Prevention of Significant Deterioration (PSD) program and Title V of the CAA. However, the court upheld those portions of USEPA's rulemaking that require a source to apply best available control technology (BACT) to GHG emissions where the source would otherwise trigger PSD permitting on account of its emissions of other pollutants. The Supreme Court's decision was limited to USEPA's regulation of GHG emissions under the PSD and Title V provisions of the CAA, and it left unanswered other questions regarding USEPA's permitting and BACT authority under the PSD program, and the USEPA's efforts to regulate GHG emissions from stationary sources.

Energy Independence and Security Act

The Energy Independence and Security Act of 2007 includes several key provisions that will increase energy efficiency and the availability of renewable energy, which will reduce GHG emissions as a result. First, this act sets a Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel by 2022.[73] Second, this act increases Corporate Average Fuel Economy Standards to require a minimum average fuel economy of 35 miles per gallon for the combined fleet of cars and light trucks by 2020. Third, this act includes a variety of new standards for lighting and for residential and commercial appliance equipment. The equipment includes residential refrigerators, freezers, refrigerator-freezers, metal halide lamps, and commercial walk-in coolers and freezers.

National Fuel Efficiency Policy

On May 19, 2009, President Barack Obama announced a new National Fuel Efficiency Policy aimed at increasing fuel economy and reducing GHG emissions pollution.[74] This policy is expected to increase fuel economy by more than five percent by requiring a fleetwide average of 35.5 miles per gallon by 2016 starting with model year 2012. On September 15, 2009, the USEPA and the Department of Transportation's (DOT) National Highway Traffic Safety Administration (NHTSA) issued a joint proposal to establish a national program consisting of new standards for model year 2012 through 2016 light-duty vehicles that will reduce GHG emissions and improve fuel economy. The proposed standards were phased in and required passenger cars and light-duty trucks to comply with a declining emissions standard. By 2016, vehicles were to meet an average standard of 250 grams of CO_2 per mile and 35.5 miles per gallon.[75] The final standards were adopted by the USEPA and the DOT on April 1, 2010. On December 7, 2009, the USEPA Administrator signed the following two distinct findings regarding GHG emissions under Section 202(a) of the CAA (42 United States Code Section 7521):

- Endangerment Finding: The Administrator finds that the current and projected concentrations of the six key well-mixed GHG emissions (CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) in the atmosphere threaten the public health and welfare of current and future generations.

- Cause or Contribute Finding: The Administrator finds that the combined emissions of these well-mixed GHG emissions from new motor vehicles and new motor vehicle engines contribute to the GHG emissions pollution that threatens public health and welfare.

While these findings do not impose additional requirements on industry or other entities, this action is a prerequisite to finalizing the USEPA's proposed GHG emissions standards for light-duty vehicles, which were jointly proposed by the USEPA and the NHTSA.

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[73] *According to the United States Energy Information Administration, 36 billion gallons of fuel represents approximately 26 percent of current gasoline consumption.*

[74] *The White House, Office of the Press Secretary, http://www.whitehouse.gov/the_press_office/President-Obama-Announces-National-Fuel-Efficiency-Policy/, May 19, 2009.*

[75] *USEPA, EPA and NHTSA Propose Historic Nation Program, 2009.*

Executive Order 13693

Published in June 10, 2015, the goal of Executive Order (E.O.) 13693, Planning for Federal Sustainability in the Next Decade, is to maintain federal leadership in sustainability and GHG emissions reductions. The E.O. outlines forward-looking goals for federal agencies in the area of energy, climate change, water use, vehicle fleets, construction, and acquisition. Federal agencies shall implement the following, where life-cycle cost-effective, beginning in 2016:

- Reduce agency building energy intensity as measured in British Thermal Units (BTUs) per square foot by 2.5 percent annually through 2025;
- Improve data center energy efficiency at agency buildings;
- Ensure a minimum percentage of total building electric and thermal energy shall be from clean energy sources;
- Improve agency water use efficiency and management (including storm water management); and
- Improve agency fleet and vehicle efficiency and management by achieving minimum percentage GHG emissions reductions.

State

California's Energy Efficiency Standards for Residential and Nonresidential Buildings

Located in Title 24, Part 6, of the California Code of Regulations (CCR) and commonly referred to as "Title 24," these energy efficiency standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to allow consideration and possible incorporation of new energy efficiency technologies and methods.[76] The California Energy Commission adopted the 2008 changes to the Building Energy Efficiency Standards to respond to the mandates of Assembly Bill (AB) 32 and to pursue California energy policy that energy efficiency is the resource of first choice for meeting California's energy needs. The most recent update to Title 24 is the 2016 Building Energy Efficiency Standards, which improve on the 2013 Building Energy Efficiency Standards for new construction of and additions and alterations to residential and nonresidential buildings. The 2016 Building Energy Efficiency Standards went into effect on July 1, 2017.

Assembly Bill 1493 (Pavley I)

AB 1493 (referred to as Pavley I), adopted in 2002, required CARB to develop and adopt standards for vehicle manufacturers to reduce GHG emissions coming from passenger vehicles and light-duty trucks at a "maximum feasible and cost effective reduction" by January 1, 2005. Pavley I took effect for model years starting in 2009 and extending to 2016, and CARB's Low Emission Vehicle (LEV) III Program will

[76] *California Energy Commission, California's Energy Efficiency Standards for Residential and Nonresidential Buildings, Title 24, Part 6, of the California Code of Regulations.*

cover 2017 to 2025. It is estimated that these standards will reduce climate change emissions from the vehicle fleet by 30 percent in 2016 compared to the emissions in the same year without the standards.[77]

Senate Bill 1078, Senate Bill 107, and E.O. S-14-08 (Renewables Portfolio Standard)

Signed on September 12, 2002, State Bill (SB) 1078 required California to generate 20 percent of its electricity from renewable energy by 2017. SB 107, signed on September 26, 2006 changed the due date for this goal from 2017 to 2010, and was achieved by the State. On November 17, 2008, E.O. S-14-08 established a Renewables Portfolio Standard target for California requiring that all retail sellers of electricity serve 33 percent of their load with renewable energy by 2020. Increased use of renewable energy sources will decrease California's reliance on fossil fuels, reducing GHG emissions from the energy sector.

E.O. S-3-05

On June 1, 2005, Governor Schwarzenegger issued E.O. S-3-05, which set the following GHG emissions reduction targets:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

E.O. S-3-05 calls for the Secretary of California Environmental Protection Agency (Cal-EPA) to be responsible for coordination of state agencies and progress reporting. A recent California Energy Commission report concludes, however, that the primary strategies to achieve this target should be major "decarbonization" of electricity supplies and fuels, and major improvements in energy efficiency.[78]

In response to the E.O. S-3-05, the Secretary of the Cal-EPA created the Climate Action Team (CAT). California's CAT originated as a coordinating council and included the Secretaries of the Natural Resources Agency, and the Department of Food and Agriculture, and the Chairs of CARB, Energy Commission, and the California Public Utilities Commission (CPUC). The original council was an informal collaboration between the agencies to develop potential mechanisms for reductions in GHG emissions in California. The original mandate for the CAT was to develop proposed measures to meet the emission reduction targets set forth in E.O. S-3-05. The CAT expanded and has members from 18 state agencies and departments. The CAT also has ten working groups that coordinate policies among their members. The working groups and their major areas of focus are as follows:

- Agriculture: Focusing on opportunities for agriculture to reduce GHG emissions through efficiency improvements and alternative energy projects, while adapting agricultural systems to climate change;

[77] *CARB, Clean Air Standards - Pavley, Assembly Bill 1493, May 6, 2013.*

[78] *California Energy Commission, California's Energy Future – The View to 2050, May 2011.*

- Biodiversity: Designing policies to protect species and natural habitats from the effects of climate change;
- Energy: Reducing GHG emissions through extensive energy efficiency policies and renewable energy generation;
- Forestry: Coupling GHG emissions reduction mitigation efforts with climate change adaptation related to forest preservation and resilience, waste to energy programs and forest offset protocols;
- Land Use and Infrastructure: Linking land use and infrastructure planning to efforts to reduce GHG emissions from vehicles and adaptation to changing climatic conditions;
- Oceans and Coastal: Evaluating the effects of sea level rise and changes in coastal storm patterns on human and natural systems in California;
- Public Health: Evaluating the effects of GHG emissions reduction mitigation policies on public health and adapting public health systems to cope with changing climatic conditions;
- Research: Coordinating research concerning impacts of and responses to climate change in California;
- State Government: Evaluating and implementing strategies to reduce GHG emissions resulting from state government operations; and
- Water: Reducing GHG emissions impacts associated with the state's water systems and exploring strategies to protect water distribution and flood protection infrastructure.

The CAT is responsible for preparing reports that summarize the state's progress in reducing GHG emissions. The most recent CAT Report was published in December 2010. The CAT Report discusses mitigation and adaptation strategies, state research programs, policy development, and future efforts.

SB 1 and SB 1017 (Million Solar Roofs Program)

SB 1 and SB 1017, enacted in August 2006, set a goal to install 3,000 megawatts of new solar capacity by 2017 - moving the state toward a cleaner energy future and helping lower the cost of solar systems for consumers. The Million Solar Roofs Program is a ratepayer-financed incentive program aimed at transforming the market for rooftop solar systems by driving down costs over time. It provides up to $3.3 billion in financial incentives that decline over time.

AB 32

In September 2006, the California Global Warming Solutions Act of 2006, also known as AB 32, was signed into law. AB 32 focuses on reducing GHG emissions in California, and requires CARB to adopt rules and regulations that would achieve GHG emissions equivalent to statewide levels in 1990 by 2020. CARB initially determined that the total statewide aggregated 1990 GHG emissions level and 2020

emissions limit was 427 million metric tons of carbon dioxide equivalent (CO_2e). The 2020 target reduction was estimated to be 174 million metric tons of CO_2e. To achieve the goal, AB 32 mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved. Because the intent of AB 32 is to limit 2020 emissions to the equivalent of 1990, it is expected that the regulations would affect many existing sources of GHG emissions and not just new general development projects. SB 1368, a companion bill to AB 32, requires the CPUC and the California Energy Commission to establish GHG emission performance standards for the generation of electricity. These standards will also apply to power that is generated outside of California and imported into the state.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions in order to reduce those emissions. On June 1, 2007, CARB adopted three discrete early action measures to reduce GHG emissions. These measures involved complying with a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.[79] On October 25, 2007, CARB tripled the set of previously approved early action measures. The approved measures include improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs emissions from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing SF_6 emissions from the non-electricity sector.

CARBS AB 32 Scoping Plan (Scoping Plan) contains the main strategies to achieve the 2020 emissions cap. The Scoping Plan was developed by CARB with input from the CAT and proposes a comprehensive set of actions designed to reduce overall carbon emissions in California, improve the environment, reduce oil dependency, diversify energy sources, and enhance public health while creating new jobs and improving the state economy. The GHG emissions reduction strategies contained in the Scoping Plan include direct regulations, alternative compliance mechanisms, monetary and non-monetary incentives, voluntary actions, and market-based mechanisms such as a cap-and-trade system.

Key approaches for reducing GHG emissions to 1990 levels by 2020 include the following:

- Expanding and strengthening existing energy efficiency programs as well as building and appliance standards;

- Achieving a statewide renewable electricity standard 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;

- Establishing targets for transportation-related GHG emissions for regions throughout the state, and pursuing policies and incentives to achieve those targets; and

[79] *CARB, Proposed Early Action Measures to Mitigate Climate Change in California, April 20, 2007.*

- Adopting and implementing measures to reduce transportation sector emissions.

CARB adopted the First Update to the AB 32 Scoping Plan in 2014.[80] The First Update identified next steps for California's leadership on climate change. It describes progress made to meet the near-term objectives of AB 32 and defines California's climate change priorities and activities for the next several years. It also frames activities and issues facing the state as it develops an integrated framework for achieving both air quality and climate goals in California beyond 2020. Specifically, the First Update covers a range of topics, including the following:

- An update of the latest scientific findings related to climate change and its impacts, including short-lived climate pollutants.

- A review of progress-to-date, including an update of Scoping Plan measures and other state, federal, and local efforts to reduce GHG emissions in California.

- Potential technologically feasible and cost-effective actions to further reduce GHG emissions by 2020.

- Recommendations for establishing a mid-term emissions limit that aligns with the state's long-term goal of an emissions limit 80 percent below 1990 levels by 2050.

- Sector-specific discussions covering issues, technologies, needs, and ongoing state activities to significantly reduce emissions throughout California's economy through 2050.

The First Update found that California is on track to meet the 2020 emissions reduction mandate established by AB 32 and noted that California could reduce emissions further by 2030 to levels in line with those needed to stay on track to reduce emissions to 80 percent below 1990 levels by 2050 if the state realizes the expected benefits of existing policy goals.[81]

SB 1368

SB 1368, adopted September 19, 2006, directs the California Energy Commission and the CPUC to adopt a performance standard for GHG emissions for the future electricity used in California, regardless of whether it is generated in-state or purchased from other states.

E.O. S-1-07, the Low Carbon Fuel Standard

On January 18, 2007, E.O. S-1- 07 was issued requiring a reduction of at least ten percent in the carbon intensity of California's transportation fuels by 2020. Regulatory proceedings and implementation of the Low Carbon Fuel Standard are CARB's responsibility. The Low Carbon Fuel Standard has been identified by CARB as a discrete early action item in CARB's Scoping Plan. CARB expects the Low

[80] *CARB, First Update to the Climate Change Scoping Plan, May 2014.*

[81] *Ibid., p. 34.*

Carbon Fuel Standard to achieve the minimum ten percent reduction goal. However, many of the early action items outlined in the Scoping Plan work in tandem with one another. To avoid the potential for double-counting emission reductions associated with AB 1493 (see previous discussion), the Scoping Plan has modified the aggregate reduction expected from the Low Carbon Fuel Standard to 9.1 percent.

AB 811

AB 811, enacted July 21, 2008, authorizes California cities and counties to designate districts within which willing property owners may enter into contractual assessments to finance the installation of renewable energy generation and energy efficiency improvements that are permanently fixed to the property.

SB 375

SB 375, adopted in September 30, 2008, provides a means for achieving AB 32 goals through the reduction in emissions by cars and light trucks. SB 375 requires Regional Transportation Plans (RTPs) prepared by Metropolitan Planning Organizations (MPOs) to include Sustainable Communities Strategies (SCSs). In adopting SB 375, the Legislature found that improved coordination between land use planning and transportation planning is needed in order to achieve the GHG emissions reduction target of AB 32. Further, the staff analysis for the bill prepared for the Senate Transportation and Housing Committee's August 29, 2008 hearing on SB 375 began with the following statement: "According to the author, this bill will help implement AB 32 by aligning planning for housing, land use, transportation and greenhouse gas emissions for the 17 MPOs in the state." Under the Sustainable Communities Act, CARB sets regional targets for GHG emissions reductions from passenger vehicle use. CARB has set the following reduction targets for SCAG: reduce per capita 8 percent of GHG emissions below 2005 levels by 2020 and 13 percent below 2005 levels by 2035.

E.O. S-13-08

On November 14, 2008, E.O. S-13-08 was signed to direct California to develop methods for adapting to climate change impacts through preparation of a statewide plan. In response to this order, the California Natural Resources Agency coordinated with ten state agencies, multiple scientists, a consulting team, and stakeholders to develop the first statewide, multi-sector adaptation strategy in the country. The resulting report, 2009 California Climate Adaptation Strategy, summarizes the best-known science to assess the vulnerability of the state to climate change impacts, and outlines possible solutions that can be implemented within and across state agencies to promote resiliency. This strategy is the first step in an evolving process to reduce California's vulnerability to climate change impacts.

Adaptation refers to efforts that prepare the state to respond to the impacts of climate change – adjustments in natural or human systems to actual or expected climate changes to minimize harm or take advantage of beneficial opportunities. California's ability to manage its climate risks through adaptation depends on a number of critical factors. These include its baseline and projected economic resources, technology, infrastructure, institutional support and effective governance, public awareness, access to the best available scientific information, sustainably-managed natural resources, and equity in access to these resources.

State CEQA Guidelines Section 15064.4

State CEQA Guidelines Section 15064.4 requires that, in performing environmental review under CEQA, an agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. The lead agency has discretion to determine whether to use a model or methodology to quantify GHG emissions, and which model or methodology to use, or rely on a qualitative analysis or performance-based standards. The lead agency should consider the following factors, among others, when assessing the significance of impacts from GHG emissions on the environment:

- The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting.
- Whether a project's GHG emissions exceed a threshold of significance that the lead agency determines applies to the project.
- The extent to which a project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.
- Such requirements must be adopted by the relevant public agency through a public review process and must reduce or mitigate the project's incremental contribution of GHG emissions. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding compliance with the adopted regulations or requirements, an EIR must be prepared for the project.

SB 743

SB 743, adopted September 27, 2013, encourages land use and transportation planning decisions and investments that reduce VMT, which contribute to GHG emissions, as required by AB 32. Key provisions of SB 743 include reforming aesthetics and parking CEQA analysis for certain urban infill projects and eliminating the measurement of auto delay, including level of service (LOS), as a metric that can be used for measuring traffic impacts in transit priority areas. SB 743 requires the Governor's Office of Planning and Research (OPR) to develop revisions to the CEQA Guidelines establishing criteria for determining the significance of transportation impacts of projects within transit priority areas that promote the "…reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses." It also allows OPR to develop alternative metrics outside of transit priority areas.

CalGreen

CalGreen is the first statewide Green Building Code. It was developed to provide a consistent approach for green building within California and took effect January 2011. CalGreen lays out minimum requirements for newly constructed buildings in California, which will reduce GHG emissions through improved efficiency and process improvements. It requires builders to install plumbing that cuts indoor water use by as much as 20 percent, to divert 50 percent of construction waste from landfills to recycling, and to use low-pollutant paints, carpets, and floors. CalGreen is updated every three years.

SBs 1078/107/X 1-2, Renewables Portfolio Standard and Renewable Energy Resources Act

SB 1078 and 107, California's Renewables Portfolio Standard, obligated investor-owned energy service providers and Community Choice Aggregations to procure an additional 1 percent of retail sales per year from eligible renewable sources until 20 percent was reached (by 2010). The CPUC and California Energy Commission are jointly responsible for implementing the program. SB X 1-2, called the California Renewable Energy Resources Act, obligates all California electricity providers to obtain at least 33 percent of their energy from renewable resources by 2020.

E.O. S-01-07

This E.O. S-01-07 established a Low-Carbon Fuel Standard and directed the Secretary of Cal-EPA to develop and propose protocols for measuring the life-cycle carbon intensity of transportation fuels.

E.O B-30-15

On April 29, 2015, Governor Brown issued E.O. B-30-15, stating a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. The E.O. establishes GHG emissions reduction targets to reduce emissions to 80 percent below 1990 levels by 2050 and sets an interim target of emissions reductions for 2030 as being necessary to guide regulatory policy and investments in California and put California on the most cost-effective path for long-term emissions reductions. The EO orders "all state agencies with jurisdiction over sources of [GHG] emissions [to] ... implement measures, pursuant to statutory authority, to achieve reductions of [GHG] emissions to meet the 2030 and 2050 [GHG] emissions reductions targets." It directs CARB to "update the Climate Change Scoping Plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent." It directs the Natural Resources Agency to update "Safeguarding California" (the state's climate adaptation strategy) every three years, as specified; directs state agencies to "take climate change into account in their planning and investment decisions, and employ full life-cycle cost accounting to evaluate and compare infrastructure investments and alternatives;" and orders the "State's Five-Year Infrastructure Plan [to] take current and future climate change impacts into account in all infrastructure projects." Among its other directives, the EO provides that "State agencies' planning and investment shall be guided by the ... principle that priority should be given to actions that both build climate preparedness and reduce GHG emissions."

SB 32

On September 8, 2016, California signed into law SB 32, which adds Section 38566 to the Health and Safety Code and requires a commitment to reducing statewide GHG emissions by 2020 to 1990 levels and by 2030 to 40 percent less than 1990 levels. SB 32 was passed with companion legislation AB 197, which provides additional direction for developing the Scoping Plan.

In December 2017, CARB adopted a second update to the Scoping Plan to reflect the 2030 targets set by Executive Order B-30-15 and codified by SB 32. This update calls for strategies that cap the state's GHG emissions at 260 $MMTCO_2e$ by 2030, and would represent a 40 percent reduction from 1990 levels. This includes several key elements, including the following:

- Relying on California's previously-codified statutory commitment to generate at least half of its electricity from renewable resources by 2030;

- Making more stringent CARB's pioneering Low Carbon Fuel Standard;

- Depending on the California Energy Commission to strengthen dramatically the state's already-stringent building and appliance efficiency standards;

- Enforcing strong new rules to reduce state methane and other short-lived climate pollutants that are especially pernicious;

- Supporting and preserving California's natural and working landscapes in order to enhance carbon sequestration;

- Devising transformative changes to California's public and private transportation sectors, including a ramped-up conversion of private vehicles from carbon-based to alternative fuels, increased public transit opportunities and progressive land use policies that allow Californians to live closer to their workplaces, thus reducing individual and statewide vehicle miles traveled; and

- Continuing the state's cap-and-trade program.

As shown on Table 6-17, these reductions are to come from a variety of sectors, including energy, transportation, electric power, waste, and the State's cap-and-trade emissions program. Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including CARB, the CPUC, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the Transportation sector, which is charged with reducing 4.5 percent of baseline 2020 emissions. Of these actions, only one (GHG emissions reductions through coordinated planning) specifically identifies local governments as the responsible agency.

Center for Biological Diversity v. California Department of Fish and Wildlife

On November 30, 2015, the California Supreme Court issued an opinion on GHG emissions significance thresholds for CEQA in the case Center for Biological Diversity et al. vs. California Department of Fish and Wildlife (commonly referred to as the Newhall decision) (224 Cal.App.4th 1105) reviewed the methodology used to analyze GHG emissions in an EIR prepared for a project that proposed 20,885 dwelling units with 58,000 residents on 12,000 acres of undeveloped land in a rural area of the County of Los Angeles (unincorporated). That EIR used a "business as usual" (BAU) approach to determine whether the project would impede the state's compliance with statutory emissions reduction mandate established by the Scoping Plan.

Table 6-17
Examples Of Emission Reductions Needed To Meet Climate Change Scoping Plan Objectives In 2030

Sector	1990 Inventory (Million Metric Tons of CO_2e)	Percent Change from 1990 ($MMTCO_2e$)	Summary of Recommended Actions
Electric Power	108	-8	Reduce state's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas production, reduce leaks from industrial facilities
Transportation	152	-32	Phase 2 heavy-duty truck GHG emissions standards, zero-emission vehicles (ZEV) action plan for trucks, construct High Speed rail system from San Francisco to Los Angeles, coordinated land use planning, Sustainable Freight Strategy
Industrial	98	-15	Reduce use of high-global-warming-potential compounds from refrigeration, air conditioning, aerosols
Waste	7	-29	Eliminate disposal of organic materials at landfills, in-state infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Source: Cal EPA, California's 2017 Climate Change Scoping Plan, Nov. 2017			

While the Supreme Court held that establishing a significance criterion based on consistency with AB 32's reduction goals was appropriate, the Court found that there was no substantial evidence supporting the conclusion of the EIR at issue in that case that the project would be consistent with AB 32's reduction goals. As noted above, AB 32 requires statewide GHG emissions to return to 1990 levels by 2020. In the AB 32 Scoping Plan, CARB determined that meeting this statewide GHG reduction goal would require a 29 percent reduction in statewide emissions from a business-as-usual approach (i.e., an approach with no conservation or regulatory efforts beyond what was in place when the forecast was made). Based on this, the EIR had concluded the project would not result in a significant climate change impact, because the project was designed to reduce GHG emissions by 31 percent over a BAU approach. The Supreme Court found that there was no substantial evidence that the project-level reduction of 31 percent in comparison to BAU is consistent with AB 32's statewide goal of a 29 percent reduction from BAU. The court reasoned that the Scoping Plan nowhere related its statewide level of reduction efforts to the percentage of reduction that would or should be required from individual projects, and nothing in the administrative record indicated that the required percentage reduction from business as usual is the same for an individual project as for the entire state population and economy. The Court suggested, however, that an appropriate threshold could assess whether a project would comply with regulatory programs designed to reduce emissions from particular activities. The Court recognized that to the extent a project's design features comply with or exceed the regulations outlined in the Scoping Plan, and adopted by CARB or other state agencies, a lead agency could appropriately rely on their use as showing compliance with performance-based standards adopted to fulfill a statewide plan for the reduction or mitigation of GHG emissions. This approach is consistent with CEQA Guidelines Section 15064, which provides that a

determination that an impact is not cumulatively considerable may rest on compliance with previously adopted plans or regulations, including plans or regulations for the reduction of GHG emissions.

Regional

SCAG's 2016-2040 RTP/SCS

The California Legislature passed SB 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires MPOs to prepare an SCS in their RTPs to achieve the per capita GHG emissions reduction targets. For the SCAG region, the SCS is contained in the 2016-2040 RTP/SCS. The RTP/SCS focuses the majority of new housing and job growth in high-quality transit areas and other opportunity areas on existing main streets, in downtowns, and commercial corridors, resulting in an improved jobs-housing balance and more opportunity for transit-oriented development. At the regional level, the 2016-2040 RTP/SCS represents the region's Climate Action Plan that defines strategies for reducing GHG emissions.

While Southern California is a leader in reducing emissions, and ambient levels of air pollutants are improving, the SCAG region continues to have the worst air quality in the nation. SCAG is the MPO for the six-county region that includes Los Angeles, Orange, Riverside, Ventura, San Bernardino and Imperial counties. The 2016–2040 RTP/SCS includes commitments to reduce emissions from transportation sources to comply with SB 375. Goals and policies included in the 2016–2040 RTP/SCS to reduce air pollution consist of adding density in proximity to transit stations, mixed-use development and encouraging active transportation (i.e., non-motorized transportation such as bicycling). SCAG promotes the following policies and actions related to active transportation to help the region confront congestion and mobility issues and consequently improve air quality:

- Implement Transportation Demand Management (TDM) strategies including integrating bicycling through folding bikes on buses programs, triple racks on buses, and dedicated racks on light and heavy rail vehicles;

- Encourage and support local jurisdictions to develop "Active Transportation Plans" for their jurisdiction if they do not already have one;

- Expand Compass Blueprint program to support member cities in the development of bicycle plans;

- Expand the Toolbox Tuesday's program to encourage local jurisdictions to direct enforcement agencies to focus on bicycling and walking safety to reduce multimodal conflicts;

- Support local advocacy groups and bicycle-related businesses to provide bicycle-safety curricula to the general public;

- Encourage children, including those with disabilities, to walk and bicycle to school;

- Encourage local jurisdictions to adopt and implement the proposed SCAG Regional Bikeway Network; and

- Support local jurisdictions to connect all of the cities within the SCAG region via bicycle facilities.

SB 375 requires CARB to develop regional CO_2 emission reduction targets, compared to 2005 emissions, for cars and light trucks only for 2020 and 2035 for each MPO. Each MPO is to prepare an SCS as part of the RTP in order to reduce CO_2 by better aligning transportation, land use, and housing. For SCAG, the targets are to reduce per capita emissions 8 percent below 2005 levels by 2020 and 13 percent below 2005 levels by 2035.[82] The 2016–2040 RTP/SCS states that the region will meet or exceed the SB 375 per capita targets, lowering regional per capita GHG emissions (below 2005 levels) by eight percent by 2020 and 18 percent by 2035. The 2016–2040 RTP/SCS also states that regional 2040 per capita emissions would be reduced by 22 percent, although CARB has not established a 2040 per capita emissions target.

SCAQMD

The SCAQMD adopted a Policy on Global Warming and Stratospheric Ozone Depletion on April 6, 1990. The policy commits the SCAQMD to consider global impacts in rulemaking and in drafting revisions to the AQMP. In March 1992, the SCAQMD Governing Board reaffirmed this policy and adopted amendments to the policy. SCAQMD released draft guidance regarding interim CEQA GHG emissions significance thresholds. SCAQMD proposed the use of a percent emission reduction target (e.g., 30 percent) to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO2e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG emissions significance threshold of 10,000 metric tons of CO2e for stationary source/industrial projects where the SCAQMD is the lead agency.

However, the SCAQMD has yet to adopt GHG emissions significance thresholds for land use development or transportation projects and has formed a GHG CEQA Significance Threshold Working Group to further evaluate potential GHG emissions significance thresholds. The GHG CEQA Significance Threshold Working Group is tasked with providing guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members of the working group included government agencies implementing CEQA and representatives from various stakeholder groups that will provide input to the SCAQMD staff on developing CEQA GHG emissions significance thresholds. The working group discussed multiple methodologies for determining Project significance. These methodologies included categorical exemptions, consistency with regional GHG emissions budgets in approved plans, a numerical threshold, performance standards, and emissions offsets. The GHG CEQA Significance Threshold Working Group has not convened since 2008.

[82] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, 2016.*

Local

GreenLA Climate Action Plan

The City has issued guidance promoting sustainable development to reduce GHG emissions citywide in the form of a Climate Action Plan (CAP). The objective of GreenLA is to reduce GHG emissions 35 percent below 1990 levels by 2030.[83] GreenLA identifies goals and actions designed to make the City a leader in confronting global climate change. The measures would reduce emissions directly from municipal facilities and operations, and create a framework to address citywide GHG emissions. GreenLA lists various focus areas in which to implement GHG emissions reduction strategies. Focus areas include energy, water, transportation, land use, waste, port, airport, and ensuring that changes to the local climate are incorporated into planning and building decisions. City goals for each focus area are identified as follows:

- Energy
    - Increase the generation of renewable energy;
    - Encourage the use of mass transit;
    - Develop sustainable construction guidelines;
    - Increase citywide energy efficiency; and
    - Promote energy conservation.
- Water
    - Decrease per capita water use to reduce electricity demand associated with water pumping and treatment.
- Transportation
    - Power the city vehicle fleet with alternative fuels; and
    - Promote alternative transportation (e.g., mass transit and rideshare).
- Other Goals
    - Create a more livable City through land use regulations;
    - Increase recycling;

[83] *City of Los Angeles, GreenLA: An Action Plan to Lead the Nation in Fighting Global Warming, May 2007.*

- Reduce emissions generated by activity associated with the Port of Los Angeles and regional airports;
- Create more city parks, promoting the environmental economic sector; and
- Adapt planning and building policies to incorporate climate change policy.

In order to provide detailed information on action items discussed in GreenLA, the City published an implementation document titled ClimateLA.[84] ClimateLA presents the existing GHG emissions inventory for the City, describes enforceable GHG emissions reduction requirements, provides mechanisms to monitor and evaluate progress, and includes mechanisms that allow the plan to be revised in order to meet targets. By 2030, the plan aims to reduce GHG emissions by 35 percent from 1990 levels, which were estimated to be approximately 54.1 million metric tons.

Thus, the City will need to lower annual GHG emissions to approximately 35.1 million metric tons per year by 2030. To achieve these reductions the City has developed strategies that focus on energy, water use, transportation, land use, waste, open space and greening, and economic factors. To reduce emissions from energy usage, ClimateLA proposes the following goals: increase the amount of renewable energy provided by the Los Angeles Department of Water and Power (LADWP); present a comprehensive set of green building policies to guide and support private sector development; reduce energy consumed by City facilities and utilize solar heating where applicable; and help citizens to use less energy. With regard to waste, ClimateLA sets the goal of reducing or recycling 70 percent of trash by 2015. With regard to open space and greening, ClimateLA includes the following goals: create 35 new parks; revitalize the Los Angeles River to create open space opportunities; plant one million trees throughout the City; identify opportunities to "daylight" streams; identify promising locations for stormwater infiltration to recharge groundwater aquifers; and collaborate with schools to create more parks in neighborhoods.

Sustainable City pLAn

In addition to GreenLA, Mayor Eric Garcetti released Los Angeles's first-ever Sustainable City pLAn (pLAn) on April 8, 2015.[85] The pLAn is a roadmap to achieving short-term results, and sets a path to strengthen and transform the City in future decades. Recognizing the risks posed by climate change, Mayor Garcetti set time-bound outcomes on climate action, most notably to reduce GHG emissions by 45 percent by 2025, 60 percent by 2035, and 80 percent by 2050, all against a 1990 baseline. Through the completion and verification of the GHG inventory update, the City concluded the following:

- The City accounted for approximately 36.2 million metric tons of CO_2e in 1990;
- The City's most recent inventory shows that emissions fell to 26.7 million metric tons of CO_2e in 2016; and

[84] *City of Los Angeles, CLIMATELA Municipal Program Implementing the GreenLA Climate Action Plan, 2008.*

[85] *City of Los Angeles, Los Angeles Climate Action Report: Updated 1990 Baseline and 2013 Emissions Inventory Summary, 2015.*

- L.A.'s emissions are 26 percent below the 1990 baseline as of 2016, putting the City more than halfway to the 2025 pLAn reduction target of 45 percent. In addition, the 20 percent reduction exceeds the 15 percent statewide goal listed in the First Update to the AB 32 Scoping Plan.

Green Building Program

The purpose of the City's Green Building Program is to reduce the use of natural resources, create healthier living environments and minimize the negative impacts of development on local, regional, and global ecosystems. The program consists of a Standard of Sustainability and Standard of Sustainable Excellence. The program addresses the following five key areas:

- Project Sites: location, site planning, landscaping, storm water management, construction and demolition recycling;

- Water Efficiency: efficient fixtures, wastewater reuse, and efficient irrigation;

- Energy & Atmosphere: energy efficiency, and clean/renewable energy;

- Materials & Resources: materials reuse, efficient building systems, and use of recycled and rapidly renewable materials; and

- Indoor Environmental Quality: improved indoor air quality, increased natural lighting, and improved thermal comfort/control.

The Standard of Sustainability establishes a requirement for non-residential projects at or above 50,000 square feet of floor area, high-rise residential (above six stories) projects at or above 50,000 square feet of floor area, or low-rise residential (six stories or less) of 50 or more dwelling units within buildings of at least 50,000 square feet of floor area to meet the intent of the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Certified level. The Standard also applies to existing buildings that meet the minimum thresholds described above when redevelopment construction costs exceed a valuation of 50 percent of the existing building's replacement cost. The voluntary Standard of Sustainable Excellence establishes an incentive program for projects that register with the LEED program, contract with a certified LEED professional, and can demonstrate how the Project will achieve LEED certification at a Silver or higher level.

Los Angeles Green Building Code

The City has adopted the Green Building Code to reduce the City's carbon footprint. The Green Building Code is applicable to new buildings and alterations with building valuations over $200,000 (residential and non-residential). The Green Building Code is based on the 2010 California Green Building Standards Code, commonly known as CalGreen that was developed and mandated by the State to attain consistency among the various jurisdictions within the State; reduce the building's energy and water use; and reduce waste (see discussion of CalGreen, above).

Existing Emissions from the Project Sites

To characterize existing conditions on the Project Sites, an emissions model is prepared using the California Emission Estimator Model (CalEEMod version 2016.3.2) to estimate the magnitude of annual GHG emissions associated with the existing uses.

Site 1 is currently developed with a 7,000 square-foot food service building and a surface parking lot. Site 2 is currently developed with a 133-space surface parking lot. Because the parking lots themselves do not generate vehicle traffic or emissions, the sole source of existing anthropogenic GHG emissions is the food service building. As shown on Table 6-18, the bulk of GHG emissions from this facility are generated from mobile sources that travel to and from the facility.

Table 6-18
Existing Daily Operations Emissions

Emissions Source	Daily Emissions (Pounds Per Day)			
	CO_2	CH_4	N_2O	CO_2e
Area Sources	<1	0	0	<1
Energy Sources	23	<1	<1	24
Mobile Sources	499	<1	0	500
Total	**523**	**<1**	**<1**	**524**
Source: DKA Planning, 2018, based on CalEEMod 2016.3.2 model runs. Refer to Appendix F.				

Impact Analysis

Methodology

The methodology utilized for this analysis is based on a Technical Advisory released by the Governor's OPR on June 19, 2008 titled *CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review*.

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.[86] 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."[87] The General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the Project. The information provided in this analysis is consistent with the General Reporting Protocol's reporting requirements.

[86] *California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf, accessed April 7, 2018.*

[87] *Ibid.*

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).[88]

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

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG emissions footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.[89] For example, CARB has proposed requiring the calculation of direct and indirect GHG emissions as part of the AB 32 reporting requirements. Additionally, the OPR 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."[90] Therefore, direct and indirect emissions have been calculated for the Project.

GHG emissions were quantified from construction and operation of the Project using SCAQMD's CalEEMod, version 2016.3.2. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[91]

Both one-time emissions and indirect emissions are expected to occur each year after build-out of the Project. One-time emissions from construction and vegetation removal were amortized over a 30-year

[88] *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.*

[89] *California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, www.arb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed April 7, 2018.*

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

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

period in accordance with SCAQMD guidance, in order to provide an annual construction emissions estimate comparable to operational emissions. Operational emissions include both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. The Project emission reductions are results of the Project's commitments and regulatory changes, which include the implementation of the Renewables Portfolio Standard of 33 percent, the Pavley regulation and Advanced Clean Cars program mandating higher fuel efficiency standards for light-duty vehicles, and the Low Carbon Fuel Standard.

Thresholds of Significance

In accordance with Appendix H of the State CEQA Guidelines (CEQA Guidelines), a project would have a significant impact related to GHG emissions if the project would do the following:

(a): Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment;

(b): Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

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

Section 15064.4 does not establish a threshold of significance. Lead agencies are called on to establish significance thresholds for their respective jurisdictions in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as the California Air Pollution Control Officers Association (CAPCOA), as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7[c]). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative, and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15130[f]).[92]

Although GHG emissions can be quantified, CARB, the SCAQMD and the City have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.[93]

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[92] *See, generally, Section 15130(f); see also Letter from Cynthia Bryant, Director of the Office of Planning and Research to Mike Chrisman, Secretary for Natural Resources, dated April 13, 2009.*

[93] *The South Coast Air Quality Management District has formed a GHG Significance Threshold Working Group. More information on this Working Group is available at www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2, accessed April 7, 2018.*

As indicated above, the CEQA Guidelines were amended in response to SB 97. In particular, the CEQA Guidelines were amended to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem within the geographic area of the project.[94] 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.[95] 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."[96] Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding of less than significant for GHG emissions if a project complies with program and/or other regulatory schemes to reduce GHG emissions.[97]

Accordingly, and in conformance with the California Supreme Court's decision in the *Center for Biological Diversity et al. vs. California Department of Fish and Wildlife* case, in the absence of any adopted, quantitative threshold, the significance of the Project's GHG emissions is evaluated consistent with CEQA Guidelines Section 15064.4(b)(2) by considering whether the Project complies with applicable plans, policies, regulations and requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions. For this Project, as a land use development project, the most directly applicable adopted regulatory plan to reduce GHG emissions is the 2016-2040 RTP/SCS, which is designed to achieve regional GHG reductions from the land use and transportation sectors as required by SB 375 and the State's long-term climate goals. This analysis also considers consistency with regulations or requirements adopted by the AB 32 Climate Change Scoping

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[94] *14 CCR § 15064(h)(3).*

[95] *Ibid.*

[96] *Ibid.*

[97] *See, for example, San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance tor Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), in which the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Further, the SCAQMD has taken this position in CEQA documents it has produced as a lead agency. The SCAQMD has prepared three Negative Declarations and one Draft Environmental Impact Report that demonstrate the SCAQMD has applied its 10,000 $MTCO_2e$/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See: SCAQMD, Final Negative Declaration for: Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH No. 2012041014 (October 2014); SCAQMD, Final Negative Declaration tor Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (December 2014); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (April 2014).*

Plan, the City of Los Angeles' LA Green Plan, and the Sustainable City pLAn. As discussed above, OPR has noted that lead agencies should make a good-faith effort to calculate or estimate GHG emissions from a project. Project GHG emissions are therefore quantified below, consistent with OPR guidelines.

Project Design Features

The following measures are included as part of the Project and would reduce GHG emissions:

- The Project shall not include natural gas-fueled fireplaces in the proposed residential units.
- Twenty percent of the Project's provided vehicle parking spaces would be capable of accommodating electric vehicle (EV) charging stations, and an additional five percent would be wired as EV charging stations for immediate use.
- The Project would incorporate approximately 10,500 square feet of solar voltaic panes on building roof levels. Approximately 4,500 square feet would be included on Site 1, and approximately 6,000 square feet would be included on Site 2.
- Windows would be included in all living units and common spaces for natural daylight, reducing the need for overhead lighting impacting the need for electricity. High-performance dual-pane windows and exterior materials would be used in order to reduce the need for energy driven mechanical systems.
- Active energy conservation strategies would include implementing LED lighting with daylighting controls and dimming capabilities, installing motion detector controls for all circulation and auxiliary spaces, providing Energy Star qualified appliances.
- Materials selection for the building would be made taking into consideration energy conservation, durability, reduction of air pollutants and recycling. Products would be chosen for their resiliency and durability in order to help offset maintenance costs. Finish materials would have no or low volatile organic (VOC) compounds, in order to help reduce the introduction of harmful chemicals into the building. Materials would be chosen for their pre/post-consumer content to reduce the amount of virgin material being used and reduce amount of waste.
- Plants and their substrate would act as a natural water filter reducing the contamination of water that leaves the site. Low-maintenance native and adapted plants would be chosen for landscaped areas and will take into consideration creating create mini-ecosystems with habitats for birds and beneficial insects in order to increase the biodiversity at the site. The landscaped area could reduce the urban heat island effect and smog as the plants act as a natural air filter and absorb heat versus reflecting it. Pervious paving areas may also be used to reduce the amount of hardscape, decrease storm water run-off, and cool the microclimate of the building.
- High-efficiency toilets with a flush volume of 1.0 gallon per flush, or less.
- Showerheads with a flow rate of 1.5 gallons per minute (gpm) or less.

- Residential bathroom faucets equipped with aerators to reduce flow to 1.0 gpm or less.
- Drip/subsurface irrigation (micro-irrigation)
- Micro-spray
- Proper hydro-zoning/zoned irrigation (group plants with similar water requirements)
- Artificial turf
- Drought-tolerant plants – 50 percent of total landscaping

Project Impacts

Construction Emissions

Construction of the Project would generate GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle trips generated by construction workers and vendors traveling to and from the Project Sites. These emissions would vary day to day over the 49-month duration of construction activities. As shown on Table 6-19, construction emissions of CO_2e would peak in 2020, when up to 13,742 pounds of CO_2e per day are anticipated. These emissions are further incorporated in the assessment of long-term operational impacts by amortizing the total of all construction emissions over a 30-year period, pursuant to guidance from the State and SCAQMD.

Table 6-19
Estimated Construction Emissions –
Unmitigated (Pounds per Day)

Construction Year	CO_2	CH_4	N_2O	CO_2e
2019 (Site 1)	24,392	2	0	24,433
2020 (Site 1)	21,323	2	0	21,370
2021 (Site 1)	6,017	1	0	6,038
2022 (Site 1)	501	<1	0	502
2022 (Site 2)*	30,126	2	0	30,181
2023 (Site 2)*	6,010	<1	0	6,023
Total (Annualized Emissions $MTCO_2e$)	**2,213**	**<1**	**0**	**2,219**

Pounds per Day
** Site 2 construction would commence after completion of Site 1 work.*
Source: DKA Planning, 2018, based on CalEEMod 2016.3.2. Refer to Appendix F.

Operational Emissions

Area Source Emissions

Area source emissions were calculated using the CalEEMod emissions inventory model, which includes hearths and landscape maintenance equipment. This includes the Project's prohibition of natural gas-

fueled fireplaces in the development. As shown on Table 6-20, the Project is expected to result in a total of approximately 13 $MTCO_2e$ of GHG emissions per year from area sources.

Table 6-20
Estimated Annual CO_2e Greenhouse Gas Emissions

Source	Annual Emissions
Area Sources	13
Energy Sources	2,746
Mobile Sources	2,616
Waste Sources	200
Water Sources	723
Construction	74
Total Emissions	**6,372**

metric tons per year

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.

Source: DKA Planning, 2018.

Energy Source Emissions

Electricity and natural gas emissions were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. As shown on Table 6-20, Project GHG emissions from electricity and natural gas usage would result in a total of approximately 2,746 $MTCO_2e$ per year. This accounts for a 42 percent reduction in energy source emissions with implementation of several statewide energy conservation programs, including reducing energy production emissions from the state's renewables portfolio standard (33 percent), natural gas extraction efficiency measures (1.6 percent), and natural gas transmission and distribution efficiency measures (7.4 percent). In addition, the Project includes design features, such as the incorporation of approximately a total of 10,500 square feet of solar voltaic panels on all roof levels that would reduce energy demand from the Project.

Mobile Source Emissions

Mobile-source emissions were calculated using the SCAQMD-recommended CalEEMod emissions inventory model. CalEEMod calculates the emissions associated with on-road mobile sources associated with residents, employees, visitors, and delivery vehicles visiting the Project Sites based on the number of daily trips generated and VMT.

Mobile source operational GHG emissions were calculated using CalEEMod and are based on the Project trip-generation estimates provided by Linscott Law & Greenspan in the Project's traffic study. As shown in Table 6-20, the Project GHG emissions from mobile sources would result in a total of 2,616 $MTCO_2e$ per year

As shown on Table 6-21, the Project's profile as an urban infill, mixed-use development with proximity to substantial public transit would produce substantial reductions over land uses that are located in a more typical community that has not coordinated its land use and transportation planning. The anticipated reductions in vehicle trips and VMT would range from 0-50 percent in reductions from pass-by trips, five percent from internal capture of trips, and up to ten percent reductions from the substantial mode share from public transit and pedestrian modes. These reductions are attributable to the Project characteristics as being an infill project near transit that supports multi-modal transportation options.

Table 6-21
Daily Vehicle Travel Reductions Associated with the Project

Land Use	Reduction from Internal Capture	Reduction from Pass-By Trips	Reduction from Transit/Walk-In Trips
Commercial	0%	50%	0%
Office	5%	0%	10%
Source: Linscott Law & Greenspan, Traffic Impact Study Weingart Projects, March 2018.			

The measures listed previously under "Project Design Features" would further reduce the Project's mobile source emissions

Solid Waste Generation Emissions

Emissions related to solid waste were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the waste generated by applicable emissions factors provided in Section 2.4 of USEPA's AP-42, Compilation of Air Pollutant Emission Factors. CalEEMod solid waste generation rates for each applicable land use were selected for this analysis. As shown on Table 6-20, the Project scenario would result in a total of approximately 200 $MTCO_2e$ of emissions per year from solid waste management, accounting for a 50-percent recycling/diversion rate.

Water Usage and Wastewater Generation Emissions

GHG emissions are related to the energy used to convey, treat, distribute water, and treat wastewater. Thus, these emissions are generally indirect emissions from the production of electricity to power these systems. Emissions related to water usage and wastewater generation were calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the water usage by the applicable energy intensity factor. As shown on Table 6-20, Project GHG emissions from water/wastewater usage would result in a total of 723 $MTCO_2e$ per year. This includes a 20-percent reduction in water/wastewater emissions consistent with building code requirements as compared to the Project without sustainability features related to water conservation that alone result in a reduction of approximately 180 $MTCO_2e$ of emissions per year. Specifically, without the City's sustainability initiatives, the Project would emit about 904 $MTCO_2e$ per year from water-related activities.

Amortized Construction Emissions and Total Operational Emissions

As shown on Table 6-20, when taking into consideration implementation of the requirements set forth in the City of Los Angeles Green Building Code and the full implementation of current state mandates, the

GHG emissions for the Project at buildout in 2025 would equal 74 $MTCO_2e$ per year (amortized over 30 years) during construction and 6,298 $MTCO_2e$ per year during operation of the Project with a combined total of 6,372 $MTCO_2e$ per year.

It should be noted that each source category of GHG emissions from the Project is subject to a number of regulations that indirectly reduce climate change-related emissions, including those listed below. These and other reductions from statewide initiatives are reflected in the Project's estimated GHG emissions.

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

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

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

- Building structures. Operational efficiencies would be built into the Project that reduce energy use and waste, as mandated by CALGreen building codes.

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

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

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

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

Less Than Significant Impact.

Consistency with Applicable Plans

As described above, compliance with a GHG emissions reduction plan renders a less-than-significant impact. Below is a discussion of the Project's consistency with relevant plans and policies that govern climate change, including the following:

- Executive Orders S-3-05 and B-30-15;

- AB 32 Scoping Plan;

- SCAG's 2016-2040 RTP/SCS;
- Sustainable City pLAn;
- Los Angeles Green Building ordinance; and
- City of Los Angeles ClimateLA implementation plan.

As discussed in detail below, the Project would be consistent with all applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions, and Project impacts would be less than significant.

Consistency with E.O. S-03-05 and E.O. B-30-15

As discussed below, the Project would be consistent with the state's Executive Orders S-3-05 and B-30-15, which are orders from the State's Executive Branch for the purpose of reducing GHG emissions, and which were subsequently codified by AB 32 and SB 32. These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use planning consistent with these Executive Orders, because the Project is a mixed-used development located in an urban infill area well-served by transportation infrastructure that includes robust public transit provided by Metro and would serve an existing homeless population.

Consistency with the AB 32 Scoping Plan

The Scoping Plan outlines a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions, including expanding energy efficiency programs, increasing electricity production from renewable resources (at least 33 percent of the Statewide electricity mix), and increasing automobile efficiency, implementing the Low-Carbon Fuel Standard, and developing a cap-and-trade program. These measures are designed to be implemented by state agencies. As discussed below, the Project would not interfere with implementation of the AB 32 measures.

Table 6-22 provides an overview of the Project's consistency with the GHG emission reduction strategies outlined by Scoping Plan measures. Based on this evaluation, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the Scoping Plan.

Table 6-22
Project Consistency With Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
SCAQMD Rule 445 (Wood Burning Devices): Requires use of natural gas to power all cooking stoves and fireplaces.	**Consistent.** All cooking stoves would either be electric or natural gas. The Project shall prohibit natural gas-fueled fireplaces in the proposed residential units.
California Renewables Portfolio Standard (RPS) program: Senate Bill 2X modified California's RPS program to require that both public and investor-owned utilities in California receive at least 33 percent of their electricity from renewable sources by the year 2020. California Senate Bill 2X also requires regulated sellers of electricity to meet an interim milestone of procuring 25 percent of their energy supply from certified renewable resources by 2016.	**Consistent.** LADWP's commitment to achieve 35 percent renewables by 2020 would exceed the requirement under the RPS program of 33 percent renewables by 2020. In 2017, LADWP indicated that 29 percent of its electricity came from renewable resources in Year 2016.[1] As LADWP would provide electricity service to the Project Sites, the Project would use electricity that is produced consistent with this performance-based standard. Electricity GHG emissions estimates assume that LADWP will receive at least 33 percent of their electricity from renewable sources by 2020.
Senate Bill 350 (SB 350): The Clean Energy and Pollution Reduction Act of 2015 increases the standards of the California RPS program by requiring that the amount of electricity generated and sold to retail customers per year from eligible renewable energy resources be increased to 50 percent by 2030 and also requires the State Energy Resources Conservation and Development Commission to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[2]	**Consistent.** LADWP would be required to generate electricity that would increase renewable energy resources to 50 percent by 2030. As LADWP would provide electricity service to the Project Sites, the Project by 2030 would use electricity consistent with the requirements of SB 350. Project buildout would occur in 2025 and thus, the estimated GHG emissions from electricity usage provided above conservatively do not include implementation of SB 350 with a compliance date of 2030. Electricity GHG emissions estimates would be further reduced by 17 percent by 2030 as the electricity provided to the Project Sites would meet the requirements under SB 350. As required under SB 350, doubling of the energy efficiency savings from final end uses of retail customers by 2030 would primarily rely on the existing suite of building energy efficiency standards under CCR, Title 24, Part 6 (consistency with this regulation is discussed below) and utility-sponsored programs such as rebates for high-efficiency appliances, heating ventilation and air conditioning (HVAC) systems and insulation. The Project would support this action/strategy because it includes compliance with specific requirements of the Los Angeles Green Code (consistency with this regulation is discussed below).
Senate Bill 1368 (SB 1368): GHG Emissions Standard for Baseload Generation 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.	**Consistent.** LADWP meets the requirements of SB 1368. As LADWP would provide electricity service to the Project Sites, the Project would use electricity that meets the requirements under SB 1368.
California Code of Regulations (CCR), Title	**Consistent.** The Appliance Efficiency Regulations apply

Table 6-22
Project Consistency With Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
20: The 2012 Appliance Efficiency Regulations, adopted by the California Energy Commission (CEC), include standards for new appliances (e.g., refrigerators) and lighting, if they are sold or offered for sale in California.	to new appliances and lighting that are sold or offered for sale in California. The Project would include new appliances and lighting that comply with this energy efficiency standard.
CCR, Title 24, Building Standards Code: The 2016 Building Energy Efficiency Standards contained in Title 24, Part 6 (also known as the California Energy Code), requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The California Green Building Standards Code (Part 11, Title 24) established mandatory and voluntary standards on planning and design for sustainable site development, energy efficiency (extensive update of the California Energy Code), water conservation, material conservation, and internal air contaminants.	**Consistent.** Consistent with regulatory requirements, the Project shall comply with applicable provisions of the 2016 Los Angeles Green Code that in turn requires compliance with mandatory standards included in the California Green Building Standards. The 2016 Title 24 standards are 28 percent more efficient (for electricity) than residential construction built to the 2013 Title 24 standards and 5 percent more efficient (for electricity) for non-residential construction built to 2013 Title 24 standards.[3] The 2016 Title 24 standards are more efficient than the 2020 Projected Emissions under Business-as-Usual in CARB's *Climate Action Scoping Plan*. The standards promote the use of better windows, insulation, lighting, ventilation systems and other features that reduce energy consumption in homes and businesses. Thus, the Project has incorporated energy efficiency standards that are substantially more effective than the measures identified in the *Climate Action Scoping Plan* to reduce GHG emissions.
Energy Independence and Security Act of 2007 (EISA): EISA requires manufacturing for sale within the United States to phase out incandescent light bulbs between 2012 and 2014 resulting in approximately 25 percent greater efficiency for light bulbs and requires approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020.	**Consistent.** EISA would serve to reduce the use of incandescent light bulbs for the Project and, thus, reduce energy usage associated with lighting. Electricity GHG emissions estimates account for a 25-percent reduction in lighting electricity consumption with implementation of this regulation.
Assembly Bill 1109 (AB 1109): The Lighting Efficiency and Toxic Reduction Act prohibits a person from manufacturing for sale in the state specified general purpose lights that contain levels of hazardous substances, as it requires the establishment of minimum energy efficiency standards for all general purpose lights. The standards are structured to reduce average statewide electrical energy consumption by not less than 50 percent from the 2007 levels for indoor residential lighting and not less than 25 percent from the 2007 levels for indoor commercial and outdoor lighting by 2018.[4]	**Consistent.** As with the EISA, the Project would meet the requirements under AB 1109, because it incorporates energy efficient lighting and electricity consumption that complies with local and state green building programs.
Cap-and-Trade Program: The program	**Consistent.** As required by AB 32 and the Climate

Table 6-22
Project Consistency With Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
establishes an overall limit on GHG emissions from capped sectors (e.g., electricity generation, petroleum refining, and cement production). Facilities subject to the cap are able to trade permits to emit GHGs within the overall limit.	Change Scoping Plan, the Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in- state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program. Therefore, GHG emissions associated with the Project's electricity usage would be covered by the Cap-and-Trade Program (as LADWP would be a covered entity) and would be consistent with AB 32 and the Climate Change Scoping Plan.
Assembly Bill 1493 (AB 1493) "Pavley Standards": AB 1493 requires the development and adoption of regulations to achieve "the maximum feasible reduction of greenhouse gases" emitted by noncommercial passenger vehicles, light-duty trucks, and other vehicles used primarily for personal transportation in the State. In compliance with AB 1493, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles and light duty trucks of model year 2009 through 2016. Model years 2017 through 2025 are addressed by California's Advanced Clean Cars program (discussed below).	**Consistent.** The Pavley regulations reduced GHG emissions from California passenger vehicles by about 22 percent in 2012 and are expected to reduce GHG emissions by about 30 percent in 2016, all while improving fuel efficiency. GHG emissions related to vehicular travel by the Project would benefit from this regulation because vehicle trips associated with the Project would be affected by AB 1493. Mobile source emissions generated by the Project would be reduced with implementation of AB 1493 consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of AB 1493 into mobile source emission factors.
Executive Order S-01-07: The Low Carbon Fuel Standard (LCFS) requires a 10-percent or greater reduction by 2020 in the average fuel carbon intensity for transportation fuels in California regulated by CARB. CARB identified the LCFS as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009 (CARB 2009).[5, 6]	**Consistent.** GHG emissions related to vehicular travel by the Project would benefit from this regulation because fuel used by Project-related vehicles would be compliant with LCFS. Mobile source GHG emissions estimates were calculated using CalEEMod that includes implementation of the LCFS into mobile source emission factors.
Advanced Clean Cars Program: In 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. By 2025, when the rules will be fully implemented, the new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions.	**Not applicable.** Although this is not applicable to the Project since it is a statewide program, standards under the Advanced Clean Cars Program will apply to all passenger and light duty trucks used by customers, employees, and deliveries to the Project. GHG emissions related to vehicular travel by the Project would benefit from this regulation and mobile source emissions generated by the Project would be reduced with implementation of standards under the Advanced Clean Cars Program consistent with reduction of GHG emissions under AB 32. Mobile source GHG emissions conservatively do not include this additional 34-percent reduction in mobile source emissions as the CalEEMod model does not yet account for this regulation. The

Table 6-22
Project Consistency With Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
	Project would further support this regulation since the Project would provide at least 20 percent of the total code-required parking spaces for the Project to be capable of supporting future EV charging stations, and the Project would provide at least 5 percent of the total code-required parking spaces with EV charging stations for immediate use.
Senate Bill (SB) 375: SB 375 requires integration of planning processes for transportation, land-use and housing. Under SB 375, each Metropolitan Planning Organization would be required to adopt a Sustainable Community Strategy (SCS) to encourage compact development that reduces passenger vehicle miles traveled and trips so that the region will meet a target, created by CARB, for reducing GHG emissions.	**Consistent.** SB 375 requires SCAG to direct the development of the SCS for the region. The Project represents an infill development within an existing urbanized area that would concentrate new residential and commercial retail and restaurant uses within an HQTA. Thus, the Project would be consistent with SCAG's 2016–2040 RTP/SCS as it would be located within an HQTA.
California Integrated Waste Management Act of 1989 and Assembly Bill 341: The California Integrated Waste Management Act of 1989 requires each jurisdiction's source reduction and recycling element to include an implementation schedule that shows: (1) diversion of 25 percent of all solid waste by January 1, 1995, through source reduction, recycling, and composting activities; and (2) diversion of 50 percent of all solid waste on and after January 1, 2000, through source reduction, recycling, and composting facilities.	**Consistent.** GHG emissions related to solid waste generation from the Project would benefit from this regulation, as it would decrease the overall amount of solid waste disposed of at landfills. The decrease in solid waste would decrease the amount of methane released from the decomposing solid waste. Project-related GHG emissions estimates from solid waste generation includes a 50-percent reduction in solid waste generation source emissions per goals of the City. The Project Applicant shall only contract for waste disposal services with a company that recycles solid waste in compliance with AB 341. In addition, the Project would provide recycling bins at appropriate locations to promote recycling of paper, metal, glass and other recyclable material.
CCR, Title 24, Building Standards Code: The California Green Building Standards Code (Part 11, Title 24) includes water efficiency requirements for new residential and non-residential uses, in which buildings shall demonstrate a 20-percent overall water use reduction.	**Consistent.** Water usage rates were calculated consistent with the requirements under City Ordinance No. 184,248, 2013 California Plumbing Code, 2016 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2016 Los Angeles Green Building Code and reflects approximately a 20 percent reduction in water usage as compared to the base demand. Project-related GHG emissions from water related sources accounts for compliance with water efficiency requirements. Water conservation measures include: residential bathroom faucets with a maximum flow rate of 1.0 gallons per minute, kitchen faucets with a maximum flow rate of 1.5 gallons per minute, Energy Star-certified and high efficiency clothes washers and dishwashers, non-residential kitchen faucets (except restaurant kitchens) with a maximum flow rate of 1.5 gallons per minute, and installation of tankless and on- demand water heaters in

Table 6-22
Project Consistency With Scoping Plan GHG Reduction Strategies

Strategy	Project Consistency
	commercial kitchens and restrooms, when appropriate, among others. The Project would have an overall water use reduction of 20 percent and would meet the requirements of the California Green Building Standards.
Senate Bill X7-7: The Water Conservation Act of 2009 sets an overall goal of reducing per-capita urban water use by 20 percent by December 31, 2020. The state is required to make incremental progress toward this goal by reducing per-capita water use by at least 10 percent by December 31, 2015. This in an implementing measure of the Water Sector of the AB 32 Scoping Plan. Reduction in water consumption directly reduces the energy necessary and the associated emissions to convene, treat, and distribute the water; it also reduces emissions from wastewater treatment.	**Consistent.** As discussed above under Title 24, the Project would meet this performance-based standard. Water conservation measures consistent with Green Building Code requirements include: residential bathroom faucets with a maximum flow rate of 1.0 gallons per minute, kitchen faucets with a maximum flow rate of 1.5 gallons per minute, Energy Star-certified and high efficiency clothes washers and dishwashers, non-residential kitchen faucets (except restaurant kitchens) with a maximum flow rate of 1.5 gallons per minute, and installation of tankless and on-demand water heaters in commercial kitchens and restrooms, when appropriate, among others. The Project thereby includes measures consistent with the GHG reductions sought by SB X7-7 related to water conservation and related GHG emissions.
CARB In-Use Off-Road Regulation: CARB's in-use off- road diesel vehicle regulation ("Off-Road Diesel Fleet Regulation") requires the owners of off-road diesel equipment fleets to meet fleet average emissions standards pursuant to an established compliance schedule.	**Consistent.** The Project would use construction contractors that would comply with this regulation.
CARB In-Use On-Road Regulation: CARB's in-use on- road heavy-duty vehicle regulation ("Truck and Bus Regulation") applies to nearly all privately and federally owned diesel fueled trucks and buses and to privately and publicly owned school buses with a gross vehicle weight rating greater than 14,000 pounds.	**Consistent.** The Project would use construction contractors that would comply with this regulation.

[1] *California Energy Commission, Utility Annual Power Content Labels for 2016, www.energy.ca.gov/pcl/labels/.*
[2] *Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, Ch. 547.*
[3] *CEC, Adoption Hearing, 2016 Building Energy Efficiency Standards.*
[4] *2007b. Assembly Bill 1109 (2007–2008 Reg. Session) Stats. 2007, Ch. 534.*
[5] *CARB, Initial Statement of Reason for Proposed Regulation for The Management of High Global Warming Potential Refrigerant for Stationary Sources, October 23, 2009.*
[6] *Carbon intensity is a measure of the GHG emissions associated with the various production, distribution, and use steps in the "lifecycle" of a transportation fuel.*

Source: DKA Planning, 2018.

The 2017 Update identifies additional GHG reduction measures necessary to achieve the 2030 target. These measures build upon those identified in the Climate Change Scoping Plan and First Update, as shown on Table 6-22. A summary of these policies and measures are provided in Table 6-22. Although a

number of these measures are currently established as policies and measures, some measures have not yet been formally proposed or adopted. It is expected that these measures or similar actions to reduce GHG emissions will be adopted as required to achieve statewide GHG emissions targets.

As such, based on the analysis above, the Project would be consistent with the GHG reduction-related actions and strategies in the Climate Change Scoping Plan.

Consistency with SCAG's 2016-2040 RTP/SCS

In order to assess the Project's consistency with the 2016-2040 RTP/SCS, this section considers the Project's land use profile for consistency with that in the 2016-2040 RTP/SCS. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's 2016-2040 RTP/SCS, if projects are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

The Project is an infill development that is also consistent with the 2016 RTP/SCS and its focus on integrated land use planning. Specifically, the Project Sites' location near substantial local transit bus services places it in an HQTA. The 2016-2040 RTP/SCS projects that these areas, while comprising only three percent of land area in the region, make up 46 percent of future household growth and 55 percent of future job growth. Further, the vertical integration of land uses on the Project Sites would produce substantial reductions in auto-mode share to and from the sites that would help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the 2016-2040 RTP/SCS.

Table 6-23 demonstrates the Project's consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. The Project also would be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS. (Additional consistency discussion is included in the SCEA's consistency analysis of Section 3 [SCEA Criteria and Transit Priority Project Consistency Analysis]). Therefore, the Project would be consistent with the GHG emissions reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

Table 6-23
Project Consistency With SCAG's 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
Land Use Strategies		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	**Consistent.** The Project would include 685 dwelling units to serve an existing homeless population that would add to the supply of housing in metropolitan Los Angeles County. Also, the Project would not contribute to any displacement of affordable housing, as the Projects Sites are currently developed non-residential uses.
Focus new growth around transit.	Local Jurisdictions	**Consistent.** The Project is an infill development that would be consistent with the 2016-2040 RTP/SCS focus on increasing development near transit facilities. The Project is also located within a High Quality Transit Area (HQTA) as defined by SCAG and a Transit Priority Area as defined by SB 743, each of which support transit opportunities and promote a walkable environment.[98] The Project Sites are also well served by public transit, including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90. Also, the Project Sites are located 0.7 miles southeast of Metro's Purple/Red line station at Pershing Square and 0.8 miles southwest of Metro's Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions	**Consistent.** The Project is an infill development that would be consistent with the 2016 RTP/SCS focus on focusing growth along the 2,980 miles of Livable Corridors in the region. It would provide needed low-income and transitional housing in Skid Row. Also, the Project Sites are located 0.7 miles southeast of Metro's Purple/Red line station at Pershing Square and 0.8 miles southwest of Metro's Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG, Local Jurisdictions	**Consistent.** The Project generally would be consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas. Project would provide needed low-income and transitional housing in Skid Row. Specifically, the Project Sites are also well served by public transit, including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90. Also, the Project Sites are located 0.7 miles southeast of Metro's Purple/Red line station at Pershing Square and 0.8 miles southwest of Metro's Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less

[98] *SCAG, High Quality Transit Areas 2012 – SCAG Region, http://gisdata-scag.opendata.arcgis.com/datasets/1f6204210fa9420b87bb2e6c147e85c3_0, accessed on June 14, 2018.*

Table 6-23
Project Consistency With SCAG's 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
		than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	**Not Applicable.** While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the Project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	**Not Applicable.** The Project is an infill development and does not include development of any natural or farm lands.
Transportation Strategies		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy calls on investing in the maintenance of our existing transportation system, the Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions Local Jurisdictions	**Consistent.** The Project is an infill development that would minimize congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density of population and jobs. The Project would provide needed housing to serve a homeless population. The Project Sites are also well served by public transit, including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90. Also, the Project Sites are located 0.7 miles southeast of Metro's Purple/Red line station at Pershing Square and 0.8 miles southwest of Metro's Gold line station at Little Tokyo/Arts District. Further, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction.
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy aims to improve the safety of the transportation system and protect users from security threats, the Project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The Project would not interfere with this larger goal of investing in the transportation system.
Technological Innovation and 21st Century Transportation		
Promote zero-emissions	SCAG	**Consistent.** While this action/strategy is not applicable on a

Table 6-23
Project Consistency With SCAG's 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis
vehicles.	Local Jurisdictions	project-specific basis, because the action/strategy involves the development and implementation of jurisdiction-level policies, the Project would include EV charging infrastructure that supports the penetration of zero-emission vehicles.
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not applicable on a project-specific basis, because the action/strategy involves the development and implementation of jurisdiction-level policies, the Project would include EV charging infrastructure that supports the penetration of zero-emission vehicles.
Implement shared mobility programs.	SCAG Local Jurisdictions	**Not Applicable.** While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the Project would not interfere with these emerging programs.
Source: SCAG, 2016–2040 RTP/SCS, Chapter 5: The Road to Greater Mobility and Sustainable Growth, April 2016.		

Consistency with City of Los Angeles' Sustainable City pLAn

The Sustainable City pLAn includes both short-term and long- term aspirations through the year 2035 in various topic areas, including: water, solar power, energy-efficient buildings, carbon and climate leadership, waste and landfills, housing and development, mobility and transit, and air quality, among others. The Sustainable City pLAn provides information as to what the City will do with buildings and infrastructure under its control. Specific targets related to housing and development and mobility and transit include the decrease of vehicle miles traveled per capita by 5 percent by 2025, and increasing trips made by walking, biking or transit by at least 35 percent by 2025.

The Project would generally comply with these aspirations, as the Project is an infill development consisting of residential and commercial uses on Project Sites located near substantial bus and rail transit services. Furthermore, the Project would comply with CALGreen, implement various project design features to reduce energy usage, water conservation measures, and would comply with the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986) in furtherance of the aspirations included in the Sustainable City pLAn with regard to energy-efficient buildings and waste and landfills. The Project would also provide secure short- and long-term bicycle storage areas for Project residents and guests.

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

efficiency and renewable energy measures can be found in Section 2 (Project Description), under the heading "Project Design Features."

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

With regard to waste, the Project would be consistent with the Sustainable City pLAn goal of increasing landfill diversion rate to at least 90 percent by 2025 and 95 percent by 2035. Operational efficiencies would be built into the Project to reduce energy use and waste, as mandated by the City's Green Building Code and CALGreen building code. With regard to ongoing operations, the Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

With regard to open space and greening, the Project would not interfere with the Sustainable City pLAn and its focus on ensuring proportion of Angelenos living within 0.5 miles of a park or open space is at least 65 percent by 2025; revitalizing the Los Angeles River to create open space opportunities; and identifying promising locations for stormwater infiltration to recharge groundwater aquifers. Therefore, the Project would be consistent with the Sustainable City pLAn.

Consistency with Los Angeles Green Building Ordinance

Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include short- and long-term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Project would comply with these mandatory measures, as the Project would provide on-site bicycle parking spaces. Furthermore, the Green Building Ordinance includes measures that would increase energy efficiency on the Project Sites, including installing Energy Star rated appliances and installation of water-conserving fixtures. The Project would comply with these measures.

The Project would comply with the Los Angeles Green Building Ordinance standards that are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the state's codes. Under the Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development.

The Project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level. Projects that are LEED certified generally exceed Title 24 (2013) standards by at least 10 percent.[99] As such, it would incorporate several design elements and programs that will reduce the carbon footprint of the development, including:

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

1. **GHG Emissions Associated with Planning and Design.** The Project must have measures to reduce storm water pollution, provide designated parking for bicycles and low-emission vehicles, have wiring for electric vehicles, reduce light pollution, and design grading and paving to keep surface water from entering buildings. This would include but not be limited to:

   - Electrical conduits and hardware for future installation of EV charging technology.

2. **GHG Emissions Associated with Energy Demand.** The Project must meet Title 24 2016 standards and include Energy Star appliances, have pre-wiring for future solar facilities, and off-grid pre-wiring for future solar facilities. This includes:

   - Use of low-emitting paints, adhesives, carpets, coating, and other materials.
   - Equipment and fixtures will comply with the following where applicable:
     - Installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .78 or higher.
     - Installed electric heat pumps will have a Heating Seasonal Performance Factor of 7.7 or higher.
     - Installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 10.0 and an Energy Efficiency Ratio of at least 11.6, depending on size category.
     - Installed tank type water heaters will have an Energy Factor higher than .6.
     - Installed tankless water heaters will have an Energy Factor higher than .80.
     - Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
     - Building lighting in the kitchen and bathrooms within the dwelling units will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).
   - An electrical conduit will be provided from the electrical service equipment to an accessible location in the attic or other location suitable for connection to a solar energy system with panels to be placed on the rooftops of the proposed buildings. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of an electrical solar energy system.
   - A minimum of 250 square feet of contiguous unobstructed roof area will be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

- Appliances will meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

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

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

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

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

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

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

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

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

4. **GHG Emissions Associated with Solid Waste Generation.** The Project is subject to construction waste reduction of at least 50 percent. Solid waste from the Project's operations would contribute toward the City's AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

5. **GHG Emissions Associated with Environmental Quality.** The Project must meet strict standards for any fireplaces and woodstoves, covering of duct openings and protection of

mechanical equipment during constructions, and meet other requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities. This would include:

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

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

Consistency with ClimateLA

Construction of the Project would be consistent with ClimateLA's goal to reduce and recycle trash (including construction waste). The Project would promote this goal by complying with waste reduction measures mandated by CALGreen and City's Green Building Code, as well as solid waste diversion policies administered by CalRecycle that in turn reduce GHG emissions.

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

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

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

With regard to water, the Project would be consistent with reducing water from growth through water conservation and recycling; reducing per capita water consumption by 20 percent; and implementing the City's water and wastewater integrated resources plan that would increase conservation, and maximize the capture and reuse of storm water. Specifically, the Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions, as well as CALGreen and City's Green Building Code that call for water-conserving fixtures and processes. As part of the Water Supply Assessment (WSA) prepared for the Project (refer to Response to Checklist Question

18[b] [Water Supply]), several water conservation features have been incorporated into the Project. These elements of the Project would be consistent with goals set forth in ClimateLA.

The Project Applicant has committed to implement the following water conservation measures that are in addition to those required by the City's Green Building Code for the entire Project:

- High-efficiency toilets with a flush volume of 1.0 gallon per flush, or less.
- Showerheads with a flow rate of 1.5 gallons per minute (gpm) or less.
- Residential bathroom faucets equipped with aerators to reduce flow to 1.0 gpm or less.
- Drip/subsurface irrigation (micro-irrigation)
- Micro-spray
- Proper hydro-zoning/zoned irrigation (group plants with similar water requirements)
- Artificial turf
- Drought-tolerant plants – 50 percent of total landscaping

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

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

For these reasons, the Project would be consistent with ClimateLA.

Conclusion Regarding Project Consistency

In summary, the plan consistency analysis provided above demonstrates that the Project complies with or exceeds the plans, policies, regulations and GHG reduction actions/strategies outlined in the Climate Change Scoping Plan, the 2016-2040 RTP/SCS, and the ClimateLA plan. In addition, consistency with the above plans, policies, regulations and GHG reduction actions/strategies would serve to reduce GHG emissions for the Project. Thus, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing emissions of GHGs. Furthermore, because the Project is consistent and does not conflict with these plans, policies, and regulations, the Project's incremental increase in GHG emissions as described above would not result in a significant impact on the

environment. Therefore, Project-specific impacts with regard to climate change would be less than significant.

Cumulative Impacts

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

The Project would be consistent with the approach outlined in CARB's Scoping Plan, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's Scoping Plan, the Project would be designed to achieve the standards of CALGreen.

Currently, there are no applicable CARB, SCAQMD, or City significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce GHG emission, including E.O. S-3-05, E.O. B-30-15, the Scoping Plan, SCAG's 2016-2040 RTP/SCS, and ClimateLA.

As discussed above, the Project is consistent with these applicable GHG reduction plans and policies. As such, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts are not cumulatively considerable.

8. HAZARDS AND HAZARDOUS MATERIALS

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

Less Than Significant Impact. The types of hazardous materials that would be used during construction of the Project would be typical of those hazardous materials necessary for construction of a mixed-use

development (e.g., paints, solvents, fuel for construction equipment, building materials, etc.). Although construction of the Project would require the routine transport, use, and disposal of hazardous waste, construction activities associated with Project would be required to comply with all applicable federal, state, and local regulations governing such activities. The existing 7,000-square-foot food service building on Site 1 was built in 1922, prior to the current asbestos and lead regulations, and thus could contain asbestos-containing materials (ACMs) and lead-based paint (LBP). (No buildings are located on Site 2.)

Pursuant to SCAQMD Rule 1403, prior to the issuance of any demolition and/or alteration permits, the Project Applicant shall provide a letter to the LADBS from a qualified asbestos abatement consultant indicating that no ACMs are present on Site 1. If ACMs are discovered on site, during demolition or construction proper abatement regulations shall be followed. Because the Project would be required to comply with the SCAQMD Rule 1403, which regulates the removal of ACMs to ensure that asbestos fibers are not released into the air during demolition and/or renovation activities, as well as other applicable state and federal regulations, impacts from ACMs would be less than significant. Additionally, demolition and removal of the existing buildings would be required to comply with CCR Title 8, Section 1532 et seq., which requires that all LBP be abated and removed by a licensed lead contractor. Standard handling and disposal practice shall be implemented pursuant to California Department of Industrial Relations (Cal-OSHA) regulations. Prior to issuance of a demolition permit, a LBP survey shall be performed and approved by the LADBS. Thus, construction of the Project would not result in a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

The Project includes the development of 685 residential dwelling units and approximately 48,043 square feet of commercial (i.e., philanthropic, retail, and office) land uses. The types of hazardous materials that would be found on the Project Sites during the Project's operational phase would be typically associated with residential and commercial land uses – paints, cleaning supplies, small amounts of petroleum products. The Project would not require routine transport, use, or disposal of hazardous materials that would create a significant hazard to the public or the environment. To the extent there would be any such transport, use, or disposal, compliance with existing local, state, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. Project impacts related to this issue would be less than significant. Therefore, impacts related to this issue would be less than significant.

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

Less Than Significant With Mitigation Incorporated. The information and analysis below is based primarily on the following documents, which are included in Appendix I:

- *Phase I Environmental Site Assessment, 552 S. San Pedro Street and 557 Crocker Street Los Angeles, CA 90013, Advantage Environmental Consultants, LLC, March 14, 2018.*

- *Phase I Environmental Site Assessment, 600-628 S. San Pedro Street and 611-615 Crocker Street Los Angeles, CA 90021, Advantage Environmental Consultants, LLC, April 2, 2018.*

- *Phase II Environmental Site Assessment, 600-628 S. San Pedro Street and 611-615 Crocker Street Los Angeles, CA 90021, Advantage Environmental Consultants, LLC, March 28, 2018.*

Advantage Environmental Consultants, LLC (AEC) prepared the Phase I Environmental Site Assessments (Phase I ESAs) for the Project Sites in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) Practice E1527-13, 40 Code of Federal Regulations (F) Part 312.

The following tasks were conducted as part of the Phase I ESAs:

- A search for environmental liens and other potential environmental related encumbrances to title of the Project Sites.

- An evaluation of standard environmental record sources contained within federal, state, and local environmental databases within specific search distances.

- An evaluation of additional environmental record sources obtained from regulatory departments/agencies.

- A qualitative evaluation of the physical characteristics of the Project Sites through a review of published topographic, geologic, and hydrogeologic maps; published groundwater data; and area observations to characterize surface water flow in vicinity of the Project Sites.

- An evaluation of past use of the Project Sites and adjacent/nearby property uses through a review of historical resources including topographic maps, aerial photographs, and City directories.

- A physical inspection of the Project Sites to search for conditions indicative of potential environmental concerns including underground storage tanks (USTs), aboveground storage tanks (ASTs), associated tank piping; stained soil or pavement; equipment that may contain or have historically contained polychlorinated biphenyls (PCBs); and other potential environmental concerns as defined in the ASTM E 1527-13 standard.

- A physical assessment of indications of past uses and visual observations of adjacent and surrounding properties (from curbside or public spaces) to assess potential impacts to the Project Sites.

- Interviews completed with the Project Applicant, owners of the Project Sites, and a local regulatory agency representative.

- Preparation of the Phase I ESAs, which includes the findings of the assessment and AEC's professional opinion regarding the level of significance of the findings. Conclusions were drawn based on the significance levels of the findings with subsequent recommendations provided.

In addition, concurrent with preparation of the Phase I ESA prepared for Site 2, AEC also prepared a Phase II ESA for Site 2. The results of these studies for each of the sites are discussed below.

Site 1

Standard Environmental Record Sources

The federal databases shown on Table 6-24 related to potential on-site and off-site sources of contamination were reviewed and interpreted by AEC.

Table 6-24
Federal Database Search (Sites 1 and 2)

Federal Databases	Search Distance From Sites
National Priorities List (NPL)	One mile
Delisted NPL	One mile
Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS)	One-half mile
CERCLIS No Further Remedial Action Planned (NFRAP)	One-half mile
Resource Conservation and Recovery Act (RCRA) CORRACTS Hazardous Waste Treatment, Storage and Disposal (TSD) Facilities	One mile
RCRA non-CORRACTS Hazardous Waste TSD Facilities	One-half mile
RCRA Hazardous Waste Generators (RCRA GEN)	One-eighth mile
Emergency Response Notification System (ERNS)	One-eighth mile
Federal Institutional/Engineering Control Registries (IC/EC)	One-half mile
Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.	

The state and local databases related to potential on-site and off-site sources of contamination were also searched and reviewed by AEC (refer to Table 6-25).

Table 6-25
State and Local Database Search (Sites 1 and 2)

State/Local Databases	Search Distance From Sites
State-equivalent NPL and CERCLIS (RESPONSE and ENVIROSTOR)	One mile
State Voluntary Cleanup Sites (VCP)	One-half mile
State Landfill and/or Solid Waste Disposal Sites (SWF/LF)	One-half mile
State Leaking Storage Tank (LUST, SLIC, SAM)	One-half mile
State Registered Storage Tank (UST, AST)	One-eighth mile
Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.	

Subject Sites

Site 1 was listed on the underground storage tank (UST) databases (CA SWEEPS UST and CA FID UST) as Weingart Center Associates Inc., at 554 S San Pedro Street. A single UST is referenced for the site on

the database. No further details are provided, and Site 1 does not appear on other databases that indicate unauthorized releases of hazardous substances or petroleum products to the subsurface.

Site 2 was listed on UST databases (CA SWEEPS UST and CA FID UST) as Community Redevelopment Agency at 600 S San Pedro Street. No further details are provided, and Site 2 does not appear on other databases that indicate unauthorized releases of hazardous substances or petroleum products to the subsurface have occurred.

Adjoining and Nearby Properties

Several listings were mapped in the standard regulatory databases within 1/4-mile of Sites 1 and 2. Table 6-26 presents a summary of the listed facilities and an opinion regarding their potential impact to Site 1. Table 6-27 presents a summary of the listed facilities and an opinion regarding their potential impact to Site 2.

The properties listed on the tables are not considered to be significant environmental concerns to the Project Sites. In addition, several properties mapped between one-quarter to one-mile from the sites also appear on various regulatory databases. These properties are also not considered to be significant environmental concerns to the Project Sites. These conclusions are based on several factors, including the nature of the regulatory database listings, distance of the off-site listed properties from the Project Sites, orientation of the listed properties relative to the sites, interpreted direction of groundwater flow, and/or regulatory case status information for the various properties as described in the database.

Non-ASTM Database Reviews

Below is a list of non-ASTM databases reviewed by AEC during the preparation of the Phase I ESAs. The descriptions of each database and their data release frequency are included in the Phase I ESAs in Appendix I to this SCEA.

Local Brownfield Lists

US BROWNFIELDS - A Listing of Brownfields Sites

Local Lists of Landfill / Solid Waste Disposal Sites

DEBRIS REGION 9 - Torres Martinez Reservation Illegal Dump Site Locations
ODI - Open Dump Inventory
WMUDS/SWAT - Waste Management Unit Database
SWRCY - Recycler Database
HAULERS - Registered Waste Tire Haulers Listing

Table 6-26
Adjoining and Nearby Properties – Site 1

Listed Property and Address	Database(s)	Mapped Distance and Direction From Site	Details	Significant Concern To Site?
Weingart Center 515 E 6th Street	UST	0.006-mile S	Referenced on the UST database with no indications of violations or a release.	No
Union Rescue Mission 547 S San Pedro Street	UST	0.023-mile NNW	Referenced on the UST database with no indications of violations or a release.	No
Mission Energy Offset Plate Co 421 E 6th Street	RCRA-GEN	0.030-mile SW	Referenced as a small quantity generator with no reported violations.	No
C and J Circe Screen, UNK 532 S Crocker Street	RCRA-GEN	0.039-mile E	Referenced as a small quantity generator with no reported violations. Referenced on the UST database with no indications of violations or a release.	No
LA Electronics Bldg 526 S San Pedro Street	RCRA GEN	0.047-mile NNE	Referenced as a small quantity generator with no reported violations.	No
UNK 526 S Crocker Street	UST	0.052-mile E	Referenced on the UST database with no indications of violations or a release.	No
Community Redevelopment Agency 600 S San Pedro Street	UST	0.060-mile SW	Referenced on the UST database with no indications of violations or a release.	No
Skid Row Housing Trust 521 S San Pedro Street	RCRA-GEN	0.062-mile N	Referenced as a small quantity generator with no reported violations.	No
City Sea Foods Inc. 531 Towne Avenue	UST	0.068-mile E	Referenced on the UST database with no indications of violations or a release.	No
Precision Metal Tech 534 Towne Avenue	RCRA-GEN	0.081-mile ESE	Referenced as a small quantity generator with no reported violations.	No
GTE 505 S San Pedro Street	UST	0.088-mile N	Referenced on the UST database with no indications of violations or a release.	No
Marks Engineering 501 E 5th Street	UST	0.122-mile NNE	Referenced on the UST database with no indications of violations or a release.	No
Central Facility Garage 519 Wall Street	LUST	0.154-mile NNW	Referenced with a "Completed Case Closed" regulatory case status as of 7/2015.	No
Former Ace Plating 719 Towne Avenue	Envirostor SLIC	0.240-mile SSW	Referenced with an "Inactive-Needs Evaluation" case status on the Envirostor database. Referenced with an open case status as of 6/2013 on the SLIC database due to contamination from plating operations.	No
Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.				

Table 6-27
Adjoining and Nearby Properties – Site 2

Listed Property and Address	Database(s)	Mapped Distance and Direction From Site	Details	Significant Concern To Site?
Weingart Center 515 E 6th Street	UST	0.029-mile NE	Referenced on the UST database with no indications of violations or a release.	No
Mission Energy Offset Plate Co 421 E 6th Street	RCRA-GEN	0.037-mile NNW	Referenced as a small quantity generator with no reported violations.	No
Latt Greene, Sheary Fran Knitin 611 E 7th Street	UST	0.065-mile SW	Referenced on the UST database with no indications of violations or a release.	No
Union Rescue Mission 547 S San Pedro Street	UST	0.069-mile N	Referenced on the UST database with no indications of violations or a release.	No
The Salvation Army 660 Towne Avenue	UST	0.090-mile SW	Referenced on the UST database with no indications of violations or a release.	No
C and J Circe Screen 532 S Crocker Street	RCRA-GEN	0.038-mile E	Referenced as a small quantity generator with no reported violations.	No
LA Electronics Bldg, UNK 526 S Crocker Street	RCRA-GEN UST	0.100-mile NNE	Referenced on the UST database with no indications of violations or a release. Referenced as a small quantity generator with no reported violations.	No
Skid Row Housing Trust 521 S San Pedro Street	RCRA-GEN	0.113-mile NNE	Referenced as a small quantity generator with no reported violations.	No
Image Laboratories, Inc. 721 S San Pedro Street	UST	0.117-mile SW	Referenced on the UST database with no indications of violations or a release.	No
City Foods Inc. 531 Towne Avenue	UST	0.119-mile ENE	Referenced on the UST database with no indications of violations or a release.	No
Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.				

Local Lists of Hazardous Waste / Contaminated Sites

US CDL - Clandestine Drug Labs
HIST Cal-Sites - Historical Calsites Database
SCH - School Property Evaluation Program
Toxic Pits - Toxic Pits Cleanup Act Sites
CDL - Clandestine Drug Labs
US HIST CDL - National Clandestine Laboratory Register

Local Lists of Registered Storage Tanks

SWEEPS UST – SWEEPS UST Listing
HIST UST – Hazardous Substance Storage Container Database
CA FID UST – Facility Inventory Database

Local Land Records

LIENS 2 - CERCLA Lien Information
LIENS - Environmental Liens Listing
DEED - Deed Restriction Listing

Records of Emergency Release Reports

HMIRS - Hazardous Materials Information Reporting System
CHMIRS - California Hazardous Material Incident Report System
LDS - Land Disposal Sites Listing
MCS - Military Cleanup Sites Listing
SPILLS 90 – SPILLS 90 data from FirstSearch

Other Ascertainable Records

RCRA-NonGen - RCRA - Non Generators
DOT OPS - Incident and Accident Data
DOD - Department of Defense Sites
FUDS - Formerly Used Defense Sites
CONSENT - Superfund (CERCLA) Consent Decrees
ROD - Records Of Decision
UMTRA - Uranium Mill Tailings Sites
MINES - Mines Master Index File
TRIS - Toxic Chemical Release Inventory System
TSCA - Toxic Substances Control Act
FTTS – FIFRA/TSCA Tracking System – FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
HIST FTTS - FIFRA/TSCA Tracking System Administrative Case Listing
SSTS - Section 7 Tracking Systems
ICIS - Integrated Compliance Information System
PADS - PCB Activity Database System
MLTS - Material Licensing Tracking System
RADINFO - Radiation Information Database
FINDS - Facility Index System/Facility Registry System
RAATS - RCRA Administrative Action Tracking System
RMP - Risk Management Plans
CA BOND EXP. PLAN - Bond Expenditure Plan
UIC - UIC Listing
NPDES - NPDES Permits Listing
Cortese - "Cortese" Hazardous Waste & Substances Sites List
HIST CORTESE - Hazardous Waste & Substance Site List
CUPA Listings - CUPA Resources List
Notify 65 - Proposition 65 Records

DRYCLEANERS - Cleaner Facilities
WIP - Well Investigation Program Case List
ENF - Enforcement Action List
HAZNET - Facility and Manifest Data
EMI - Emissions Inventory Data
INDIAN RESERV - Indian Reservations
SCRD DRYCLEANERS - State Coalition for Remediation of Drycleaners Listing
MWMP - Medical Waste Management Program Listing
COAL ASDH DOE – Sleam Electric Plan Operation Data Listing
COAL ASH EPA – Coal Combustion Residues Surface Impoundments List
HWT - Registered Hazardous Waste Transporter Database
HWP - Envirostor Permitted Facilities List
FINANCIAL ASSURANCE - Financial Assurance Information Listing
LEAD SMELTERS - Lead Smelter Sites
2020 COR ACTION - 2020 Corrective Action Program List
US AIRS - Aerometric Information Retrieval System Facility Subsystem
PRP - Potentially Responsible Parties
WDS - Waste Discharge System
EPA WATCH LIST - EPA WATCH LIST
US FIN ASSUR - Financial Assurance Information
PCB TRANSFORMER - PCB Transformer Registration Database
PROC - Certified Processors Database
FUSRAP - Formerly Utilized Sites Remedial Action Program
US MINES – Mines Master Index File
PEST LIC – Pesticide Regulation Licenses Listing
WASTEWATER PITS – Oil Wastewater Pits Listing
ECHO – Enforcement and Compliance History Information
FUELS PROGRAM – EPA Fuels Program Registered Listing
Los Angeles Co. HMS – County of Los Angeles
LA Co. Site Mitigation – County of Los Angeles

Non-ASTM Database Listings

There are no non-ASTM database listings mapped on the Project Sites. There are multiple off-site properties (two US Brownfields, one CA HIST Cal-Sites, two Los Angeles Co. HMS, one NY Manifest, and one LA Co. Site Mitigation) listed on the non-ASTM databases in the searched vicinity of Site 1. These properties are not considered to be significant environmental concerns to Site 1. There are multiple off-Site properties (three US Brownfields, two CA HIST Cal-Sites, one CHMIRS, two Los Angeles Co. HMS, one NY Manifest, and one LA Co. Site Mitigation) listed on the non-ASTM databases in the searched vicinity of Site 2. These properties are not considered to be significant environmental concerns to Site 2. These conclusions are based on several factors, including distance of the off-site listed properties from the sites, orientation of the listed properties relative to the sites, interpreted direction of groundwater flow, and/or regulatory case status information (i.e. “closed case”) for the various properties as described in the database report.

Additional Environmental Record Sources

LAFD – UST Request

Site 1: AEC conducted a records search with the LAFD for Site 1, No files were identified for the site, except for a single record identified for 554 South San Pedro Street. A "Fire Permit Application for Underground Storage Tanks or Atmospheric Systems" was provided to AEC by the LAFD. The permit was for the installation of a single UST, was signed and dated by a representative of the Weingart Center Association on October 24, 1988 and was dated by the Los Angeles City Clerk on November 8, 1988. No additional information regarding USTs at Site 1 was found in LAFD files, including documentation that the UST in question was actually installed. During the preparation of this assessment, Weingart Center representatives were interviewed regarding the potential presence of a tank at the property, and no such representatives were aware of a tank being present.

Site 2: AEC conducted a records search with the LAFD for Site 2. Several files were identified for the site regarding installation and removal of eleven USTs 1935 and 1990. All USTs appear to have been removed from Site 2 by 1990. Reports were provided in the records search documenting the discovery of petroleum hydrocarbon impacted soil at the bottom of a former tank pit during the removal of a 1,000-gallon tank in June 1990. The pit was lined with plastic and backfilled with the excavated material. Subsurface work in 1991 included drilling in the area around the excavation to delineate the contaminated area. The material in the pit was subsequently excavated and removed from the site as non-hazardous waste. A no further action letter from the City was issued on January 27, 1992.

Los Angeles Department of Building and Safety

Site 1: AEC searched for building records pertaining to Site 1 on the LADBS website. Records included various construction, alteration, demolition, and general structural related permits for the Site. There were no references in the permits to USTs, hazardous wastes/materials or other potential environmental concerns.

Site 2: AEC searched for building records pertaining to Site 2 on the LADBS website. Records included an "Application for the Erection of a Building" dated December 11, 1935 for a gasoline filling station for General Petroleum Corp. A grading permit application for the removal of contaminated soil for tank removal dated October 28, 1991. A figure accompanying the permit application shows the excavation location near the central area of the site. Other permits noted during the records search included various construction, alteration, demolition, and general structural related permits for Site 2.

State Water Resources Control Board

AEC searched the California State Water Resources Control Board (SWRCB) maintained Geotracker database for information regarding past or present environmental regulatory cases and/or hazardous material releases in connection with the Project Sites or its adjacent and nearby properties. No environmental regulatory or release cases for the Project Sites were identified in the Geotracker database search. Off-site properties identified on the Geotracker database search are not considered to be a concern to the Project Sites.

Historical Use Information

Historical sources were reviewed to develop a history of the previous uses of the Project Sites and adjacent/nearby properties to help identify the likelihood of past uses having led to RECs in connection with the sites.

Fire Insurance Maps

Sanborn fire insurance maps were reviewed for the years of 1888, 1894, 1906, 1920, 1950, 1953, 1954, 1959, 1960, 1967, and 1970 with respect to the Project Sites. The results of the map review for Site 1 are summarized on Table 6-28. The results of the map review for Site 2 are summarized on Table 6-29.

Table 6-28
Sanborn Maps Review Results – Site 1

Year	Observations
1888	**SITE:** The site is vacant. **SURROUNDING AREA:** Residential dwellings are partially depicted on the northwestern adjacent property beyond S San Pedro Street. Other adjacent properties are vacant. Surrounding streets and roadways are depicted similar to their current configurations.
1894	**SITE:** The site is vacant. **SURROUNDING AREA:** A dwelling is depicted on the northern and southwestern adjacent properties. Other dwellings are scattered in the surrounding area.
1906, 1920	**SITE:** Lodgings and ancillary structures and a dwelling are depicted in the eastern portion of the site addressed as 555 and 557 Crocker Street. The reminder of the site is vacant. **SURROUNDING AREA:** The surrounding area consists of residential and commercial buildings.
1950, 1953, 1954	**SITE:** The eastern portion of the site is similar to the 1920 map. A commercial building is depicted on the western portion of the site with multiple storefronts. **SURROUNDING AREA:** A mixed-use structure with a hotel depicted on the southwestern adjacent property is similar to its current configuration. The western adjacent property beyond S San Pedro Street is depicted as a mixed-use structure. A two-story structure is depicted on the southeastern adjacent property (northwestern corner of E 6th Street and Crocker Street) with "Gas & oil" labeled on the corner of the property in 1950. The corner is labeled as parking in 1953 and 1954.
1959, 1960	**SITE:** The eastern portion of the site consists of a single building labeled as "lodging." A commercial building is depicted on the western portion of the site with multiple storefronts. **SURROUNDING AREA:** The surrounding area consists of residential and commercial buildings and parking lots.
1967, 1970	**SITE:** The eastern portion of the site is vacant. A commercial building is depicted on the western portion of the site with multiple storefronts. **SURROUNDING AREA:** The surrounding area consists of residential and commercial buildings and parking lots.
Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.	

Table 6-29
Sanborn Maps Review Results – Site 2

Year	Observations
1888	**SITE:** A stable and a shed are depicted on the site. **SURROUNDING AREA:** Three residential dwellings are depicted on the northwestern adjacent property beyond S San Pedro Street. Other adjacent properties are vacant. Surrounding streets and roadways are depicted similar to their current configurations.
1894	**SITE:** A single dwelling is depicted on the eastern side of the site along Crocker Street. **SURROUNDING AREA:** A dwelling is depicted on the northern and southeastern adjacent properties.
1906, 1920	**SITE:** A commercial structure identified as "Meek's Bakery" is depicted in the northern portion of the site. The structure is labeled with lodgings, a bakery, storage, offices, stores, and a wagon house. Residential flats and an apartment building are depicted to the south of Meek's Bakery along S San Pedro Street. Two dwellings are depicted on the eastern side of the site along Crocker Street. **SURROUNDING AREA:** The surrounding area consists of residential dwellings and flats. A glassworks facility and residential properties are depicted to the northwest of the site across S San Pedro Street. Lodgings and residential properties are depicted to the north of the site across E 6th Street.
1950, 1953, 1954, 1959, 1960, 1967, and 1970	**SITE:** A rectangular gasoline service station is depicted in the northern area of the site. A glass cutting shop and a store are depicted to the south of the service station along S San Pedro Street. The remaining portions of the site are vacant or labeled as auto parking. **SURROUNDING AREA:** A service station is depicted on the corner of the intersection to the northwest across S San Pedro Street. Also across S San Pedro Street is a vacant lot labeled as "Earth Fill" and a printing facility. A mixed-use structure with a hotel is depicted on the northern adjacent property across E 6th Street is similar to its current configuration. A vacant lot then a mixed-use structure with a hotel is depicted on the southeastern adjacent property. An apartment building and residential properties are depicted on the southern adjacent properties.
Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.	

City Directories

AEC reviewed City directories for the Project Sites and adjacent properties dating back to 1920. The results of the City directory search are provided for Site 1 and Site 2 on Table 6-30 and 6-31, respectively.

Table 6-30
City Directory Listings Review Results – Site 1

Year	Businesses/Owners/Land Uses
562 S San Pedro Street	
1962	1962 Lewis J W Co
1958	Carroll Machry
1942	Zane Saml Belle
1937	Kissling Frank J
1929	Millet J C Co Wm Wahl
1924	Lake View Creamery Co W F Sperry
560 S San Pedro Street	
19811	El Rey Mkt
1962	Tilery & Cutter Addressing Mach Co
1962-1958	Lewis J W Co RL
1942	Strickland & Davis Co J M Strickland J S Davis
1933	Cutler Hammer Inc W F Price
1924	Stewart Electric Co
558 S San Pedro Street	
1937	O'Neil Leland P Emmeline
1929	Ball Judson A Elsie
1924	Millwork Quantity Survey Bureau JLL
556 S San Pedro Street	
1967	Midway Tool & Supply Co
1958	Diesel Mach Shop Serv
1937	Samrt Clinton H CS
1933	Grinnell Bert Janet cook, Brookman Jos A Sarah
1929	Harmon Edw D
1924	Lincoln Don
554 S San Pedro Street	
1990	Morrison Management Service
1967	Schmitz Paper Punching
1962	Dots Ofc Supply
1958-1937	Chicago Belting Co
1933	Fisher Ray
1929	Murray Jacobs Co H G Kimes Dist Mgr
1924	McGuire Elmer E
552 S San Pedro Street	
1929	Guarra Ameba
557 Crocker Street	
	No listings
Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.	

Table 6-31
City Directory Listings Review Results – Site 2

Year	Businesses/Owners/Land Uses
600 S San Pedro Street	
1958-1976	Gould Car Service
1951	S San Pedro General Petroleum Corp 6th & San Pedro Stn, S San Pedro Gould Carl Serv, S San Pedro Olympia Serv Stn
1937	General Petroleum Corp gas stations
610 S San Pedro Street	
1924	Residential (personal names)
612 S San Pedro Street	
1924-1942	Los Angeles Cut Glass Co Bert and Mark Williams
616 S San Pedro Street	
1937	Residential
620 S San Pedro Street	
1924-1933	Residential
622 S San Pedro Street	
1924-1933	Residential
624 S San Pedro Street	
1933	Residential
626 S San Pedro Street	
1951	S San Pedro Associated Distrs
1924-1942	Residential
613 Crocker Street	
1924-1937	Residential
611 Crocker Street	
1924-1937	Residential
Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.	

With the exception of the service station listed at 600 S San Pedro Street, listings for the Project Sites are associated with residential and general commercial/retail purposes and are not considered to be significant environmental concerns to the sites. Listings for adjacent properties are associated with residential or general commercial uses and are also not considered to be significant environmental concerns to the site.

Aerial Photographs

AEC reviewed aerial photographs dated 1948, 1952, 1964, 1972, 1980, 1994, 2003, 2005, 2004, 2005, 2009, 2010, and 2012 provided by online resources. The results of the aerial photograph reviews for Site 1 are summarized on Table 6-32. The results of the aerial photograph reviews for Site 2 are summarized on Table 6-33.

Table 6-32
Aerial Photograph Review Results – Site 1

Year	Observations
1948, 1952	**SITE:** The site appears to be developed with two residential structures on the southern half of the site and a commercial structure on the northern half of the site similar to the current configuration. **SURROUNDING AREA:** A commercial structure is depicted on the southwestern adjacent property similar to current its configuration. A smaller structure appears adjacent to the south of the large structure. Commercial structures are similar to their current configurations to the west beyond S San Pedro Street, and to the north of the site. Dwellings are depicted adjacent to the south across Crocker Street. Nearby streets and roadways appear similar to their current configurations.
1964-2012	**SITE:** The southern half of the site appears as a parking lot. The site appears similar to its current configuration. **SURROUNDING AREA:** Adjacent properties appear similar to their current configurations as residential and commercial buildings and parking lots.
Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.	

Table 6-33
Aerial Photograph Review Results – Site 2

Year	Observations
1948-1972	**SITE:** The site appears to be developed with a rectangular structure in the northern portion the site (gasoline service station). Two structures are depicted along S San Pedro south of the service station area. The structures appearing on-site are similar to what is described in the Sanborn Map review from similar time frames. **SURROUNDING AREA:** A commercial structure is depicted on the northern adjacent property similar to current its configuration. A service station appears on the northwestern adjacent property beyond S San Pedro Street. A parking lot then a commercial structure appears to the south of the service station. Two residential structures appear to the south of the site along Crocker Street. A structure appears on the southeast adjacent property is similar to its current configuration as a hotel. Nearby streets and roadways appear similar to their current configurations.
1980	**SITE:** The site appears similar to prior photographs. **SURROUNDING AREA:** The northwestern adjacent property (former service station) appears to be developed with a large commercial structure.
1994	**SITE:** The site appears in its current configuration as a parking lot. **SURROUNDING AREA:** The surrounding area appears in their current configurations.
Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.	

State of California Division of Oil and Gas Records

According to online resources provided by the California Department of Conservation, Division of Oil, Gas and Geothermal Resources, there are no oil, gas or geothermal wells located on the Project Sites or adjacent properties.

Site Reconnaissance

A reconnaissance of the Project Sites was conducted on March 8, 2018 by Mr. Dan Weis of AEC's Western Regional office. Mr. Weis was accompanied by Weingart Center Association personnel during the site reconnaissance. The objective of the reconnaissance was to obtain information indicating the likelihood of RECs in connection with the Project Sites.

Methodology and Limiting Conditions

The reconnaissance consisted of walking the Project Sites and along public sidewalks (for viewing of adjacent/nearby properties). Full access to the Site was provided. However, it should be noted that the entire surface area of the parking lots at both Sites 1 and 2 was not visible due to the presence of parked vehicles throughout.

General Site Setting

Site 1: The site is currently used as a café and parking lot by the Weingart Center Association. The site and its adjacent/nearby properties are situated within an area of Downtown Los Angeles comprised of residential and commercial properties. The current use of the site and adjoining properties are not ones that are indicative of the use, treatment, storage, disposal or generation of significant quantities of hazardous substances or petroleum products that have adversely impacted the subsurface of the site.

Site 2: The site is developed with a paved asphalt parking lot surrounded by chain link fencing. A security guard booth is located at the main access gate on E 6th Street. The site and its adjacent/nearby properties are situated within an area of Downtown Los Angeles comprised of residential and commercial properties. The current use of the site and adjoining properties are not ones that are indicative of the use, treatment, storage, disposal or generation of significant quantities of hazardous substances or petroleum products that have adversely impacted the subsurface of the site.

Site Observations

AEC examined Sites 1 and 2 for evidence of the potential RECs shown on Table 6-34 and Table 6-35, respectively. The items noted on the tables are discussed below.

Table 6-34
Site Observation Results – Site 1

Conditions	Not Observed or Noted	Observed or Noted	Significant Environmental Concern?
Hazardous Substances/Petroleum Products	--	X	No
Waste Generation/Storage/Disposal	--	X	No
ASTs	--	X	No
USTs	X	--	--
PCB Containing Equipment	--	X	No
Chemical/Petroleum Odors	X	--	--
Pools of Liquid	X	--	--
Floor Drains/Sumps/Wells	--	X	No
Drums	X	--	--
Stains or Corrosion	X	--	--
Unidentified Substance Containers	X	--	
Stained Soil or Pavement	X	--	--
Stressed Vegetation	X	--	--
Pits, Ponds or Lagoons	X	--	--
Wastewater Discharges/Disposal Systems	X	--	--
Septic Systems/Cesspools	X	--	--
Non-Hazardous Solid Waste Disposal Areas	--	X	No
Drinking Water Systems/Water Wells	X	--	--
Other Wells	X	--	--
Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.			

Table 6-35
Site Observation Results – Site 2

Conditions	Not Observed or Noted	Observed or Noted	Significant Environmental Concern?
Hazardous Substances/Petroleum Products	X	--	--
Waste Generation/Storage/Disposal	X	--	--
ASTs	X	--	--
USTs	X	--	--
PCB Containing Equipment	X	--	--
Chemical/Petroleum Odors	X	--	--
Pools of Liquid	X	--	--
Floor Drains/Sumps/Wells	X	--	--
Drums	X	--	--
Stains or Corrosion	X	--	--
Unidentified Substance Containers	X	--	--
Stained Soil or Pavement	X	--	--
Stressed Vegetation	X	--	--
Pits, Ponds or Lagoons	X	--	--
Wastewater Discharges/Disposal Systems	X	--	--
Septic Systems/Cesspools	X	--	--
Non-Hazardous Solid Waste Disposal Areas	X	--	--
Drinking Water Systems/Water Wells	X	--	--
Other Wells	X	--	--
Source: Advantage Environmental Consultants, LLC. April 2018. Refer to Appendix I.			

Hazardous Substances/Petroleum Products – Aboveground Storage Tanks - Waste Generation/Storage/Disposal

A 250-gallon aboveground storage tank (AST) containing diesel fuel was noted in the parking lot area at Site 1. The AST stores fuel for an emergency generator. The AST is staged on a concrete pad with curbs providing secondary containment. No suspect conditions (i.e. spills, stains or odors) were noted in the vicinity of the AST. An approximate 20-gallon red metal container containing waste kitchen grease was noted at the south side of the café building. The container appeared to be in good condition with no suspect conditions (i.e. spills, stains or odors) noted in the vicinity of the container. Retail sized containers of janitorial supplies were noted inside of the café building. The containers were properly labeled. No suspect conditions (i.e. spills, stains or odors) were noted in the vicinity of the containers.

Floor Drains/Sumps/Wells

Floor drains were noted within the restrooms and kitchen of the café building on Site 1. No suspect conditions (i.e. stains or odors) were noted in the vicinity of the floor drains.

PCB Containing Equipment

Two pad mounted electrical transformers were noted in the parking lot at Site 1. The transformers are utility owned (LADWP) and are not labeled with respect to PCB content. No suspect conditions were noted in the vicinity of the transformers.

Non-Hazardous Solid Waste Disposal Areas

AEC observed a compactor in the southwest corner of the parking lot at Site 1. No staining or other suspect conditions were noted in the area of the compactor.

Additional Services

Site 1: On July 8, 2017, Southwest Geophysics, Inc., a subcontractor to AEC, completed a geophysical survey at Site 1. The included studies of a concrete patio area and parking lot located on the site. The results of the survey of the patio area did not reveal the presence of a UST or possible excavation. However, variations to the subsurface features noted during the completion of this geophysical survey may exist. Uncertainties of subsurface conditions can be reduced through additional subsurface surveying and/or exploration. It should also be noted that geophysical surveys are limited by a variety of factors including soil type, cultural interferences and surface metal mass. It should be noted that while the conclusions of the Phase I ESA are in part based on the findings of the geophysical survey, the survey and AEC's report are not guarantees that a tank or tanks do not exist at the site. No additional services were completed by AEC as part of preparation of the Phase I ESA for Site 1. AEC concluded that the Phase I ESA revealed no evidence of RECs in connection with Site 1, and additional assessment of Site 1 was not determined to be warranted. To ensure that no significant impacts related to the potential UST, the Project Applicant would be required to implement Mitigation Measure HAZ-MM-1, which states that during excavation of Site 1 for the subterranean parking garage and prior to issuance of a Building Permit, if a UST is encountered, the Project Applicant shall procure a Division 5 Permit from the Los Angeles Fire Department for removal of a UST and shall comply with the requirements of the permit.

Site 2: As stated previously, a Phase II ESA was completed concurrently with the Phase I ESA for Site 2. The subsurface evaluation was recommended due to the potential presence of lead impacted artificial fill material at the site and to further evaluate the extent of potential petroleum hydrocarbon and VOCs impacts at the site. The Phase II ESA included the completion of a geophysical survey in the northern portion of the site (former gasoline station area) using ground penetrating radar, electromagnetic technologies and other methods. The assessment also included the drilling of 10 soil borings to maximum depths of 20 feet below the surface and sampling of soil for total and soluble lead, petroleum hydrocarbons, and VOCs. In addition, soil gas probes were installed and soil gas samples were also analyzed for VOCs. In summary, the Phase II ESA concluded the following:

- The geophysical survey did not conclusively reveal the presence of USTs at the site.
- No significant soil impacts were identified during the assessment. However, the soil data gathered during the completion of the Phase II ESA will be utilized by the selected

grading/excavation contractor for development of Site 2 in evaluating disposal locations that may receive exported fill/soil from the site during future construction activities.

- Petroleum hydrocarbons and VOCs were not detected in any soil or soil gas samples analyzed during the Phase II ESA. As such, vapor intrusion is not an exposure pathway of significant concern at the site.

- All data obtained during the subsurface investigation was considered to be valid and useful for decision-making purposes. In addition, no upset conditions occurred during the sampling events or completion of the laboratory analysis that may have adversely influenced the results of the investigation.

- Additional assessment at Site 2 is not considered warranted.

Conclusion

Based on the information presented above, the Project would not create significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, Project impacts related to this issue would be less than significant.

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

No Impact. No existing or proposed schools are located within one-quarter mile of the Project Sites. The closest school is the Para Los Niños Charter Middle School, located approximately 0.5 miles southeast of the Project Sites. Thus, the Project would not emit hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school. As the Project would comply with all federal, state, and local standards and regulations, it is not anticipated to emit any hazardous emissions during construction or operation. Therefore, the Project would not adversely affect the Para Los Niños Charter Middle School. Therefore, impacts would be less than significant, and no further analysis is required.

d) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?

In 2015, the California Supreme Court in CBIA v. BAAQMD, 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 the project. The revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. For example, if construction of the project on a

hazardous waste site will cause the potential dispersion of hazardous waste in the environment, the EIR should assess the impacts of that dispersion to the environment, including to the project's residents.

Thus, in accordance with Appendix H of the State CEQA Guidelines and the CBIA v. BAAQMD decision, 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.

No Impact. California Government Code Section 65962.5 requires various state agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB), 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. Neither of the Project Sites is included on any list compiled pursuant to Government Code Section 65962.5.[100] As discussed in detail above in response to Checklist Question 8(b), the construction and operation of the Project would not create a significant hazard to the public or the environment, as a result of being on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Based on this, development of the Project would not cause or exacerbate a significant hazard to the public or the environment. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Sites are not located within two miles of a public airport. The closest airport is the Hollywood Burbank Airport located approximately 16.9 miles northwest of the sites. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard for people residing or working in the area of the Project Sites. Therefore, no impacts related to this issue would occur.

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

No Impact. The Project Sites are not located within the vicinity of a private airstrip. The closest airport is the Hollywood Burbank Airport located approximately 16.9 miles northwest of the sites. Thus, implementation of the Project would not have the potential to exacerbate current environmental conditions as to result in a safety hazard for people residing or working in the area of the Project Sites. Therefore, no impacts related to this issue would occur.

[100] *Department of Toxic Substances Control, Envirostor, https://www.envirostor.dtsc.ca.gov/public/map/?global_id=60001142, April 16, 2018.*

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

Less Than Significant Impact. The City's General Plan Safety Element addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, that identifies emergency evacuation routes, along with the location of selected emergency facilities. According to the Safety Element of the General Plan, the Project Sites are located along a designated disaster route (i.e., San Pedro Street).[101]

While it is expected that the majority of construction activities for the Project would be confined to the Project Sites, temporary and limited off-site construction activities may occur in adjacent street rights-of-way during certain periods of the day, which could potentially affect emergency access adjacent to the Project Sites. Access to the Project Sites and surrounding area during construction of the Project would be maintained in accordance with standard construction management plans that would be implemented to ensure adequate circulation and emergency access. Furthermore, prior to the issuance of a building permit, the Project Applicant would be required by the LAFD and the LADBS to develop an emergency response plan for the Project in consultation with the LAFD. The emergency response plan shall include but not be limited to the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, location of nearest hospitals, and fire departments. Preparation and implementation of the Project-specific emergency response plan would ensure that Project impacts related to emergency response would be less than significant.

h) Would the project exacerbate existing environmental conditions so as to increase the potential to expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

No Impact. The Project Sites are located in a highly urbanized area of the City that is not subject to wildland fires. Therefore, the Project would not expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. Implementation of the Project would not have the potential to exacerbate existing environmental conditions so as to increase the potential to expose people or structures to significant risk of loss, injury or death involving wildland fires, and no impacts would occur as a result of the Project.

Mitigation Measures (Hazards and Hazardous Materials)

HAZ-MM-1: During excavation of Site 1 for the subterranean parking garage and prior to issuance of a Building Permit, if a UST is encountered, the Project Applicant shall procure a

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

Division 5 Permit from the Los Angeles Fire Department for removal of a UST and shall comply with the requirements of the permit.

Cumulative Impacts

The geographic extent of the Project's environmental impacts is limited to the Project Sites and would not contribute to any other potential environmental impact that may occur beyond the boundaries of the Project Sites. All related projects would be subject to discretionary or ministerial review by their respective jurisdictions, which would be responsible for assessing potential hazards risks associated with those related projects, and if necessary, the applicants of those projects would be required to implement measures appropriate for the type and extent of hazardous materials present and the land use proposed to reduce the risk associated with the hazardous materials to an acceptable level. As stated previously, with mitigation, the Project would not result in any significant impacts related to hazards and hazardous materials. Therefore, no significant Project cumulative impacts related to hazards and hazardous materials would occur.

9. HYDROLOGY AND WATER QUALITY

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

Less Than Significant Impact. During construction of the Project, particularly during the grading and excavation phases, stormwater runoff from precipitation events could cause exposed and stockpiled soils to be subject to erosion and convey sediments into municipal storm drain systems. In addition, on-site watering activities to reduce airborne dust could contribute to pollutant loading in runoff. Pollutant discharges relating to the storage, handling, use and disposal of chemicals, adhesives, coatings, lubricants, and fuel could also occur. Thus, a significant impact could occur if the Project discharges water that does not meet the quality standards of agencies that regulate surface water quality and water discharge into storm water drainage systems, or would not comply with all applicable regulations as governed by the Los Angeles Regional Water Quality Control Board (LARWQCB).

The Project would be required to comply with the National Pollutant Discharge Elimination System (NPDES) General Construction Permit including the preparation of a Stormwater Pollution Prevention Plan (SWPPP) and implementation of best management practices (BMPs), required to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Sites would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements.

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants typically associated with mixed-use developments (e.g., household cleaners, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains, however during operation the Project would be required to comply with the City's Low Impact Development (LID) Ordinance. The

LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Sites as compared to the current conditions. Compliance with the LID Plan and Standard Urban Stormwater Mitigation Plan (SUSMP), including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality.

Conformance with these regulations would ensure construction and operational activities would result in less-than-significant impacts and would not violate water quality standards, waste discharge requirements, or otherwise substantially degrade water quality.

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

No Impact. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a 7,000-square-foot food service building; Site 2 is developed with a surface parking lot. There are no permeable surfaces on the Project Sites. During a storm event stormwater runoff flows to the adjacent roadways where it is directed into the City's storm drain system. As such, the Project Sites are not a source of groundwater recharge. Following redevelopment of the Project Sites, groundwater recharge would remain negligible, similar to existing conditions.

Based on the geotechnical investigations conducted for the Project Sites (refer to Appendix H1 and H2), and as discussed in in response to Checklist Question 6(a)(iii), the historically highest groundwater level in the area ranges from between approximately 85 feet and 95 feet beneath the ground surface. Groundwater was not encountered in borings drilled to a maximum depth of 50½ feet below the existing ground surface for Site 1 and 40 feet below the existing ground surface for Site 2. Based on the historic high groundwater levels in the site vicinity, the lack of groundwater in the borings, and the depth of proposed construction, groundwater is neither expected to be encountered during construction, nor have a detrimental effect on the Project. However, it is possible for groundwater levels to vary seasonally or for groundwater seepage conditions to develop where none previously existed, especially in impermeable fine-grained soils which are heavily irrigated or after seasonal rainfall. In addition, recent requirements for stormwater infiltration could result in shallower seepage conditions in the immediate site vicinity. Should shallower or perched groundwater be encountered during Project construction, it would be pumped and discharged in accordance with all applicable LAWRQCB requirements, resulting in no impacts to groundwater supplies or water quality standards. Additionally, all water consumption associated with the Project would be supplied by LADWP and not from groundwater beneath the Project Sites. Thus, no impacts related to groundwater would occur as a result of the Project.

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

Less Than Significant Impact. A significant impact could occur if the Project substantially altered the drainage pattern of the Project Sites or an existing stream or river, so that substantial erosion or siltation would result on-or off-site. The Project Sites are located in a highly urbanized area of the City. There are no natural watercourses on the Project Sites or in the vicinity of the sites. As discussed above, the Project Sites are developed with buildings and/or paved surfaces and are considered 100 percent impervious. Current stormwater runoff flows to the local storm drain system.

Under the post-Project condition, the Project Sites also would be considered 100 percent impervious, and drainage patterns would be much the same as under the existing condition. The Project Applicant would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. While grading and construction activities may temporarily alter the existing drainage patterns of the site, BMPs would be implemented to minimize soil erosion impacts during Project grading and construction activities.

In addition, the Project would be required to implement a LID Plan (during operation), which would reduce the amount of surface water runoff leaving the Project Sites after a storm event. Specifically, the LID Plan would require the implementation of stormwater BMPs to retain or treat the runoff from a storm event producing 3/4-inch of rainfall in a 24-hour period. Therefore, the Project would not result in substantial erosion or siltation on- or off-site, and impacts would be less than significant.

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

Less Than Significant Impact. A significant impact could occur if the Project resulted in increased surface water runoff volumes during construction, or if operation of the Project would result in flooding conditions affecting the Project Sites or nearby properties. Grading and construction activities on the Project Sites may temporarily alter the existing drainage patterns and reduce off-site flows. However, construction and operation of the Project would not result in a significant increase in site runoff or any changes in the local drainage patterns that would result in flooding on- or off-site. The Project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction of the Project. Compliance with the LID Ordinance would also reduce the amount of surface water runoff leaving the Project Sites as compared to the current conditions. Impacts would therefore be less than significant.

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

Less Than Significant Impact. A significant impact could occur if the Project would increase the volume of stormwater runoff to a level that exceeds the capacity of the storm drain system serving the

Project Sites, or if the Project would introduce substantial new sources of polluted runoff. Runoff from the Project Sites currently is and would continue to be collected on the sites and directed towards existing storm drains in the vicinity of the Project Sites, which include catch basins at the corners of South San Pedro Street and East 6th Street and Crocker Street and East 6th Street.

Construction-Related Project Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, ″good housekeeping″ procedures, or BMPs, can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze, or other fluids on the construction site are also common sources of stormwater pollution and soil contamination. Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP. These ″good-housekeeping″ practices would ensure that short-term construction-related impacts would be less than significant.

Operation-Related Project Impacts

Pursuant to City policy, stormwater retention would be required as part of the LID/SUSMP implementation features (despite no increase of imperviousness surfaces on the site). Any contaminants gathered during routine cleaning of construction equipment would be disposed of in compliance with applicable stormwater pollution prevention permits. Further, pollutants resulting from Project operation, including petroleum products associated with the Project's parking and circulation areas, would be subject to the requirements and regulations of the NPDES and applicable LID Ordinance requirements. Accordingly, the Project would be required to demonstrate compliance with LID Ordinance standards and retain or treat the first three-quarters inch of rainfall in a 24-hour period. Thus, the Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, Project impacts related to storm drain capacity and water quality would be less than significant.

Activities associated with operation of the Project could generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking garage could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the Project must

comply with water quality standards and wastewater discharge BMPs set forth by the City, the SWRCB, and the Project's approved LID Plan. Through compliance with existing regulations and the approved LID Plan, the Project would not create or contribute surface runoff that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Therefore, Project impacts related to storm drain capacity and water quality would be less than significant.

f) Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed previously, the Project would be required to comply with the NPDES General Construction Permit including the preparation of a SWPPP and implementation of BMPs that would require the Project to minimize soil erosion and sedimentation from entering the storm drains during the construction period. In addition, the Project would be subject to the City's Stormwater and Urban Runoff Pollution Control regulations (Ordinance No. 172,176 and No. 173,494) to ensure pollutant loads from the Project Sites would be minimized for downstream receiving waters. Compliance with the NPDES and implementation of the SWPPP and BMPs, as well as the City's discharge requirements, would ensure that construction stormwater runoff would not violate water quality and/or discharge requirements. Construction related impacts would be less than significant.

Stormwater runoff generated during operation of the Project has the potential to introduce small amounts of pollutants typically associated with mixed-use developments (e.g., household cleaners, landscaping pesticides, and vehicle petroleum products) into the stormwater system. Stormwater runoff from precipitation events could carry urban pollutants into municipal storm drains; however, during operation the Project would be required to comply with the City's LID Ordinance. The LID Ordinance applies to all development and redevelopment in the City that requires a building permit. LID Plans are required to include a site design approach and BMPs that address runoff and pollution at the source. Further, to comply with LID Ordinance the Project would be required to capture and treat the first 3/4-inch of rainfall in accordance with established stormwater treatment priorities. Compliance with the LID Ordinance would reduce the amount of surface water runoff leaving the Project Sites as compared to the current conditions. Compliance with the LID Plan and SUSMP, including the implementation of BMPs, would ensure that operation of the Project would not violate water quality standard and discharge requirements or otherwise substantially degrade water quality. Impacts would be less than significant.

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

No Impact. The Project Sites are not located within a 100-year zone, as mapped by the Federal Emergency Management Agency (FEMA).[102] Thus, the Project would not place housing within a 100-

[102] *FEMA, https://msc.fema.gov/portal/search?AddressQuery=350%20Hill%20street%2C%20los%20angeles%2C%20ca#searchresultsanchor, effective on 9-26-2008; and City of Los Angeles General Plan Safety Element, Exhibit F.*

year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map. Therefore, no impacts related to this issue would occur.

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

No Impact. As discussed above, the Project Sites are not located within a 100-year flood hazard area.[103] Thus, the Project would not place housing within a 100-year flood hazard area and structures would not impede or redirect flood flows. Therefore, no impacts related to this issue would occur.

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

Less Than Significant Impact. As discussed above, the Project Sites are not located within a designated 100-year flood plain. However, the Project Sites are identified in the Safety Element of the General Plan as being located in an area potentially susceptible to floods associated with a dam associated with the Hollywood Reservoir/Mulholland Dam.[104] However, the Baldwin Hills dam failure in 1963 and the near collapse of the Van Norman Dam during the 1971 San Fernando Earthquake resulted in strengthening of the federal, state, and local design standards and retrofitting of existing dam facilities. None of the 13 dams in the greater Los Angeles area was severely damaged during the 1994 Northridge Earthquake. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act following the San Fernando earthquake.[105]

To further ensure against dam failure, the LADWP maintains a Water System Reservoir Surveillance Program. Most of LADWP's dams and reservoirs are under the jurisdiction of the California Department of Water Resources, Division of Safety of Dams (DSOD). DSOD issues operating licenses for dams and reservoirs under its jurisdiction, and the owner must comply with certain operation, maintenance, and inspection procedures in order to retain the license to operate the facility. LADWP maintains an assertive dam safety program, consisting of a six-person Reservoir Surveillance Group dedicated to inspecting each in-City reservoir monthly and each of its Owens Valley reservoirs annually or semi-annually. Reservoir inspections include reading groundwater monitoring wells in and around the dams, reading flows at seepage drains, and performing a thorough visual inspection. Many LADWP reservoirs have Movement and Settlement (M&S) survey points installed on, and near, the dams. These points are periodically measured using precision survey equipment. The M&S survey, groundwater, and seepage data are plotted on long-term charts to determine if there has been any significant change over time. LADWP conducts surveillance of the reservoirs as required by DSOD.[106] Thus, the Hollywood Reservoir/Mulholland Dam,

[103] *Ibid.*

[104] *Los Angeles General Plan Safety Element, Exhibit G, Inundation and Tsunami Hazard Areas.*

[105] *Los Angeles General Plan Safety Element, Page II-16.*

[106] *Los Angeles Department of Water and Power, Water Infrastructure Plan 2016, http://ezweb.ladwp.com/UserFiles/Rates%20Documents/2016/Water_Infra_Plan_2016.pdf, accessed on April 17, 2018.*

as with other dams in California, is continually monitored by various governmental agencies (such as the State of California Division of Safety and Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design and construction practices and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the maximum credible earthquake for the site. As such, the minimal risk of flooding from potential dam or levee failure would not be exacerbated by the Project. Therefore, impacts related to flooding would be less than significant.

j) Would the project expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is an oscillation of a body of water in an enclosed or semi-enclosed basin, such as a reservoir, harbor, lake, or storage tank. A tsunami is a great sea wave, commonly referred to as a tidal wave, produced by a significant disturbance undersea, such as a tectonic displacement of sea floor associated with large, shallow earthquakes. Mudflows occur as a result of downslope movement of soil and/or rock under the influence of gravity. The Project Sites are located approximately 14 miles east of the Pacific Ocean. In addition, the Safety Element of the General Plan does not map the Project Sites as being located within an area potentially affected by a tsunami.[107] Therefore, the Project would not expose people or structures to a significant risk of loss, injury, or death involving inundation by seiche, tsunami, or mudflow.

Cumulative Impacts

The sites of the proposed Project and the related projects are located in an urbanized area where most of the surrounding properties are already developed. The existing storm drainage system serving this area has been designed to accommodate runoff from an urban built-out environment. When new construction occurs it generally does not lead to substantial additional runoff, since new developments is required to control the amount and quality of stormwater runoff coming from their respective sites. Additionally, all new development in the City is required to comply with the City's LID Ordinance and incorporate appropriate stormwater pollution control measures into the design plans to ensure that water quality impacts are minimized. Therefore, Project cumulative impacts related to hydrology and water quality would be less than significant.

10. LAND USE AND PLANNING

a) Would the project physically divide an established community?

No Impact. The Project Sites are located in a fully urbanized area of Los Angeles, in the Central City Community Plan Area. Site 1 is developed with a surface parking lot and a 7,000-square-foot food service building; Site 2 is developed with a surface parking lot. Specific uses surrounding the Project Sites include social services, warehouse, parking, and transitional housing land uses. A fully developed street network is located adjacent to the Project Sites and within the vicinity of the sites, along with all basic

[107] *Ibid.*

urban infrastructure systems. The Project would not create a physical barrier causing an impediment to travel or access the area surrounding the Project Sites. Rather, the Project includes removal of the existing land uses from the Project Sites and development of the sites with residential and commercial land uses. There would be no impact involving a physical separation of or other disruption to the physical structure of adjacent properties or the surrounding community, as development of the Project would occur within the boundaries of the existing Project Sites. Thus, the Project would not physically divide, disrupt, or isolate an established community. Therefore, no impacts related to this issue would occur.

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

Less Than Significant With Mitigation Incorporated. As discussed below, with mitigation, the Project would be substantially consistent with all of the applicable plans, policies, and regulations adopted for the purpose of avoiding or mitigating an environmental effect associated with development of the Project Sites. Therefore, Project impacts related to land use and planning would be less than significant.

Regional

Southern California Association of Governments

SCAG is the Metropolitan Planning Organization (MPO) for six counties: Los Angeles, Orange, San Bernardino, Riverside, Ventura, and Imperial. The SCAG region encompasses a population exceeding 18 million persons in an area of more than 38,000 square miles. As the federally-designated Metropolitan Planning Organization, SCAG is mandated to research and create plans for transportation, growth management, hazardous waste management, and air quality. Applicable SCAG publications are discussed below.

SCAG Regional Comprehensive Plan

SCAG has prepared the 2008 Regional Comprehensive Plan (2008 RCP) in response to SCAG's Regional Council directive in its 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges.[108] The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

[108] *2008 Regional Comprehensive Plan, SCAG, http://www.scag.ca.gov/rcp/pdf/finalrcp/f2008RCP.*

The 2008 RCP replaced the Regional Comprehensive Plan and Guide (RCPG) for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the 2016-2040 RTP/SCS (discussed below),

SCAG 2016-2040 RTP/SCS

On September 30, 2008, SB 375 was passed to help achieve AB 32 goals related to the reduction of greenhouse gases through regulation of cars and light trucks. SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector.[109] It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires MPOs to prepare an SCS within the RTP that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions.

On September 23, 2010, CARB adopted regional targets for the reduction of GHG emissions applying to the years 2020 and 2035. For the area under SCAG jurisdiction, including the Project area, CARB adopted Regional Targets for reduction of GHG emissions by eight percent for 2020 and by 13 percent for 2035. On February 15, 2011, CARB's Executive Officer approved the final targets.[110]

On April 7, 2016, the Regional Council of SCAG adopted the 2016-2040 RTP/SCS. For the past three decades, SCAG has prepared RTPs with the primary goal of increasing mobility for the region's residents and visitors. Through the 2016-2040 RTP/SCS SCAG continues to emphasize sustainability and integrated planning, whose vision encompasses three principles that collectively work as the key to the region's future: mobility, economy, and sustainability.

The 2016-2040 RTP/SCS includes a strong commitment to reduce emissions from transportation sources to comply with SB 375, improve public health, and meet the NAAQS as set forth by the Federal Clean Air Act. As such, the 2016-2040 RTP/SCS contains a regional commitment for the broad deployment of zero- and near-zero-emission transportation technologies in the 2016-2040 time frame and clear steps to move toward this objective. This is especially critical for the goods movement system. The development of a world-class, zero- or near-zero-emission freight transportation system is necessary to maintain economic growth in the region, to sustain quality of life, and to meet federal air quality requirements. The

[109] *AB 32 was signed into law in 2006 and focuses on achieving GHG emissions equivalent to statewide levels in 1990 by 2020.*

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

2016-2040 RTP/SCS puts forth an aggressive strategy for technology development and deployment to achieve this objective. This strategy will have many co-benefits, including energy security, cost certainty, increased public support for infrastructure, GHG emissions reduction, and economic development.

The 2016-2040 RTP/SCS includes a significant consideration of the economic impacts and opportunities provided by the transportation infrastructure plan set forth in the 2016-2040 RTP/SCS, considering not only the economic and job creation impacts of the direct investment in transportation infrastructure, but also the efficiency gains in terms of worker and business economic productivity and goods movement. The 2016-2040 RTP/SCS outlines a transportation infrastructure investment strategy that will benefit Southern California, the State, and the nation in terms of economic development, competitive advantage, and overall competitiveness in the global economy in terms of attracting and retaining employers in the Southern California region.

The 2016-2040 RTP/SCS provides a blueprint for improving quality of life for residents by providing more choices for where they will live, work, and play, and how they will move around. It is designed to promote safe, secure, and efficient transportation systems to provide improved access to opportunities, such as jobs, education, and healthcare. Its emphasis on transit and active transportation is designed to allow residents to lead a healthier, more active lifestyle. Its goal is to create jobs, ensure the region's economic competitiveness through strategic investments in the goods movement system, and improve environmental and health outcomes for its residents by 2040. More importantly, the 2016-2040 RTP/SCS is also designed to preserve what makes the region special, including stable and successful neighborhoods and array of open spaces for future generations.

The 2016-2040 RTP/SCS also includes examples of measures that could reduce impacts from planning, development, and transportation. It notes, however, that the example measures are not intended to serve as any kind of checklist to be used on a project-specific basis. Since every project and project setting is different, project-specific analysis is needed to identify applicable and feasible mitigation. These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized.

Project Consistency Discussion

A detailed discussion of the Project's consistency with the 2016-2040 RTP/SCS is included in Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis). As discussed there, the Project would be substantially consistent with the applicable 2016-2040 RTP/SCS policies and with the general use designation, density, and building intensity identified in the 2016-2040 RTP/SCS for the area in which the Project Sites are located.

While the Project is consistent with the SCAG 2016-2040 RTP/SCS, the Project is not consistent with the City's current land use and zoning designations for the Project Sites. As such, a General Plan Amendment, Zone Change, and Height District Change are required. The SCAG 2016-2040 RTP/SCS recognizes that land uses authorized under the 2016-2040 RTP/SCS may be inconsistent with existing land use plans, policies, and regulations of an agency with jurisdiction over a project and identified mitigation measure MM-LU-1(b) (listed below) to address and avoid or reduce potential significant effects of such inconsistency to less than significant levels.

- MM-LU-1(b): Where an inconsistency with the adopted general plan is identified at the proposed Project location, determine if the environmental, social, economic, and engineering benefits of the Project warrant a variance from adopted zoning or an amendment to the general plan.

This mitigation measure permits a local agency to resolve the inconsistency between the general use designations under the SCAG 2016-2040 RTP/SCS and the adopted general plan with an amendment to the general plan and related zoning where the local agency finds that the environmental, social, economic, and engineering benefits of a project warrant a variance from the City's adopted general plan and zoning designations. Implementation of MM-LU-1(b) and approval by the City of a general plan amendment and zone change would allow the Project to proceed in a manner consistent with both the 2016-2040 RPT/SCS and the City's General Plan land use designation and zoning for the Project Sites. The discussion regarding implementation of this mitigation measure and the environmental, social, economic, and engineering benefits of the Project is provided, below.

Site Context

The Project Sites are located within the Skid Row area of Downtown Los Angeles within the Central City Community Plan area of the City's General Plan Land Use element. Skid Row, a former industrial manufacturing center, has over the last half-century experienced an exodus of heavy, medium and light industry from the area. Industry in Los Angeles County has decentralized, moving to places like Commerce and further east into San Bernardino County. Skid Row has seen a spillover of neighboring residential and commercial neighborhoods including the Historic Core and Little Tokyo, where the borders between these neighborhoods have been blurred. In addition, the neighborhood has seen an increase in homelessness and homeless services, including shelters, clinics, transitional and permanent supportive housing, and provision of social services such as rehabilitation and jobs training.

Homelessness is not specific to Skid Row. Los Angeles is facing a homelessness epidemic, with approximately 60,000 persons in Los Angeles County experiencing homelessness on any given night and the highest density of these individuals is in central Los Angeles.[111] Homelessness in Los Angeles County has increased nearly 25 percent since 2016.[112] The homelessness problem is compounded by the housing crisis, which Los Angeles is also experiencing. In Los Angeles County, approximately 600,000 people are considered severely rent burdened, meaning they spend half of their income on rent. Furthermore, more than 8,000 people became homeless in Los Angeles for the first-time last year.[113] The County of Los Angeles is woefully short on affordable housing, needing an overwhelming 551,807 new units of affordable housing to satisfy demand from very low and extremely low-income individuals.[114]

[111] *The Greater Los Angeles Homeless County, Homeless Count 2017 Los Angeles County Fact Sheet, Los Angeles Homeless Services Authority, https://www.lahsa.org/homeless-count/, accessed May 2018.*

[112] *Ibid.*

[113] *Ibid.*

[114] *Los Angeles County Renters in Crisis: A Call for Action, California Housing Partnership, May 2017.*

City Policies to Address Homelessness and to Create Affordable Housing

The City is creating policies to address the homeless and housing crises. Voters recently approved Measure H (a County-wide ballot measure) and Proposition HHH (a City ballot measure) to implement sales taxes that will help fund homeless services and homeless housing. Measure H aims to do several things to increase services for homeless, including but not limited to development of outreach teams comprised of case workers and health specialists, temporary bridge housing, a rapid rehousing program and the provision of supportive services like job training, substance abuse counseling, and mental health treatment.[115] Proposition HHH will incur a new property tax that will fund the Proposition HHH Permanent Supportive Housing Loan Program which emphasizing reducing homelessness by providing funding to create safe and affordable housing units, and increasing accessibility to a variety of services and treatment programs within these permanent supportive housing Projects.[116]

In addition to these homelessness initiatives, there are several other City initiatives aimed at the creation of affordable housing that have been recently adopted or are in process. Mayor Eric Garcetti issued Executive Directive 13: Support for Affordable Housing, which aims to issue permits for 100,000 new housing units in the City by 2021, ensuring that at least 15,000 of those units are set aside as affordable units for low-income households. The City Council recently adopted the Affordable Housing Linkage Fee. The linkage fee is based on the nexus between the development of nonresidential and market rate Projects and the increased need to provide affordable housing. The linkage fee will be charged to project applicants commensurate with the characteristics of each project. Proceeds will be used to preserve existing affordable housing covenants and develop new affordable housing Projects.[117] In addition, each Councilmember has pledged to back the approval of at least 222 units of supportive housing in their district before July 1, 2020. Furthermore, the City recently implemented the Transit Oriented Communities Guidelines, which create incentives to produce housing near transit in return for incorporation of affordable housing in these Projects.

The Department of City Planning is also undertaking DTLA 2040, which involves an update of the Central City and Central City North Community Plans and would modify the land use designations and zoning for Downtown Los Angeles. DTLA 2040 began in 2014 and is currently in the environmental review process. The Department of City Planning expects publication of the Draft Environmental Impact Report by Summer 2018. Once the project completes environmental review, the adoption process for DTLA 2040 will begin. As part of the Community Plan Update process, the City is evaluating the re-designation of land that is currently designated for manufacturing and heavy industrial uses to different designations that could accommodate housing, general commercial uses, and other new industries.

[115] *Los Angeles County Homeless Initiative –FY 2018-19 Draft Measure H Funding Recommendations.*

[116] *Supportive Housing (Prop HHH), Los Angeles Housing and Community Investment Department*

[117] *City of Los Angeles Ordinance No. 185,342*

Incompatibility of Project Area and Project Sites with existing Manufacturing Land Use and Zoning Designations

The Project Sites are not a viable location for manufacturing uses. As Skid Row exists today, there is already a high density of housing and social services provided in industrially zoned land which is incompatible with the area's manufacturing land use designation and zoning. In general, much of this area is incompatible with the manufacturing land use designation. Industry has changed over the past decades and no longer aligns with the land use characteristics of heavy manufacturing of the first half of the 20th century. Industry in Los Angeles is no longer focused on manufacturing of products to be used in mass production, but instead focused on providing services and creating content such as film production, music studios, fashion industries, etc. Additionally, the developable sites in the Skid Row area are not suitable for industrial development from a size and cost perspective. The majority of the land parcels in the area are small, less than an acre. Many land parcels would need to be assembled in order to create a viable manufacturing development site, in an area where land costs are very high. In addition, the infrastructure in the area is not adequate for industrial uses. Roads are narrow, old, and congested and cannot accommodate typically large delivery trucks. Utilities have also not been updated in nearly a century and cannot support the utility demands of modern day manufacturing uses without adding significant redevelopment costs. Industry instead has moved to places like San Bernardino County where land is readily available and inexpensive compared to the central core of Los Angeles and where utilities can be easily installed to accommodate manufacturing.

The Project Sites could not support the development of a factory or other manufacturing center as it is not large enough to accommodate factory buildings and truck loading and the utility systems would require significant upgrades for modern industrial uses.

In addition, the Department of City Planning issued *Downtown Industrial Core: Data and Recommendations,* which are intended to maintain industrial and manufacturing uses in areas zoned for such uses in the City. However, that policy contains an exception for affordable housing, by recommending to "Reinforce Community Plan objectives and policies to allow permanent supportive housing and assure no net loss of affordable housing" near the Project Sites.[118]

In light of the incompatibility of the Project Sites for industrial and manufacturing uses, the Project Sites are likely to remain in its current, underutilized condition in the absence of general plan amendment and zone change. The requested General Plan Amendment to Regional Center Commercial and Zone and Height District Change to C2-4D in a manner consistent with the Urban Land Development Category in the 2016-2040 RTP/SCS and the designation of the area as a High Quality Transit Area (HQTA) and consistent with the *Downtown Industrial Core: Data and Recommendations adopted as guidelines by the City Planning Commission*. While that policy was never adopted by the City Council, the Project is nevertheless consistent with the policy, which contained an exception for affordable housing, by recommending reinforcing Community Plan objectives and policies to allow permanent supportive housing and assure no net loss of affordable housing in the area of the Project Sites. In addition, the City Planning Commission previously approved an industrial land use policy that was intended to maintain

[118] *Department of City Planning, Downtown Industrial Core: Data and Recommendations*

industrial and manufacturing uses in areas zoned for such uses in the City, including the area of Downtown Los Angeles encompassing the Project Sites.[119] The proposed high-density mixed-use Project would also be consistent with the numerous City ordinances, plans and policies enumerated above, by addressing homelessness and providing new, much needed permanent supportive and affordable housing for homeless (including individuals and families) and including social service components, consistent with Measure HHH, to support future residents.

Environmental Benefits of Project

The Project would benefit the environment in several ways that support the City's and the 2016-2040 RTP/SCS sustainability goals and warrant a variance from the existing General Plan and zoning designations for the Project Sites. Importantly, the Project would remove two large surface parking lots and construct dense affordable housing near jobs and transit. Removal of the parking lot would reduce urban runoff and the heat island effect while promoting smart growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality. The Project has very little parking for the residential uses and instead focuses on providing ample bicycle parking and infrastructure to further dis-incentivize automobile use and encourage biking and walking. The Project would be built to the current building codes that require sustainability measures such as low flow fixtures and efficient energy systems. The Project would also incorporate approximately 10,500 square feet of solar voltaic panels on the roof levels. Additionally, the Project would incorporate approximately 34,000 square feet of outdoor open space in the form of landscaped courtyards, terraces and pet areas, as well as plant approximately 86 trees on-site in an area that is currently lacking green space and trees. These green areas and trees would further improve air quality and create much needed outdoor recreation amenities in Skid Row. The Project also would activate the sidewalks at the Project Sites by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking and transit use.

These positive environmental impacts of the Project are in alignment with the City's *Plan for a Healthy LA*, which is a recently adopted element of the General Plan. Main tenets of the *Plan for a Health LA* include access to affordable, healthy, and safe housing for residents of all ages and income levels as well as access to healthy and sustainable environments with clean air, soil, and water, ample green and open space, including a robust tree canopy in all neighborhoods.[120] For these reasons, the requested General Plan Amendment and rezoning are warranted due to the environmental benefits the Project would bring to the area and the City.

Social Benefits of the Project

The Project also would create many social benefits to the City that support the 2016-2040 RTP/SCS goals and warrant a variance from the General Plan and land use designations for the Project Sites. Los Angeles is experiencing a housing and homelessness crisis with tens of thousands of homeless living on the streets

[119] *City of Los Angeles, Downtown Industrial Core: Data and Recommendations, December 2006.*

[120] *Plan for a Healthy LA, Department of City Planning, March 2015.*

and hundreds of thousands of affordable units needed to alleviate the problem. The Project would provide 676 affordable housing units set aside for very low-income individuals, with over 450 of those units allocated for permanent supportive housing of the homeless. The Project would directly address the homelessness and housing crisis by taking people off the streets and providing permanent affordable housing and much needed housing stability. The *Plan for a Healthy LA* also sets out to create education resources and workforce development that prepares residents for the jobs of the future at every stage of their lives.[121] The Project would include approximately 26,000 square feet of philanthropic institution uses that provide supportive services including jobs training, counseling and computer and Internet access. The goal of these supportive services is to provide formerly homeless individuals with the life and jobs skills needed to reenter the workforce. This goal is in alignment with the *Plan for a Healthy LA,* along with Measure H which aims to rehabilitate homeless individuals so that they may rejoin society. This would be a direct social benefit. For these reasons, the requested General Plan Amendment and rezoning are warranted due to the social benefits the Project would bring to the area and the City.

Economic Benefits of the Project

The Project would create economic benefits that support the 2016-2040 RTP/SCS goals and warrant a variance from the General Plan and land use designations for the Project Sites. The Project would provide jobs training with the goal of enabling formerly homeless individuals to reenter the workforce. This would directly impact the economy creating new workers who would in turn have increased spending power and therefore increase their economic consumption. The Project would also create approximately 22,500 square feet of new commercial, retail and office uses that would contribute to the economy by creating new businesses, jobs and sales tax revenue. Additionally, the Project would create a well-built and attractive buildings in the Skid Row area akin to a market-rate apartment development that would increase the aesthetic appeal of the area and in turn increase the attractiveness for new economic development in the area. For these reasons, the requested General Plan Amendment and rezoning are warranted due to the economic benefits the Project would bring to the area and the City.

Engineering Benefits of the Project

The Project would create engineering benefits, which support the 2016-2040 RTP/SCS goals and warrant a variance from the General Plan and land use designations for the Project Sites. The Project would be built to the most current building codes that would assist in protecting residents from earthquake and other geologic impacts and would require sustainability measures such as low flow fixtures and energy efficient building systems. The Project would also incorporate approximately 10,500 square feet of solar voltaic panels that would capture solar energy to create electricity for the Project. Accordingly, the Project would create engineering benefits that merit a Zone Change and General Plan Amendment. For these reasons, the requested General Plan Amendment and rezoning are warranted due to the engineering benefits the Project would bring to the area and the City.

Overall, the Project's environmental, social, economic and engineering benefits would create engineering benefits which support the 2016-2040 RTP/SCS goals and warrant a variance from the General Plan and

[121] *Ibid.*

land use designations for the Project Sites as stated above. In light of the environmental, social, economic and engineering benefits of the Project, existing City plans and policies, and draft plans and policies for Downtown Los Angeles and the Project Sites, a variance from the adopted general plan and zoning for the Project Sites is warranted and with implementation of MM-LU-1(b) of 2016-2040 RTP/SCS, the Project is consistent with the 2016-2040 RTP/SCS.

Local

City of Los Angeles General Plan

The City of Los Angeles General Plan (General Plan), adopted December 1996 and re-adopted August 2001, provides general guidance on land use issues for the entire City. The General Plan consists of a Framework Element, a Land Use Element (comprising 35 community plans prepared for distinct geographic areas of the City), and 10 citywide elements.

City of Los Angeles Framework Element

The City's General Plan Framework Element, adopted in December 1996 and readopted in August 2001, contains goals, policies, and objectives that address land use and serves as a guide for updating the community plans and the citywide elements. The Framework Element provides a base relationship between land use and transportation, and provides guidance for future updates to the various elements of the General Plan, but does not supersede the more detailed community and specific plans. The Land Use chapter of the Framework Element contains Long Range Land Use Diagrams that depict the generalized distribution of centers, districts, and mixed-use boulevards throughout the City, while the community plans determine the specific land use designations of individual parcels.

Project Consistency Discussion

The Project's consistency with the General Plan Framework Element land use policies is provided in Table 6-36. As shown therein, the Project would be substantially consistent with the applicable policies and therefore, no significant impacts regarding consistency with this plan would occur. Although the Project is consistent with the SCAG 2016-2040 RTP/SCS and the City's General Plan and zoning, MM-LU-1(b) is nonetheless incorporated in order to address any potential inconsistencies between the 2016-2040 RTP/SCP and the adopted general plan land use designation and zoning for the Project Sites.

Table 6-36
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
Framework Element: Land Use Chapter	
3.1.1 Identify areas on the Long-Range Land Use Diagram and in the community plans sufficient for the development of a diversity of uses that serve the needs of existing and future residents (housing, employment, retail, entertainment, cultural/institutional, educational, health, services, recreation, and similar uses), provide job opportunities, and support visitors and tourism.	**Consistent.** The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 residential dwelling units and approximately 48,043 square feet of commercial land uses within an HQTA, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. In addition, the Project would provide jobs training with the goal of enabling formerly homeless individuals to reenter the workforce. This would directly impact the economy positively by creating new workers who would in turn have increased spending power and thus, increase their economic consumption. The Project also would create 22,500 square feet of new commercial, retail, and office uses that would contribute to the economy by creating new businesses, jobs, and sales tax revenue.
3.2.2 Establish, through the Framework Long-Range Land Use Diagram, community plans, and other implementing tools, patterns and types of development that improve the integration of housing with commercial uses and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.	**Consistent.** The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 residential dwelling units and approximately 48,043 square feet of commercial land uses within an HQTA, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. The Project Sites are in proximity to existing bus lines (including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90). Also, Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted in Section 2 (Project Description), the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. Additionally, the Project includes 493 secure bicycle parking spaces. In addition, the Project would provide jobs training with the goal of enabling formerly homeless individuals to reenter the workforce. This would directly impact the economy positively by creating new workers who would in turn have increased spending power and thus, increase their economic consumption. The Project also would create 22,500 square feet of new commercial, retail, and office uses that would contribute to the economy by creating new businesses, jobs, and sales tax revenue.

Table 6-36
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
3.2.3 Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Consistent.** The area of the Project Sites experiences a high level of pedestrian activity, particularly along the key corridors, such as South San Pedro Street and 6th Street near the Project Sites. Based on the existing level of pedestrian activity in the area and the proximity of transit and sources of employment and retail opportunities, it is anticipated that there would continue to be a high level of pedestrian activity in the area as well as to and from the Project Sites. The Project would be designed to encourage pedestrian activity and walking and cycling as a transportation mode. The Project would be designed to provide connections to the adjacent public sidewalks and would include site enhancements to promote walkability. The Project Sites would be accessible from nearby public bus and rail transit stops as well as other amenities along nearby major corridors. The majority of pedestrian access to the Project Sites would occur via the existing public sidewalks provided along every street in the Downtown Los Angeles area. Use of bicycles as a transportation mode to and from the Project Sites would be encouraged as part of the Project by the provision of ample and safe parking. The type of spaces and dimensions would be provided based on LAMC Sections 12.21 A.16 and 12.21 A.4(c), as well as to meet the needs of a variety of bicycles. The bicycle spaces would be provided in a readily accessible location(s). Appropriate lighting would be provided to increase safety and provide theft protection during nighttime parking. The short-term and long-term bicycle parking requirements of the LAMC would be satisfied both for the residential and commercial land use components of the Project.
3.4.1 Conserve existing stable residential neighborhoods and lower-intensity commercial districts and encourage the majority of new commercial and mixed-use (integrated commercial and residential) development to be located (a) in a network of neighborhood districts, community, regional, and downtown centers, (b) in proximity to rail and bus transit stations and corridors, and (c) along the City's major boulevards, referred to as districts, centers, and mixed-use boulevards, in accordance with the Framework Long-Range Land Use Diagram.	**Consistent.** The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 residential dwelling units and approximately 48,043 square feet of commercial land uses within an HQTA, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. The Project Sites are in proximity to existing bus lines (including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90). Also, Also, Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted in Section 2 (Project Description), the Project

Table 6-36
Project Consistency with Applicable Policies of the Framework Element

Objective	Project Consistency
	Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. Additionally, the Project includes 493 secure bicycle parking spaces. In addition, the Project would provide jobs training with the goal of enabling formerly homeless individuals to reenter the workforce. This would directly impact the economy positively by creating new workers who would in turn have increased spending power and thus, increase their economic consumption. The Project also would create 22,500 square feet of new commercial, retail, and office uses that would contribute to the economy by creating new businesses, jobs, and sales tax revenue.
Source: City of Los Angeles General Plan.	

City of Los Angeles Health and Wellness Element

The Plan for a Healthy Los Angeles (Plan) lays the foundation to create healthier communities for all residents of 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. Through a new focus on public health from the perspective of the built environment and City services, the City seeks to achieve better health and social equity through its programs, policies, plans, budgeting, and community engagement.

With a focus on public health and safety, the Plan 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.

The Plan accomplishes two policy objectives: it elevates existing health-oriented policies in the General Plan and, where policy gaps exist, creates new policies to reinforce the City's goal of creating healthy, vibrant communities. The Plan acknowledges the relationship between public health and issues such as transportation, housing, environmental justice, and open space, among others, by reviewing the relevant policies in the General Plan and identifying where further policy direction is needed to achieve the goal of creating a healthy and sustainable City.[122]

[122] *Implementation of the Plan is addressed through programs, ordinances, and Community Plans, among other planning policy documents, which allow for the flexibility needed to address the specific needs of the City's diverse communities. References to neighborhoods usually reflect the Community Plan Area boundaries used by the Department of City Planning, but the City recognizes the fluidity and diversity of the City's neighborhoods.*

Project Consistency Discussion

The Project's consistency with the General Plan Health and Wellness Element land use policies is discussed on Table 6-37. As shown therein, the Project would be substantially consistent with the applicable policies and therefore, no significant impacts with respect to consistency with this plan would occur.

Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
1.3 Promote healthy communities by focusing on prevention, interventions, and by addressing the root causes of health disparities and inequities in Los Angeles.	**Consistent.** The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 residential dwelling units and approximately 48,043 square feet of commercial land uses within an HQTA, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. The Project Sites are in proximity to existing bus lines (including Metro Local Lines 17, 18, 51/52/352, 53, 60, 62, 720, and 760; Gardena Line 1X; and Montebello 40 and 90). Also, Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted in Section 2 (Project Description), the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction.. The Project would be designed to encourage pedestrian activity and walking as a transportation mode. The Project would be designed to provide connections to the adjacent public sidewalks and would include site enhancements to promote walkability. The Project Sites would be accessible from nearby public bus and rail transit stops as well as other amenities along nearby major corridors. The majority of pedestrian access to the Project Sites would occur via the existing public sidewalks provided along every street in the Downtown Los Angeles area. Use of bicycles as a transportation mode to and from the Project Sites would be encouraged as part of the Project by the provision of ample and safe parking (493 spaces). The type of spaces and dimensions would be provided based on LAMC Sections 12.21 A.16 and 12.21 A.4(c), as well as to meet the needs of a variety of bicycles. The bicycle spaces would be provided in a readily accessible location(s). Appropriate lighting would be provided to increase safety and provide theft protection during nighttime parking. The short-term and long-term bicycle parking

Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
	requirements of the LAMC would be satisfied both for the residential and commercial land use components of the Project.
1.5 Improve Angelenos' health and well-being by incorporating a health perspective into land use, design, policy, and zoning decisions through existing tools, practices, and programs.	**Consistent.** The Project would benefit the health and well-being of City residents in several ways. The Project would remove two large surface parking lots and construct dense affordable housing near jobs and transit. Removal of the parking lot would reduce urban runoff and the heat island effect while promoting smart growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality. The Project would provide a reduced amount of parking for the residential uses and instead focuses on providing ample bicycle parking (493 spaces) and infrastructure to further dis-incentivize automobile use and encourage biking and walking. The Project would be built to the current building codes that require sustainability measures such as low-flow fixtures and efficient energy systems. The Project would also incorporate solar voltaic panels on the roof levels. Additionally, the Project would incorporate more than 13,000 square feet of outdoor open space in the form of landscaped courtyards, terraces and pet areas, as well as plant 86 trees on-site in an area that is currently lacking green space and trees. These green areas and trees would further improve air quality and create much needed outdoor recreation amenities in Skid Row. The Project also would activate the sidewalks at the Project Sites by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking and transit use. These positive environmental effects of the Project are in alignment with the Health and Wellness Element. Main tenets of the element include access to affordable, healthy, and safe housing for residents of all ages and income levels as well as access to healthy and sustainable environments with clean air, soil, and water, ample green and open space, including a robust tree canopy in all neighborhoods. The Project also would create many social benefits to the City. As mentioned previously, the City is experiencing a housing and homelessness crisis with tens of thousands of homeless living on the streets and hundreds of thousands of affordable units needed to alleviate the problem. The Project would provide 676 affordable housing units set aside for very low-income individuals, with over 450 of those units allocated for permanent supportive housing of the homeless. The Project would directly address the homelessness and housing crisis by taking people off the streets and

Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
	providing permanent affordable housing and much needed housing stability. The City has set out to create education resources and workforce development that prepares residents for the jobs of the future at every stage of their lives. The Project would include approximately 25,493 square feet of philanthropic institution uses that provide supportive services including jobs training, counseling and computer and internet access. The goal of these supportive services is to provide formerly homeless individuals with the life and jobs skills needed to reenter the workforce. This would be a direct social benefit.
2.1 Enhance opportunities for improved health and well-being for all Angelenos by increasing the availability of and access to affordable goods and services that promote health and healthy environments, with a priority on low-income neighborhoods.	**Consistent.** The Project would create many social benefits to the City. As mentioned previously, the City is experiencing a housing and homelessness crisis with tens of thousands of homeless living on the streets and hundreds of thousands of affordable units needed to alleviate the problem. The Project would provide 676 affordable housing units set aside for very low-income individuals, with over 450 of those units allocated for permanent supportive housing of the homeless. The Project would directly address the homelessness and housing crisis by taking people off the streets and providing permanent affordable housing and much needed housing stability. The City has set out to create education resources and workforce development that prepares residents for the jobs of the future at every stage of their lives. The Project would include approximately 25,493 square feet of philanthropic institution uses that provide supportive services including jobs training, counseling and computer and internet access. The goal of these supportive services is to provide formerly homeless individuals with the life and jobs skills needed to reenter the workforce. This would be a direct social benefit.
2.2 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.	**Consistent.** The Project would benefit the health and well-being of City residents in several ways. Project would remove two large surface parking lots and construct dense affordable housing near jobs and transit. Removal of the parking lot would reduce urban runoff and the heat island effect while promoting smart growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality. The Project would provide a reduced amount of parking for the residential uses and instead focuses on providing ample bicycle parking (493 spaces) and infrastructure to further dis-incentivize automobile use and encourage biking and walking. The Project would be built to the current building codes that require sustainability measures such as low-flow fixtures and efficient energy systems. The Project would also incorporate solar voltaic panels on the roof levels. Additionally, the Project would incorporate more than

Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
	13,000 square feet of outdoor open space in the form of landscaped courtyards, terraces and pet areas, as well as plant 86 trees on-site in an area that is currently lacking green space and trees. These green areas and trees would further improve air quality and create much needed outdoor recreation amenities in Skid Row. The Project also would activate the sidewalks at the Project Sites by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking and transit use. These positive environmental effects of the Project are in alignment with the Health and Wellness Element. Main tenets of the element include access to affordable, healthy, and safe housing for residents of all ages and income levels as well as access to healthy and sustainable environments with clean air, soil, and water, ample green and open space, including a robust tree canopy in all neighborhoods. The Project also would create many social benefits to the City. As mentioned previously, the City is experiencing a housing and homelessness crisis with tens of thousands of homeless living on the streets and hundreds of thousands of affordable units needed to alleviate the problem. The Project would provide 676 affordable housing units set aside for very low-income individuals, with over 450 of those units allocated for permanent supportive housing of the homeless. The Project would directly address the homelessness and housing crisis by taking people off the streets and providing permanent affordable housing and much needed housing stability. The City has set out to create education resources and workforce development that prepares residents for the jobs of the future at every stage of their lives. The Project would include approximately 25,493 square feet of philanthropic institution uses that provide supportive services including jobs training, counseling and computer and internet access. The goal of these supportive services is to provide formerly homeless individuals with the life and jobs skills needed to reenter the workforce. This would be a direct social benefit.
2.3 Strive to eliminate barriers for individuals with permanent and temporary disabilities to access health care and health resources.	**Consistent.** Design of the Project would comply with all existing federal, state, and local regulations including the Americans with Disabilities Act.
2.11 Lay the foundation for healthy communities and healthy living by promoting infrastructure improvements that support active transportation with safe, attractive, and comfortable facilities that meet community needs; prioritize implementation in communities with the greatest infrastructure	**Consistent.** The Project would benefit the health and well-being of City residents in several ways. Project would remove two large surface parking lots and construct dense affordable housing near jobs and transit. Removal of the parking lot would reduce urban runoff and the heat island effect while promoting smart

Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
deficiencies that threaten the health, safety, and well-being of the most vulnerable users.	growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality. The Project would provide a reduced amount of parking for the residential uses and instead focuses on providing ample bicycle parking (493 spaces) and infrastructure to further dis-incentivize automobile use and encourage biking and walking. The Project would be built to the current building codes that require sustainability measures such as low -low fixtures and efficient energy systems. The Project would also incorporate solar voltaic panels on the roof levels. Additionally, the Project would incorporate more than 13,000 square feet of outdoor open space in the form of landscaped courtyards, terraces and pet areas, as well as plant 86 trees on-site in an area that is currently lacking green space and trees. These green areas and trees would further improve air quality and create much needed outdoor recreation amenities in Skid Row. The Project also would activate the sidewalks at the Project Sites by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking and transit use. These positive environmental effects of the Project are in alignment with the Health and Wellness Element. Main tenets of the element include access to affordable, healthy, and safe housing for residents of all ages and income levels as well as access to healthy and sustainable environments with clean air, soil, and water, ample green and open space, including a robust tree canopy in all neighborhoods. The Project also would create many social benefits to the City. As mentioned previously, the City is experiencing a housing and homelessness crisis with tens of thousands of homeless living on the streets and hundreds of thousands of affordable units needed to alleviate the problem. The Project would provide 676 affordable housing units set aside for very low-income individuals, with over 450 of those units allocated for permanent supportive housing of the homeless. The Project would directly address the homelessness and housing crisis by taking people off the streets and providing permanent affordable housing and much needed housing stability. The City has set out to create education resources and workforce development that prepares residents for the jobs of the future at every stage of their lives. The Project would include approximately 25,493 square feet of philanthropic institution uses that provide supportive services including jobs training, counseling and computer and internet access. The goal of these supportive services is

Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
	to provide formerly homeless individuals with the life and jobs skills needed to reenter the workforce. This would be a direct social benefit.
3.8 Support public, private, and nonprofit partners in the ongoing development of new and innovative active spaces and strategies to increase the number of Angelenos who engage in physical activity across ages and level of abilities.	**Consistent.** The Project would benefit the health and well-being of City residents in several ways. Project would remove two large surface parking lots and construct dense affordable housing near jobs and transit. Removal of the parking lot would reduce urban runoff and the heat island effect while promoting smart growth by placing housing near jobs and transit, reducing vehicle trips and improving air quality. The Project would provide a reduced amount of parking for the residential uses and instead focuses on providing ample bicycle parking (493 spaces) and infrastructure to further dis-incentivize automobile use and encourage biking and walking. The Project would be built to the current building codes that require sustainability measures such as low-flow fixtures and efficient energy systems. The Project would also incorporate solar voltaic panels on the roof levels. Additionally, the Project would incorporate more than 13,000 square feet of outdoor open space in the form of landscaped courtyards, terraces and pet areas, as well as plant 86 trees on-site in an area that is currently lacking green space and trees. These green areas and trees would further improve air quality and create much needed outdoor recreation amenities in Skid Row. The Project also would activate the sidewalks at the Project Sites by incorporating street-level retail and neighborhood serving uses, while simultaneously creating internal infrastructure for bike parking and encouraging walking, biking and transit use. These positive environmental effects of the Project are in alignment with the Health and Wellness Element. Main tenets of the element include access to affordable, healthy, and safe housing for residents of all ages and income levels as well as access to healthy and sustainable environments with clean air, soil, and water, ample green and open space, including a robust tree canopy in all neighborhoods. The Project also would create many social benefits to the City. As mentioned previously, the City is experiencing a housing and homelessness crisis with tens of thousands of homeless living on the streets and hundreds of thousands of affordable units needed to alleviate the problem. The Project would provide 676 affordable housing units set aside for very low-income individuals, with over 450 of those units allocated for permanent supportive housing of the homeless. The Project would directly address the homelessness and housing crisis by taking people off the streets and

Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
	providing permanent affordable housing and much needed housing stability. The City has set out to create education resources and workforce development that prepares residents for the jobs of the future at every stage of their lives. The Project would include approximately 25,493 square feet of philanthropic institution uses that provide supportive services including jobs training, counseling and computer and internet access. The goal of these supportive services is to provide formerly homeless individuals with the life and jobs skills needed to reenter the workforce. This would be a direct social benefit.
5.1 Reduce air pollution from stationary and mobile sources; protect human health and welfare and promote improved respiratory health.	**Consistent.** The Project is an infill development that includes redevelopment of the Project Sites in Downtown Los Angeles with a mixed-use development, including residential housing and commercial land uses to serve an existing homeless population. The Project would reduce dependence on car travel and air pollutants generated by car traffic through the Project Sites' proximity to existing bus lines (including Metro Local Lines 2, 4, 10, 28, 30, 35, 40, 45, 81, 83, 90, 91, 94, 330, 728, 745, and 794; LADOT Community Express Line 419; and Metro Red and Purple lines). Also, Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted in Section 2 (Project Description), the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. In addition, the Project would be located near commercial uses and employment areas in Downtown Los Angeles. Finally, the Project would encourage bicycling with the inclusion of 493 bicycle parking spaces and a bicycle repair station.
5.3 Reduce exposure to second-hand smoke by promoting smoke-free environments and market and support public, private, and nonprofit cessation programs and services.	**Consistent.** The Project would reduce exposure to second-hand smoke in accordance with applicable law.
5.4 Protect communities' health and well-being from exposure to noxious activities (for example, oil and gas extraction) that emit odors, noise, toxic, hazardous, or contaminant substances, materials, vapors, and others.	**Consistent.** As discussed in response to Checklist Question 3(d), the Project would not expose sensitive receptors to pollutant emissions in excess of SCAQMD's significance thresholds. Also, the Project's commercial uses would not include hazardous materials, such as a dry cleaner. As discussed in response to Checklist Question 3(e), the Project would not result in any impacts related to odors.

Table 6-37
Project Consistency with Applicable Policies of the Health and Wellness Element

Policy	Project Consistency
5.7 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 others susceptible to respiratory diseases.	**Consistent.** As discussed in response to Checklist Question 7(a), the mixed-use nature of the Project, its proximity to transit, and compliance with the City's Green Building Code would reduce the Project's GHG emissions profile and the Project would be consistent with applicable GHG reduction plans and strategies. As discussed in in detail there, Project impacts related to GHG emissions would be less than significant.
7.2 Continue to promote the development and implementation of comprehensive strategies that foster safe passages in neighborhoods with high crime and gang activity to ensure that all Angelenos can travel with confidence and without fear.	**Consistent.** The Project would include adequate lighting provided (in accordance with LAMC requirements, including LAMC Section 91.8607) to ensure safe lighting for pedestrian paths. Numerous windows would be located on the streets surrounding the Project Sites, as well as along the Project's internal circulation, placing "eyes on the street." Additionally, prior to issuance of a building permit, the Project Applicant would be required to coordinate with the Los Angeles Police Department (LAPD) and incorporate all safety features into the design of the Project to maximize safety at the Project Sites.
Source: City of Los Angeles, Health and Wellness Element of the General Plan, March 2015.	

Central City Community Plan

The Central City Community Plan (Community Plan) area is located south of Sunset Boulevard/Cesar Chavez Avenue, north of the Santa Monica Freeway (Interstate 10), east of the Harbor Freeway (Interstate 110) and west of Alameda Street. It is bordered by the community plan areas of Central City North, Silver Lake-Echo Park-Elysian Valley, Westlake, Southeast Los Angeles, and South Los Angeles. Central City is the City's second smallest community plan area, representing less than one percent of the land in the City (approximately 2,161 acres or 3.38 square miles). Since this area is the governmental, financial, and the industrial hub of Los Angeles, land has primarily been dedicated to these uses. Consequently, this area has a smaller residential population in comparison with the rest of the City, though dwelling units and resident population are growing as people find a renewed interest in urban living and existing vacant and often historic commercial and industrial buildings are being converted to residential uses.

The Community Plan promotes an arrangement of land use, infrastructure, and services intended to enhance the economic, social, and physical health, safety, welfare, and convenience of the people who live, work and invest in the community. By serving to guide development, the Community Plan encourages progress and change within the community to meet anticipated needs and circumstances, promotes balanced growth, builds on economic strengths and opportunities while protecting the physical, economic, and social investments in the community to the extent reasonable and feasible.

The current land use designation for the Project Sites in the Community Plan is Light Manufacturing (refer to Figure 2-2 in Section 2 [Project Description]).

Project Consistency Discussion

As discussed on Table 6-38 and below, the Project would be substantially consistent with the applicable policies and therefore, no significant impacts regarding consistency with this plan would occur.

Table 6-38
Project Consistency with the Community Plan

Guideline	Consistency Discussion
Residential	
1-1.1 Maintain zoning standards that clearly promote housing and limit ancillary commercial to that which meets the needs of neighborhood residents or is compatible with residential uses.	**Consistent.** The Project Sites are located in a highly urbanized area in the City. The Project would develop 685 residential dwelling units and approximately 48,043 square feet of commercial land uses within an HQTA, as defined by SCAG, and a transit priority area as defined by SB 743 for the purpose of serving an existing homeless population that currently resides in Downtown Los Angeles. The Project includes neighborhood-serving, ground floor retail, similar to other retail land uses provided in the vicinity of the Project Sites. Additionally, consistent with other services provided near the Project Sites, the Project includes office and philanthropic uses to support the Project's residential population. Philanthropic uses include: game rooms, gyms, group space, counseling, computer rooms, classrooms, and kitchen and dining. Of the 382 residential dwelling units proposed on Site 1, 378 residential dwelling units would be designated restricted affordable at the Very Low-Income level. Approximately 80 percent of these units would be set aside for permanent supportive housing for the homeless, and up to 20 percent would be set aside for individuals and families. Of the 303 residential dwelling units proposed on Site 2, 303 residential dwelling units would be designated restricted affordable at the Very Low-Income level. Approximately 60 percent of these units would be set aside for permanent supportive housing for the homeless, and up to 40 percent would be set aside for individuals and families. The Project would be compatible with other high-rise mixed-use/residential building in the vicinity of the Project Sites.
1-5.1 Monitor the supply of low-income housing stock to guard against loss of units through demolition, conversion, and deterioration of units.	**Consistent.** No housing is located on the Project Sites. Thus, the Project would not cause the loss of any affordable housing. Instead, 378 of the proposed 382 residential dwelling units developed on Site 1 would be designated restricted affordable at the Very Low-Income level. Approximately 80 percent of these units would be set aside for permanent supportive housing for the homeless, and up to 20

Table 6-38
Project Consistency with the Community Plan

Guideline	Consistency Discussion
	percent would be set aside for individuals and families. Of the 303 residential dwelling units developed on Site 2, 298 residential dwelling units would also be designated restricted affordable at the Very Low-Income level. Approximately 60 percent of these units would be set aside for permanent supportive housing for the homeless, and up to 40 percent would be set aside for individuals and families.
Commercial	
2-1.2 To maintain a safe, clean, attractive, and lively environment.	**Consistent.** The Project includes infill development of new multi-family residential and commercial land uses that are needed in the area of the Project Sites. The Project would include on-site maintenance and security systems. The Project would be designed and constructed to meet the City's design and landscaping standards.
2-2.1 Focus on attracting businesses and retail uses that build on existing strengths of the area in terms of both the labor force, and businesses.	**Consistent.** The Project includes neighborhood-serving retail that would support the proposed residential land uses and would provide employment.
2-2.3 Support the growth of neighborhoods with small, local retail services.	**Consistent.** The Project includes neighborhood-serving retail that would support the proposed residential land uses, as well as existing residents in the area of the Project Sites.
Police Protection	
5-1.1 Consult with the Police Department as part of the review of significant development projects and General Plan amendments affecting land use to determine the impact on law enforcement service demands.	**Consistent.** The LAPD was consulted in preparation of this SCEA (refer to Appendix L). As discussed in response to Checklist Question 14(a)(ii), Project impacts related to LAPD services would be less than significant.
5-2.1 Promote the safety and security of personal property through proper design and effective use of the built environment which can lead to a reduction in the incidence and fear of crime, reduction in calls for police service, and to an increase in the quality of life.	**Consistent.** The Project would include standard security measures such as adequate security lighting, controlled residential access, and secure parking facilities. These measures for the Project shall be approved by the LAPD prior to the issuance of building permits.
Fire Protection	
6-1.1 Coordinate with the City of Los Angeles Fire Department during the review of significant development projects and General Plan amendments affecting land use to determine the impacts on service demands.	**Consistent.** The LAFD was consulted in preparation of this SCEA (refer to Appendix L). As discussed in response to Checklist Question 14(a)(i), Project impacts related to LAFD services would be less than significant.
Source: City Central Community Plan.	

The Project Applicant is requesting General Plan Amendments for both Site 1 and Site 2 to amend the land use designation in the Community Plan from Light Manufacturing (corresponding to the M2 Zone) to the Regional Center Commercial (corresponding to the C2 Zone) and to amend Footnote 3 of the Community Plan to permit the Project to exceed the 6:1 FAR limitation. (As part of the discretionary requests for the Projects, the Project Applicant is also requesting Zone Changes/Height District Changes

from the M2-2D Zone to the C2-4D Zone for both sites. The findings for the requested Zone and Height District Changes are addressed below.)

The requested General Plan Amendments from Light Manufacturing to Regional Center Commercial and amendment to Footnote 3 would create development sites that are compatible with the Community Plan's description of the Central City East neighborhood as the location for approximately 6,500 single-room occupancy (SRO) hotel units that are "the primary source of housing for the area." In addition the Project Applicant's request to amend Footnote 3 of the Central City Community plan would allow the Project to exceed a 6:1 Floor Area Ratio without utilizing a Transfer of Development Rights, consistent with Government Code 65915(k) to allow a 35 percent increase in the FAR to 8.1:1. The Community Plan notes that in an effort to "foster the development of a residential neighborhood, Central City East has been targeted as a priority intervention area for the rehabilitation of the area's SRO hotels."[123] The Community Plan also observes that the area of the Project Sites is a center of social services including alcohol treatment programs and mental health services, and that the area includes such programs as job training, transitional housing, and homeless outreach.

The Projects would help to foster the development of a residential neighborhood by demolishing an aging food service building and surface parking lot at Site 1 and a surface parking lot at Site 2 to construct a mixed-use development with supportive services for the residents. The new modern residential units, which would remain deed restricted, would ensure the primary source of housing in the area is maintained well into the future. In fact, the Projects would increase the unit count in the area by 685 residential units. The Projects proposes to be a well-designed building with attractive architectural features that would provide permanent affordable housing for Very Low Income and homeless persons in a maximum of 676 Restricted Affordable Efficiency Dwelling Units. Site 1's frontage on South San Pedro Street and Crocker Street would be enhanced with large, transparent windows that create an inviting pedestrian experience to activate the streets.

Downtown Design Guide: Design for a Livable Downtown

The Downtown Design Guide: Design for a Livable Downtown (Downtown Design Guide) is an interdepartmental project among Department of City Planning, Community Redevelopment Agency, LADOT, and Public Works. Together with urban design, transportation and environmental consultants, the Urban Design Studio, City developed the Downtown Design Guide to advance new context-sensitive street standards which emphasize walkability, sustainability and transit options; and simple but critical urban design standards to reinforce the community character of Downtown Los Angeles' many neighborhoods and districts. The purpose of the Downtown Design Guide is to coordinate and orchestrate the overall development of the City core, so that projects help each other succeed and result in a better, livable downtown. The Downtown Design Guide is intended to provide guidance for creating a livable downtown.

[123] *Central City Community Plan, page I-10.*

Project Consistency Discussion

As part of the Project's Application, the Project Applicant was required to complete a copy of the Downtown Design Guide Checklist, which includes all of the design guidelines from the Downtown Design Guide and an indication (checkmark) of whether the Project complies or does not comply with each design guideline or whether the design guideline is not applicable to the Project. The Project Applicant must provide a written justification for any instances where the Project does not comply with a particular design guideline or where the design guideline is not applicable. Planning staff has reviewed the Downtown Design Guide Checklist in light of the design and architecture of the Project (refer to Appendix J) and has determined that the Project does comply with the Downtown Design Guide.

City of Los Angeles General Provisions and Zoning Code

All development activity on the Project Sites is subject to the LAMC, particularly Chapter 1, General Provisions and Zoning, also known as the City of Los Angeles Planning and Zoning Code (Zoning Code). The Zoning Code includes development standards for the various districts in the City. As shown on Figure 2-3 in Section 2 (Project Description), the Project Sites are currently zoned M2-2D (Light Industrial Zone, Height District 2, Development Limitation). Footnote 2 in the Community Plan indicates that the Project Sites "correspond to Height District No. 2-D for commercial, industrial, and public facilities zones; D Limitation to 3:1 floor area ratio (FAR), except for transfer of floor area of up to 6:1 FAR.

Project Consistency Discussion

The Project Applicant is requesting Zone and Height District changes from the M2-2D to the C2-4D Zone for Sites 1 and 2, in conjunction with the requested General Plan Amendments from Light Manufacturing to Regional Center Commercial. As shown on the Land Use Map of the Community Plan, the C2 Zone is one of the corresponding zones of the Regional Center Commercial land use designation.

The existing M2 Zone permits existing industrial and commercial buildings, subject to regulations, to be adaptively reused to contain residential dwelling units. The zone does not permit the construction of residential dwelling units in new, ground-up developments. The requested C2 Zone would permit the development of the Project Sites with newly constructed buildings to house up to 685 residential dwelling units, of which 676 would be set aside as Restricted Affordable Housing. The proposed development of the Project Sites would be consistent with the existing development of the Central City East district, as described in the Community Plan text, which is developed primarily with SRO units and supportive services.

In conjunction with the requested zone change, the Project Applicant is requesting a Height District Change to change the existing Height District from 2D to 4D. The Project Sites are subject to the Development "D" Limitations contained within Ordinance No. 164,307, Subarea 1295, which restricts the maximum FAR for the site to 3:1, in lieu of the maximum permitted 6:1 FAR allowed in Height District No. 2. The requested Height District would change existing Height District to Height District No. 4, with consideration of a D Limitation restricting the FAR limitations to that of the two Projects. The Project on Site 1 would have a maximum 8.1:1 FAR, while the Project on Site 2 would have a maximum 3.5:1 FAR.

Although the Project is consistent with the SCAG 2016-2040 RTP/SCS and the City's General Plan and zoning, MM-LU-1(b) is nonetheless incorporated in order to address any potential inconsistencies between the 2016-2040 RTP/SCP and the adopted general plan land use designation and zoning for the Project Sites.

c) Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a 7,000-square-foot food service building; Site 2 is developed with a surface parking lot. There are no significant ecological areas (SEAs) and/or other biological resources on and/or near the Project Sites.[124] Thus, development of the Project Sites would not subject to any applicable habitat conservation plan or natural community conservation plan. Thus, the Project would not conflict with any applicable habitat conservation plan or natural community conservation plan, and no impacts related to this issue would occur.

Mitigation Measures (Land Use and Planning)

To ensure that the Project impacts related to land use and planning would be less than significant, implementation of the following mitigation measure is required:

MM-LU-1(b): Where an inconsistency with the adopted general plan is identified at the proposed Project location, determine if the environmental, social, economic, and engineering benefits of the Project warrant a variance from adopted zoning or an amendment to the general plan.

Cumulative Impacts

As discussed previously, the Project would not result in any inconsistencies with any of the applicable plans, policies, or regulations associated with development of the Project Sites. The City would assess the consistency of the related projects with all applicable plans, policies, and regulations associated with those sites, individually. Regardless of any potentially inconsistencies the related projects may result in, because the Project would not result in any inconsistencies, the Project would not have the potential to contribute to any cumulative inconsistency impacts.

11. MINERAL RESOURCES

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

No Impact. The Project Sites are located in an urbanized area of the City. There are no known mineral resources on the Project Sites or in the vicinity.[125] The project sites are currently zoned M2-2D and the

[124] *City of Los Angeles General Plan Conservation Element, Exhibit B2.*

[125] *City of Los Angeles General Plan, Conservation Element, Exhibit A.*

applicant has requested an amendment to the land use designation and requested a zone change to C2-4D. Thus, the project sites would not be zoned for oil extraction and drilling, or mining of mineral resources, and there are no such sites at the Project Sites. Further, the Project Sites are not located in an identified Mineral Resource Zone in the City of Los Angeles General Plan Conservation Element.[126] Thus, the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. Therefore, no impacts related to issue would occur.

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

No Impact. The Project Sites are located in an urbanized area of the City. The Project Sites are not identified as a mineral resource recovery site.[127] Thus, the Project would not result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, no impacts related to issue would occur.

Cumulative Impacts

As discussed previously, the Project would not result in any impacts related to mineral resources. Regardless to what degree the related projects could result in impacts related to mineral resources, because the Project would not result in any impacts related to mineral resources, the Project would not have the potential to contribute to any cumulative impacts.

12. NOISE

The information and analysis presented in this section is based primarily on the following (refer to Appendix K):

- *Noise Modeling Results, Weingart Projects, DKA Planning, March 2018.*

Introduction to Noise

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel, abbreviated dB. Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. Table 6-39 provides examples of A-weighted noise levels from common sources.

[126] *City of Los Angeles, Conservation Element Exhibit A Mineral Resources Map, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf*

[127] *Ibid.*

Table 6-39
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA, L_{eq})
Near Jet Engine	130
Rock and Roll Band	110
Jet flyover at 1,000 feet	100
Power Motor	90
Food Blender	80
Living Room Music	70
Human Voice at 3 feet	60
Residential Air Conditioner at 50 feet	50
Bird Calls	40
Quiet Living Room	30
Average Whisper	20
Rustling Leaves	10
Note: The noise levels presented on this table are approximations intended for general reference and informational use. They do not meet the standard required for detailed noise analysis, but are provided for the reader to gain a rudimentary concept of various noise levels.	
Source: Cowan, James P., Handbook of Environmental Acoustics, 1993.	

Noise Definitions

This noise analysis discusses sound levels in terms of Equivalent Noise Level (L_{eq}) and Community Noise Equivalent Level (CNEL).

Equivalent Noise Level: L_{eq} represents the average noise level on an energy basis for a specific time period. Average noise level is based on the energy content (acoustic energy) of sound. For example, the L_{eq} for one hour is the energy average noise level during that hour. L_{eq} can be thought of as a continuous noise level of a certain period equivalent in energy content to a fluctuating noise level of that same period. L_{eq} is expressed in units of dBA.

Community Noise Equivalent Level: CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 P.M. and 10:00 P.M. is as if it were actually 5 dBA higher than had it occurred between 7:00 A.M. and 7:00 P.M. From 10:00 P.M. to 7:00 A.M., humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL figures are obtained by adding an additional 5 dBA to evening noise levels between 7:00 P.M. and 10:00 P.M. and 10 dBA to nighttime noise levels between 10:00 P.M. and 7:00 A.M. Because of this, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

Regarding construction noise emissions, it should be noted that maximum noise levels (L_{max}) only occur when equipment is operating under full power conditions. However, construction equipment rarely operates at full power and intensity for extended durations. Because of this, the average (hourly L_{eq}) noise levels of equipment are generally utilized to more accurately characterize the effect of construction noise, as the L_{eq} metric accounts for typical usage patterns and other factors. For example, though an auger drill

rig may produce a maximum, peak noise level of 84.4 dBA L_{max}, an auger drill would not be operated continuously and at full power over the course of any hour of work. Instead, it would operate intermittently before moving to drill a new location. Therefore, an hourly average L_{eq} would better account for this equipment's pattern of use.

The CNEL metric is utilized almost exclusively to characterize 24-hour noise impacts from operations, including traffic noise levels. Construction activities generally do not occur during the evening, nighttime, and early morning periods when CNEL adjusts for increased human noise sensitivity.

Effects of Noise

The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise.

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.[128] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[129]

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA L_{eq}, and that individual noise events of 45 dBA or higher be limited.[130] Assuming a conservative exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA L_{eq}. Individual exterior events of 60 dBA or higher should also be limited.

Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65-70 dBA L_{eq} and cardiovascular effects including ischaemic heart disease and hypertension. However, at this time, the relationship is largely inconclusive.

People with normal hearing sensitivity can recognize small perceptible changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable and may cause community reactions. Sound level increases of 10 dBA or greater are perceived as a doubling in loudness and can

[128] *National Institute on Deafness and Other Communication Disorders, www.nidcd.nih.gov/health/noise-induced-hearing-loss.*

[129] *World Health Organization, Guidelines for Community Noise, 1999.*

[130] *Ibid.*

provoke a community response.[131] However, few people are highly annoyed at noise levels below 55 dBA L_{eq}.[132]

Noise Attenuation

Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources, commonly referred to as "point sources," can decrease by approximately 6 dBA over hard surfaces (i.e., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (i.e., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet and over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile sources decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels allowing noise to reach receivers by diffraction only. As a result, sound barriers can reduce source noise levels by up to 20 dBA.[133] However, the effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

Regulatory Framework

Federal

Currently, no federal noise standards regulate environmental noise associated with short-term construction activities or the long-term operations of development projects. As such, temporary and long-term noise impacts produced by the Project would be largely regulated by and evaluated with respect to state and City standards designed to protect public well-being and health.

State

The State's 2017 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. Table 6-40 illustrates State compatibility considerations between various land uses and exterior noise levels.

[131] *Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.*

[132] *World Health Organization, Guidelines for Community Noise, 1999.*

[133] *California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.*

Table 6-40
State of California Noise/Land Use Compatibility Matrix

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] 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.
[b] 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.
[c] 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.
[d] Clearly Unacceptable: New construction or development should generally not be undertaken.

Source: California Office of Planning and Research, General Plan Guidelines – Noise Element Guidelines (Appendix E), Figure 2, 2017.

City

Los Angeles General Plan Noise Element

The City's General Plan includes a Noise Element that identifies policies and standard to guide for the control of noise to protect residents, workers, and visitors. Its primary goal is to regulate long-term noise impacts that preserve acceptable noise environments for all types of land uses. However, the Noise Element contains no quantitative or other thresholds of significance for evaluating a proposed project's noise impacts. Instead, it adopts the State's guidance on noise and land use compatibility, shown on Table 6-40, "to help guide determination of appropriate land use and mitigation measures vis-à-vis existing or anticipated ambient noise levels."

Los Angeles Municipal Code

The LAMC contains a number of regulations that would apply to the Project's temporary construction activities and long-term operations. Section 41.40(a) would prohibit Project construction activities from occurring between the hours of 9:00 P.M. and 7:00 A.M., Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 A.M. or after 6:00 P.M. on any Saturday, or on any Sunday or national holiday.

SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.

> *(a) No person shall, between the hours of 9:00 P.M. and 7:00 A.M. of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.*
>
> *(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 A.M. or after 6:00 P.M. on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…*

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA.

SEC.112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

> *(a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.*
>
> *(b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any*

residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

(c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

Section 112.02(a), below, would prevent Project heating, ventilation, and air conditioning (HVAC) systems and other mechanical equipment from elevating ambient noise levels at neighboring residences by more than 5 dBA.

SEC. 112.02. AIR CONDITIONING, REFRIGERATION, HEATING, PLUMBING, FILTERING EQUIPMENT

(a) It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property … to exceed the ambient noise level by more than five decibels.

Los Angeles CEQA Thresholds Guide

The City's 2006 L.A. CEQA Thresholds Guide (Threshold Guide) provides guidance for the determination of significance for construction and operational noise impacts. It should be noted that the Threshold Guide is "intended to be available as a voluntary tool" that serves as "a guidance document that draws together practical information" to "streamline and enhance the City's permit and development processes." The Threshold Guide further explains that "[i]t recognizes that the impacts resulting from a particular action depend on the project setting, design, and operational components and that the determination of significance and the appropriate criteria for evaluation are the responsibility of the lead agency." According to the Threshold Guide, a project would, under normal circumstances, have a significant impact from construction noise sources if the following occurred:

- *Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;*

- *Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or*

- *Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at any time on Sunday.*

Construction of the Project is anticipated to require approximately 49 months to complete. Thus, the significance criteria used in the construction noise analysis presented below is the increase in the ambient exterior noise levels of 5 dBA (hourly L_{eq}) or more at a noise-sensitive use.

For operational noise sources, a Project would have a significant impact if it were to 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…*

- *Any 5 dBA or greater increase.*

These "normally unacceptable" and "clearly unacceptable" categories refer to those outlined by the State's noise and land-use compatibility chart, shown on Table 6-40.

Existing Conditions

According to the Thresholds Guide, land uses sensitive to noise include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The following receptors were chosen specifically for detailed construction noise impact analysis given their potential sensitivities to noise and their proximity to the Project Sites:

Charles Cobb Apartments – 521 S. San Pedro Street

This residential land use is located approximately 260 feet north of Site 1 and approximately 560 feet north of Site 2.

Union Rescue Mission – 545 S. San Pedro Street

This receptor consists of a homeless shelter and related uses that would be considered sensitive to noise (e.g. homeless temporary/supportive housing). It is located approximately 105 feet northwest of Site 1 and approximately 320 feet northwest of Site 2.

Volunteers of America – 543 Crocker Street

This receptor also consists of homeless support uses that may be sensitive to noise. It is located approximately 30 feet north of Site 1 and approximately 310 feet north of Site 2.

Weingart Center Association – 566 S. San Pedro Street

This receptor contains housing elements that would be considered sensitive to noise. It is located approximately 10 feet south of Site 1 and 80 feet north of Site 2.

The Midnight Mission – 601 S. San Pedro Street

This receptor also contains housing elements that would be considered sensitive to noise. It is located approximately 215 feet southwest of Site 1 and approximately 100 feet west of Site 2.

Abbey Apartments – 625 S. San Pedro Street

This residential land use is located approximately 400 feet southwest of Site 1 and approximately 85 feet west of Site 2.

Hotel Norbo – 526 E. 6th Street

This residential land use is located approximately 190 feet south of Site 1 and approximately 30 feet east of Site 2.

Central City Community Church – 419 E. 6th Street

This church is located approximately 85 feet west of Site 1 and approximately 130 feet northwest of Site 2.

To help determine these receptors' ambient noise conditions, DKA Planning took a noise measurement at a representative location near the Project along Wall Street.[134] A daytime ambient noise level of 68.0 dBA L_{eq} was measured, and field observations confirmed that this noise level is reasonably representative for the Project's receptors.[135] At the time of the noise measurement, vehicle traffic was comparable along north-south streets near 7th Street in the vicinity of the Project Sites. Land uses along these roadways are also fairly consistent. Most noise in the area of the Project Sites is due to vehicle traffic.

a) Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant With Mitigation Incorporated.

Construction Noise

Noise from demolition and grading activities is typically the foremost concern when evaluating a project's construction noise impacts, as these activities often require the use of heavy-duty, diesel-powered earthmoving equipment.

As noted above, consistent with the Thresholds Guide, the Project would result in a significant impact if 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 such a use. Construction activities would not occur between 9:00 P.M. and 7:00 A.M. Monday through Friday, before 8:00 A.M. or after 6:00 P.M. on Saturday, or at all on Sunday or during a national holiday.

For this Project, construction noise impacts were modeled using the noise reference levels of excavators and front-end loaders utilized to demolish, excavate, and grade for the Project. Excavators can produce

[134] *The noise measurement was taken using a Quest Technologies SoundPro DL Sound Level Meter. The SoundPro meter complies with the American National Standards Institute (ANSI) and International Electrotechnical Commission (IEC) for general environmental measurement instrumentation. The meter was equipped with an omni-directional microphone, calibrated before the day's measurement, and set at approximately 5 feet above the ground.*

[135] *It should be noted that recording ambient noise levels at each receptor location is infeasible due to the present conditions of the area of the Project Sites. However, the ambient noise level measured near the Project Sites' area along Wall Street was determined to be reasonably representative of the area.*

average peak noise levels of 80.7 dBA at a reference distance of 50 feet; front-end loaders, 79.1 dBA.[136] Compounding their noise impacts is the fact that these vehicles commonly operate in tandem. Excavators remove soils and debris, and front-end loaders transport this matter to on-site stockpiles or haul trucks for off-site export. As a result, the simultaneous use of excavators and front-end loaders typically has the greatest potential to cause sustained and significant noise impacts at nearby receptors. The estimated noise levels from the proposed uses of excavators and front-end loaders are shown on Table 6-41. When modeling the noise levels shown below, the impact analysis assumed the simultaneous operation of excavators and front-end loaders on both Project Sites, as it is possible that Site 1 and Site 2 demolition and grading phase activities (respectively) could be concurrent.

Table 6-41
Construction Noise Levels Without Mitigation

Receptor	Distance (ft.) Site 1/Site 2	Construction Noise Level (dBA L_{eq})	Existing Ambient (dBA L_{eq})	New Ambient (dBA L_{eq})	Increase
Residential/Transitional Housing/Shelter					
Charles Cobb Apartments	260/560	65.5	68.0	69.9	1.9
Union Rescue Mission	105/320	73.0	68.0	74.2	6.2
Volunteers of America	30/310	79.0	68.0	79.3	11.3
Weingart Center Association	10/80	80.4	68.0	80.7	12.7
The Midnight Mission	215/100	73.0	68.0	74.4	6.4
Abbey Apartments	400/85	74.4	68.0	75.3	7.3
Hotel Norbo	190/30	79.1	68.0	79.4	11.4
Church					
Central City Community Church	85/130	75.9	68.0	76.6	8.6
Source: DKA Planning 2018. Refer to Appendix K.					

As shown above, Union Rescue Mission, Volunteers of America, Weingart Center Association, The Midnight Mission, Abbey Apartments, Hotel Norbo, and Central City Community Church could all experience impacts in excess of 5 dBA as a result of the Project's demolition and grading construction activities. This would exceed the 5 dBA noise increase threshold considered to be a significant impact by the Thresholds Guide for construction activities lasting more than ten days in a three month period.

Mitigation Measures NOISE-MM-1 and NOISE-MM-2, described in detail below, would reduce the Project's construction noise impact at Union Rescue Mission, Volunteers of America, Weingart Center Association, The Midnight Mission, Abbey Apartments, Hotel Norbo, and Central City Community

[136] *Reference noise levels obtained from the Federal Highway Administration's Roadway Construction Noise Model.*

Church to below the Thresholds Guide's recommended 5 dBA threshold of significance. Applicable mitigation measures would require the use of sound mufflers for equipment and the erection of a sound barrier wall. These mitigation measures would also reduce on-site construction source noise levels to below LAMC Section 112.05's 75 dBA limit at 50 feet for powered construction equipment operating in or within 500 feet of residential zones. Therefore, the Project's construction-related noise impacts would be less than significant.

With regard to off-site construction-related noise impacts, peak noise sources would result from haul truck activity during demolition and grading activities, which would require up to approximately 12 haul trips per workday to export excavated soils and demolished materials from the Project Sites to a regional landfill. Such activity can increase ambient noise levels at roadside sensitive receptors along the designated haul route. A 3 dBA increase in traffic-related noise levels is associated with a doubling of traffic, assuming that travel speeds and fleet mix remain constant. A 5 dBA increase in noise levels would require an approximate tripling of traffic. Though the addition of haul trucks would alter the fleet mix of haul route roadways, this effect can be accounted for by the concept of equivalent vehicles, which equates the noise levels from heavy trucks to an acoustically equivalent number of automobiles. According to Federal Highway Administration (FHWA) Reference Energy Mean Emission Levels (REMELs) for its TNM noise prediction software, one heavy truck traveling at 35 mph produces as much noise as approximately 19 automobiles traveling at the same speed. This relationship can be used to determine whether the addition of Project haul trucks would result in an equivalent doubling or tripling of traffic volumes along nearby roadways, and thus whether or not they would be capable of producing a significant impact at any roadside sensitive receptors. Considering that the Project would generate up to approximately 12 haul trips per workday, and that the noise impact of these haul trips would be acoustically equivalent to approximately 228 automobile trips per work day, the Project would not cause an equivalent doubling or tripling of traffic levels that would be associated with either a 3 dBA or 5 dBA noise increase, respectively. The Project is located in a dense urban environment with high traffic levels. Roadways in the vicinity of the Project experience hundreds of automobile trips per hour, even during off-peak hours of travel. On average, Project haul trucks would not contribute more than 50 equivalent automobile trips per work hour on nearby roadways. As a result, the Project's hauling activities would not substantially increase ambient noise levels at sensitive receptors located along haul route roadways. The Project's off-site construction-related noise impact associated with haul trips would be less than significant.

Operational Noise

On-Site Noise Sources

During operations, the Project would produce noise from both on- and off-site sources. For the reasons discussed below, the Project would not result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies, and on-site operational noise impacts would be less than significant.

Mechanical Equipment

The Project buildings would include HVAC equipment, which would produce on-site noise. However, regulatory compliance with LAMC Section 112.02, referenced above, would ultimately ensure that noises from sources such as heating, air conditioning, and ventilation systems not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Compliance with this regulation would prevent the Project from unreasonably increasing noise levels at off-site uses as a result of its mechanical noises. Additionally, HVAC systems are relatively quiet in operation and are not likely to contribute to noticeable increases in noise levels at off-site uses. Further, HVAC units would be rooftop mounted in central clusters, setback from rooftop edges. Other mechanical and utility rooms would be internally located and would not be audible off-site.

Residential Land Uses

Noise from recurrent activities (e.g., conversation, consumer electronics, dog barking) and non-recurrent activities (e.g., social gatherings) would elevate ambient noise levels to different degrees. The City's noise ordinance would provide a means to address nuisances related to intrusive residential noises. It should be noted that voice noise levels generally increase proportionally to background ambient noise levels, but only from approximately 55 dBA to 67 dBA at a reference distance of one meter.[137] Any such noises from the Project's open community areas would therefore be proportional to existing ambient noise levels and would rapidly attenuate by distance. It is unlikely that conversational noises would be substantially audible, if audible at all, at nearby sensitive receptors. These noise levels would have a nominal effect on ambient noise levels in the vicinity of the Project.

Commercial Land Uses

The ground floor of the Project's Tower 1B would include 2,250 square feet of retail area on Site 1, and Building 2 would include an additional 3,200 square feet of ground floor retail area on Site 2. Most noises from the operation of the Project's commercial uses would be internal and inaudible at off-site receptors, especially given the relatively elevated noise levels in the area of the Project Sites, as the sites are located in a transitional neighborhood with a mix of residential, light manufacturing, warehouse, and commercial uses. The addition of the Project's commercial land uses would be consistent with the noise profile of the existing environment and would not result in a noticeable increase in ambient noise levels near the Project Sites. The Project would not include any outdoor amplified music systems.

Auto-Related Activities

Vehicle parking on Site 1 would be provided by a 32-space subterranean parking garage. Auto-related noises would likely be inaudible, or at least considerably attenuated, at off-site locations as a result of the subterranean aspect of the parking garage. Site 2 would contain 221 vehicle parking spaces in a four-level garage, which would replace an existing 133-space surface parking lot. The net increase of 88 parking spaces would have a marginal effect on surrounding noise levels, as according to the Federal Transit

[137] *USEPA, Speech Levels in Various Noise Environments, May 1977.*

Administration (FTA) calculations for parking garage noise, a parking garage with an hourly vehicle activity equal to the garage's 221-vehicle capacity would only produce a noise level of approximately 50 dBA L_{eq}.[138] Considering that the existing ambient noise levels in the area of the Project Sites are typically greater than 60 dBA L_{eq}, any noise increase would be negligible and below thresholds of perceptibility.

Off-Site Noise Sources

The majority of the Project's operational noise impacts would be from off-site mobile sources associated with net new daily trips. On a typical weekday, the Project would generate an estimated 2,038 net new daily trips, including 229 during the AM peak hour and 197 during the PM peak hour.[139] The noise levels of these vehicle trips were modeled using the Federal Highway Administration's (FHWA) Traffic Noise Model 2.5 (TNM 2.5). This noise prediction software uses traffic volumes, vehicle mix, average speeds, roadway geometry, and other inputs to calculate average noise levels in dBA along roadway segments. For this analysis, the "existing year (2017) no Project" scenario was compared to the "existing year (2017) with Project" scenario, as well as comparison of the "future year (2025) no Project" scenario to the "future year (2025) with Project" scenario. Tables 6-42 through 6-45 show the Project's projected contributions to peak-hour ambient noise level increases along modeled roadway segments. As shown, Project traffic would not result in a noticeable increase in noise levels. The overall effect on 24-hour noise levels would be far below the Thresholds Guide's minimum 3 dBA CNEL noise increase threshold for operational noise sources. Therefore, Project impacts related to traffic noise would be less than significant.

Table 6-42
Estimated AM Peak-Hour Mobile Source Noise Levels (2017)

Roadway Segment	Estimated dBA, CNEL			
	No Project (2017)	With Project (2017)	Project Change	Significant Impact?
N/B Los Angeles St., N of 6th St.	69.7	69.8	0.1	No
S/B Los Angeles St., N of 6th St.	67.6	67.7	0.1	No
E/B 6th St., E of San Pedro St.	63.3	63.3	< 0.1	No
N/B San Pedro St., N of 6th St.	64.5	64.6	0.1	No
S/B San Pedro St., N of 6th St.	65.0	65.1	0.1	No
Source: DKA Planning, 2018. Refer to Appendix K.				

[138] *FTA, Transit Noise and Vibration Impact Assessment, May 2006.*

[139] *Linscott Law & Greenspan Engineers, Weingart Projects Traffic Impact Study, March 2018.*

Table 6-43
Estimated PM Peak-Hour Mobile Source Noise Levels (2017)

Roadway Segment	Estimated dBA, CNEL			
	No Project (2017)	With Project (2017)	Project Change	Significant Impact?
N/B Los Angeles St., N of 6th St.	70.0	70.0	< 0.1	No
S/B Los Angeles St., N of 6th St.	69.0	69.0	< 0.1	No
E/B 6th St., E of San Pedro St.	67.2	67.4	0.2	No
N/B San Pedro St., N of 6th St.	66.4	66.4	< 0.1	No
S/B San Pedro St., N of 6th St.	65.9	65.9	< 0.1	No
Source: DKA Planning, 2018. Refer to Appendix K.				

Table 6-44
Estimated AM Peak-Hour Mobile Source Noise Levels (2025)

Roadway Segment	Estimated dBA, CNEL			
	No Project (2025)	With Project (2025)	Project Change	Significant Impact?
N/B Los Angeles St., N of 6th St.	71.0	71.0	< 0.1	No
S/B Los Angeles St., N of 6th St.	69.2	69.2	< 0.1	No
E/B 6th St., E of San Pedro St.	66.7	67.0	0.3	No
N/B San Pedro St., N of 6th St.	65.8	65.9	0.1	No
S/B San Pedro St., N of 6th St.	66.2	66.2	< 0.1	No
Source: DKA Planning, 2018. Refer to Appendix K.				

Table 6-45
Estimated PM Peak-Hour Mobile Source Noise Levels (2025)

Roadway Segment	Estimated dBA, CNEL			
	No Project (2025)	With Project (2025)	Project Change	Significant Impact?
N/B Los Angeles St., N of 6th St.	71.5	71.6	0.1	No
S/B Los Angeles St., N of 6th St.	70.4	70.4	< 0.1	No
E/B 6th St., E of San Pedro St.	69.3	69.4	0.1	No
N/B San Pedro St., N of 6th St.	67.6	67.6	< 0.1	No
S/B San Pedro St., N of 6th St.	67.1	67.2	0.1	No
Source: DKA Planning, 2018. Refer to Appendix K.				

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

Less Than Significant Impact. The information and analysis in this section is based on the noise modeling results prepared by DKA Planning (refer to Appendix K).

Introduction to Vibration

Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, and acceleration. Unlike noise, vibration is not a common environmental problem, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration include trains, construction activities, and certain industrial operations.

Vibration Definitions

This noise analysis discusses vibration in terms of Peak Particle Velocity (PPV). PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are usually measured in inches per second.[140]

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. Background vibration levels in residential areas are usually well below the threshold of perception for humans, approximately 0.01 inches per second.[141] Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Common outdoor sources of ground-borne vibration include construction equipment, trains, and traffic on rough or unpaved roads. Traffic vibration from smooth and well-maintained roads is typically not perceptible.

Regulatory Framework

Federal Transit Administration

For the evaluation of construction-related vibration impacts, state standards set by the FTA are used given the absence of federal, county, and city standards specific to construction activities. In 2006, the FTA published the Transit Noise and Vibration Impact Assessment manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. Table 6-46 summarizes the FTA's vibration guidelines for building and structural damage.

[140] *California Department of Transportation, Transportation and Construction Vibration Guidance Manual, September 2013.*

[141] *Ibid.*

Table 6-46
FTA Vibration Damage Potential Threshold Criteria

Building Category	Construction Damage Vibration Criteria (PPV, in/sec)
I. Reinforced-concrete, steel or timber (no plaster)	0.5
II. Engineered concrete and masonry (no plaster)	0.3
III. Non-engineered timber and masonry buildings	0.2
IV. Buildings extremely susceptible to vibration damage	0.12
Source: FTA, 2006.	

Project Impacts

Construction Vibration

As discussed earlier, construction of the Project would require heavy-duty earthmoving vehicles such as excavators and front-end loaders. These types of vehicles can produce peak vibration velocities of up to 0.089 inches per second PPV at a distance of 25 feet.[142] Auger drilling rigs for shoring activities can produce similar vibration levels. Table 6-47 shows the Project's estimated construction vibration levels at the nearest off-site structures. No building would experience potentially damaging levels of groundborne vibration from the Project's construction activities. Other buildings are located at greater distances from the Project and would experience reduced vibrations. Therefore, the Project's construction-related vibration impacts would be less than significant.

Operational Vibration

During Project operations, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Operational ground-borne vibration in the Project's vicinity would be generated by its related vehicle travel on local roadways. However as previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. As a result, the Project's long-term vibration impacts would be less than significant.

[142] *Ibid.*

Table 6-47
Potential Building Damage Vibration Levels At Off-Site Structures – Unmitigated

Building/Structure	Distance from Project Sites (ft.)	Condition	Significance Threshold PPV (in/sec)	Impact PPV (in/sec)	Significant?
Volunteers of America 543 Crocker St.	30	Engineered concrete and masonry (no plaster)	0.3	0.073	No
Weingart Center Association 556 S. San Pedro St.	10	Engineered concrete and masonry (no plaster)	0.3	0.244	No
Hotel Norbo 526 E. 6th St.	30[1]	Engineered concrete and masonry (no plaster)	0.3	0.073	No
Weingart Association Center Corporate Offices 522 E. 6th St.	10	Engineered concrete and masonry (no plaster)	0.3	0.244	No

[1] *A portion of Site 2 is located approximately 10 feet from this receptor. However, there would be no major building construction at this site location. A courtyard is proposed for the eastern portion of Site 2 nearest to Hotel Norbo. Construction of this courtyard would not require the use of any significant vibration-generating equipment.*

Source: DKA Planning 2018. Refer to Appendix K.

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

Less Than Significant Impact. As discussed in response to Checklist Question 12(a), operation of the Project would not generate a substantial permanent increase in noise in excess of City noise standards. Therefore, Project impacts related to permanent noise increase would be less than significant.

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

Less Than Significant With Mitigation Incorporated. As discussed in response to Checklist Question 12(a), without mitigation, the Project's construction activities could generate noise in excess of the Thresholds Guide's 5 dBA construction noise impact threshold. However, implementation of Mitigation Measures NOISE-MM-1 and NOISE-MM-2, as described below, would reduce the construction noise levels to below these thresholds (refer to Table 6-45). Thus, the Project would not result in a substantial temporary or periodic increase in ambient noise levels in excess of the relevant noise standards. Therefore, Project impacts related to temporary or periodic noise increase would be less than significant.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Sites are not located within an airport land use plan or within two miles of a public airport or public use airport. The closest airport to the Project Sites is the Hollywood Burbank

Airport located approximately 15.4 miles northwest of the site. Based on the above the Project would not exacerbate the existing airport noise conditions so as to expose people residing or working in the Project area to excessive noise levels. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels and no impact would occur.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The Project Sites are not located in the vicinity of a private airstrip. Thus, the Project would not exacerbate the existing airport noise conditions so as to expose people residing or working in the Project area to excessive noise levels.

Mitigation Measures (Construction Noise)

Implementation of the following mitigation measures would ensure that the Project's construction-related noise impacts would be less than significant:

NOISE-MM-1: All diesel-powered construction vehicles shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA.

NOISE-MM-2: Temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA shall be erected along the Project's boundaries.

As shown on Table 6-48, the implementation of Mitigation Measures NOISE-MM-1 and NOISE-MM-2 would reduce the Project's construction-related ambient noise level increases at Union Rescue Mission, Volunteers of America, Weingart Center Association, The Midnight Mission, Abbey Apartments, Hotel Norbo, and Central City Community Church to below the L.A. CEQA Thresholds Guide's 5 dBA threshold of significance. With regard to Mitigation Measure NOISE-MM-1, exhaust mufflers and engine compartment damping systems would reduce the maximum noise levels of powered construction equipment by at least 3 dBA, conservatively. Regarding Mitigation Measure NOISE-MM-2, temporary noise barriers with a transmission loss value of at least 20 dBA would be capable of reducing construction noise levels by at least 10 dBA. Barriers constructed of 22-gage steel or 0.0625-inch-thick aluminum sheeting could achieve this standard. One-half-inch plywood barriers also would be acceptable. With these measures in place, the Project's construction noise impact would be less than significant.

Table 6-48
Construction Noise Levels With Mitigation

Receptor	Distance (ft.) Site 1/Site 2	Construction Noise Level (dBA L_{eq})	Existing Ambient (dBA L_{eq})	New Ambient (dBA L_{eq})	Increase
Residential/Transitional Housing/Shelter					
Charles Cobb Apartments	260/560	52.5	68.0	68.1	0.1
Union Rescue Mission	105/320	60.0	68.0	68.6	0.6
Volunteers of America	30/310	66.0	68.0	70.1	2.1
Weingart Center Association	10/80	67.4	68.0	70.7	2.7
The Midnight Mission	215/100	60.3	38.0	68.7	0.7
Abbey Apartments	400/85	61.4	68.0	68.9	0.9
Hotel Norbo	190/30	66.1	68.0	70.2	2.2
Church					
Central City Community Church	85/130	62.9	68.0	69.2	1.2
Source: DKA Planning 2018. Refer to Appendix K.					

Cumulative Impacts

Construction Noise

As discussed previously, construction activities would temporarily increase ambient noise levels at nearby receptors. Any other future developments that are built concurrently with the Project could further contribute to these temporary increases in ambient noise levels. The related projects closest to the Project Sites include the following (refer to Figure 2-8 in Section 2 [Project Description]):

> #63, located at 649 South Wall Street, approximately 881 feet southwest of Site 2, includes development of a 66,000-square-foot medical office and assisted living facility
>
> #89, located at 656 South Stanford Avenue, approximately 858 feet southeast of Site 2, includes development of 82 dwelling units
>
> #151, located at 655 South San Pedro/513 East 7th Street, approximately 230 feet southwest of Site 2, includes development of 84 dwelling units
>
> #159, located at 609 East 5th Street, approximately 747 feet northeast of Site 1, includes development of 151 dwelling units.

As shown, only one related project (#151) is located within 500 feet of the Project, the screening distance recommended by the Thresholds Guide to identify potential construction impacts. This related project, a

modest residential development located at 655 South San Pedro Street/513 East 7th Street, is approximately 230 feet southwest of the Site 2. This related project is located approximately 160 feet southwest of Abbey Apartments and 275 feet southwest of The Midnight Mission. The Project Sites are located 85 feet east and 100 feet east of these receptors, respectively. With mitigation, the Project's construction noise impact at Abbey Apartments would be only 0.9 dBA. At The Midnight Mission, its noise impact would be just 0.6 dBA. Given the related project's extra distance from these two sensitive receptors, it stands to reason that construction of the related project would result in noise impacts that are less than the Project's own impacts, assuming that the related project incorporates a similar set of project design features or mitigation measures that represent industry "best practices" for controlling the construction noise of urban infill projects in compliance with the City's noise regulations. Combined, simultaneous construction noises from both projects would not increase ambient noise levels at Abbey Apartments and The Midnight Mission by greater than 5 dBA. With the identified mitigation, the Project would have a minimal and less than significant impact at these receptors, and its potential to contribute to cumulative construction noise levels at these receptors would be less than significant.

Operational Noise

The majority of the Project's long-term noise would come from traffic traveling to and from the Project Sites. This addition of future traffic from any new developments in the vicinity of the Project Sites and overall ambient traffic growth would elevate ambient noise levels surrounding local roadways. However, the Project's individual contribution to permanent off-site ambient noise level increases would be minimal. As shown on Tables 6-44 and 6-45, with or without the addition of Project traffic, future roadside ambient noise levels would not increase by 3 dBA to or within their respective "Normally Unacceptable" or "Clearly Unacceptable" noise categories, or by 5 dBA or greater overall. Therefore, the Project's cumulative operational noise impact would be less than significant.

13. POPULATION AND HOUSING

a) Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A significant impact could occur if the Project would locate new development such as homes, businesses, and/or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude. Based on the L.A. CEQA Thresholds Guide the determination of whether a project results in a significant impact on population and housing growth considers (a) the degree to which a project would cause growth (i.e., new housing or employment generators) or accelerate development in an undeveloped area that exceeds projected/planned levels for the year of project occupancy, and would result in an adverse physical change in the environment; (b) whether the project would introduce unplanned infrastructure that was not previously evaluated in the adopted Community Plan or General Plan; and (c) the extent to which growth would occur without implementation of the Project.

Existing Conditions

The Project Sites are located within SCAG's jurisdiction. SCAG's mandated responsibilities include development plans and policies with respect to the region's population growth, transportation programs, air quality, housing, and economic development. The 2016–2040 RTP/SCS includes the following proposed growth forecast for population, households, and employment for the City 2040:[143]

- Population: 3,845,500 persons in 2012 and 4,609,400 in 2040;
- Households: 1,325,500 households in 2012 and 1,690,300 in 2040; and
- Employment: 1,696,400 jobs in 2012 and 2,169,100 in 2040.

According to analysis by the State's Housing and Community Development Department, prior to the recent economic downturn and foreclosure crisis, California had experienced decades of undersupply of housing, contributing to significant price escalation and the affordability crisis.[144] The factors contributing to California's continuing housing supply and affordability problems include a chronic mismatch between the existing housing stock and the demand for housing by type and location; lack of sufficient housing construction to meet demand; and persistently high housing costs relative to household incomes, even with the effects of the recent national recession.

Almost all future California population and household growth will occur in metropolitan areas, and most of that will occur in southern California. According to SCAG's 2008 growth forecast, the six-county region is projected to add about 4.6 million people and about 1.6 million households between 2010 and 2035. In Los Angeles County (County) alone, the forecast envisions about 1.7 million people and about 646,000 households between 2010 and 2035. As the largest city in the County, the City will receive most of the County's future growth.

Table 6-49 lists SCAG's forecasts for population, housing employment, and persons-per-household rate for the City, as well as the number and percent change.[145]

[143] *SCAG, 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, Current Demographics and Forecast, Table 11, page 24: http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_DemographicsGrowthForecast.pdf.*

[144] *State of California – Business, Transportation and Housing Agency, The State of Housing in California 2012: Affordability Worsens, Supply Problems Remain, 2012.*

[145] *Employment information is provided for informational purposes only.*

Table 6-49
Population, Housing, Employment,
and Persons-Per-Household Forecasts for the City

Year	Population	Households	Employment[1]	Person/Households
2017[2]	3,981,910	1,390,645	1,780,810	2.86
2020[3]	3,991,700	1,455,700	1,817,700	2.74
2025[2]	4,200,166	1,494,844	1,915,866	2.81
2035[3]	4,320,600	1,626,600	1,906,800	2.66
2040[4]	4,609,400	1,690,300	2,169,100	2.72
Change 2017 to 2025[5]				
Number Changed	+218,256	+104,232	+135,056	-0.05
Percent Changed	+5.48%	+7.50%	+7.58%	-1.87%
Change 2020 to 2035				
Number Changed	+328,900	+170,900	+89,100	-0.08
Percent Changed	+8.2%	+11.7%	+4.9%	-2.9%
Change 2020 to 2040				
Number Changed	+617,700	+234,900	+351,400	-0.02
Percent Changed	+15.4%	+16.1%	+19.3%	0.72%

[1] *Employment information is provided for informational purposes only.*
[2] *Population, housing and employment rate data for years 2017 (baseline year) and 2025 (anticipated buildout year of the Project) were calculated based on a linear interpolation of the 2012 to 2040 projections in SCAG's adopted 2016-2040 RTP/SCS.*
[3] *2020 and 2035: Based on SCAG's adopted 2012-2035 RTP/SCS, page 32.*
[4] *2040: Based on SCAG's adopted 2016-2040 RTP/SCS, Appendix, page 24.*
[5] *Represents a comparison of baseline year to Project buildout year.*

Existing Uses

The Project Sites are located in Downtown Los Angeles, a highly urbanized area of the City. Site 1 is developed with a surface parking lot and a 7,000-square-foot food service building; Site 2 is developed with a surface parking lot. According to the Project Applicant, approximately 15 people are employed at Site 1.

Project Impacts

Construction

The construction activities associated with the Project would create temporary construction-related jobs. Nevertheless the work requirements of most construction activities are highly specialized, so that

construction workers remain at a job site only for the time in which their specific skills are needed to complete a particular phase of the construction process. Thus, construction workers would not be anticipated to relocate their residence to the Project area and would not induce substantial population growth and/or require permanent housing. Therefore, the Project's indirect population growth impacts related to construction activities would be less than significant.

Operation

The Project includes the development of up to 685 new residential dwelling units, including approximately 451 permanent supportive units, up to 225 affordable housing units, and 9 manager units, and up to a maximum of 5,450 square feet of retail, 25,493 square feet of philanthropic, and 17,100 square feet of office uses. The maximum residential occupancy for the Project would be 1,420, limited by requirements set forth in the regulatory agreement between the Project Applicant and the HCIDLA. Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City.[146] Assuming approximately 2.07 persons-per-unit rate, approximately 887 of the Project's future residents already reside in the City.[147] It is likely that the remaining 533 future residents already live in the City, as well, as discussed in more detail below. However, for purposes of a conservative analysis, it is assumed that the Project could add 533 new residents to the City. In addition, according to the Project Applicant the Project would generate approximately 74 employees.

Population: As shown on Table 6-50, compared to the anticipated population growth in the City between the 2017 baseline year and the Project's anticipated buildout year of the 2025, the Project's residential population would represent 0.24 percent of the total forecasted City population growth during that period. The Project's residential population would represent 0.16 percent of the forecasted growth between 2020 and 2035 in the City and 0.08 percent of the forecasted population growth between 2020 and 2040.

[146] *The People Concern/OPCC & Lamp Community United, Hazel Lopez, Director of CES and Community Engagement, May 21, 2018.*

[147] *1,420 maximum residents/685 units = 2.07 persons per unit.*

Table 6-50
Project Growth Comparison to Growth Forecasts

Net Project Population, Housing, and Employment Growth	Forecast Citywide Growth[1]	Project % of Forecast Citywide Growth
As compared to SCAG Growth Forecast from 2017 to 2025 (Interpolated)		
533 residents	+218,256	0.24
685 units	+104,232	0.66
74 employees	+135,056	0.06
As compared to SCAG Growth Forecast from 2020 to 2035[1]		
533 residents	+328,900	0.16
685 units	+170,900	0.40
74 employees	+89,100	0.08
As compared to SCAG Growth Forecast from 2020 to 2040		
533 residents	+617,700	0.08
685 units	+234,900	0.29
74 employees	+351,400	0.02

[1] *Refer to Table 6-49.*

Housing: As shown on Table 6-50, compared to the anticipated housing growth in the City between the 2017 baseline year and the Project's anticipated buildout year of the 2025, the Project's residential housing would represent 0.66 percent of the forecasted City housing growth. The Project's housing units would represent approximately 0.40 percent of forecasted growth between 2020 and 2035 in the City and 0.29 percent between 2020 and 2040.

Employment: As shown on Table 6-50, compared to the anticipated employment growth in the City between the 2017 baseline year and the Project's anticipated buildout year of the 2025, the Project's employment would represent 0.06 percent of the forecasted City employment growth. The Project's employment would represent approximately 0.08 percent of forecasted growth between 2020 and 2035 in the City and 0.02 percent between 2020 and 2040.

The Project Sites are located in the "Skid Row" area of Downtown Los Angeles that is defined as the area east of Main Street, south of 3rd Street, west of Alameda Street, and north of 7th Street, and contains a large population of homeless people. According to the 2017 Greater Los Angeles Homeless Count, there are approximately 7,386 homeless persons living within Council District 14 (the Council District in which the Project Sites are located), with approximately 57 percent living unsheltered.[148] The purpose of the

[148] *2017 Greater Los Angeles Homeless Count, Los Angeles Homeless Services Authority, 2018. https://www.lahsa.org/homeless-count/, access on April 28, 2018*

Project is to provide permanent supportive and affordable housing and services to help meet the needs of an existing homeless population.

Approximately 66 percent of the housing provided as part of the Project would be restricted to house only persons who were previously homeless, representing approximately 937 people.[149] The remaining 483 future Project residents would occupy affordable housing units and could comprise individuals and families and in each case, could also be previously homeless people, as well.[150] As stated previously, approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City, equating to approximately 887 people. Given the number of homeless people living in the City (including the relatively large homeless population living near the Project Sites), it is anticipated that some or all of the 937 Project (previously-homeless) residents already live in the City and as such, it is likely that as much as 66 percent of the Project's population growth (up to 937 people) would not represent new growth in the City. Of course, it is also possible that the remaining Project residents already live in the City, as well. Assuming this, none of the Project's population growth would represent new growth in the City. However, for a conservative analysis, the comparison of the Project's potential growth as compared to growth forecasts for the City presented on Table 6-50 assumes that all of the Project's residents would relocated to the City. As shown on the table, the Project's population, housing, and employment growth falls within SCAG's growth projections for the City.

Additionally, the Project Sites are already served by an existing roadway network and utility and public services infrastructure. The Project does not include the development of any new or extended roadways or other infrastructure. For the reasons discussed above, the Project would not indirectly or directly induce substantial population growth. Therefore, Project impacts related to population growth would be less than significant.

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

No Impact. No housing currently exists on the Project Sites. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. The Project would not displace any existing housing, necessitating the construction of replacement housing elsewhere. The Project would provide up to 685 new dwelling units to accommodate an existing homeless population. Thus, no impact would occur.

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

No Impact. No housing currently exists on the Project Sites, and no people live on the Project Sites. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface

[149] *As stated previously, the Project would have a maximum occupancy of 1,420 people. 1,420 people x 66% = 937 people.*

[150] *1,420 people – 937 people = 483 people.*

parking lot. The Project Sites are not currently used as housing by the homeless population and thus, construction of the Project would not displace any existing housing, necessitating the construction of replacement housing elsewhere. The Project would provide 685 new dwelling units to accommodate an existing homeless population. Thus, no impact would occur.

Cumulative Impacts

The related projects listed on Table 2-2 in Section 2 (Project Description) include development of approximately 114,595 dwelling units. It is possible that some of the sites of these related projects already include residential land uses that would be removed with implementation of the related projects and as such, the total net number of dwelling units that would be created would be fewer than what has been estimated, and it is likely, as a result of natural growth, that many of the units will be occupied by people already residing in the City. Much of the growth in the City is targeted in transit-rich areas such as Downtown Los Angeles. The related project list includes applications and plans under consideration and some or all may not be constructed or may be constructed at lower unit counts than shown. In addition, the City is currently experiencing a strong market environment, and it is anticipated that growth will even out over time. Thus, cumulative growth is assessed over the 2020-2040 year time frame established in the SCAG housing growth forecast. However, for a conservative analysis, it is assumed that all estimated dwelling units would be net new units and all residents would be net new residents. The housing units associated with the related project would generate approximately 278,466 cumulative residents.[151]

As shown on Table 6-51, cumulative residential population would represent approximately 45.16 percent of the population growth forecast between 2020 and 2040 for the City, and cumulative housing units would represent approximately 49.08 of the housing growth forecast between 2020 and 2040 for the City. As stated previously, approximately 66 percent of the housing provided as part of the Project would be restricted to supportive housing, designed to house only persons who were previously homeless, representing approximately 937 people. (The remaining Project residents would occupy affordable units and could also be previously homeless people.) Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City, equating to approximately 887 people. Given the number of homeless people living in the City (including the relatively large homeless population living near the Project Sites), it is anticipated that some or all of the 937 Project (previously-homeless) residents already live in the City and as such, it is likely that as much as 66 percent of the Project's population growth (approximately 937 people) would not represent new growth in the City. Of course, it is also possible that the remaining approximately 483 future Project residents already live in the City, as well. Assuming this, none of the Project's population growth would represent new growth in the City. However, for a conservative analysis, the comparison of the Project's potential growth as compared to growth forecasts for the City presented on Table 6-48 assumes that all of the Project's residents would relocate to the City. As shown on the table, the Project's population, housing, and employment growth falls within SCAG's growth projections for the City. Thus, the Project would not directly contribute to cumulative population growth. Therefore, the Project's contribution to cumulative population growth in the City would not be considerable.

[151] *The number of cumulative residents is based on the American Community Survey, 5-year (2013-2016) Average Estimates rate of 2.43 persons per household for the City.*

Table 6-51
Cumulative Comparison to Growth Forecasts (2020-2040)

Cumulative Population and Housing Growth	Forecast Citywide Growth[1]	Cumulative % of Forecast Citywide Growth
278,999 residents	+617,700	45.16
115,280 units	+234,900	49.08

[1] *Refer to Table 6-49.*
[2] *This conservatively assumes that all of the cumulative projects would have the same buildout year as the Project.*

14. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective for any of the following public services:

(i) Fire protection?

Less Than Significant Impact. The LAFD provides fire and emergency medical protection services to the Project Sites. The Project Sites are located in an urbanized area of the City that is currently served by existing LAFD services. Fire stations that serve the Project Sites are shown on Table 6-52.

Table 6-52
Fire Stations Serving the Project Sites

No.	Address	Distance from Project Sites (miles)
9	430 7th Street	0.2
4	450 East Temple Street	1.3
10	1335 South Olive Street	1.6

Source: LAFD, https://www.lafd.org/fire-stations/station-results, access August 1, 2018.

Construction

Construction activities associated with the Project may temporarily increase demand for fire protection and emergency medical services. Construction activities may also cause the occasional exposure of combustible materials, such as wood, plastics, sawdust, coverings and coatings, to heat sources from machinery and equipment sparking, exposed electrical lines, welding activities, and chemical reactions in combustible materials and coatings.

To comply with California Department of Industrial Relations (Cal-OSHA) and state and City Fire and Building Code requirements, construction managers and personnel would be trained in fire prevention and emergency response, and fire suppression equipment specific to construction would be maintained on-site.[152] Project construction would comply with all applicable codes and ordinances related to the maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Thus, in light of City and state regulations and code requirements that would, in part, require personnel to be trained in fire prevention and emergency response, maintenance of fire suppression equipment, and implementation of proper procedures for storage and handling of flammable materials, construction impacts on fire protection and emergency medical services would be less than significant.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response, by adding construction traffic to the street network and by necessitating partial lane closures during street improvements and utility installations. These impacts, while potentially adverse, are considered to be less than significant for the following reasons:

- Construction activities are temporary in nature and do not create continuing risks;
- General "good housekeeping" procedures employed by the construction contractors and the work crews (e.g., maintaining mechanical equipment, proper storage of flammable materials, cleanup of spills of flammable liquid) would minimize these hazards; and
- Partial lane closures would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the Project Sites, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Impacts on traffic that could potentially affect emergency response are addressed through a Construction Staging and Traffic Management Plan (CSTMP) (refer to Mitigation Measure TRAFFIC-MM-1), which includes traffic management strategies for Project construction. The CSTMP would outline and dictate how construction operations would be carried out, and would identify specific actions to reduce effects on the surrounding community. The CSTMP would be based on the nature and timing of specific construction activities and other projects in the vicinity.

In addition to traffic, there are a number of factors that influence emergency response, including alarm transfer time, alarm answering and processing time, mobilization time, risk appraisal, geography, distance, traffic signals, and roadway characteristics. While even with the CSTMP, it is acknowledged that the Project would incrementally increase traffic, which could potentially delay emergency response times, the Project's potential impacts are minimal given these other factors.

[152] *https://www.dir.ca.gov/title8/1920.html*

Overall, construction is not considered to be a high-risk activity, and the LAFD is equipped and prepared to deal with construction-related traffic and fires should they occur. Due to the limited duration of construction activities and compliance with applicable codes, Project construction would not be expected to adversely impact firefighting and emergency services to the extent that there would be a need for new or expanded fire facilities in order to maintain acceptable service ratios, response times, or other performance objectives of the LAFD. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, 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. Therefore, impacts associated with construction of the Project would be less than significant.

Operation

As stated previously, the Project would increase the amount of developed square footage on the Project Sites, which in turn, would generate new residents, visitors, and employees at the Project Sites, and could increase the need for fire protection services at the sites. It should be noted that the purpose of the Project is to house and provide services to the existing homeless population already living within the vicinity of the Project Sites. The maximum residential occupancy for the Project would be 1,420, limited by requirements set forth in the regulatory agreement between the Project Applicant and the HCIDLA. Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City.[153] Assuming approximately 2.07 persons-per-unit rate, approximately 887 of the Project's future residents already reside in the City.[154] It is likely that the remaining 533 future residents already live in the City, as well, as discussed in more detail below. However, for purposes of a conservative analysis, it is assumed that the Project could add 533 new residents to the City. In addition, according to the Project Applicant the Project would generate approximately 74 employees.

The paragraphs below discuss the criteria for determining the Project's impacts to fire protection services, including fire flow and response distance.

Fire Flow

Prior to construction of the Project, the Water Operations Division of LADWP would perform a detailed fire-flow study at the time of permit review (plan check) in order to ascertain whether further water system or site-specific improvements would be necessary. In addition, the LAFD would review the plans for compliance with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. Thus, fire flow to the Project Sites would be adequate, and the associated impact would be less than significant.

[153] *The People Concern/OPCC & Lamp Community United, Hazel Lopez, Director of CES and Community Engagement, May 21, 2018.*

[154] *1,420 maximum residents/685 units = 2.07 persons per unit.*

Response Distance

The nearest fire station with an engine and truck company is Station No. 9, approximately 0.2 miles from the Project Sites. Additional fire stations within 2.0 miles include Station Nos. 4 and 10. LAFD's ability to provide adequate fire protection and emergency response services to a site is determined by the response distance and the degree to which emergency response vehicles can successfully navigate the given access ways and adjunct circulation system, which is largely dependent on roadway congestion and intersection level of service (LOS) along the response route. If the response distance standard cannot be achieved for a specific location, then fire sprinkler systems are required. Nonetheless, a fire sprinkler system would be included in the mixed-use buildings for all proposed land uses as part of the Project. Additionally, as stated previously, the Project would be required to comply with applicable City Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, and would be required to include features such as an emergency and standby power system, a fire command center, established emergency procedures, emergency stairways, appropriately-sized exterior graphics, automatic fire-extinguishing system, automatic smoke detection system, emergency voice/alarm communication system, manual alarm fire boxes, etc. Given the close proximity of the closest fire station with an engine and the fire protection systems that would be incorporated into the proposed building, Project impacts related to response distance and time would be less than significant.

Emergency Access

The LAFD would review the Project plans for compliance with the Los Angeles Fire Code, California Fire Code, City of Los Angeles Building Code, and National Fire Protection Association standards, thereby ensuring that the Project would not create any undue fire hazard. The Project would include an emergency response plan that would address the following: mapping of emergency exits, evacuation routes for vehicles and pedestrians, and locations of nearest hospitals and fire departments. Through compliance with applicable provisions of the Fire Code, Project impacts related to emergency access would be less than significant.

Cumulative Impacts

Implementation of the related projects on Table 2-2 in Section 2 (Project Description) could result in a net increase in the number of residents and employees in the Project area and could further increase the demand for fire protection services. Cumulative development requires the LAFD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the Fire Code and other applicable regulations of the LAMC including, but not limited to, automatic fire sprinkler systems for high-rise buildings and/or residential projects located farther than 1.5 miles from the nearest LAFD Engine or Truck Company to compensate for additional response time, and other recommendations made by the LAFD to ensure fire protection safety. Through the process of compliance, the ability of the LAFD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAFD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and

related projects would contribute. Therefore, cumulative impacts related to fire protection services would be less than significant.

(ii) Police protection?

Less Than Significant With Mitigation Incorporated. The LAPD provides police protection services to the Project Sites. As discussed above, the Project would increase the number of residents and employees at the Project Sites. Implementation of the Project could result in an increase in calls for police protection.

A significant impact may occur if the LAPD could not adequately serve a project, necessitating a new or physically altered station. The determination of whether a project could result in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the Project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

Construction

Although there is the potential for Project construction to create an increase in demand for police protection services, the Project would provide security on the Project Sites as needed and appropriate during the construction process. This security includes perimeter fencing, lighting, and security guards, thereby reducing the demand for LAPD services. The specific type and combination of construction site security features would depend on the phase of construction. The Project Applicant would install temporary construction fencing to secure the Project Sites during the construction phase to ensure that valuable materials (e.g., building supplies and metals such as copper wiring), as well as construction equipment are not easily stolen or abused.

During construction, emergency response vehicles can use a variety of options for dealing with traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Lights and other identifying noises compel traffic to pull to the side where available to provide access through traffic. Although minor traffic delays due to potential lane closures could occur during construction, particularly during the construction of utilities and street improvements, impacts to police response times are considered to be less than significant for the following reasons:

(1) Emergency access would be maintained to the Project Sites during construction through marked emergency access points approved by the LAPD;

(2) Construction impacts are temporary in nature and do not cause lasting effects; and

(3) Partial lane closures, if determined to be necessary, would not significantly affect emergency vehicles, the drivers of which normally have a variety of options for avoiding traffic, such as using their sirens to clear a path of travel or driving in the lanes of opposing traffic. Additionally, if there are partial closures to streets surrounding the

Project Sites, flagmen would be used to facilitate the traffic flow until such temporary street closures are complete.

Construction of the Project would not affect the LAPD's ability to respond to emergencies to the extent that there is no a need for any additional new or expanded police facilities, in order to maintain acceptable service ratios, response times, or other performance objectives of the LAPD. Moreover, consistent with *City of Hayward v. Trustees of California State University* (2015) 242 Cal.App.4th 833, 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. For these reasons, Project construction impacts on police services would be less than significant.

Operation

The purpose of the Project is to house and provide services to the existing homeless population already living within the vicinity of the Project Sites. The maximum residential occupancy for the Project would be 1,420 individuals, subject to the requirements set forth in the regulatory agreement between the Project Applicant and the HCIDLA. Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City.[155] Assuming approximately 2.07 persons-per-unit rate, approximately 887 of the Project's future residents already reside in the City.[156] It is likely that the remaining 533 future residents already live in the City, as well, as discussed in more detail below. However, for purposes of a conservative analysis, it is assumed that the Project could add 533 new residents to the City. In addition, according to the Project Applicant the Project would generate approximately 74 employees.

Additionally, the Project would include project design features, namely include security features within the parking facilities and exterior building areas such as appropriate lighting and gated access. The Project would include defensible spaces designed to reduce opportunity crimes and ensure safety and security. In addition, the lighting and landscaping design would ensure high visibility and the Project would provide for on-site security measures and controlled access systems for residents and tenants to minimize the demand for police protection services. The Project would incorporate crime prevention features into the design of the buildings and public spaces, such as lighting of entryways and public areas. The Project would feature the following:

- On-site security personnel;
- Security cameras;
- Perimeter lighting to supplement the street lighting and to provide increased visibility and security;

[155] *The People Concern/OPCC & Lamp Community United, Hazel Lopez, Director of CES and Community Engagement, May 21, 2018.*

[156] *1,420 maximum residents/685 units = 2.07 persons per unit.*

- Parking structure access control; and
- Residential units access control.

As outlined in Mitigation Measure POLICE-MM-1, he Project would provide the LAPD with a diagram of each portion of the Project Sites, showing access routes and additional access information as requested by the LAPD, to facilitate police response. Emergency access to the Project Sites would be provided by the existing street system. The Project's direct minimal population increase and associated demand for police services, along with the provision of on-site security features, coordination with LAFD, and incorporation of crime prevention features, would not require the provision of new or physically altered police stations in order to maintain acceptable service ratios or other performance objectives for police protection. Additionally, the Project would also contribute to the General Fund, a portion of which is allocated to the LAPD and other public services. Therefore, with mitigation, Project impacts related to police protection services would be less than significant.

Mitigation Measure (Public Services – Police Services)

POLICE-MM-1: Prior to issuance of a Certificate of Occupancy, the Project Applicant shall provide the Central Area Commanding Area Officer with diagrams of each portion of the Project Sites. The diagrams shall include access routes and additional information that might facilitate police response.

Cumulative Impacts

Implementation of the related projects listed on Table 2-2 in Section 2 (Project Description) could result in a net increase in the number of residents and employees in the area of the Project Sites and could further increase the demand for police protection services. Cumulative development requires the LAPD to continually evaluate the need for new or physically altered facilities in order to maintain adequate service ratios. Similar to the proposed Project, the related projects would be subject to the site plan review and approval requirements, recommendations of the LAPD related to crime prevention features, and other applicable regulations of the LAMC. Through the process of compliance, the ability of the LAPD to provide adequate facilities to accommodate future growth and maintain acceptable levels of service would be ensured. Furthermore, the increased demands for additional LAPD staffing, equipment, and facilities would be funded via existing mechanisms (e.g., property taxes and government funding) to which the Project and related projects would contribute. Therefore, cumulative impacts related to police protection services would be less than significant.

(iii) Schools?

Less Than Significant Impact. Los Angeles Unified School District (LAUSD) provided a list of LAUSD schools that serve the Project Sites and area are shown on Table 6-53. As shown on Table 6-54, the Project would generate a total of approximately 311 students, including 1555 elementary students, 42 middle school students, and 114 high school students. The elementary and middle schools and the Belmont High School Zone serving the Project Sites are currently operating over capacity, whereas the Jefferson High School Zone serving the Project Sites is operating under capacity. However, pursuant to

the California Government Code Section 65995, the Project's required payment of the school fees established by the LAUSD in accordance with existing rules and regulations regarding the calculation and payment of such fees would, by law, provide full and complete mitigation for any potential direct and indirect impacts to schools as a result of the Project. Therefore, Project impacts to school services would be less than significant.

Table 6-53
LAUSD School's Serving the Area of the Project Sites
Student Capacity and Enrollment

School Type (Grade)	School Name	Location	Capacity (students)	Actual Enrollment (students)	(-)Under / (+)Over Capacity (students)
Elementary School	9th Street Elementary School	835 Stanford Avenue	360	342	+73
Middle School	Hollenbeck Middle School	2510 East 6th Street	1,453	1,073	+83
High School	Belmont High School Zone	Various	7,041	5,331	+109
High School	Jefferson High School Zone	Various	5,706	4,466	-2,195

Source: LAUSD, Rena Perez, Director, November 16, 2017 (refer to Appendix L).

Table 6-54
Estimated Project Student Generation

Land Use	Size	School Type	Student Generation Rate[1]	Total Students Generated[2]
Residential	685 du	Elementary (K-6)	0.2269/du	155
		Middle (7-8)	0.0611/du	42
		High (9-12)	0.1296/du	114
			Total	**311**

du = dwelling unit

[1] *Los Angeles Unified School District, Student Generation Rate Calculation, Table 3, March 2017.*
According to the 2017 Greater Los Angeles Homeless Count, approximately 6.0 percent of the homeless population in Council District 14 (the Council District in which the Project Sites are located) is school-aged children. As such, the total number of students estimated for the Project is conservative.

Cumulative Impacts

The related projects listed on Table 2-2 in Section 2 (Project Description) could result in an increase in the number students in the Project area. However, similar to the applicant of the proposed Project, the applicants of all the related projects would be required to pay the applicable school fees to the LAUSD to

ensure that no significant impacts to school services would occur. Therefore, cumulative impacts to school services would be less than significant.

(iv) Parks?

Less Than Significant Impact. The Los Angeles Department of Recreation and Parks (LADRP) operates and maintains park and recreational services and facilities in the area of the Project Sites. Parks and recreational facilities that serve the Project Sites and area are shown on Table 6-55.

Table 6-55
Parks and Recreation Facilities

Park/Recreation Facility Name	Address
Neighborhood Parks within 2.0-mile radius	
6th and Gladys Street Park	824 E 6th Street
Arts District Park	501 S Hewitt Street
Grand Hope Park	900 S. Hope Street
Hope and Peace Park	843 Bonnie Brae Street
Orthopedic Hospital Universal Access Playground	2400 S. Flower Street
Patton Street Pocket Park	317-327 Patton Street
Prospect Park	612 N. Echandia Street
Rockwood Community Park	1571 Rockwood Street
San Julian Park	312 E. 5th Street
Spring Street Park	428 S. Spring Street
Unidad Park	1644-48 Beverly Boulevard
Community Parks within 5.0-mile radius	
Aliso-Pico Recreation Center	370 S. Clarence Street
Alpine Recreation Center	817 Yale Street
Augustus F. Hawkins Natural Park	5790 Compton Avenue
Bellevue Recreation Center	826 Lucille Avenue
Boyle Heights Sports Center	933 S. Mott Street
Carlin G. Smith Recreation Center	511 W. Avenue 46
Central Recreation Center	1357 E. 22nd Street
Cypress Recreation Center	2630 Pepper Avenue
Denker Recreation Center	1550 W. 35th Place
Downey Pool	1775 N. Spring Street
Downey Recreation Center	1772 N. Spring Street
Echo Park	751 Echo Park Boulevard
Echo Park Boys and Girls	303 Patton Street
Echo Park Deep Pool	1419 Colton Street
El Sereno Recreation Center	4721 Klamath Street
El Sereno Senior Citizens Center	4818 Klamath Place
Elysian Valley Recreation Center	1811 Ripple Street
Evergreen Recreation Center	2839 E. 4th Street
EXPO Center	3980 S. Menlo Avenue
Fred Roberts Recreation Center	4700 Honduras Street
Gilbert W. Lindsay Community Center	429 E. 42nd Place
Hazard Park	2230 Norfolk Street
Hollenbeck Park	415 S. St. Louis Street
Hostetter Park	3141 E. Olympic Boulevard
James Slauson Recreation Center	5306 S. Compton Avenue

Table 6-55
Parks and Recreation Facilities

Park/Recreation Facility Name	Address
Lafayette Park	2830 W. 6th Street
Lake Street Park	227 N. Lake Street
Lemon Grove Recreation Center	4959 Lemon Grove Avenue
Lincoln Heights Recreation Center	2303 Workman Avenue
Lincoln Heights Youth Center	2500 Griffin Avenue.
Lincoln Park	3501 Valley Boulevard
Loren Miller Recreation Center	2717 Halldale Avenue
MacArthur Park	2230 W. 6th Street
Martin Luther King Jr. Park	3934 S. Western Avenue
Miguel Contreras Learning Center Pool	322 S. Lucas Avenue
Montecito Heights Recreation Center	4545 Homer Street
Msgr. Ramon D. Garcia Recreation Center	1016 S. Fresno Avenue
Normandie Recreation Center	1550 S. Normandie Avenue
Parkview Photo Center,	2332 W. 4th Street
Pecan Recreation Center	127 S. Pecan Street
Pershing Square	525 S. Olive Street
Pueblo del Rio Recreation Center	5350 Alba Street
Queen Anne Recreation Center	1240 West Boulevard
Ramona Gardens Park	2830 Lancaster Avenue
Ramona Gardens Recreation Center	2830 Lancaster Avenue
Ramona Hall Community Center	4580 N. Figueroa Street
Rio de Los Angeles State Park	1900 N. San Fernando Road
Roosevelt High School Pool	456 S. Mathews Street
Rose Hill Park	3606 Boundary Avenue
Rose Hill Recreation Center	4530 Mercury Avenue
Seoul International Park	3250 San Marino Street
Shatto Recreation Center	3191 W. 4th Street
Silverlake Recreation Center and Dog Park	1850 W. Silverlake Boulevard
South Los Angeles Sports Activity Center	7020 S. Figueroa Street
South Park Recreation Center	345 E. 51st Street
South Seas House Park	2301 W. 24th Street
State Street Recreation Center	716 N. State Street
Sycamore Grove Park	4702 N. Figueroa Street
Toberman Recreation Center	1725 Toberman Street
Trinity Recreation Center	2415 Trinity Street
Vista Hermosa Soccer Field	1301 W. 1st Street
Wabash Recreation Center	2765 Wabash Avenue
Regional Parks within 10.0-mile radius	
Arroyo Seco Park	5568 Via Marisol
Ascot Hills Park	4371 Multnomah Street
Barnsdall Park	4800 Hollywood Boulevard
Cahuenga Peak Phase I	3698 W. Wonderview Road (in Griffith Park)
Cahuenga Peak Phase II	3698 W. Wonderview Road (in Griffith Park)
Campo de Cahuenga	3919 Lankershim Boulevard
Charles F. Lummis Home	200 E. Avenue 43
Cheviot Hills Park	2551 Motor Avenue
Elysian Park	929 Academy Road
Ernest E. Debs Regional Park	4235 Monterey Road
Exposition Park Rose Garden	701 State Drive

Table 6-55
Parks and Recreation Facilities

Park/Recreation Facility Name	Address
Griffith Park	4730 Crystal Springs Drive
Griffith Park Boys Camp	4730 Crystal Springs Drive (in Griffith Park)
Harding Golf Course	4730 Crystal Springs Drive (in Griffith Park)
Heritage Square	3800 Homer Street
Hollywoodland Girl's Camp	3200 Canyon Drive (in Griffith Park)
L.A. Equestrian Center	500 Riverside Drive (in Griffith Park)
L.A. Live Steamers	5202 Zoo Drive (in Griffith Park)
Los Feliz Golf Course	3207 Los Feliz Boulevard
Rancho Park Golf Course	10460 Pica Boulevard
Roosevelt Golf Course	2650 N. Vermont Avenue (in Griffith Park)
Runyon Canyon Park	2000 N. Fuller Avenue
Rustic Canyon Park	SW of Sullivan Fire Road
South L.A. Wetlands Park	5413 S. Avalon Boulevard
Travel Town Museum	Griffith Park Drive near Zoo Drive (in Griffith Park
Wattles Garden Park	1824 N. Curson Avenue
White Point Park Nature Preserve	1600 S. Paseo del Mar
Wilson Golf Course	4730 Crystal Springs Drive (in Griffith Park)

[1] *Written correspondence from Darryl Ford, Senior Management Analyst I, Los Angeles Department of Recreation and Parks, November 17, 2016. Refer to Appendix L.*

A breakdown of common open space components for Site 1 and 2 are shown on Tables 6-56 and 6-57, respectively. All of the Project's proposed 685 dwelling units would have fewer than three habitable rooms, for which LAMC Section 12.21 G requires 100 square feet of open space per dwelling unit. Based on this standard, the Project would be required to provide 59,500 square feet of open space. Pursuant to LAMC Section 11.5.11(e) and California Government Code 65915(k), the Project Applicant is requesting approval to reduce the required open space square footage on Site 1 by 33 percent. For Site 2, the Project Applicant is requesting an incentive to permit 27 percent (9,145 square feet) of the common open space be provided in interior common areas and 30 percent (or 10,040 square feet) of the provided open space to be covered by a structure or trellis in lieu of the requirements of LAMC Section 12.21 G that limits the interior common areas to 25 percent of required (or 7,574 square feet) and mandates all exterior areas to be open to the sky.

To encourage the development of affordable housing, the City's Greater Downtown Housing Incentive Area Ordinance allows for a 50 percent reduction of open space – a reduction that is larger reduction than the reductions requested by the Project Applicant. Even with the requested reductions, the Project would provide 59,060 square feet of open space, specifically tailored to formerly homeless individuals. The open spaces would include exterior and interior areas, providing passive enjoyment as well as allowing for an extensive array for social services for each resident. A portion of the open space areas is exterior spaces covered by building structure or trellis/solar arrays. Technically, these areas would not count toward the Project's LAMC-required open space requirements, but they would be an important amenity to high-density affordable housing.

Table 6-56
Common Open Space Components for Site 1 Development

Common Open Space Component	Size
Tower 1A	
Exterior Open Space (Open to Sky)	
Level 1 Courtyard	1,800 sf
Level 3 Garden Court	1,290 sf
Subtotal	*3,090 sf*
Exterior Open Space (Not Open to Sky)	
Level 3	445 sf
Levels 6 & 7	1,400 sf
Level 12	700 sf
Level 13	850 sf
Level 18	3,910 sf
Subtotal	*7,305 sf*
Interior Recreation Room	4,395 sf
Level 1	5,405 sf
Level 3	9,800 sf
Subtotal	
Total Tower 1A	***20,195 sf***
Tower 1B	
Exterior Open Space (Open to Sky)	
Level 1 Courtyard	2,260 sf
Level 12 Open Deck	1,120 sf
Subtotal	*3,380 sf*
Interior Recreation Room	
Level 1	1,415 sf
Level 12	1,070 sf
Subtotal	*2,485 sf*
Total Tower 1B	***5,865 sf***
Total	**26,060 sf**
sf = square feet	

Table 6-57
Common Open Space Components for Site 2 Development

Common Open Space Component	Size
Exterior Common Space	
Level 1 Courtyard	13,815 sf
Interior Recreation Room(s)	
Level 3	1,600 sf
Level 4 – Tower	5,000 sf
Level 19	2,545 sf
	9,145 sf
Exterior Covered Decks	
Level 4 – Parking Structure	5,050 sf
Levels 7 & 8	1,430 sf
Levels 15 & 16	1,430 sf
Level 19	2,130 sf
Total Interior	10,040 sf
Total	**33,000 sf**
sf = square feet	

Section 12.33 of the LAMC requires applicants of new residential projects to pay applicable park fees based on the number of residential units to be developed. However, in accordance with Section 12.33 C.3 of the LAMC, affordable housing units are exempt from the park fees payment requirements. Of the 685 proposed residential units, 676 units would be affordable units, and 9 units would be market-rate manager's units. Thus, the Project Applicant would be required to pay park fees for the 9 manager's units.

As discussed, the Project would meet LAMC open space requirements with the requested reductions, which are consistent with the Greater Downtown Housing Incentives, and would be required to pay applicable park fees. Through compliance with the LAMC, Project impacts related to parks and recreational facilities would be less than significant.

Cumulative Impacts

The related projects listed on Table 2-2 in Section 2 (Project Description) could result in an increase demand for parks and recreational services. The extent to which the related residential projects include parks/recreational amenities is unknown. However, the applicants of these projects would be required to meet LAMC open space requirements and would be subject to the park fees pursuant to LAMC Section 12.33, ensuring that any potential impacts to parks and recreational facilities would be less than significant. As stated previously, the Project would not result in any significant impacts related to parks and recreational facilities. Therefore, cumulative impacts to park and recreational facilities would be less than significant.

(v) Other public facilities?

Libraries

Less Than Significant Impact. The libraries that serve the Project area include those shown on Table 6-58. On February 8, 2007, the Board of the Library Commissioners approved a new Branch Facilities Plan, which includes criteria for developing new libraries and recommends new size standards for the provision of Los Angeles Public Library (LAPL) facilities, including the following:[157]

- A 12,500 square-foot facility for a community with less than 45,000 population.
- A 14,500 square-foot facility for a community with more than 45,000 population and up to a 20,000 square-foot for a Regional Branch.
- An additional Branch Library should be developed for a population equal to or in excess of 90,000 persons.

Table 6-58
Libraries Serving the Project Area

Library	Size (sf)	Collection Size/ Circulation	Staffing Levels	Service Population
Richard J. Riordan Central Library 630 5th Street	538,000	Volumes - 2.6 million Circulation – 1.2 million	390 staff	3,792,622 39,818,605
Chinatown Branch Library 639 N. Hill Street	14,500	Volumes - 74,709 Circulation – 193,627	13.5 staff	11,225
Echo Park Branch Library 1410 W. Temple Street	17,543	Volumes – 43,689 Circulation – 93,418	9.5 staff	52,842
Little Tokyo Branch Library 203 S. Los Angeles St.	12,500	Volumes – 66,634 Circulation – 142,247	10 staff	45,796
Benjamin Franklin Branch Library 2200 E. 1st Street	9,656	Volumes – 35,545 Circulation – 98,218	11 staff	40,319

sf = square feet

Source: Los Angeles Public Library, Thomas Jung, Management Analyst II, May 11, 2018. (Refer to Appendix L.)

[157] *Los Angeles Public Library, Thomas Jung, Management Analyst II, May 11, 2018. (Refer to Appendix L.)*

The purpose of the Project is to house and provide services to the existing homeless population already living within the vicinity of the Project Sites. The Project includes the development of up to 685 new residential dwelling units, including 451 permanent supportive units, an additional 225 units that would be affordable rental units, and 9 manager units, and up to a maximum of 5,450 square feet of retail, 25,493 square feet of philanthropic, and 17,100 square feet of office uses. The maximum residential occupancy for the Project would be 1,420 individuals, subject to the requirements set forth in the regulatory agreement between the Project Applicant and the HCIDLA. Approximately 95 percent of the future residents of the 451 permanent supportive units would be previously homeless people from within the City.[158] Assuming approximately 2.07 persons-per-unit rate, approximately 887 of the Project's future residents already reside in the City.[159] It is likely that the remaining 533 future residents already live in the City. However, for purposes of a conservative analysis, it is assumed that the Project could add 533 new residents to the City.

Moreover, the Project would provide on-site computers, Internet access, and on-site library facilities, including an art and music library space, reference books, and other books for loan to Project residents. It is anticipated that most, if not all, of the demand for library services created by the Project would be accommodated by the Project. For these reasons, the Project would not create the need for new or expanded library facilities. Therefore, Project impacts related to library services would be less than significant.

Cumulative Impacts

Implementation of the related projects listed on Table 2-2 in Section 2 (Project Description) could increase the demand for library services in the Project area. The related residential projects would be subject to the standards to determine demand for library facilities used by the City, and would likely be required to implement mitigation where applicable. As such, the demand for library services created by these residential projects could be accommodated, and impacts would be less than significant. As stated previously, the Project would not result in any significant impacts related to library services. Therefore, cumulative impacts to library services would be less than significant.

15. RECREATION

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

Less Than Significant Impact. Refer to the response to Checklist Question 14(a)(iv) (Public Services - Parks). A breakdown of common open space components for Site's 1 and 2 are shown on Tables 6-57 and 6-58, respectively. All of the Project's proposed 685 dwelling units would have fewer than three habitable rooms, for which LAMC Section 12.21 G requires 100 square feet of open space per dwelling unit.

[158] *The People Concern/OPCC & Lamp Community United, Hazel Lopez, Director of CES and Community Engagement, May 21, 2018.*

[159] *1,420 maximum residents/685 units = 2.07 persons per unit.*

Based on this standard, the Project would be required to provide 68,500 square feet of open space. Pursuant to LAMC Section 11.5.11(e) and California Government Code 65915(k), the Project Applicant is requesting to reduce the required open space square footage on Site 1 by 33 percent and increase the allowable square footage of interior and covered open space that can be counted toward the total open space requirement by 200 percent. For Site 2, the Project Applicant is requesting approval to increase the allowable square footage of interior and covered open space that can be counted toward the total open space requirement by 250 percent.

To encourage the development of affordable housing, the City's Greater Downtown Housing Incentive Area Ordinance allows for a 50 percent reduction of open space – a reduction that is larger reduction than the reductions requested by the Project Applicant. Even with the requested reductions, the Project would provide 59,060 square feet of open space, specifically tailored to formerly homeless individuals. The open spaces would include exterior and interior areas, providing passive enjoyment as well as allowing for an extensive array for social services for each resident. A portion of the open space areas is exterior spaces covered by building structure or trellis/solar arrays. Technically, these areas would not count toward the Project's LAMC-required open space requirements, but they would be an important amenity to high-density affordable housing..

Section 12.33 of the LAMC requires applicants of new residential projects to pay applicable park fees based on the number of residential units to be developed. However, in accordance with Section 12.33 C.3 of the LAMC, affordable housing units are exempt from the park fees payment requirements. Of the 685 proposed residential units, 676 units would be affordable units, and 9 units would be market-rate manager's units. Thus, the Project Applicant would be required to pay park fees for the 9 manager's units. As discussed, the Project would meet LAMC open space requirements and would be required to pay applicable park fees. Through compliance with the LAMC, Project impacts related to parks and recreational facilities would be less than significant.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. The Project includes development of private and public open space areas that are inclusive of the mixed-use development and are required to meet the City's open space requirement. The assessment of impacts associated with development of these open space facilities is inclusive of the assessment of impacts associated with the Project in its entirety. No direct significant impacts would occur as a result of development of the open space facilities.

Cumulative Impacts

Refer to discussion of cumulative impacts related to parks and recreational facilities under response to Checklist Question 14(a)(iv) (Public Services – Parks).

16. TRANSPORTATION/TRAFFIC

a) 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?

Less Than Significant With Mitigation Incorporated. The analysis in this section is based on the following (refer to Appendix M):

- *Weingart Projects Traffic Impact Study, Linscott, Law & Greenspan Engineers, March 13, 2018.*
- *Transportation Impact Assessment for the Proposed Weingart Mixed-Use/Affordable Housing Projects, Clearance Letter, LADOT, May 3, 2018.*
- *Weingart Projects Construction Traffic Analysis, Linscott, Law & Greenspan Engineers, May 4, 2018.*

The Traffic Impact Study was approved by LADOT on May 3, 2018 (refer to Appendix M). Under SB 375, when going forward with an SCEA (such as this document), project-specific and cumulative impacts associated with cars and light trucks on the regional transportation network are not required to be assessed, pursuant to PRC 21155.2(b) and 21159.28(a). To the extent that these impacts are included herein is done so for informational purposes, only.

Study Intersections

Through coordination between Linscott, Law & Greenspan Engineers (LLG) and LADOT staff, seven study intersections were identified for evaluation during the weekday morning and afternoon peak hours. The study intersections provide both regional and local access to the study area and define the extent of the boundaries for this traffic impact analysis.

The traffic analysis study area generally comprises those locations that have the greatest potential to experience significant traffic impacts due to the Project, as defined by the City as Lead Agency under CEQA. In The traffic engineering practice, the study area generally includes those intersections that meeting the following criteria:

a. Immediately adjacent or in close proximity to the project site;

b. In the vicinity of the project site that are documented to have current or projected future adverse operational issues; and

c. In the vicinity of the project site that are forecast to experience a relatively greater percentage of project-related vehicular turning movements (e.g., at freeway ramp intersections).

The study intersections selected for analysis were based on the above criteria, the Projects' calculated peak-hour vehicle trip generation, the anticipated distribution of Project vehicular trips, and existing intersection/corridor operations. LADOT confirmed the appropriateness of the seven study intersections when it entered into a traffic study Memorandum of Understanding (MOU) for the Project (refer to

Appendix M). The list of study intersections is presented on Table 6-59, and the study locations are shown on Figure 6-2.

Table 6-59
List of Study Intersections

No.	Intersection	Traffic Control	Jurisdiction(s)
1	Los Angeles Street/6th Street	Signalized	City of Los Angeles
2	San Pedro Street/4th Street	Signalized	City of Los Angeles
3	San Pedro Street/5th Street	Signalized	City of Los Angeles
4	San Pedro Street/6th Street	Signalized	City of Los Angeles
5	San Pedro Street/7th Street	Signalized	City of Los Angeles
6	San Pedro Street/8th Street	Signalized	City of Los Angeles
7	Central Avenue/6th Street	Signalized	City of Los Angeles
Source: Linscott, Law & Greenspan Engineers, 2018. Refer to Appendix M.			

Methodologies

Based on LADOT's Transportation Impact Study Guidelines (December 2016), this study uses the Critical Movement Analysis (CMA) methodology for the analysis and evaluation of traffic operations at signalized intersections under the City's jurisdiction, as detailed in Circular Number 212 published by the Transportation Research Board (TRB).[160] This analysis technique describes the operating characteristics of an intersection in terms of the "Level of Service" (LOS) based on intersection traffic volume and other variables such as number and type of signal phasing, lane geometries, and other factors which determine both the quantity of traffic that can move through an intersection (Capacity) and the quality of that traffic flow (LOS).

"Capacity" represents the maximum total hourly volume of vehicles in the critical lanes that has a reasonable expectation of passing through an intersection under prevailing roadway and traffic conditions. Critical lanes are defined generally as those intersection movements or groups of movements which exhibit the highest "per lane" volumes, thus defining the maximum amount of vehicles attempting to travel through the intersection during a specific time period. The capacity of an intersection also varies based on the number of signal phases for the location; more signal phases generally result in more "lost" or "startup" time, as drivers exhibit slight reaction delays when signal indications change from "red" to "green." For the CMA analysis methodology, the intersection capacities associated with the various levels of service are therefore based on the number of traffic signal phases, as shown on Table 6-60.

[160] *Interim Materials on Highway Capacity, Circular Number 212, Transportation Research Board, Washington, D.C., 1980.*

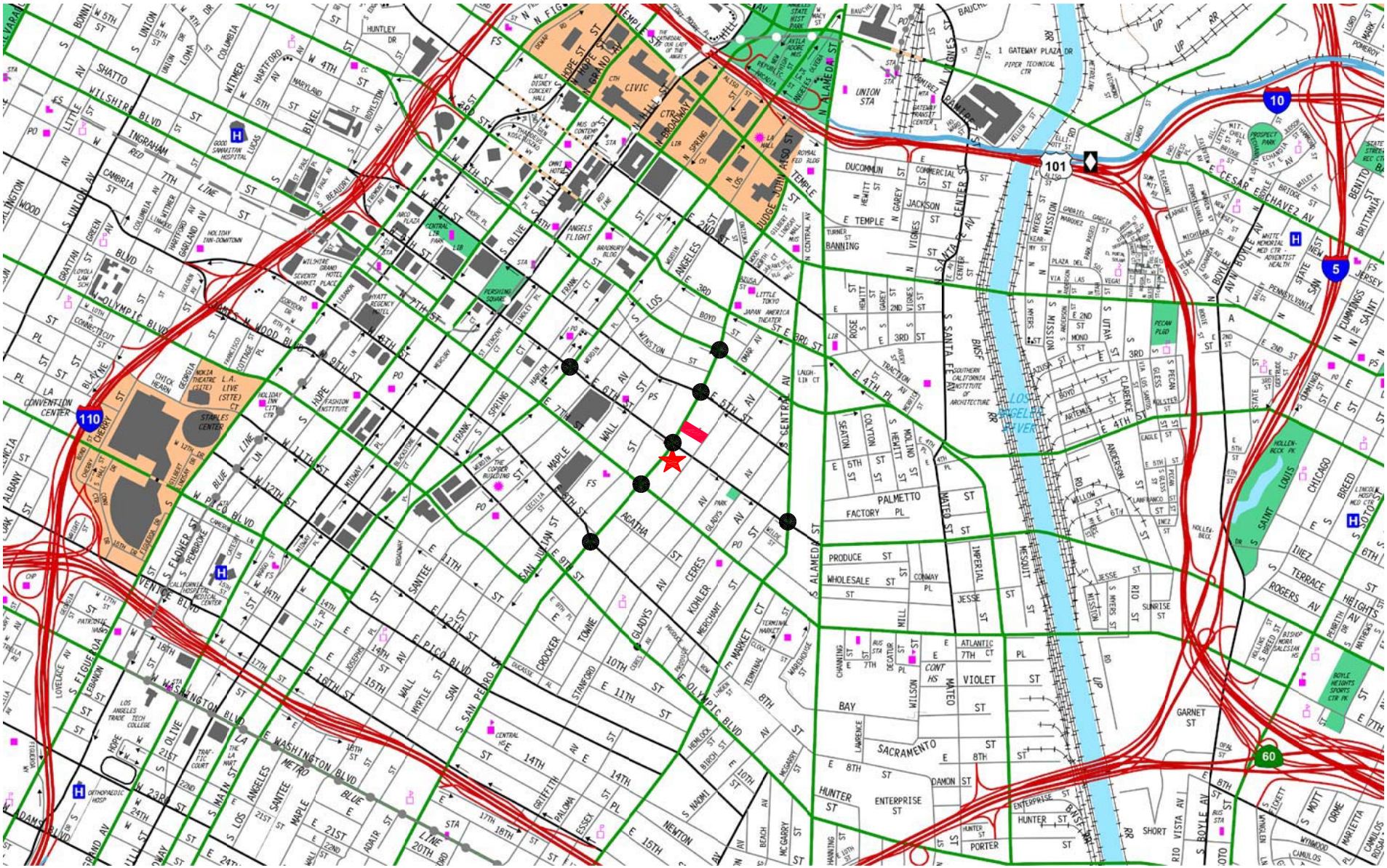


Figure 6-2
Study Area

Source: Linscott, Law & Greenspan, Engineers, 2018.

Table 6-60
CMA Volume Ranges per LOS*

LOS	Maximum Sum of Critical Volumes (VPH) vs. Number of Signal Phases		
	Two Phases	Three Phases	For or More Phases
A	900	855	825
B	1,050	1,000	965
C	1,200	1,140	1,100
D	1,350	1,275	1,225
E	1,500	1,425	1,375
F	NA	NA	NA

* *For planning applications only. Not appropriate for operations/design applications.*

For the intersection evaluation and transportation planning purposes of this traffic study, LADOT policy requires that the maximum "baseline" capacity of an intersection equate to the value associated with LOS E shown on Table 6-60. This value represents the highest volume of traffic that can be adequately accommodated through urban area intersections without a breakdown in operations, resulting in unstable traffic flows, high levels of congestion, and long delays.

The "Critical Movement" indices at an intersection are determined by first identifying the sum of the critical lane traffic volumes at the intersection. This total traffic *volume* value, which represents the most critical intersection demand, is then divided by the appropriate intersection *capacity* value for the type of signal control at the intersection, to determine the "CMA value" for the intersection that is roughly equivalent to its volume-to-capacity ratio.

LOS describes the quality of traffic flow through the intersection. LOS A through LOS C exhibit good traffic flow characteristics, with little congestion. LOS D is typically the level for which metropolitan area street systems are designated, and represents the highest level of acceptable congestion and delay. LOS E defines conditions at or near the capacity of an intersection, and is characterized by short-duration stoppages and unstable traffic flows at its upper range. LOS F occurs when a facility is overloaded, and is characterized by stop-and-go traffic with long duration delays. Note that the LOS definitions do not represent a single operating condition, but rather correspond to a range of CMA values, as shown on Table 6-61.

Table 6-61
LOS Definitions for Signalized Intersections (CMA Method)

LOS	Intersection Capacity Utilization	Definition
A	0.000 - 0.600	EXCELLENT. No vehicle waits longer than one red light and no approach phase is fully used.
B	0.601 - 0.700	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	GOOD. Occasionally drivers may have to wait through more than one red light; backups may develop behind turning vehicles.
D	0.801 - 0.900	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	POOR. Represents the most vehicles intersection approaches can accommodate; may be long lines of waiting vehicles through several cycles.
F	> 1.000	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.

Source: Transportation Research Board, Transportation Research Circular No. 212, Interim Materials on Highway Capacity, 1980.

Existing Conditions

Existing Street System

Regional Highway System

Regional vehicular access to the Project Sites is provided by the U.S. 101 (Hollywood) Freeway. Additional freeways providing indirect access to the Project Sites include the I-10 (Santa Monica) Freeway and State Route 110/I-110 (Pasadena/Harbor) Freeway. Brief descriptions of the Hollywood Freeway, Pasadena/Harbor Freeway and Santa Monica Freeway are provided in the following paragraphs.

U.S. 101 (Hollywood) Freeway is generally a north-south oriented freeway connecting Downtown Los Angeles to the San Fernando Valley within the Los Angeles region. In the vicinity of the Project Sites, the U.S. 101 Freeway alignment runs in a northwest to southeast direction. Four mainline travel lanes are provided in each direction on the U.S. 101 Freeway. Within the general area of the Project Sites, on and/or off-ramps are provided at Broadway-Aliso Street, Spring Street, Los Angeles Street, and Alameda Street.

SR-110/I-110 (Pasadena/Harbor) Freeway is a major north-south oriented freeway connecting Pasadena to the north with the San Pedro area to the south. The SR-110/I-110 Freeway generally contains four mainline freeway lanes in each direction in the vicinity of the Project Sites. The Harbor Freeway Transitway located south of the Project Sites and Downtown Los Angeles, includes two elevated express

lanes in each direction (which requires the use of a FasTrak Flex transponder). Within the general area of the Project Sites, on and/or off-ramps are provided at 3rd Street, 4th Street, 5th Street, and 6th Street.

I-10 (Santa Monica) Freeway is a major east-west oriented freeway connecting Santa Monica to the west to the Inland Empire to the east. The I-10 Freeway generally contains four mainline freeway lanes in each direction along with auxiliary lanes in the Downtown area. Within the general area of the Project Sites, in the eastbound direction on the I-10 Freeway, off-ramps are provided at Grand Avenue and Maple Street. In the westbound direction on the I-10 Freeway, off-ramps are provided at Los Angeles Street and Hoover Street/20th Street.

Roadway Classifications

The City utilizes the roadway categories recognized by regional, state, and federal transportation agencies. There are four categories in the roadway hierarchy, ranging from freeways with the highest capacity to two-lane undivided roadways with the lowest capacity. The roadway categories are summarized as follows:

Freeways are limited-access and high speed travel ways included in the state and federal highway systems. Their purpose is to carry regional through-traffic. Access is provided by interchanges with typical spacing of one mile or greater. No local access is provided to adjacent land uses.

Arterial roadways are major streets (e.g., Boulevard and Avenue designations) that primarily serve through-traffic and provide access to abutting properties as a secondary function. Arterials are generally designed with two to six travel lanes and their major intersections are signalized. This roadway type is divided into two categories: principal and minor arterials. Principal arterials are typically four-or-more lane roadways and serve both local and regional through-traffic. Minor arterials are typically two-to-four lane streets that service local and commute traffic.

Collector roadways are streets that provide access and traffic circulation within residential and non-residential (e.g., commercial and industrial) areas. Collector roadways connect local streets to arterials and are typically designed with two through travel lanes (i.e., one through travel lane in each direction) that may accommodate on-street parking. They may also provide access to abutting properties.

Local roadways distribute traffic within a neighborhood, or similar adjacent neighborhoods, and are not intended for use as a through-street or a link between higher capacity facilities such as collector or arterial roadways. Local streets are fronted by residential uses and do not typically serve commercial uses.

Alleys are common throughout the Downtown area as well as throughout the City. Alleys parallel to major and secondary highways provide an essential service function, enable limitations on curb cuts, and assist traffic flow on arterial streets.

Local Street System

All seven study intersections are currently controlled by traffic signals. The existing roadway configurations and intersection controls at the study intersections are displayed on Figure 6-3, and descriptions of the existing roadways (e.g., number of travel lanes, median type, and speed limit) are provided on Table 6-62.

Transit Services

Extensive public bus and rail transit service is provided within the Project study area. Public bus transit service in the immediate Project study area is currently provided by Metro, City of Gardena Transit, and City of Montebello Bus Lines. Additional public bus transit service in the Downtown Los Angeles area is provided by Foothill Transit, LADOT DASH Transit Service, Orange County Transportation Authority, and Torrance Transit Service. The Metro Red and Gold lines also are provided in proximity to the Project Sites. Metro's nearest Purple/Red line station is the Pershing Square station, which is located 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted previously, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. Walk Score calculates a transit score based on the number and proximity of bus and rail routes, which generates a transit score of approximately 95 (Rider's Paradise) out of 100 for the Project Sites.[161] A summary of the existing transit service, including the transit route, destinations and peak-hour headways is presented on Table 6-63. The existing public transit routes in the vicinity of the Project Sites are illustrated on Figure 6-4.

[161] *Refer to http://www.walkscore.com/, which generates the transit score for the project site. Walk Score calculates the transit score of an address by locating nearby bus/rail transit routes and stops. Walk Score measures how easy it is to live a car-lite lifestyle—not how pretty the area is for using transit service.*

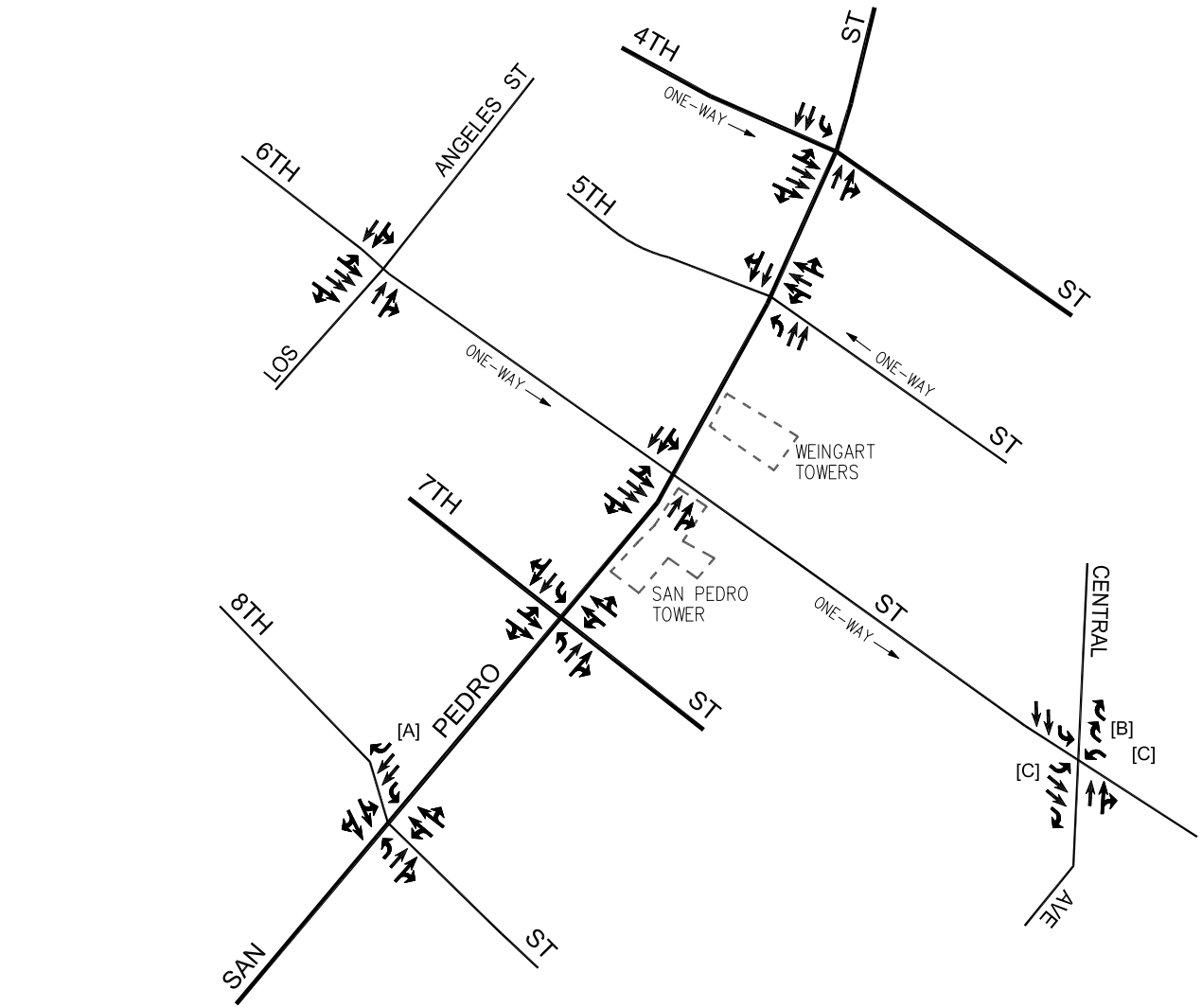


Figure 6-3
Existing Lane Configurations

Source: Linscott, Law & Greenspan, Engineers, 2018.

Table 6-62
Existing Roadway Descriptions

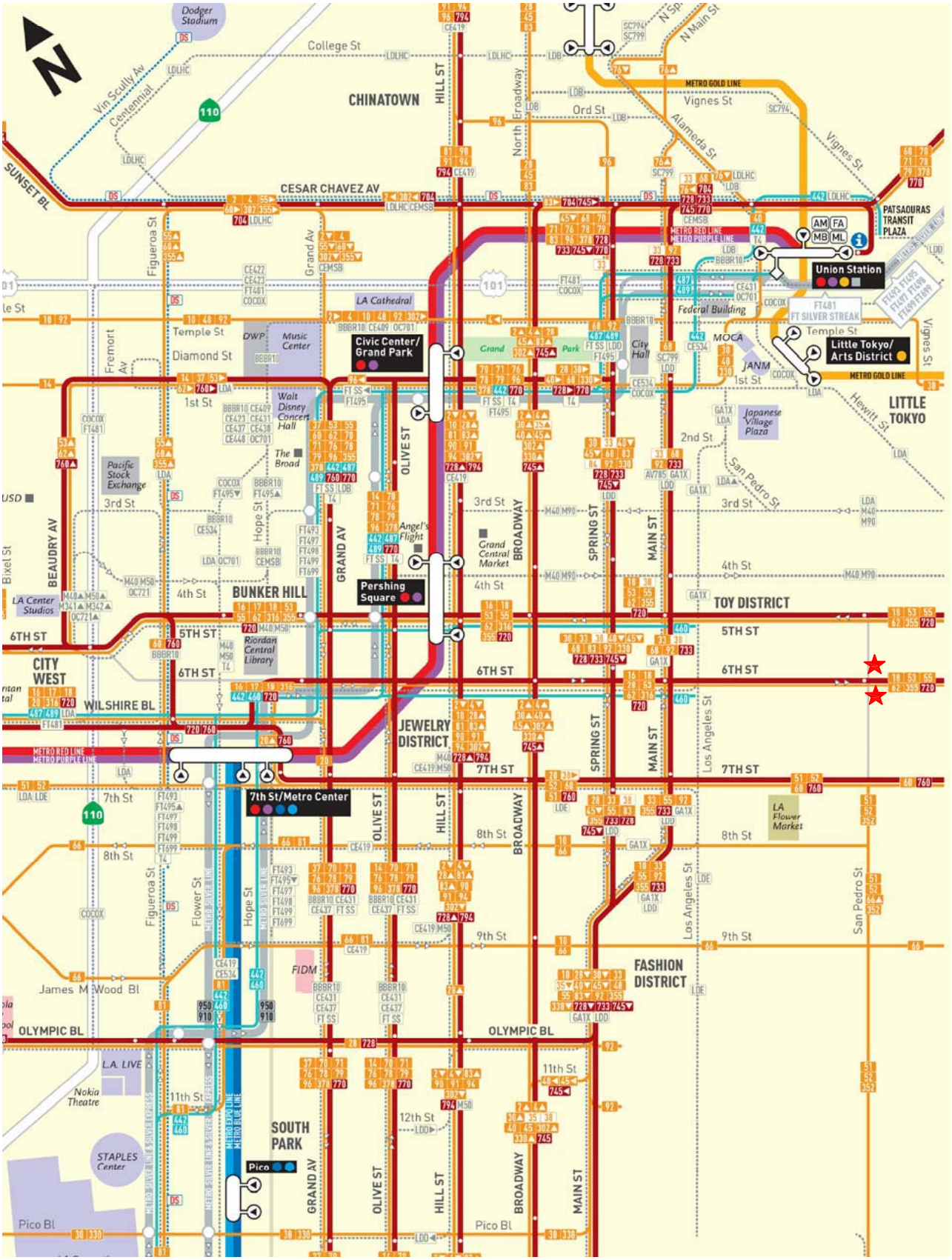
Roadway	Classification [1]	Travel Lanes		Median Types [4]
		Direction [2]	No. Lanes [3]	
Los Angeles Street	Avenue II	N-S	4	N/A
San Pedro Street (East of Los Angeles Street)	Avenue II	N-S	4	N/A
Central Avenue (9^{th} St to 2^{nd} St)	Avenue I	N-S	4	2WLT/NA
4^{th} Street (Broadway to San Pedro St)	Avenue III	E	4	N/A
4^{th} Street (San Pedro St to Alameda St)	Avenue II	E	4	N/A
5^{th} Street (Broadway to Los Angeles St)	Avenue III	W	4	N/A
5^{th} Street (Los Angeles St to Alameda St)	Avenue II	W	4	N/A
6^{th} Street (Flower St to Los Angeles St)	Avenue III	E	4	N/A
6^{th} Street (Los Angeles St to Central Ave)	Avenue II	E	4	N/A
6^{th} Street (Central Ave to Mateo St)	Avenue II	E-W	4	N/A
7^{th} Street	Avenue II	E-W	4	N/A
8^{th} Street (Olive St to Main St)	Avenue III	E-W	4	N/A
8^{th} Street (Main St to Central Ave)	Avenue II	E-W	4	N/A

Notes:
[1] Roadway classifications obtained from the City of Los Angeles Mobility Plan 2035, Adopted January 20, 2016.
[2] Direction of roadways in the project area: NB-SB – northbound and southbound; and EB-WB – eastbound and westbound.
[3] Number of lanes in both directions of the roadway.
[4] Median type of the road RMI – Raised Median Island; 2 WLT – 2-Way Left-Turn Lane; and N/A – Not Applicable.
Source: Linscott, Law & Greenspan Engineers, 2018. Refer to Appendix M.

Table 6-63
Existing Transit Routes [1]

Route	Destinations	Roadway(s) Near the Project Sites	No. of Buses/Trains During Peak Hour		
			DIR	AM	PM
Metro 17	Century City to Downtown Los Angeles via Culver City, West Hollywood, Beverly Grove, Hancock Park and Los Angeles	Los Angeles Street, 6th Street	EB WB	2 2	2 2
Metro 18	Wilshire Center to Montebello via Downtown Los Angeles, Boyle Heights and East Los Angeles	Los Angeles Street, San Pedro Street, Central Avenue, 5th Street, 6th Street	EB WB	6 6	8 11
Metro 51/52/352	Wilshire Center to Compton via Westlake, Downtown Los Angeles, Los Angeles and Harbor Gateway	San Pedro Street, 7th Street, 8th Street	NB SB	15 14	14 13
Metro 53	Carson to Downtown Los Angeles via Compton and Los Angeles	Los Angeles Street, San Pedro Street, Central Avenue, 5th Street, 6th Street	NB SB	11 5	5 8
Metro 60	Downtown Los Angeles to Compton via Vernon, Southgate and Lynwood	San Pedro Street, 7th Street	NB SB	8 9	9 10
Metro 62	Downtown Los Angeles to Hawaiian Gardens via Boyle Heights, Commerce, Downey, Norwalk and Cerritos	Los Angeles Street, San Pedro Street, Central Avenue, 5th Street, 6th Street,	EB WB	3 3	3 3
Metro 720	Santa Monica to Commerce via Westwood and Los Angeles	San Pedro Street, Central Avenue, 5th Street, 6th Street	EB WB	6 19	18 8
Metro 760	Lynwood to Downtown Los Angeles via South Gate and Huntington Park	San Pedro Street, 7th Street	NB SB	5 4	5 5
Gardena Line 1X	Redondo Beach to Downtown Los Angeles via Torrance and Gardena	Los Angeles Street, 6th Street	NB SB	2 2	2 2
Montebello 40	Whittier to Downtown Los Angeles via Pico Rivera, Montebello and East Los Angeles	San Pedro Street, 4th Street	EB WB	6 6	6 6
Montebello 90	Whittier to Downtown Los Angeles via Pico Rivera, Montebello and East Los Angeles	San Pedro Street, 4th Street	EB WB	2 3	3 2
			TOTAL	**139**	**145**

[1] Sources: Los Angeles County Metropolitan Transportation Authority (Metro), City of Gardena Transit and City of Montebello Bus Lines, websites, 2018.



MAP SOURCE: METROPOLITAN TRANSPORTATION AUTHORITY (METRO) WEBSITE NOVEMBER 2017

★ PROJECT SITES

Figure 6-4
Existing Public Transit Routes

Source: Linscott, Law & Greenspan, Engineers, 2018.

Traffic Counts

Manual counts of vehicular turning movements were conducted at each of the study intersections listed on Table 6-59 during the weekday morning (AM) and afternoon (PM) commute periods to determine the peak-hour traffic volumes. The manual counts were conducted by an independent traffic count subconsultant (The Traffic Solution) at the study intersections from 7:00 to 10:00 AM to determine the weekday AM peak commute hour, and from 3:00 to 6:00 PM to determine the weekday PM peak commute hour. In conjunction with the manual turning movement vehicle counts, a count of bicycle and pedestrian volumes were also collected during the peak periods. It is noted that all of the traffic counts were conducted when local schools were in session. Traffic volumes at the study intersections show the typical peak periods between 7:00 to 10:00 AM and 3:00 to 6:00 PM generally associated with metropolitan Los Angeles weekday peak commute hours.

The weekday and weekend peak-hour manual counts of vehicle movements at the study intersections are summarized on Table 6-64. The existing traffic volumes at the study intersections during the weekday AM and PM peak hours are shown on Figures 6-5 and 6-6, respectively.

Existing LOS

As indicated in column [1] of Table 6-65, all seven study intersections are currently operating at LOS A during the weekday AM and PM peak hours under existing conditions. These operating conditions at the study intersections reflect the one-way travel patterns of the east-west oriented roadways (i.e., 4th Street, 5th Street, 6th Street) that reduce the number of conflicts for critical movements.

Table 6-64
Existing Traffic Volumes – Weekday AM and PM Peak Hours

No.		Date	DIR	AM Peak Hour		PM Peak Hour	
				Began	Volume	Began	Volume
1	Los Angeles Street/ 6th Street	10/12/2017	NB	7:15	418	5:00	975
			SB		1,020		798
			EB		404		821
			WB		0		0
2	San Pedro Street/ 4th Street	10/12/2017	NB	7:15	347	5:00	813
			SB		629		445
			EB		680		1,651
			WB		0		0
3	San Pedro Street/ 5th Street	10/12/2017	NB	7:15	345	5:00	769
			SB		660		476
			EB		0		0
			WB		449		360
4	San Pedro Street/ 6th Street	10/12/2017	NB	7:15	383	5:00	751
			SB		566		452
			EB		218		777
			WB		0		0
5	San Pedro Street/ 7th Street	10/12/2017	NB	7:15	457	5:00	775
			SB		548		494
			EB		543		774
			WB		788		683
6	San Pedro Street/ 8th Street	10/12/2017	NB	7:15	681	5:00	904
			SB		711		639
			EB		162		358
			WB		425		508
7	Central Avenue/ 6th Street	10/12/2017	NB	7:15	465	5:00	916
			SB		483		482
			EB		183		678
			WB		410		373

Source: Linscott, Law & Greenspan Engineers, 2018. Refer to Appendix M.

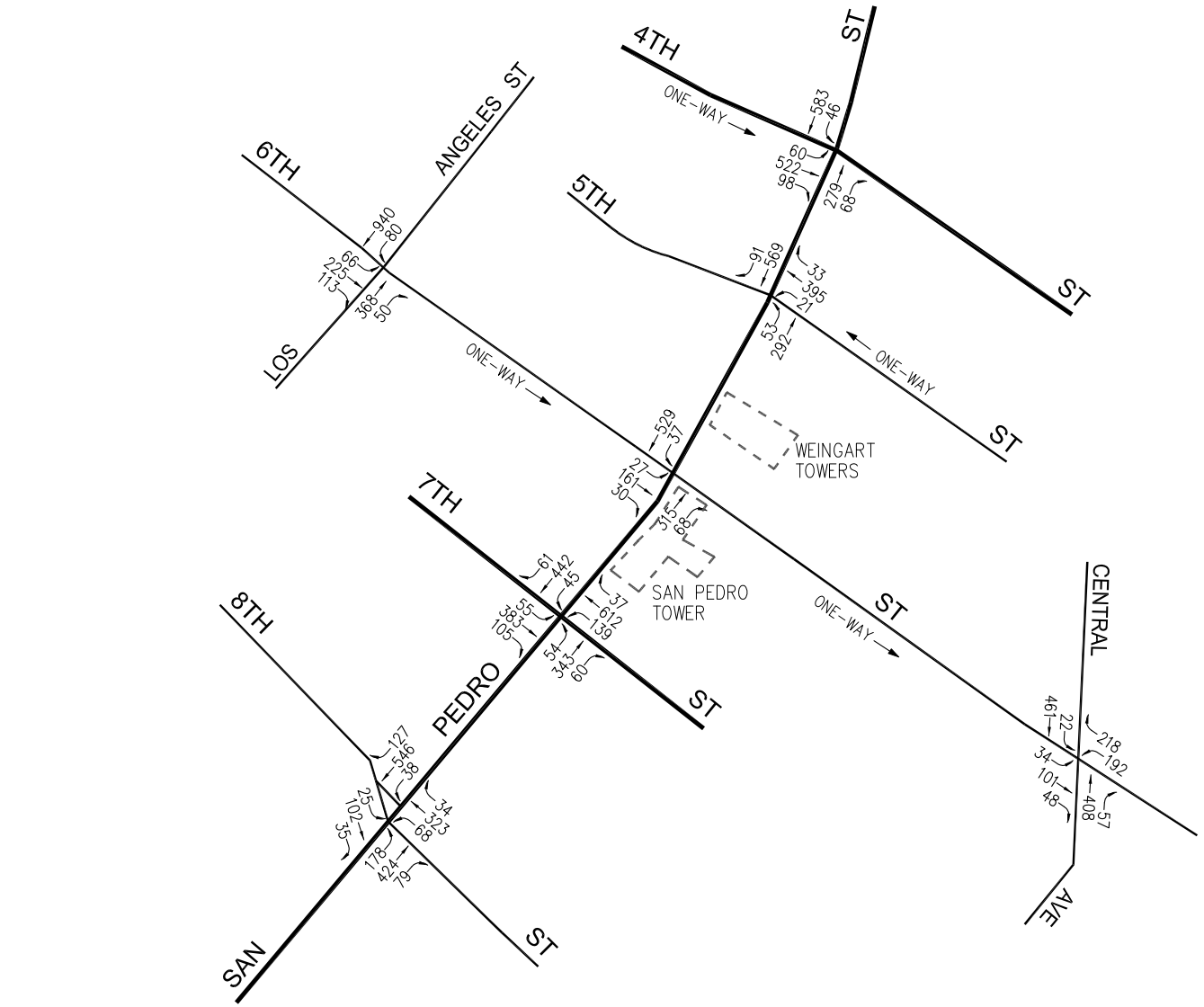


Figure 6-5
Existing Traffic Volumes
Weekday AM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.

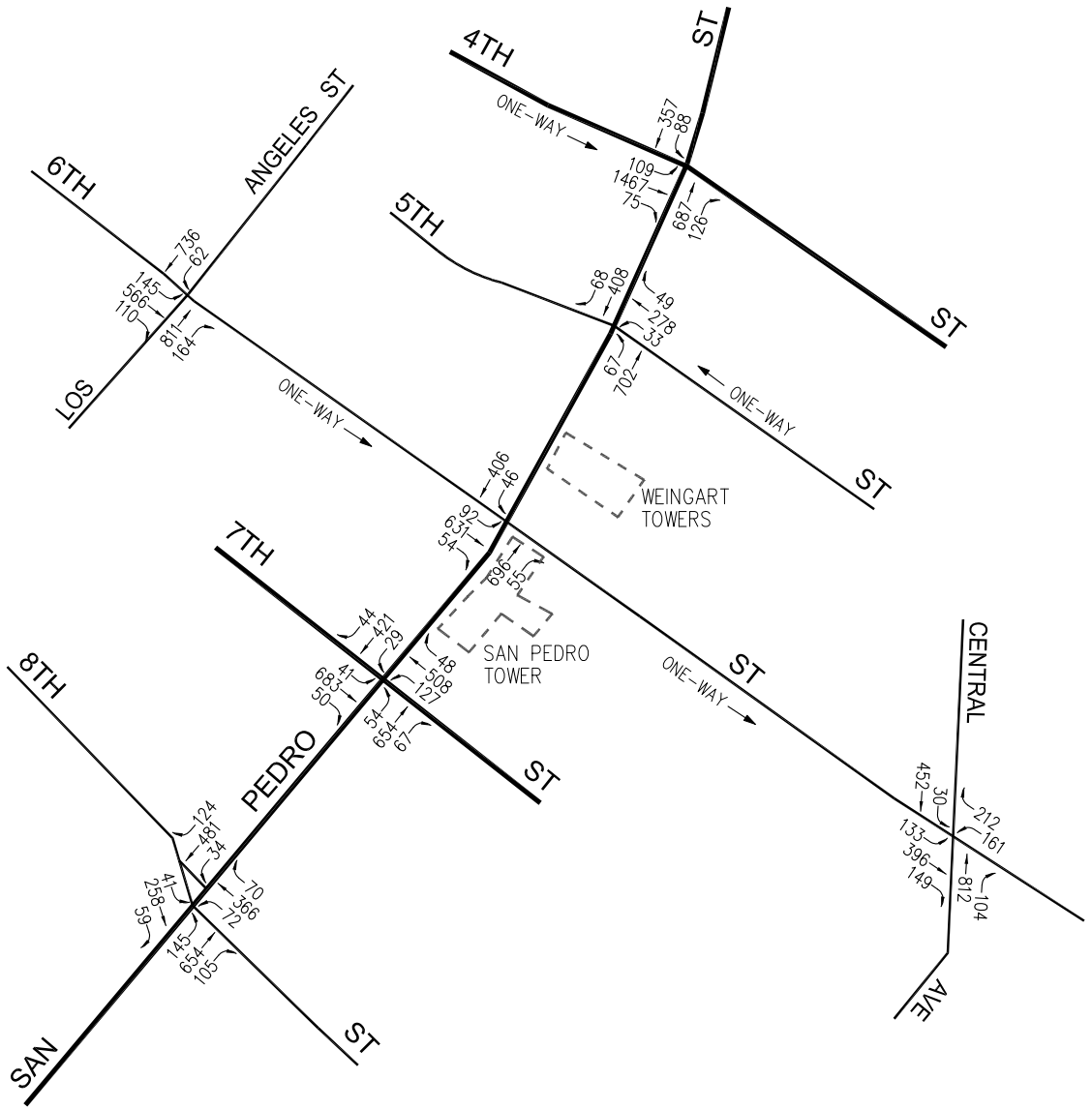


Figure 6-6
Existing Traffic Volumes
Weekday PM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.

Table 6-65
Summary of Volume to Capacity Ratios and Levels of Service
Weekday AM and PM Peak Hours

No	Study Intersection	Peak Hour	[1]		[2]				[3]		[4]			
			Year 2017 Existing		Year 2017 Existing With Project		Change V/C	Signif Impact	Year 2025 Future W/O Project		Year 2025 Future with Project		Change V/C	Signif Impact
			V/C	LOS	V/C	LOS	[(2)-(1)]	[a]	V/C	LOS	V/C	LOS	[(4)-(3)]	[a]
1	Los Angeles Street/	AM	0.342	A	0.353	A	0.011	No	0.545	A	0.556	A	0.011	No
	6th Street	PM	0.403	A	0.407	A	0.004	No	0.617	B	0.625	B	0.008	No
2	San Pedro Street/	AM	0.208	A	0.211	A	0.003	No	0.291	A	0.293	A	0.002	No
	4th Street	PM	0.505	A	0.515	A	0.010	No	0.632	B	0.641	B	0.009	No
3	San Pedro Street/	AM	0.255	A	0.273	A	0.018	No	0.375	A	0.392	A	0.017	No
	5th Street	PM	0.214	A	0.225	A	0.011	No	0.379	A	0.389	A	0.010	No
4	San Pedro Street/	AM	0.138	A	0.143	A	0.005	No	0.251	A	0.287	A	0.036	No
	6th Street	PM	0.311	A	0.335	A	0.024	No	0.457	A	0.482	A	0.025	No
5	San Pedro Street/	AM	0.450	A	0.480	A	0.030	No	0.715	C	0.753	C	0.038	No
	7th Street	PM	0.542	A	0.579	A	0.037	No	0.735	C	0.769	C	0.034	No
6	San Pedro Street/	AM	0.359	A	0.371	A	0.012	No	0.507	A	0.519	A	0.012	No
	8th Street	PM	0.397	A	0.407	A	0.010	No	0.566	A	0.576	A	0.010	No
7	Central Avenue/	AM	0.262	A	0.277	A	0.015	No	0.492	A	0.507	A	0.015	No
	6th Street	PM	0.516	A	0.529	A	0.013	No	0.797	C	0.810	D	0.013	No

[a] According to LADOT's "Transportation Impact Study Guidelines," December 2016, a transportation impact on an intersection shall be deemed significant in accordance with the following table:

Final v/c	*LOS*	*Project Related Increase in V/C*
>0.701 – 0.800	*C*	*equal to or greater than 00.040*
>0.801 – 0.900	*D*	*equal to or greater than 0.020*
>0.901	*E/F*	*equal to or greater than 0.010*

Source: Linscott, Law & Greenspan, 2018. Refer to Appendix M.

Threshold of Significance

LADOT's significance criteria for determining intersection LOS impacts are shown on Table 6-66.

Table 6-66
LADOT Intersection Significance Thresholds

Intersection Conditions with Project Traffic		Project-related Increase in V/C Ratio
LOS	V/C	
C	0.701 - 0.800	Equal to or greater than 0.04
D	0.801 - 0.900	Equal to or greater than 0.02
E, F	> 0.900	Equal to or greater than 0.01
Source: LADOT.		

Project Impacts – Intersection LOS

Trip Generation

Traffic generation is expressed in vehicle trip ends, defined as one-way vehicular movements, either entering or exiting the generating land use. Traffic volumes to be generated by the Project were forecast for the weekday AM and PM peak hours, over a 24-hour period. Generation rates provided in the ITE *Trip Generation Manual* were utilized to forecast traffic generation for the Project. Traffic volumes expected to be generated by the Project's general office and commercial (i.e., retail) land use components were based upon the following ITE trip generation average rates:

- ITE Land Use Code 710: General Office Building
- ITE Land Use Code 820: Shopping Center

The kitchen/dining room and flex space planned for the Project would provide meals for residents and area homeless during breakfast, lunch and dinner. At other times this space may be used for other activities. It was deemed appropriate to estimate trips for this space only for service and delivery by selecting and ITE land use category (ITE 110, General Light Industrial) that could approximate these trips.

As the ITE publication does not provide trip rates for a land use such as the Project's specific residential land use component, it was deemed appropriate to forecast the trips expected to be generated by the affordable housing land use component using trip rates recently published by LADOT that are directly applicable to the Project. LADOT trip generation rates for affordable housing projects were published in November 2016, and developed based on vehicle trip count data collected at affordable housing sites in the City during year 2016. The LADOT affordable housing trip rates include three different housing type categories: affordable family housing, and affordable special needs and supportive housing. In this instance, the affordable family and affordable special needs and supportive housing category are directly applicable to the proposed Project, which would provide housing for permanent long-term tenants with supportive services designed to enable homeless persons and individuals/families at risk of homelessness

to ensure that they remain housed and live as independently as possible. LADOT's affordable family and affordable special needs and supportive housing category trip rates are summarized below.

Affordable Family Housing

- Average Daily Trip Rate: 4.08 trips per dwelling unit
- Average AM Peak-Hour Trip Rate: 0.50 trips per dwelling unit; 40 percent inbound and 60 percent outbound
- Average PM Peak-Hour Trip Rate: 0.34 trips per dwelling unit; 55 percent inbound and 45 percent outbound

Affordable Special Needs and Supportive Housing

- Average Daily Trip Rate: 1.27 trips per dwelling unit
- Average AM Peak-Hour Trip Rate: 0.12 trips per dwelling unit; 44 percent inbound and 56 percent outbound
- Average PM Peak-Hour Trip Rate: 0.12 trips per dwelling unit; 59 percent inbound and 41 percent outbound

The ITE manual contains trip rates for a variety of land uses (including office buildings, shopping centers, condominiums, etc.), which have been derived based on traffic counts conducted at existing sites. However, the traffic count data submitted to ITE is for free-standing sites generally located in suburban locations, which likely do not reflect the trip generation characteristics for projects located in urban areas such as the City of Los Angeles's transit oriented district (TOD) areas. Thus, the trip rates provided in the ITE *Trip Generation Manual* (derived from traffic counts at suburban projects) overstate the trip generation potential of projects located within the Downtown Los Angeles area, including the Project.

For the Project, it is reasonable to conclude that its primary land use component (i.e., affordable housing), location in Downtown Los Angeles near multimodal corridors, and proximity to rail lines would result in a significant reduction in vehicle trips as compared to the trip forecasts that would otherwise be calculated using the applicable and unadjusted ITE trip rates in a passively managed traffic management condition. An actively managed site could be expected to yield additional trip reductions. Thus, based on criteria contained in Section 3.3B of LADOT's Transportation Impact Study Guidelines and recent Downtown Los Angeles project experience, conservative adjustments were made to the Project's general office land use component trip generation forecasts to account for transit usage, walkability and internal capture as follows:

- 5 percent transit adjustment
- 5 percent walk adjustment

- 5 percent internal capture adjustment

For the Project's commercial (i.e., retail) land use components, a forecast was made of likely pass-by trips that could be anticipated at the sites. Pass-by trips are intermediate stops on the way from an origin to a primary trip destination without a route diversion. Pass-by trips are attracted from traffic passing a site on an adjacent street or roadway that offers direct access to the site. The pass-by traffic forecast has been estimated based on existing traffic volumes in the vicinity of the Project Sites and the *LADOT Policy on Pass-by Trips*. Pass-by adjustments have been applied to the weekday AM and PM peak-hour traffic volume forecasts, as well as to the daily traffic volume forecasts, for the Project's commercial land use components.

In addition to the Project trip generation forecasts, forecasts also were made for the existing land uses at the Project Sites. Although the existing site use (Weingart Café) on Site 1 is a functional restaurant, it serves the homeless and does not function as a typical restaurant. As such, it was determined appropriate to estimate existing site trips only for service and delivery trips by selecting an ITE land use category (i.e., ITE Code 110, General Light Industrial) that could approximate these trips.

The trip generation rates and forecast of the vehicular trips anticipated to be generated by the Project are presented on Table 6-67. As summarized on the table, the Project would generate a net increase of 229 trips (120 inbound trips and 109 outbound trips) during the weekday AM peak hour. During the weekday PM peak hour, the Project would generate a net increase of 197 trips (91 inbound trips and 106 outbound trips). Over a 24-hour period, the Project would generate a net increase of 2,038 trips (1,019 inbound trips and 1,019 outbound trips) during a typical weekday.

Table 6-67
Project Trip Generation [1]

Land Use	Size		Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
				In	Out	Total	In	Out	Total
Site 1 [3]									
Affordable Housing - Supportive [4]	302	DU	384	16	20	36	21	15	36
Affordable Housing - Family [5]	76	DU	310	15	23	38	14	12	26
Manager Apartment [6]	4	DU	27	0	2	2	1	1	2
Commercial [7]	2,250	GLSF	96	1	1	2	4	4	8
- Less 50% Pass-by [8]			(48)	(1)	(1)	(2)	(2)	(2)	(4)
General Office [9]	19,030	GSF	210	26	4	30	5	23	28
- Less Transit Adjustment (5%) [10]			(11)	(1)	0	(1)	0	(1)	(1)
- Less Walk Adjustment (5%) [10]			(11)	(1)	0	(1)	0	(1)	(1)
- Less Internal Capture (5%) [10]			(11)	(1)	0	(1)	0	(1)	(1)
Dining Room/Flex Space [11]	11,463	GSF	80	10	1	11	1	10	11
Site 1 Subtotal			***1,026***	***64***	***50***	***114***	***44***	***60***	***104***
Site 2 [3]									
Affordable Housing - Supportive [4]	149	DU	189	8	10	18	11	7	18
Affordable Housing - Family [5]	149	DU	608	30	45	75	28	23	51
Manager Apartment [6]	5	DU	33	1	2	3	2	1	3
Commercial [7]	3,200	GLSF	137	2	1	3	6	6	12
- Less 50% Pass-by [8]			(69)	(1)	(1)	(2)	(3)	(3)	(6)
General Office [9]	17,100	GSF	189	24	3	27	4	21	25
- Less Transit Adjustment (5%) [10]			(9)	(1)	0	(1)	0	(1)	(1)
- Less Walk Adjustment (5%) [10]			(9)	(1)	0	(1)	0	(1)	(1)
- Less Internal Capture (5%) [10]			(9)	(1)	0	(1)	0	(1)	(1)
Site 2 Subtotal			***1,060***	***61***	***60***	***121***	***48***	***52***	***100***
Sits 1 & 2 Subtotal			**2,086**	**125**	**110**	**235**	**92**	**112**	**204**
Less Existing Site 1 Development									
Weingart Cafe [12]	(7,000)	GSF	(48)	(5)	(1)	(6)	(1)	(6)	(7)
TOTAL			**2,038**	**120**	**109**	**229**	**91**	**106**	**197**

[1] Source: City of Los Angeles Department of Transportation (LADOT), November 2016; and ITE "Trip Generation Manual," 9th Edition, 2012.
[2] Trips are one-way traffic movements, entering or leaving.
[3] Refer to Section 2 (Project Description) for a description of the specific proposed land uses.
[4]LADOT trip generation average rates for affordable housing type Special Needs & Supportive Housing.
- Daily Trip Rate: 1.27 trips/dwelling unit; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.12 trips/dwelling unit; 44% inbound/56% outbound
- PM Peak Hour Trip Rate: 0.12 trips/dwelling unit; 59% inbound/41% outbound
[5] LADOT trip generation average rates for affordable housing type Family.
- Daily Trip Rate: 4.08 trips/dwelling unit; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.50 trips/dwelling unit; 40% inbound/60% outbound
- PM Peak Hour Trip Rate: 0.34 trips/dwelling unit; 55% inbound/45% outbound
[6] ITE Land Use Code 220 (Apartment) trip generation average rates.
- Daily Trip Rate: 6.65 trips/dwelling unit; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.51 trips/dwelling units; 20% inbound/80% outbound
- PM Peak Hour Trip Rate: 0.62 trips/dwelling units; 65% inbound/35% outbound
[7] ITE Land Use Code 820 (Shopping Center) trip generation average rates.
- Daily Trip Rate: 42.7 trips/1,000 SF of floor area; 50% inbound/50% outbound
- AM Peak Hour Trip Rate: 0.96 trips/1,000 SF of floor area; 62% inbound/38% outbound
- PM Peak Hour Trip Rate: 3.71 trips/1,000 SF of floor area; 48% inbound/52% outbound
[8] Source: LADOT policy on pass-by trip adjustments. Pass-by trips are made as intermediate stops on the way from an origin to a primary trip destination without a route diversion. Pass-by trips are attracted from the traffic passing the site on an adjacent street or

Table 6-67
Project Trip Generation [1]

Land Use	Size	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			In	Out	Total	In	Out	Total
roadway that offers direct access to the site. *[9] ITE Land Use Code 710 (General Office Building) trip generation average rates.* *- Daily Trip Rate: 11.03 trips/1,000 SF of floor area; 50% inbound/50% outbound* *- AM Peak Hour Trip Rate: 1.56 trips/1,000 SF of floor area; 88% inbound/12% outbound* *- PM Peak Hour Trip Rate: 1.49 trips/1,000 SF of floor area; 17% inbound/83% outbound* *The Project plans for Site 2 show 12,100 square feet of office land uses. However, this SCEA assumes an additional 5,000 square feet of office land uses to allow for flexibility in the mix of non-residential land uses needed to accommodate the programming needs of the Project and to ensure that the potential environmental impacts associated with the change in mix of uses have been accounted for.* *[10] Transit, walk and Downtown Los Angeles trip adjustments are based on site's proximity to Metro rail and bus transit opportunities and the two project site locations.* *[11] The planned kitchen/dining room/flex space will provide meals for residents and area homeless during breakfast, lunch and dinner. At other times this space may be used for other activities. It was deemed appropriate to estimate trips for this space only for service and delivery by selecting an ITE land use category (ITE 110, General Light Industrial) that could approximate these trips.* *ITE Land Use Code 110 (General Light Industrial) trip generation average rates.* *- Daily Trip Rate: 6.97 trips/1,000 SF of floor area; 50% inbound/50% outbound* *- AM Peak Hour Trip Rate: 0.92 trips/1,000 SF of floor area; 88% inbound/12% outbound* *- PM Peak Hour Trip Rate: 0.97 trips/1,000 SF of floor area; 12% inbound/88% outbound* *[12] Although the existing site use (Weingart Café) for Site 1 is a functional restaurant, it serves the homeless and does not operate as a typical restaurant. It was determined appropriate to estimate existing site trips only for service and delivery trips by selecting an ITE land use category (ITE Code 110, General Light Industrial) that could approximate these trips.* *ITE Land Use Code 110 (General Light Industrial) trip generation average rates.* *- Daily Trip Rate: 6.97 trips/1,000 SF of floor area; 50% inbound/50% outbound* *- AM Peak Hour Trip Rate: 0.92 trips/1,000 SF of floor area; 88% inbound/12% outbound* *- PM Peak Hour Trip Rate: 0.97 trips/1,000 SF of floor area; 12% inbound/88% outbound* *Source: Linscott, Law & Greenspan Engineers, 2018. Refer to Appendix M.*								

Project Traffic Distribution and Assignment

Project traffic volumes both entering and exiting the Project Sites have been distributed and assigned to the adjacent street system based on the following considerations:

- The sites' proximity to major traffic corridors (i.e., Los Angeles Street, San Pedro Street, Central Avenue, 4th Street, 5th Street, 6th Street, etc.);
- Expected localized traffic flow patterns based on adjacent roadway channelization and presence of traffic signals;
- Existing intersection traffic volumes;
- Ingress/egress scheme planned for the Project, including the restricted right-turn ingress/egress access scheme for Site 2;
- Nearby population and employment centers; and
- Input from LADOT staff.

The general, directional traffic distribution pattern for the Project are presented on Figures 6-7 through 6-10.

The forecast weekday AM and PM peak-hour traffic volumes at the study intersections associated with the Project are presented on Figures 6-11 and 6-12, respectively. The traffic volume assignments presented on these figures reflect the traffic distribution characteristics shown on Figures 6-7 through 6-10 and the Project traffic generation forecasts presented on Table 6-67. It is noted that the commercial component trip distribution pattern for Site 1 (i.e., refer to Figure 6-5) has been utilized for the existing use on Site 1.

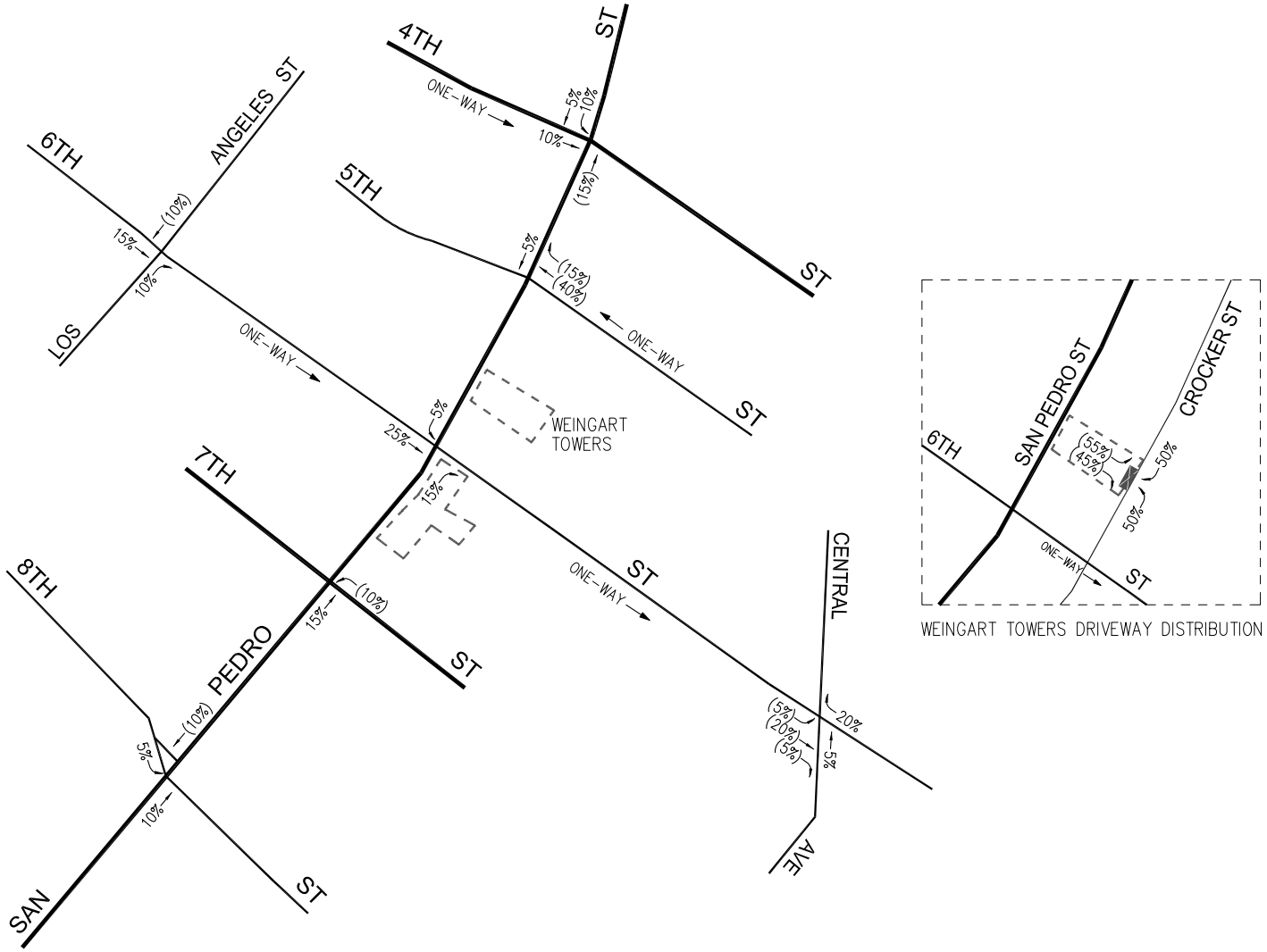
Existing (2017) With Project Intersection LOS Impacts

The existing with Project traffic volumes at the study intersections during the weekday AM and PM peak hours are illustrated on Figures 6-13 and 6-14, respectively. As shown in column [2] on Table 6-65, application of the City's threshold criteria to the "Existing With Project" scenario indicates that the Project would not result in significant impacts at any of the seven study intersections. Therefore, Project impacts related to intersection LOS would be less than significant.

Future (2025) Intersection LOS Impacts

Related Projects

A forecast of on-street traffic conditions prior to occupancy of the Project was prepared by incorporating the potential trips associated with other known development projects (related projects) in the area (i.e., within an approximate 1.5-mile radius from the Project Sites, which is the range that LADOT uses when assessing cumulative impacts). With this information, the potential impact of the Project was evaluated within the context of the cumulative impacts of all ongoing development. The related projects research was based on information on file with both LADOT and LADCP. For LADOT, a list of related projects was obtained from LADOT at the time of preparation of the MOU for the approximately 1.5-mile radius from the Project Sites. For LADCP, the research included, but was not limited to, a review of proposed development projects within the Central City and Central City North community plan areas, proposed development projects within an approximate 1.5-mile radius from the Projects Sites for which EIRs are being or have been prepared (as shown on the Major Projects section of LADCP's website), and LADCP's bi-weekly case filing reports. In addition, related projects lists from recently approved traffic study MOU and traffic studies in the vicinity of the Project Sites also were reviewed. The list of related projects is presented on Table 6-68. The location of the related projects is shown on Figure 2-1 in Section 2 (Project Description).



WEINGART TOWERS DRIVEWAY DISTRIBUTION

[- - -] PROJECT SITES

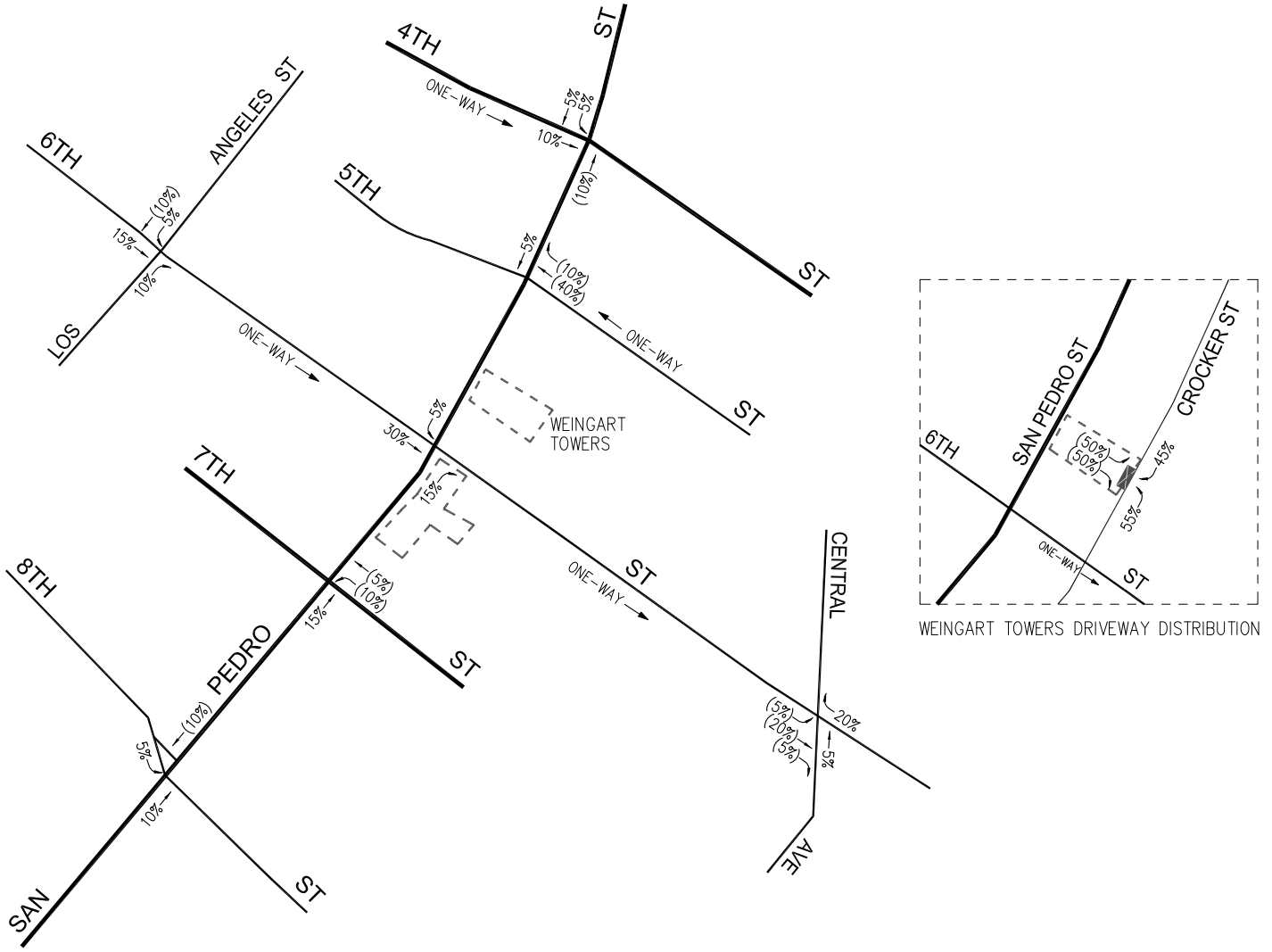
XX = INBOUND PERCENTAGE

(XX) = OUTBOUND PERCENTAGE

NORTH

Figure 6-7
Project Trip Distribution - Site 1
Residential Component

Source: Linscott, Law & Greenspan, Engineers, 2018.



WEINGART TOWERS DRIVEWAY DISTRIBUTION

[ ] PROJECT SITES

XX = INBOUND PERCENTAGE

(XX) = OUTBOUND PERCENTAGE

NORTH

Figure 6-8
Project Trip Distribution - Site 1
Commercial Component

Source: Linscott, Law & Greenspan, Engineers, 2018.

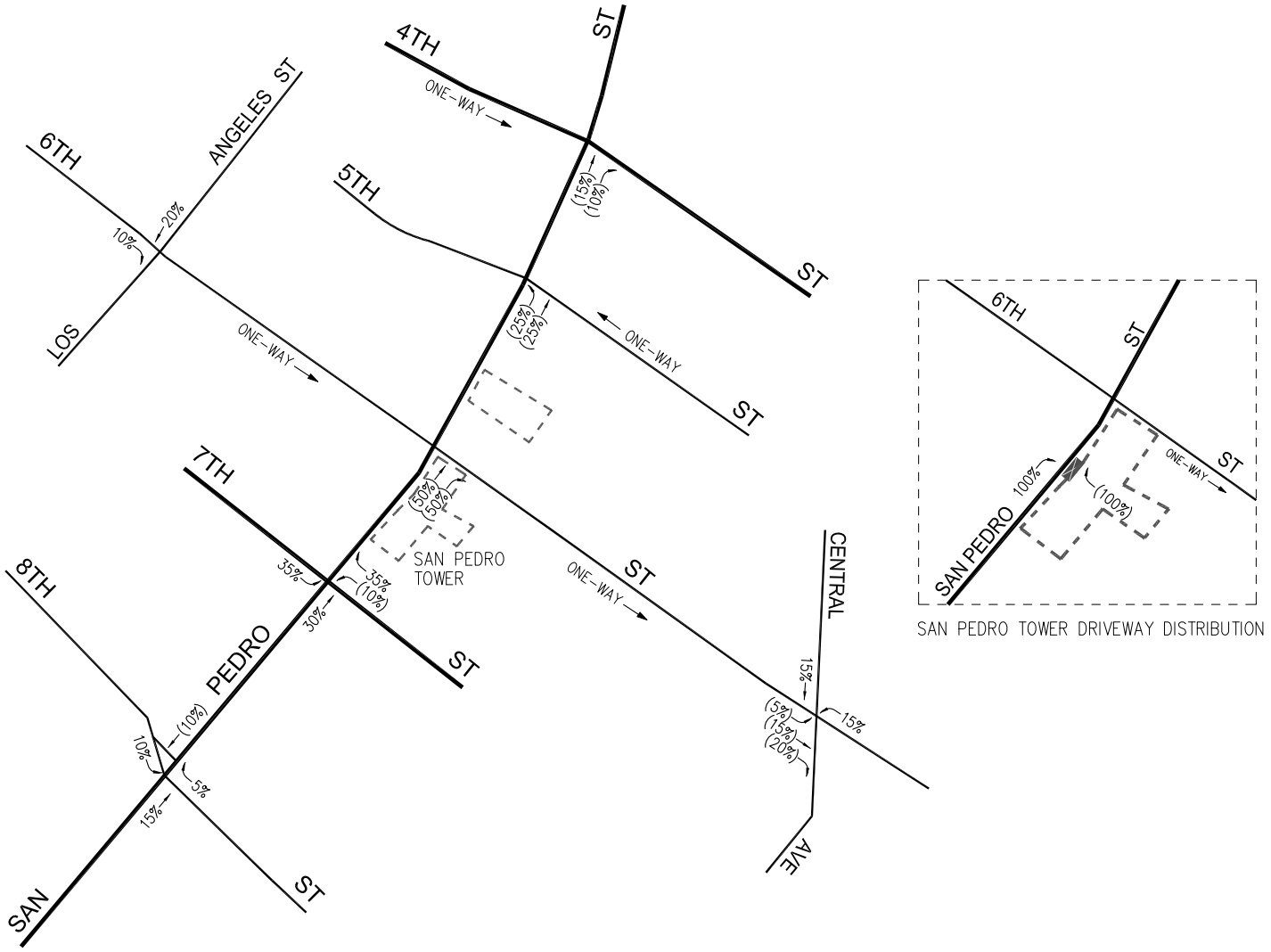
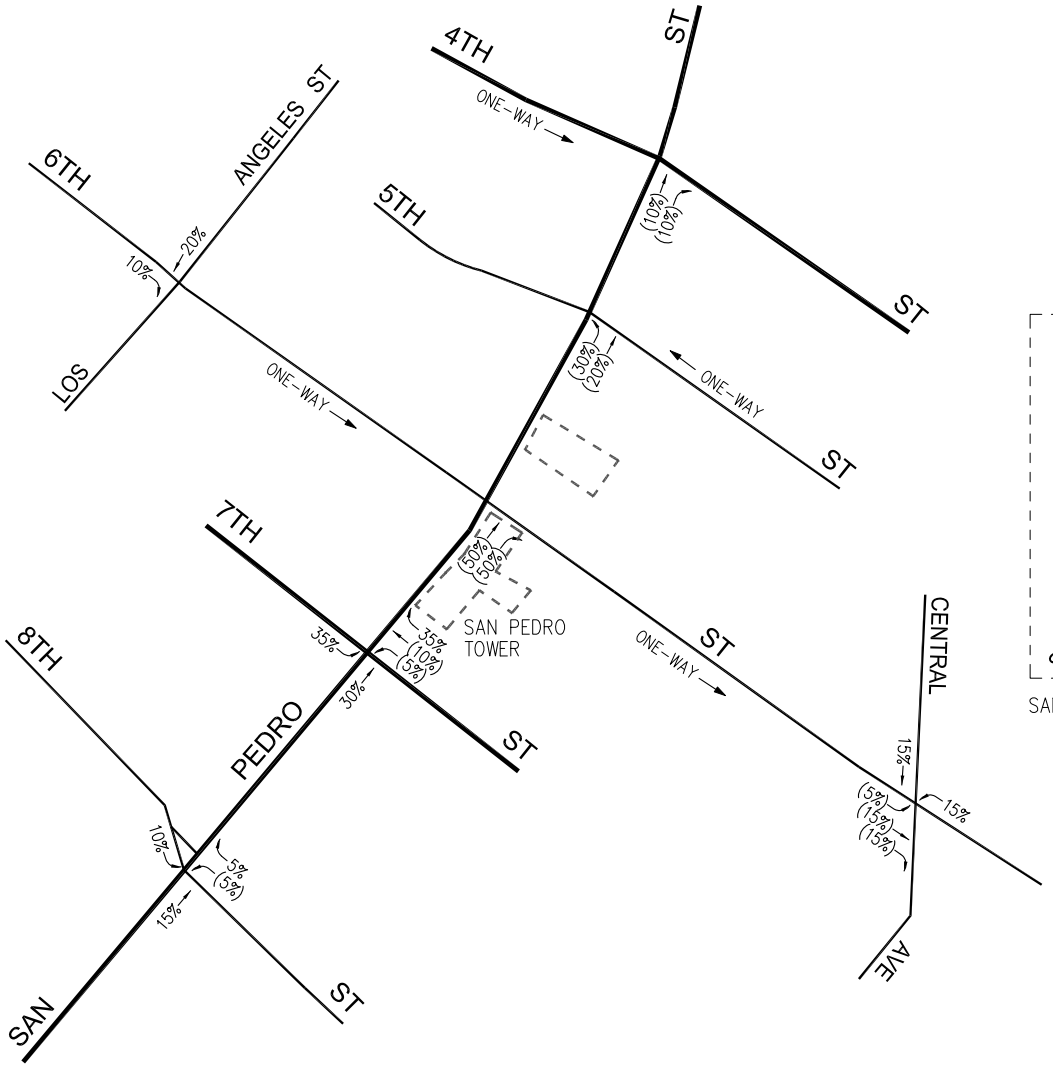
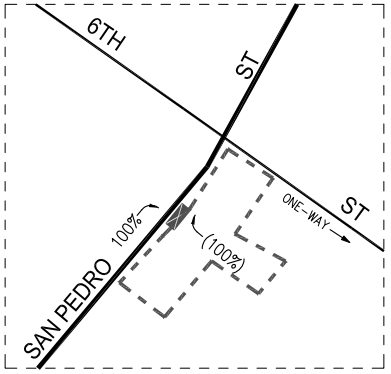


Figure 6-9
Project Trip Distribution - Site 2
Residential Component

Source: Linscott, Law & Greenspan, Engineers, 2018.





SAN PEDRO TOWER DRIVEWAY DISTRIBUTION

PROJECT SITES

XX = INBOUND PERCENTAGE

(XX) = OUTBOUND PERCENTAGE

NORTH

Figure 6-10
Project Trip Distribution - Site 2
Commercial Component

Source: Linscott, Law & Greenspan, Engineers, 2018.

Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
1	Proposed	220 East Washington Boulevard	Specialty Retail Restaurant Apartment	7,750 7,750 357	GLSF GSF DU	[1]	2,113	38	118	156	125	53	178
2	Proposed	1500 South Figueroa Street	Apartment Retail	190 12,432	DU GLSF	[1]	1,199	18	67	85	71	40	111
3	Under Construction	454 East Commercial Street	Bus Maintenance Facility	2	Acres	[1]	300	22	8	30	9	1	10
4	Proposed	Tenten Wilshire Expansion 1027 West Wilshire Boulevard	Condominium Retail	356 5,000	DU GLSF	[3]	5,457	113	248	361	286	217	503
5	Proposed	233 West Washington Boulevard	Apartment Retail	160 24,000	DU GLSF	[1]	1,764	25	56	81	89	71	160
6	Proposed	215 West 9th Street	Condominium Retail	210 9,000	DU GLSF	[1]	1,140	14	56	70	64	38	102
7	Proposed	1400 South Figueroa Street	Apartment Retail	106 4,834	DU GLSF	[1]	647	10	38	48	39	22	61
8	Under Construction	Amacon Project 1133 South Hope Street	Apartment Retail	208 5,029	DU GLSF	[1]	1,543	20	74	94	91	50	141
9	Proposed	Magatoys 905 East 2nd Street	Condominium Retail	320 18,712	DU GLSF	[1]	1,207	(6)	70	64	69	23	92
10	Under Construction	Park Fifth 427 West 5th Street, 437 South Hill Street	Apartment Restaurant	600 13,742	DU GSF	[3]	4,707	71	273	344	279	158	437
11	Proposed	1115 South Hill Street	Condominium Restaurant	172 6,850	DU GSF	[1]	543	(45)	40	(5)	50	(7)	43
12	Proposed	1130 West Wilshire Boulevard	Office Day Care	88,224 20	GSF Students	[1]	964	92	12	104	28	61	89

Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
			High-Turnover Restaurant	248	GSF								
			Quality Restaurant	5,375	GSF								
13	Proposed	Embassy Tower 848 South Grand Avenue	Condominium	420	DU	[1]	3,882	66	144	210	212	165	377
			Retail	38,500	GLSF								
14	Proposed	826 South Mateo Street	Condominium	90	DU	[1]	1,267	11	34	45	62	39	101
			Retail	11,000	GLSF								
			Restaurant	5,600	GSF								
15	Proposed	2030 East 7th Street	Office	243,583	GSF	[1]	2,306	274	34	308	69	249	318
			Retail	40,000	GLSF								
16	Proposed	The Reef - LA Mart/SOLA Village 1900 South Broadway	Condominium	900	DU	[1]	5,985	390	552	942	637	566	1,203
			Apartment	550	DU								
			Hotel	210	Rooms								
			Retail	143,100	GLSF								
			Office	180,000	GSF								
			Gallery/Museum	17,600	GSF								
			Gym	8,000	GSF								
17	Proposed	Grand Avenue Project 225 South Grand Avenue 100 South Grand Avenue	Condominium	1,432	DU	[1] [4]	21,631	929	611	1,540	1,067	1,348	2,415
			Apartment	357	DU								
			Office	681,000	GSF								
			Retail	449,000	GLSF								
18	Under Construction	Metropolis Mixed-Use 899 South Francisco Street	Hotel	480	Rooms	[3] [5]	8,010	307	318	625	387	512	899
			Condominium	836	DU								
			Retail/Restaurant	46,000	GSF								
			Office	988,225	GSF								
19	Proposed	LA Civic Center Office 150 North Los Angeles Street	Office	712,500	GSF	[1]	13,534	930	118	1,048	435	942	1,377
			Retail	35,000	GLSF								
			Child Care	2,500	GSF								
20	Proposed	1300 South Hope Street	Apartment	419	DU	[1]	4,280	88	105	193	136	102	238
			Retail	42,000	GLSF								
21	Proposed	2130 East Violet Street	Office	94,000	GSF	[1]	1,351	137	30	167	39	122	161

Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
			Retail	7,500	GLSF								
22	Proposed	1329 West 7th Street	Apartment	87	DU	[1]	662	16	37	53	39	22	61
23	Under Construction	Topaz Mixed-Use 534-552 South Main Street 539-547 South Los Angeles Street	Apartment Retail Restaurant Fast-Food Restaurant	160 18,000 3,500 3,500	DU GLSF GSF GSF	[1]	2,213	52	75	127	87	58	145
24	Under Construction	840 South Olive Street	Condominium Restaurant Retail	303 9,680 1,500	DU GSF GLSF	[1]	3,071	81	166	247	174	96	270
25	Under Construction	Santa Fe Freight Yard Redevelopment 950 East 3rd Street	Apartment Retail/Restaurant School	635 30,062 532	DU GLSF Students	[1]	6,372	162	177	339	245	213	458
26	Proposed	201 South Broadway	Office/Retail Restaurant	27,675	GSF	[1]	1,638	(40)	(41)	(81)	53	17	70
27	Proposed	The City Market 1057 South San Pedro Street ENV-2012-3003-EIR	Office Retail Cinema Apartment Hotel Condominium	549,141 224,862 744 877 210 68	GSF GLSF Seats DU Rooms DU	[6]	15,890	837	434	1,271	632	957	1,589
28	Under Construction	400 South Broadway	Apartment Retail Bar	450 6,904 5,000	DU GLSF GSF	[3]	3,292	50	187	237	193	112	305
29	Proposed	Camden Arts Mixed-Use 1525 East Industrial Street	Apartment Retail Restaurant Office	328 6,400 5,700 27,300	DU GLSF GSF GSF	[1]	2,288	58	73	131	86	69	155
30	Proposed	920 South Hill Street	Apartment Retail	239 5,400	DU GLSF	[1]	1,476	23	84	107	87	50	137

Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
31	Proposed	955 South Broadway	Apartment Retail	163 6,406	DU GLSF	[1]	1,275	21	72	93	74	43	117
32	Under Construction	1212 South Flower Street	Condominium Retail	730 7,873	DU GLSF	[1]	3,956	78	233	311	229	121	350
33	Under Construction	820 South Olive Street 825 South Hill Street	Apartment Retail	589 4,500	DU GLSF	[1]	3,309	63	202	265	195	106	301
34	Proposed	1722 East 16th Street	Restaurant	8,515	GSF	[1]	592	(4)	2	(2)	36	11	47
35	Proposed	601 South Main Street	Condominium Retail	452 25,000	DU GLSF	[1]	2,686	36	144	180	152	87	239
36	Proposed	2051 East 7th Street	Apartment Retail Restaurant	320 15,000 5,000	DU GLSF GSF	[3]	2,310	17	127	144	145	64	209
37	Under Construction	Herald Examiner 1111 South Broadway & 156 West 11th Street & 1201 South Main Street	Apartment Retail Office	391 49,000 39,725	DU GLSF GSF	[8]	5,198	144	176	320	258	274	532
38	Under Construction	South Park Site 1 1120 South Grand Avenue	Apartment Retail	666 20,690	DU GLSF	[1]	2,730	42	127	169	136	93	229
39	Under Construction	1247 South Grand Avenue	Apartment Retail	115 4,610	DU GLSF	[9]	763	10	41	51	42	25	67
40	Proposed	1400 South Flower Street	Apartment Retail	147 6,921	DU GLSF	[1]	798	(1)	49	48	51	16	67
41	Proposed	Variety Arts Mixed-Use 940 South Figueroa Street	Theater Restaurant Bar	1,942 10,056 5,119	Seats GSF GSF	[1]	2,237	5	4	9	99	35	134
42	Under Construction	La Plaza Cultura Village 527 North Spring Street	Apartment Retail Specialty Retail Restaurant	345 23,000 21,000 11,000	DU GLSF GLSF GSF	[1]	3,585	49	118	167	189	131	320
43	Proposed	1036 South Grand	Restaurant	7,149	GSF	[1]	492	2	3	5	27	14	41

Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
		Avenue											
44	Proposed	Coca Cola 963 East 4th Street	Office Retail Restaurant	78,600 25,000 20,000	GSF GLSF GSF	[1]	2,512	106	22	128	113	138	251
45	Proposed	1248 South Figueroa Street	Hotel Restaurant	1,162 13,145	Rooms GSF	[3]	5,720	192	125	317	203	212	415
46	Proposed	459 South Hartford Avenue	Apartment	101	DU	[1]	361	15	15	30	22	22	44
47	Proposed	Arts District Center 1129 East 5th Street	Retail Restaurant Hotel Apartment Art School/Convention Hall Art Gallery/Creative Office	23,000 28,400 149 228 15,700 39,860	GLSF GSF Rooms DU GSF GSF	[1]	4,674	130	140	270	157	69	226
48	Proposed	1800 East 7th Street	Apartment Restaurant Retail	122 4,605 3,245	DU GSF GLSF	[3]	1,536	42	74	116	74	46	120
49	Proposed	1150 West Wilshire Boulevard	Apartment Restaurant	80 4,589	DU GSF	[1]	511	(22)	26	4	39	(5)	34
50	Under Construction	737 South Spring Street	Apartment Pharmacy/Drug Store	320 25,000	DU GSF	[1]	3,942	72	141	213	167	116	283
51	Proposed	520 South Mateo Street CPC-2016-3853	Apartment Office Retail Restaurant	600 30,000 15,000 15,000	DU GSF GLSF GSF	[3]	4,995	157	220	377	274	223	497
52	Proposed	1218 West Ingraham Street	Apartment	80	DU	[1]	532	8	33	41	33	17	50
53	Proposed	Palmetto & Mateo 555 South Mateo Street	Retail	153,000	GLSF	[1]	4,300	5	30	35	220	205	425

Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
54	Under Construction	732 South Spring Street	Apartment Pharmacy/Drug Store	400 15,000	DU GSF	[1]	3,359	59	152	211	164	104	268
55	Proposed	340 South Hill Street	Apartment Restaurant	428 2,894	DU GSF	[3]	2,253	36	129	165	133	75	208
56	Proposed	1145 West 7th Street ENV-2015-2800-MND	Condominium Retail	241 7,291	DU GLSF	[1]	1,084	4	66	70	67	35	102
57	Proposed	540 South Santa Fe Avenue	Office	89,825	GSF	[1]	726	90	12	102	17	81	98
58	Proposed	360 South Alameda Street	Apartment Office Restaurant	55 6,300 2,500	DU GSF GSF	[1]	670	25	33	58	35	26	61
59	Proposed	118 South Astronaut Ellison S Onizuka Street	Apartment	77	DU	[1]	97	(1)	20	19	19	6	25
60	Proposed	222 West 2nd Street	Office Apartment Retail	534,044 107 7,200	GSF DU GLSF	[10]	4,006	467	93	560	118	423	541
61	Proposed	Soho House 1000 South Santa Fe Avenue	Restaurant/Bar Private Club	8,447 48	GSF Rooms	[3]	966	36	38	74	49	20	69
62	Proposed	700 West Cesar Chavez Avenue	Apartment Retail	299 8,000	DU GLSF	[1]	1,511	7	89	96	99	54	153
63	Proposed	Clinic at 7th & Wall 649 South Wall Street	Medical Office Assisted Living	66 55	Empl. Beds	[1]	104	24	5	29	3	24	27
64	Proposed	Metro Emergency Security Operations Center 410 North Center Street	Office	110,000	GSF	[1]	1,165	87	0	87	0	79	79
65	Proposed	500 South Mateo Street	Restaurant	12,882	GSF	[1]	1,052	48	41	89	50	31	81
66	Proposed	Medallion Phase 2 300 South Main Street	Apartment Retail/Restaurant	471 32,970	DU GLSF	[1]	4,691	143	243	386	257	153	410
67	Proposed	Alexan South Broadway	Apartment	300	DU	[1]	1,998	29	108	137	117	67	184

Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
		850 South Hill Street	Retail/Restaurant	7,000	GLSF								
68	Proposed	Olympic & Hill Mixed-Use 1030 South Hill Street	Apartment Retail Restaurant	700 7,000 8,000	DU GLSF GSF	[1]	3,392	49	193	242	181	104	285
69	Proposed	Alameda Hotel 400 South Alameda Street	Hotel Restaurant Retail	66 2,130 840	Rooms GSF GLSF	[1]	512	20	18	38	23	14	37
70	Proposed	Apex II 700 West 9th Street	Apartment Retail	341 11,687	DU GLSF	[3]	2,624	37	146	183	143	95	238
71	Proposed	649 South Olive Street	Hotel	241	Rooms	[1]	1,674	65	44	109	63	60	123
72	Proposed	Sapphire Mixed-Use 1111 West 6th Street	Apartment Retail	362 25,805	DU GLSF	[1]	587	(71)	117	46	104	(51)	53
73	Proposed	Grand Residences 1233 South Grand Avenue	Condominium Restaurant	161 3,000	DU GSF	[11]	1,116	23	62	85	62	33	95
74	Proposed	675 South Bixel Street	Hotel Apartment Retail	126 422 4,874	Rooms DU GLSF	[1]	3,461	74	173	247	184	116	300
75	Proposed	740 South Hartford Avenue	Apartment	80	DU	[1]	479	7	30	37	29	15	44
76	Proposed	Lifan Tower 1235 West 7th Street	Condominium Retail	304 5,960	DU GLSF	[1]	1,959	30	108	138	114	66	180
77	Proposed	940 South Hill Street	Apartment Retail	232 14,000	DU GLSF	[1]	1,881	20	80	100	115	53	168
78	Proposed	361 South Spring Street	Hotel Meeting Rooms	315 2,000	Rooms GSF	[1]	2,273	91	59	150	84	85	169
79	Proposed	1340 South Olive Street	Apartment Retail Restaurant	156 5,000 10,000	DU GLSF GSF	[1]	1,700	51	82	133	89	57	146
80	Proposed	1334 South Flower Street	Apartment Retail/Restaurant	146 6,270	DU GLSF	[1]	796	(1)	49	48	51	16	67

Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
81	Proposed	929 East 2nd Street	Retail Other	37,974 71,078	GLSF GSF	[3]	2,153	68	12	80	105	96	201
82	Proposed	633 South Spring Street	Hotel Restaurant Bar	176 8,430 5,290	Rooms GSF GSF	[1]	2,045	83	33	116	97	99	196
83	Proposed	Luxe Hotel 1020 South Figueroa Street	Hotel Condominium Retail	300 435 58,959	Rooms DU GLSF	[1]	6,583	204	274	478	312	27	339
84	Under Construction	1200 South Figueroa Street	Residential Restaurant Retail	648 20,000 28,000	DU GSF GLSF	[12]	5,717	79	158	237	170	113	283
85	Proposed	701 South Hill Street	Apartment Retail	124 8,500	DU GLSF	[13] [14]	825 363	13 5	50 3	63 8	50 15	27 17	77 32
86	Proposed	525 South Spring Street	Apartment Retail	360 9,400	DU GLSF	[13] [14]	2,394 401	37 6	147 3	184 9	145 17	78 18	223 35
87	Proposed	Case Hotel 1106 South Broadway	Hotel	151	Rooms	[15]	1,234	47	33	80	46	45	91
88	Proposed	Freehand Hotel 416 West 8th Street	Hotel	200	Rooms	[15]	1,634	63	43	106	61	59	120
89	Proposed	656 South Stanford Avenue	Apartment	82	DU	[1]	1,463	8	34	42	33	18	51
90	Proposed	Olympic Tower 815 West Olympic Boulevard	Hotel Retail Condominiums Office Conference Center	373 65,074 374 33,498 10,801	Rooms GLSF DU GSF GSF	[16]	4,423	166	170	336	189	185	374
91	Proposed	LA Gateway Project 1025 Olympic Boulevard ENV-2016-4889-EIR	Apartment Restaurant Retail	1,367 20,000 20,000	DU GSF GLSF	[3]	5,216	86	297	383	283	115	398
92	Under Construction	Oceanwide Plaza 1101 South Flower Street	Condominiums Hotel	504 183	DU Rooms	[17] [18] [15] [18]	2,928 1,495	38 57	184 40	222 97	176 56	86 54	262 110

Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
			Retail	120,583	GLSF	[14] [18]	5,149	72	44	116	215	232	447
			Restaurant	46,000	GSF	[19] [18]	5,849	273	224	497	272	181	453
93	Proposed	Los Angeles Sports and Entertainment District	Office	601,800	GSF	[4] [18] [20]	5,136	708	96	804	129	631	760
		Figueroa Street & 11th Street DIR-2005-7453-SPP-M3	Convention Center	250,000	GSF	[4] [18]	2,050	Nom.	Nom.	Nom.	51	154	205
94	Proposed	708 North Hill Street	Apartment	162	DU	[1]	980	16	57	73	57	33	90
			Retail	5,000	GLSF								
95	Proposed	130 South Beaudry Avenue	Apartment	230	DU	[1]	1,159	8	76	84	76	29	105
96	Proposed	Urban View Lots 495 South Hartford Avenue	Apartment	218	DU	[1]	1,033	16	63	79	62	34	96
97	Proposed	8th & Figueroa Mixed-Use 744 South Figueroa Street	Apartment	438	DU	[1]	2,972	38	148	186	176	94	270
			Retail	7,500	GLSF								
98	Proposed	433 South Main Street	Condominium	196	DU	[1]	1,450	32	72	104	61	37	98
			Mixed-Use	6,200	GSF								
99	Proposed	Downtown LA Hotel 926 West James M. Woods Boulevard	Hotel	247	Rooms	[1]	1,562	59	42	101	59	56	115
100	Proposed	JMF Tower 333 West 5th Street	Condominiums	100	DU	[1]	3,358	64	72	136	201	129	330
			Hotel	200	Rooms								
			Retail	27,500	GLSF								
101	Proposed	Times Mirror Square 202 West 1st Street	Apartments	1,127	DU	[21]	8,535	94	341	435	294	38	332
			Office	285,088	GSF								
			Supermarket	50,000	GSF								
			Restaurant	75,589	GSF								
102	Under Construction	888 South Hope Street	Apartments	526	DU	[13]	3,498	54	214	268	212	114	326
103	Proposed	2117 East Violet Street CPC-2017-437-GPA	Apartments	509	DU	[13]	3,385	52	208	260	205	111	316
			Retail	288,230	GLSF	[14]	12,307	172	105	277	513	556	1,069

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Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
104	Proposed	Ferrante 1000 West Temple Street	Apartments Retail	1,500 30,000	DU GLSF	[13] [14]	9,975 1,281	153 18	612 11	765 29	605 53	325 58	930 111
105	Proposed	6AM Project	Apartments	1,305	DU	[1]	14,258	437	585	1,022	710	642	1,352
		640 South Alameda Street, 1206 East 6th Street ENV-2016-3758-EIR	Condominiums Hotel Office Retail School Art Space	431 412 253,514 127,609 29,316 22,429	DU Rooms GSF GLSF GSF GSF								
106	Proposed	1300 South Figueroa Street CPC-2017-746-GPA	Hotel	1,024	Rooms	[15]	9,134	398	288	686	351	366	717
107	Proposed	Budokan of Los Angeles 237-249 South Los Angeles Street	Sports Center	63,000	GSF	[1]	1,869	79	50	129	161	98	259
108	Proposed	King's Arch 537 South Broadway	Office	45,000	GSF	[23]	496	62	8	70	11	56	67
109	Proposed	Title Insurance Building 433 South Spring Street	Office	320,000	GSF	[23]	3,178	427	58	485	74	363	437
110	Proposed	Subway Terminal Retail 417 South Hill Street	Retail/Office	130,000	GLSF	[14]	5,551	78	47	125	231	251	482
111	Proposed	401 South Hewitt Street COC-2017-469-GPA	Office Retail Restaurant	255,500 4,970 9,940	GSF GLSF GSF	[1]	3,493	365	76	441	100	324	424
112	Proposed	333 South Alameda Street CPC-2017-552-GPA	Apartments Retail	994 99,300	DU GLSF	[3]	8,445	134	260	394	390	329	719
113	Proposed	1000 South Hill Street ENV-2016-4711-EAF	Apartments Retail	498 8,707	DU GLSF	[13] [14]	3,312 372	51 5	203 3	254 8	201 15	108 17	309 32
114	Proposed	1018 West Ingraham Street ENV-2017-979-EAF	Apartments Retail	37 1,890	DU GLSF	[1]	327	5	16	21	18	12	30
115	Proposed	1100 East 5th Street	Apartment	220	DU	[3]	2,583	79	119	198	133	74	207

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Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
		ENV-2016-3727-EIR, VTT-74549	Office Restaurant Retail	20,021 19,609 9,250	GSF GSF GLSF								
116	Proposed	1100 South Main Street ENV-2016-3825-EAF	Apartments Retail	379 25,810	DU GLSF	[3]	385	9	103	112	78	14	92
117	Proposed	220 North Center Street 2017-CEN-46412	Apartment Retail	430 8,742	DU GLSF	[3]	2,166	33	119	152	121	79	200
118	Proposed	1219 South Hope Street ENV-2017-1701-EAF	Hotel Restaurant	75 7,700	Rooms GSF	[1]	613	24	16	40	23	22	45
119	Proposed	1307 West 7th Street DIR-2015-3777-SPP-DB-1A	Apartments Retail	76 6,035	DU GLSF	[13] [14]	505 258	8 4	31 2	39 6	31 11	16 11	47 22
120	Proposed	1322 West Maryland Street DIR-2016-3116-DB-SPP	Apartments Retail	47 760	DU GLSF	[13] [14]	313 32	5 1	19 0	24 1	19 1	10 2	29 3
121	Proposed	1323 South Grand Avenue	Apartments Retail/Restaurant	284 6,300	DU GLSF	[1]	2,158	33	118	151	125	74	199
122	Proposed	601 South Central Avenue 930 East 6th Street	Apartments Retail	236 12,000	DU GLSF	[1]	1,074	17	79	96	70	32	102
123	Proposed	640 South Santa Fe Avenue	Office Retail/Restaurant	91,185 15,980	GSF GLSF	[1]	1,330	90	8	98	43	114	157
124	Proposed	641 South Imperial Street ENV-2017-740-EAF	Apartments Office	140 14,749	DU GLSF	[3] [13] [3] [23]	931 163	14 20	57 3	71 23	57 4	30 18	87 22
125	Proposed	643 North Spring Street	Apartments Hotel Retail Restaurant	281 142 17,003 2,532	DU Rooms GLSF GSF	[1]	2,723	61	122	183	138	91	229
126	Proposed	668 South Alameda Street	Apartment	475	DU	[3]	4,002	107	182	289	216	145	361

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Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
		VTT-74537	Office Retail Supermarket Restaurant	43,000 9,000 15,000 17,000	GSF GLSF GSF GSF								
127	Proposed	676 South Mateo Street VTT-74550	Apartment Mixed-Use	185 27,280	DU GLSF	[1]	1,990	50	95	145	106	51	157
128	Proposed	755 South Los Angeles Street ENV-2016-4963-EAF	Office Retail Restaurant	60,243 16,694 26,959	GSF GLSF GSF	[3]	2,482	110	57	167	105	100	205
129	Proposed	940 East 4th Street ENV-2017-611-EAF	Apartment Retail Office	93 14,248 6,000	DU GLSF GSF	[3]	788	14	37	51	44	31	75
130	Proposed	1410 South Flower Street ENV-2016-2477-MND	Apartments Retail	152 1,184	DU GLSF	[13] [14]	1,011 51	16 1	62 0	78 1	61 2	33 2	94 4
131	Proposed	845 South Olive Street ENV-2016-4864-MND	Apartment Retail Restaurant	208 810 1,620	DU GLSF GSF	[3]	1,305	25	76	101	77	42	119
132	Proposed	330 South Alameda Street ENV-2016-3335-EIR	Apartment Office Retail	186 10,415 11,925	DU GSF GLSF	[3]	1,662	36	76	112	91	65	156
133	Proposed	527 South Colyton Street ENV-2016-3400-EIR	Apartments Retail Office	310 11,375 11,736	DU GLSF GSF	[1]	2,095	36	116	152	121	74	195
134	Proposed	Fashion District Residences 212-230 East 7th Street, 701-739 South Maple Avenue ENV-2016-3685-MND	Apartments Retail Restaurant	452 6,802 6,802	DU GLSF GSF	[1]	3,199	67	179	246	185	105	290
135	Proposed	755 South Wall Street ENV-2016-3991-EIR	Apartment Retail Event Space	323 4,400 125	DU GLSF Persons	[3]	2,499	122	79	201	164	141	305

Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
			Office	53,200	GSF								
			Restaurant	4,420	GSF								
136	Proposed	1101 East 5th Street, 445-457 South Colyton Street ENV-2016-4476-EIR	Live/Work			[3]							
				129	DU		4,674	130	140	270	157	69	226
			Retail	26,979	GLSF								
			Restaurant	31,719	GSF								
			Hotel	113	Rooms								
			Art Uses	13,771	GSF								
137	Proposed	1045 South Olive Street ENV-2017-3264-EIR	Apartments	794	DU	[1]	2,227	39	157	196	138	62	200
			Retail	12,504	GLSF								
138	Proposed	Figueroa Centre 913 South Figueroa Street ENV-2017-174-EIR	Hotel	220	Rooms	[3]	7,145	143	162	305	315	290	605
			Condominiums	200	DU								
			Retail	94,080	GLSF								
139	Proposed	8th, Grand & Hope Tower 754 South Hope Street	Apartments	401	DU	[1]	2,315	35	137	172	137	78	215
			Retail	19,909	GLSF								
140	Proposed	1340 South Hill Street ENV-2017-1213-EAF	Apartments	233	DU	[3]	1,755	11	103	114	108	30	138
141	Proposed	670 South Mesquite Street ENV-2017-249-EIR	Apartments	308	DU	[1]	22,845	1,258	321	1,579	640	1,195	1,835
			Hotel	236	Rooms								
			Office	944,055	GSF								
			Retail	79,240	GLSF								
			Restaurant	89,576	GSF								
			Event Space	93,617	GSF								
			Gym	62,148	GSF								
			Grocery	56,912	GSF								
142	Under Construction	Alameda Square 777 South Alameda Street	Restaurant	117,400	GSF	[1]	916	(134)	(172)	(306)	(157)	35	(122)
			Retail	66,200	GLSF								
143	Proposed	1600 South Figueroa Street	Apartments	336	DU	[13]	2,234	34	137	171	135	73	208

Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
		CPC-2017-400-GPA	Hotel	250	Rooms	[15]	2,230	97	71	168	86	89	175
144	Proposed	2159 East Bay Street CPC-2017-624-VZC	Office Retail	203,670 18,330	GSF GLSF	[1]	2,029	194	30	224	57	192	249
145	Proposed	2110 Bay Street 2016-CEN-44566	Apartment Affordable Housing Office Retail	99 11 113,350 43,657	DU DU GSF GLSF	[3]	2,394	180	63	243	89	192	281
146	Proposed	215 West 14th Street	Apartment Retail	154 10,700	DU GLSF	[3]	1,481	22	67	89	81	54	135
147	Proposed	1745 East 7th Street	Apartment Retail	57 6,000	DU GLSF	[3]	635	10	25	35	34	23	57
148	Under Construction	354 South Spring Street	Apartment Restaurant	212 15,280	DU GSF	[13]	1,410	22	86	108	85	46	131
149	Proposed	Alameda District Plan	Residential Office Retail Hotel Restaurant	22 7,443,200 645,000 750 20,000	DU GSF GLSF Rooms GSF	[3]	25,312	862	527	1,389	734	1,042	1,776
150	Proposed	775 South Figueroa Street 945 West 8th Street	Apartment Retail	781 6,700	DU GLSF	[1]	2,869	63	146	209	144	91	235
151	Proposed	655 South San Pedro 513 East 7th Street DIR-2017-2333-SPR	Apartment	81	DU	[3]	539	8	33	41	33	17	50
152	Proposed	900 North Alameda Street 2017-CEN-46271	Data Center	179,900	GSF	[3]	178	8	8	16	3	13	16
153	Proposed	1005 South Mateo Street 2007-CEN-4582	Industrial Park	94,849	GSF	[3]	426	40	9	49	10	39	49
154	Proposed	1000-1024 South Mateo Street	Apartment Office Restaurant Retail	104 101,983 16,279 5,830	DU GSF GSF GLSF	[3]	2,238	153	83	236	90	131	221

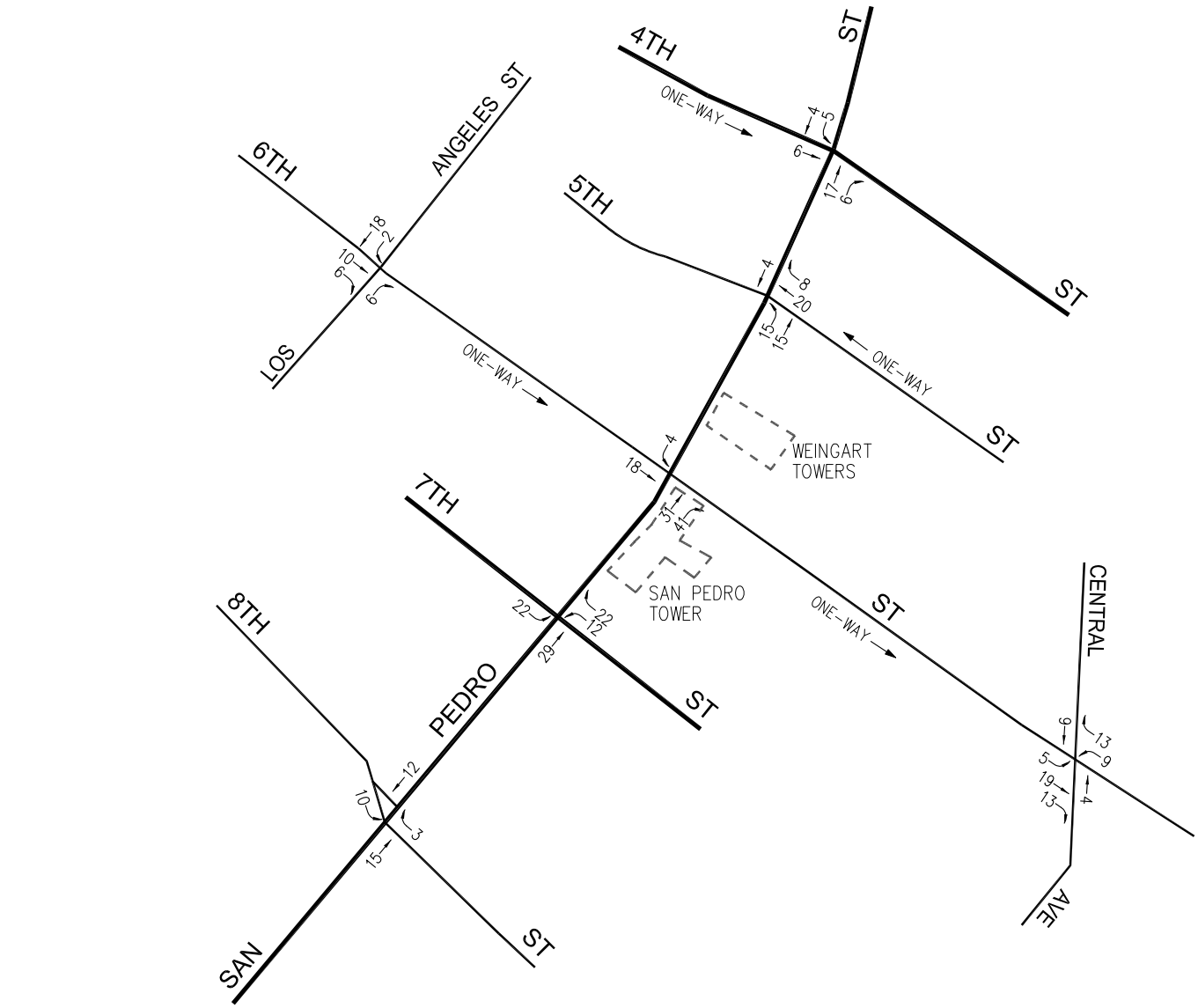
Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data			Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size				In	Out	Total	In	Out	Total
			Arts & Production	5,519	GSF								
155	Proposed	LA County Consolidated Correctional Facility 441 East Bauchet Street	Jail	3,885	Beds	[1]	242	0	9	9	0	9	9
156	Proposed	2143 East Violet Street	Apartment Office Retail	320 224,292 46,670	DU GSF GLSF	[1]	4,477	329	122	451	130	330	460
157	Proposed	806 East 3rd Street	Restaurant	18,327	GSF	[1]	253	1	(1)	0	13	7	20
158	Proposed	Olympia Mixed-Use 1001 West Olympic Boulevard	Apartment Restaurant Retail Hotel	879 20,000 20,000 1,000	DU GSF GLSF Rooms	[1]	10,418	320	388	708	455	309	764
159	Proposed	609 East 5th Street	Apartment	151	DU	[1]	1,004	15	62	77	61	33	94
160	Proposed	810 East 3rd Street	Apartment Restaurant Retail	4 3,541 6,171	DU GSF GLSF	[1]	1,487	37	32	69	87	48	135
161	Proposed	508 East 4th Street	Apartment	41	DU	[1]	167	8	12	20	8	6	14

[1] Source: City of Los Angeles Department of Transportation (LADOT) and Department of City Planning (LADCP), except as noted below. The peak hour traffic volumes were forecast based on trip data provided by LADOT and by applying trip rates as provided in the ITE "Trip Generation Manual," 9th Edition, 2012.
[2] Trips are one-way traffic movements, entering or leaving.
[3] Project description and trip generation forecasts obtained from third party research.
[4] Description listed constitutes the remaining allowable development under this project.
[5] Source: "Metropolis Master Plan Project – Traffic Analysis Update Phase 2" from Tomas Carranza, Senior Transportation Engineer, to Blake Lamb, City Planner, May 9, 2014.
[6] Source: "Traffic Assessment for the Proposed Development Project Located at 1057 South San Pedro Street," from Tomas Carranza, Senior Transportation Engineer, to Karen Hoo, City Planner, November 6, 2013.
[7] Daily trip volumes are not provided. PM peak hour volume was estimated to represent 10% of the daily totals.
[8] Source: "Updated Traffic Assessment for the South Park Residential Sites and Herald Examiner Building Renovation Project", from Tomas Carranza, Senior Transportation Engineer, to Karen Hoo, City Planner, January 24, 2014.
[9] Source: "Grand Avenue/Pico Boulevard Project Traffic Impact Analysis", prepared by Kunzman Associates, Inc., January 27, 2014.
[10] Source: "222 West 2nd Project Traffic Study MOU," prepared by LLG Engineers, Dated January 18, 2016.
[11] Source: "Grand Residences Draft Traffic Impact Study", prepared by LLG Engineers, February 4, 2016.
[12] Sources: "Los Angeles Sports and Entertainment District Specific Plan Determination and Findings", Michael J. LoGrande, Director of Planning, November 12, 2014; "L.A. Entertainment District EIR Traffic Study", prepared by The Mobility Group with Kaku Associates, January 2001. Daily and AM Peak Hour trips were forecast using the following ITE trip generation average rates; Land Use Code 222 (High-Rise Apartment), Land Use Code 931 (Quality Restaurant), and Land Use Code 820 (Shopping Center).

Table 6-68
Related Projects List and Trip Generation [1]

Map No.	Project Status	Project Name/Number Address/Location	Land Use Data		Project Data Source	Daily Trip Ends [2] Volumes	AM Peak Hour Volumes [2]			PM Peak Hour Volumes [2]		
			Land-Use	Size			In	Out	Total	In	Out	Total
[13] ITE Land Use Code 220 (Apartment) trip generation average rates. *[14] ITE Land Use Code 820 (Shopping Center) trip generation average rates.* *[15] ITE Land Use Code 310 (Hotel) trip generation average rates.* *[16] Source: "Olympic Tower Project Traffic Impact Study", prepared by LLG Engineers, October 27, 2016.* *[17] ITE Land use Code 232 (High-Rise Condo/Townhouse) trip generation rates.* *[18] Source: "Los Angeles Sports and Entertainment District Specific Plan", DIR-2005-7453-SPP-M3, January 2015.* *[19] ITE Land Use Code 932 (High-turnover [Sit-Down] Restaurant) trip generation average rates.* *[20] ITE Land Use Code 710 (General Office Building) trip generation equation rates.* *[21] Source: "Times Mirror Square", LADOT Transportation Impact Study Memorandum of Understanding, dated March 30, 2017.* *[22] ITE Land Use Code 495 (Recreational Community Center) trip generation average rates.* *[23] ITE Land Use Code 710 (General Office Building) trip generation average rates.* *Source: Linscott, Law & Greenspan Engineers, 2018. Refer to Appendix M.*											



Source: Linscott, Law & Greenspan, Engineers, 2018.

Figure 6-11
Project Traffic Volumes
Weekday AM Peak Hour

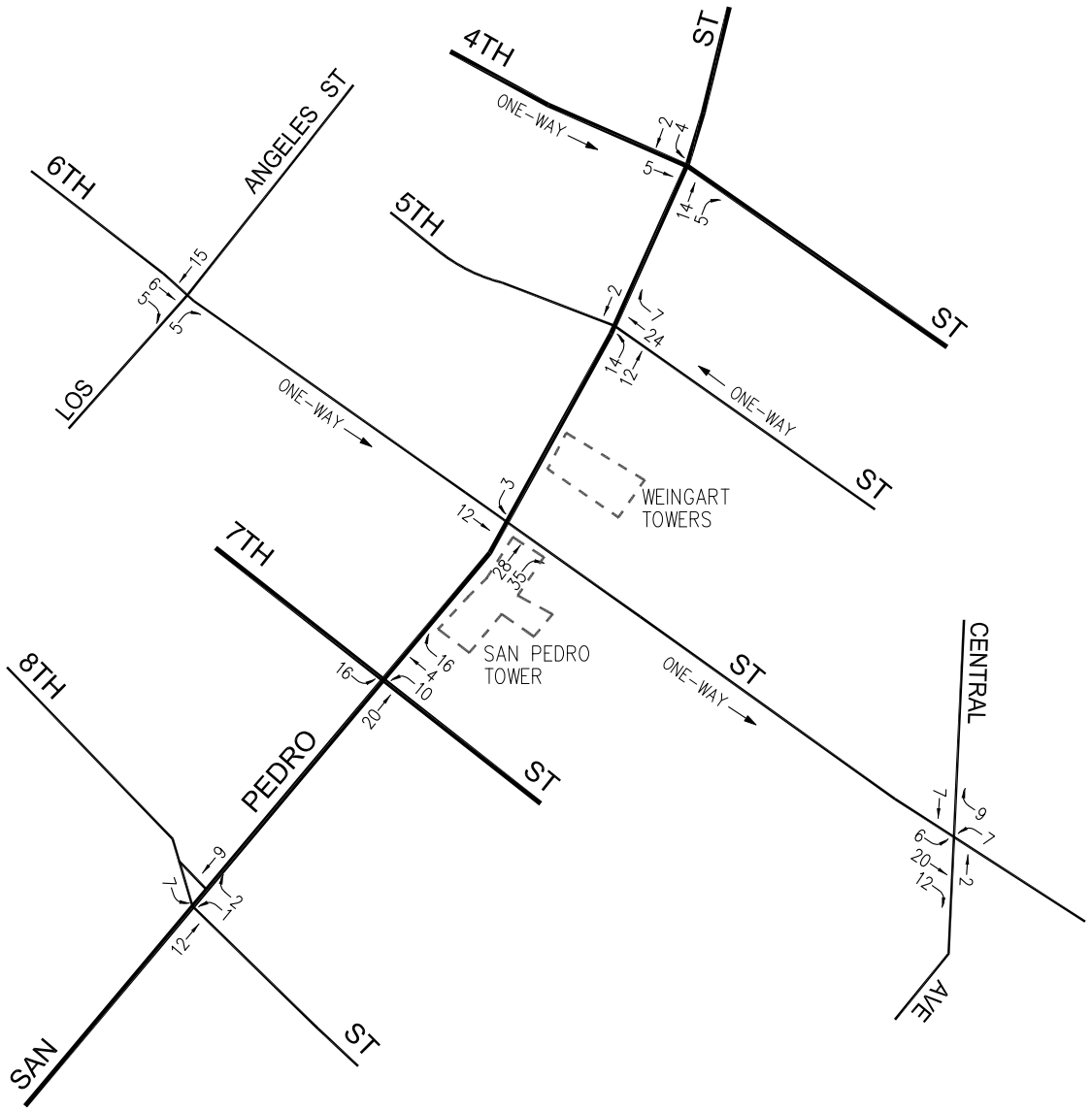


Figure 6-12
Project Traffic Volumes
Weekday PM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.

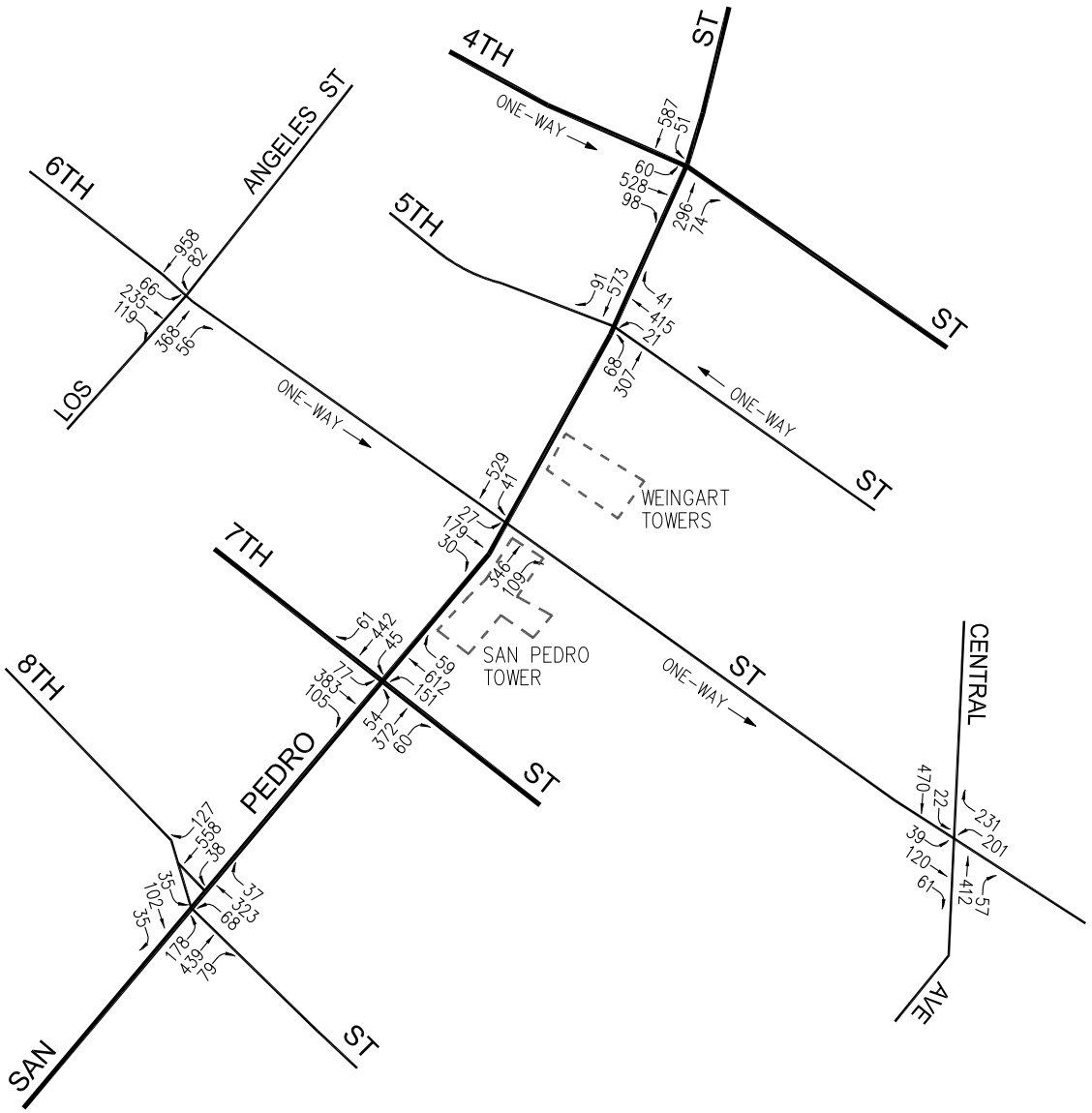


Figure 6-13
Existing With Project Traffic Volumes
Weekday AM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.

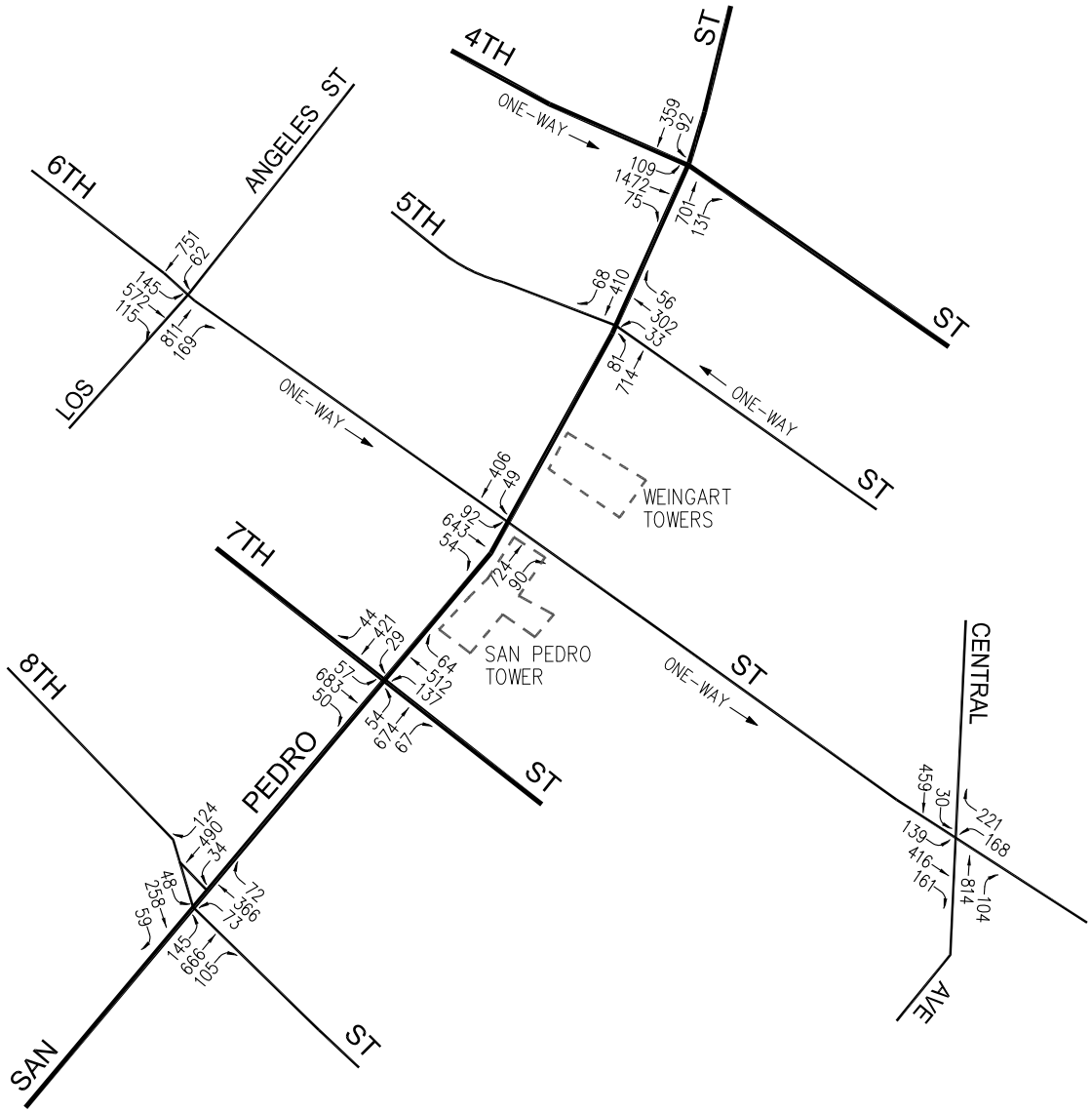


Figure 6-14
Existing With Project Traffic Volumes
Weekday PM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.

Traffic volumes expected to be generated by the related projects were calculated using rates provided in the ITE Trip Generation Manual or were obtained from other traffic studies recently approved by the City. The related projects' respective traffic generation for the weekday AM and PM peak hours, as well as on a daily basis for a typical weekday, is summarized on Table 6-68, The related projects traffic volumes were distributed and assigned to the street system based on the location of the related projects in relation to the study intersections, their proximity to major traffic corridors, proposed land uses, nearby population and employment centers, etc. The distribution of the related projects traffic volumes to the study intersections during the weekday AM and PM peak hours are displayed on Figures 6-15 and 6-16, respectively.

Downtown Transit/Infrastructure Projects

Several transit and/or infrastructure projects are proposed or under construction within the greater Downtown Los Angeles area. While the projects discussed below and others like them could be expected to result in greater trip reductions than what occur today, no trip reductions have been assumed in this traffic analysis for existing uses so as to provide a conservative review of potential traffic impacts. Some of the relevant projects are as follows:

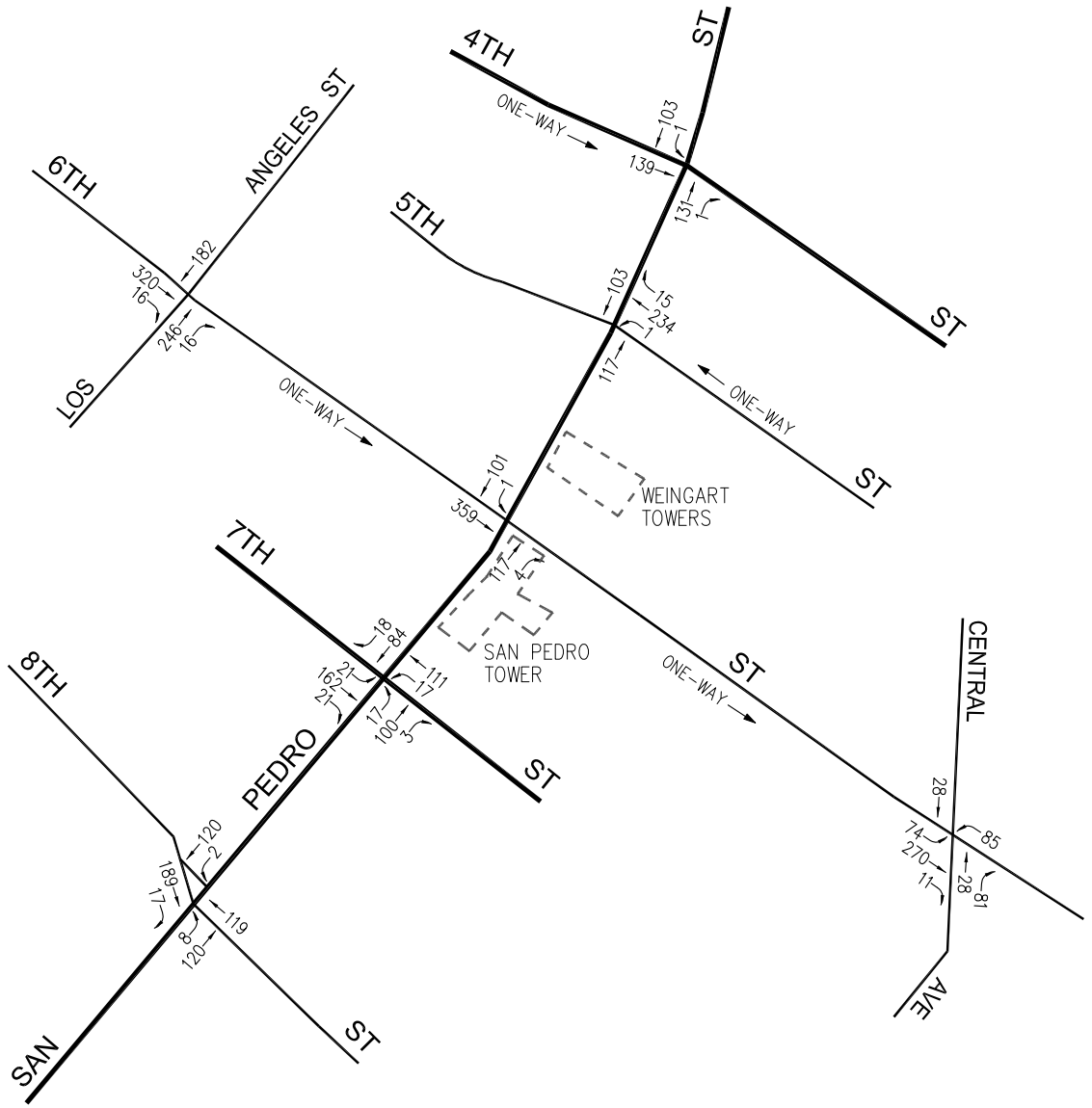
Regional Connector Transit Project

As summarized on the Metro website, the Regional Connector project will extend from Metro's Little Tokyo/Arts District Station to the 7th Street/Metro Center in Downtown Los Angeles. This will allow transit passengers to access the Gold, Blue, Expo, Red, and Purple lines. The addition will extend 1.9 miles and will serve Little Tokyo, the Arts District, Civic Center, the Historic Core, Broadway, Grand Avenue, Bunker Hill, and Flower Street, as well as the Financial District.

This new extension will provide a one-seat ride for travel across Los Angeles County by allowing passengers to travel between Azusa and Long Beach and between East Los Angeles and Santa Monica without having to transfer lines. The forecast opening year of the Regional Connector Transit project is currently 2021.

Downtown Los Angeles Historic Streetcar Project

The restoration of the Historic Streetcar Service in Downtown Los Angeles is expected to revive a service that previously spanned over 600 miles of the Los Angeles area during the first half of the 1900's. The approved alignments closely follow the early alignments that traversed the historic Downtown core. The service would increase mobility and improve connectivity by linking residential and employment hubs, shopping districts, civic resources, cultural institutions, landmarks and entertainment venues for those who live, work, and visit Downtown. The Historic Streetcar project is also intended to connect patrons to a regional network of transit options including local and regional bus lines, and Metro Rail lines including the Regional Connector Transit project. Based on information contained in the Historic Streetcar project's Environmental Impact Report (SCH No. 2013011001), which has been certified by the Los Angeles City Council, assuming that the necessary funding is obtained, this project may be completed by 2020.

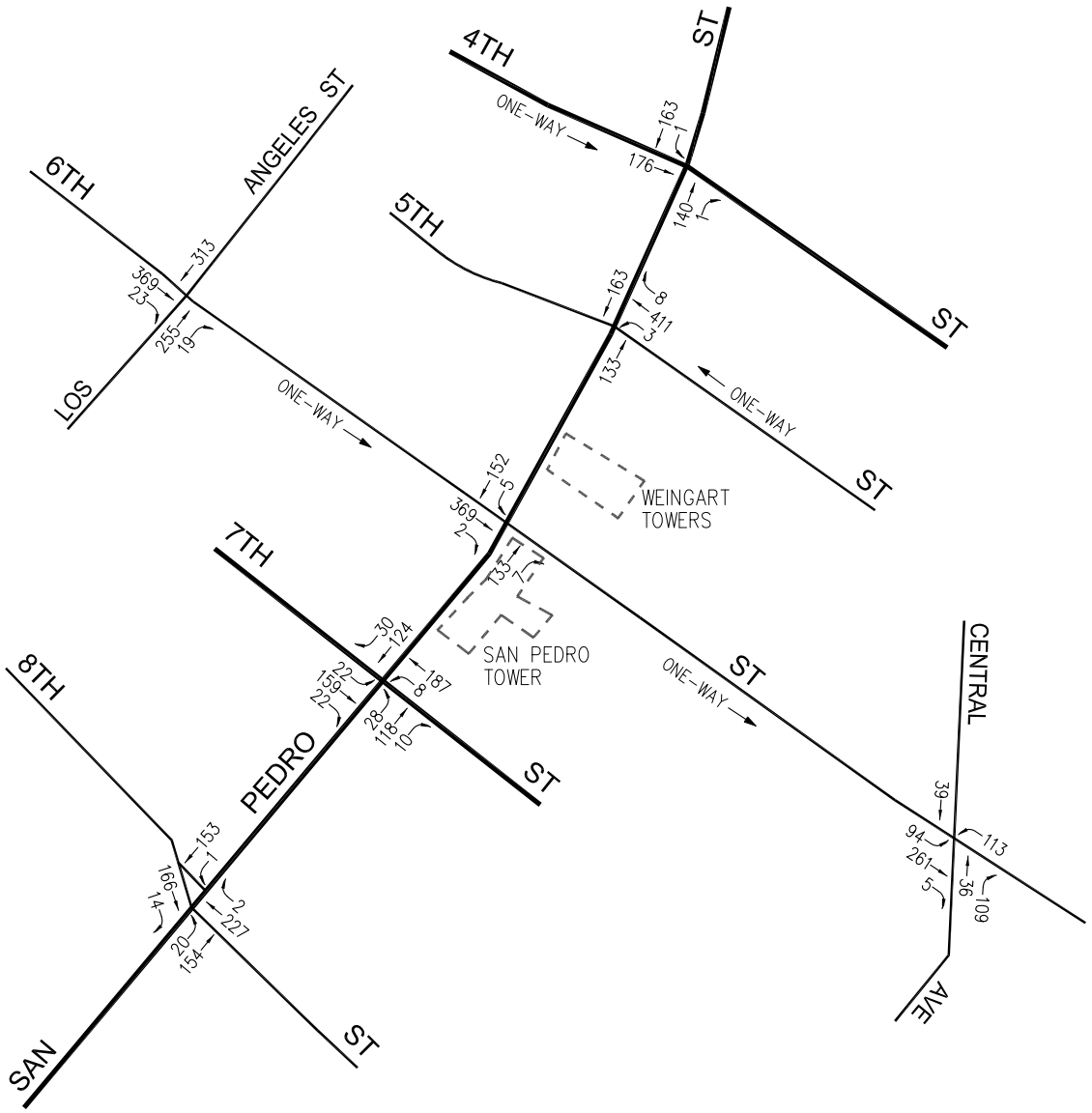


PROJECT SITES

NORTH

Figure 6-15
Related Projects Traffic Volumes
Weekday AM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.



[- - -] PROJECT SITES

NORTH

Figure 6-16
Related Projects Traffic Volumes
Weekday PM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.

Ambient Traffic Growth Factor

Horizon year background traffic growth estimates have been calculated using an ambient traffic growth factor. In addtion to accounting for traffic generated by related projects, an ambient traffic growth factor is intended to include unknown related projects in the study area as well as account for typical growth in traffic volumes due to the development of projects outside the study area. Ambient traffic growth in the Downtown Los Angeles area (i.e., included in Regional Statistical Area 23 [RSA 23] that includes Downtown LA), which is presented in the *2010 Congestion Management Program*, indicates existing traffic volumes are expected to increase at an annual rate of approximately 0.20 percent per year between years 2010 and 2025. An annual growth rate of 1.0 percent until the year 2025 (i.e., the anticipated Project build-out year) was selected for this analysis in consultation with LADOT during the scoping process. Thus, application of this 1.0 percent ambient growth factor in addition to the forecast traffic generated by the related projects allows for a conservative forecast of future traffic volumes in the Project study area as incorporation of both (i.e., an ambient traffic growth rate and a detailed list of related projects) overstates potential future traffic volumes. The related projects should already be incorporated as part of the growth rate projection per the adopted, local and regional planning documents (i.e., which account for the future population, housing, and employment [socio-economic data] projections).

Future (2025) Without Project

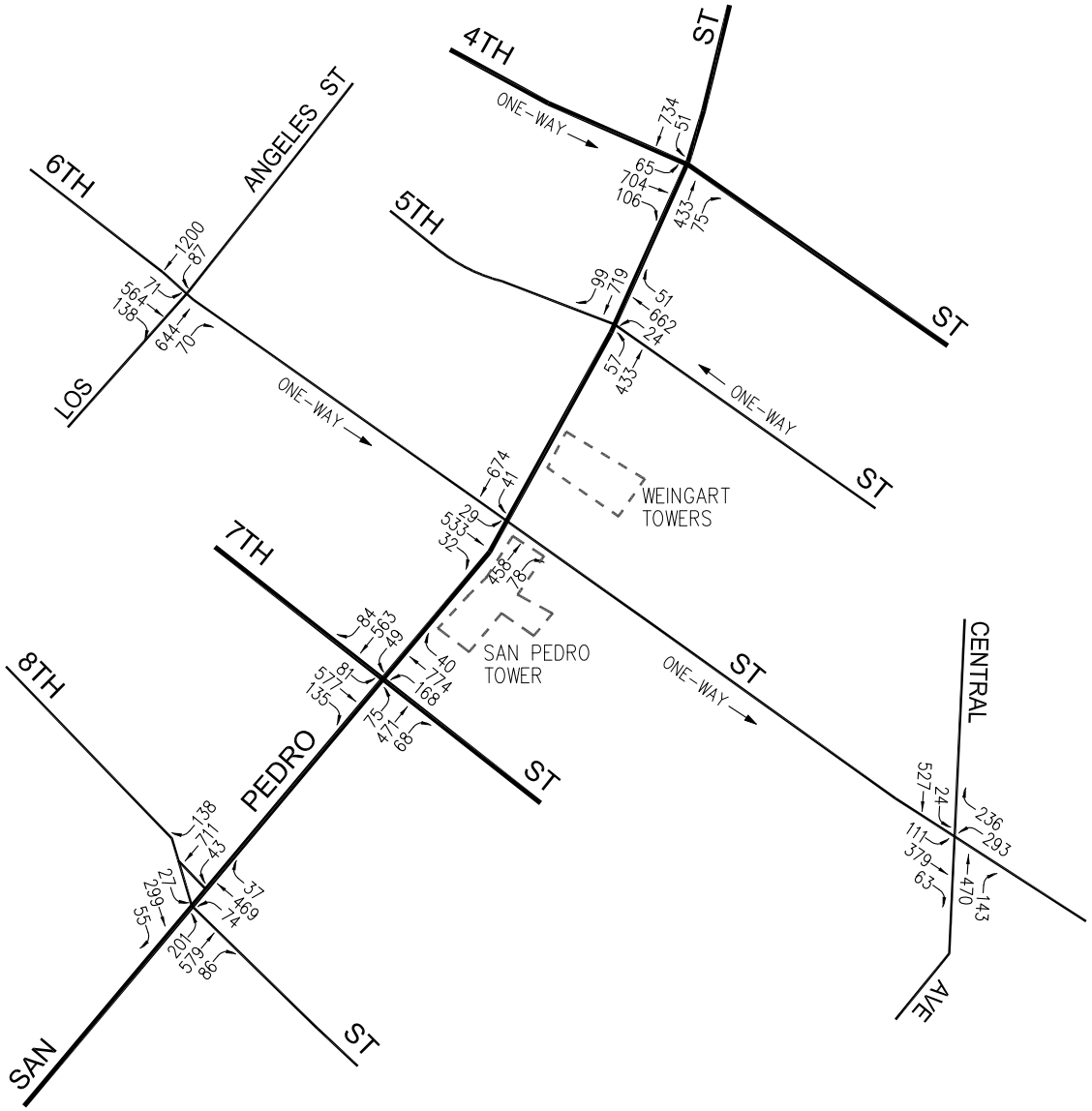
The future without Project (existing, ambient growth, and related projects) traffic volumes at the study intersections during the weekday AM and PM peak hours are presented on Figures 6-17 and 6-18, respectively. The future cumulative baseline conditions were forecast based on the addition of traffic generated by the completion and occupancy of the related projects, as well as the growth in traffic due to the combined effects of continuing development, intensification of existing developments and other factors (i.e., ambient growth). The *v/c* ratios at all of the study intersections are incrementally increased with the addition of ambient traffic and traffic generated by the related projects listed on Table 6-68. As presented in column [3] on Table 6-65, all seven study intersections are expected to operate at LOS C or better during the weekday AM and PM peak hours with the addition of growth in ambient traffic and related projects traffic under the future without Project conditions.

Future (2025) With Project Impacts

The future with Project (existing, ambient growth, related projects, and Project) traffic volumes at the study intersections during the weekday AM and PM peak hours are provided on Figures 6-19 and 6-20, respectively. As shown in column [4] on Table 6-65, application of the City's threshold criteria to the future with Project scenario indicates that the Project would not create significant impacts at any of the seven study intersections. Therefore, cumulative intersection LOS impacts would be less than significant

Construction Traffic Impacts

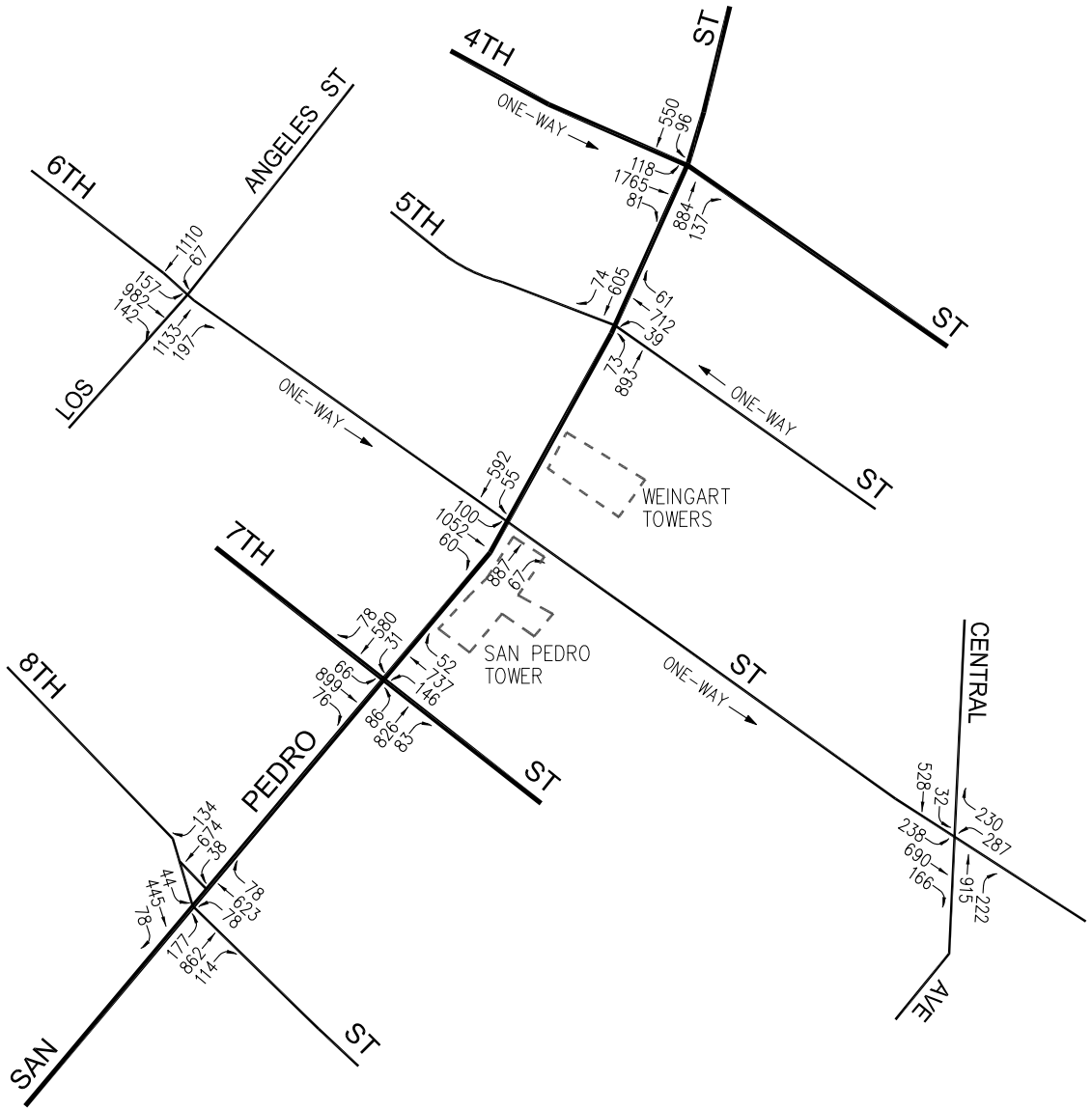
The Project would be constructed over three phases, as shown on Table 6-5 (refer to response to Checklist Question 3[b], Air Quality – Construction Emissions).



PROJECT SITES

Figure 6-17
Future Without Project Traffic Volumes
Weekday AM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.



PROJECT SITES

NORTH

Figure 6-18
Future Without Project Traffic Volumes
Weekday PM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.

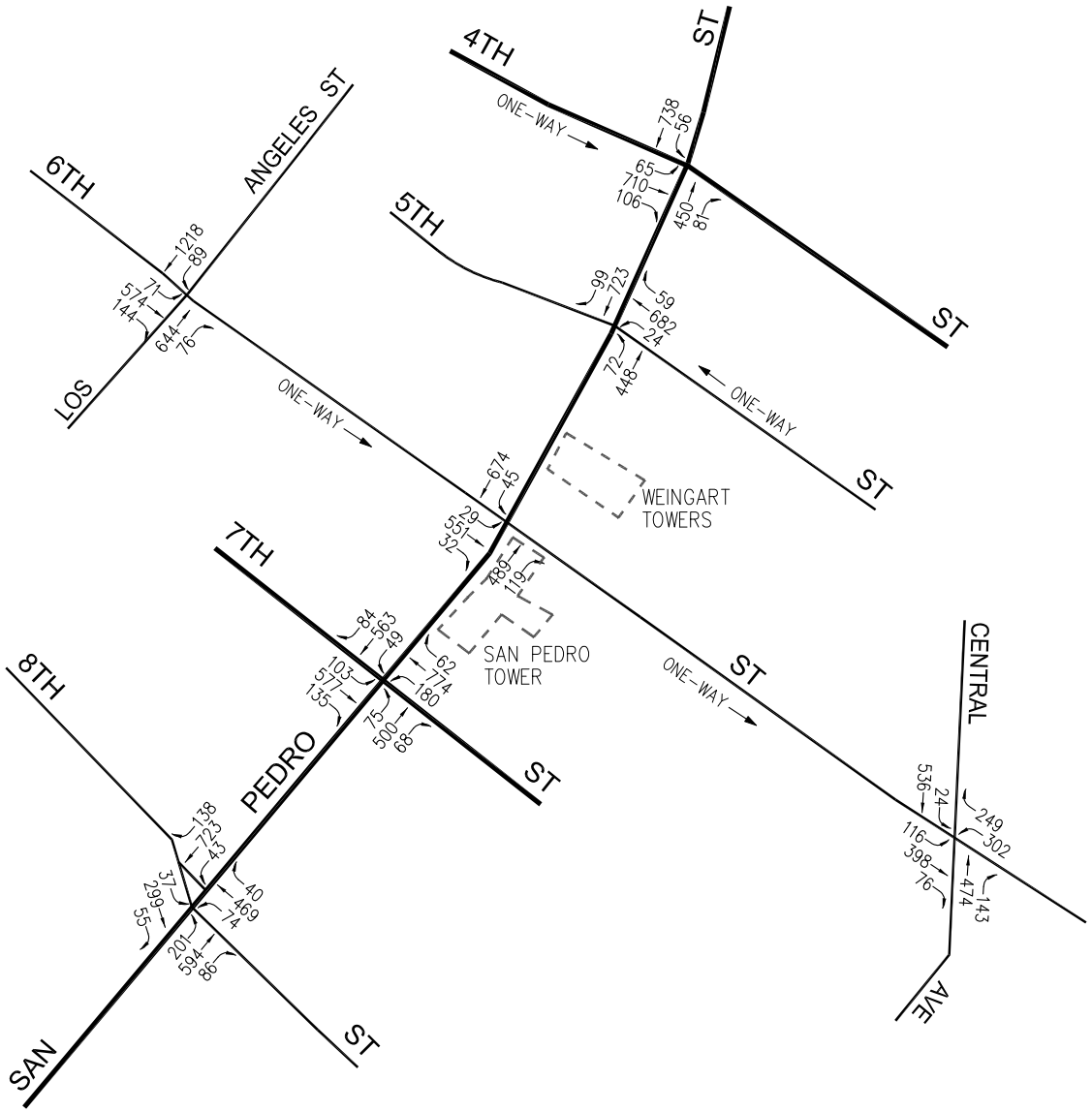


Figure 6-19
Future With Project Traffic Volumes
Weekday AM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.

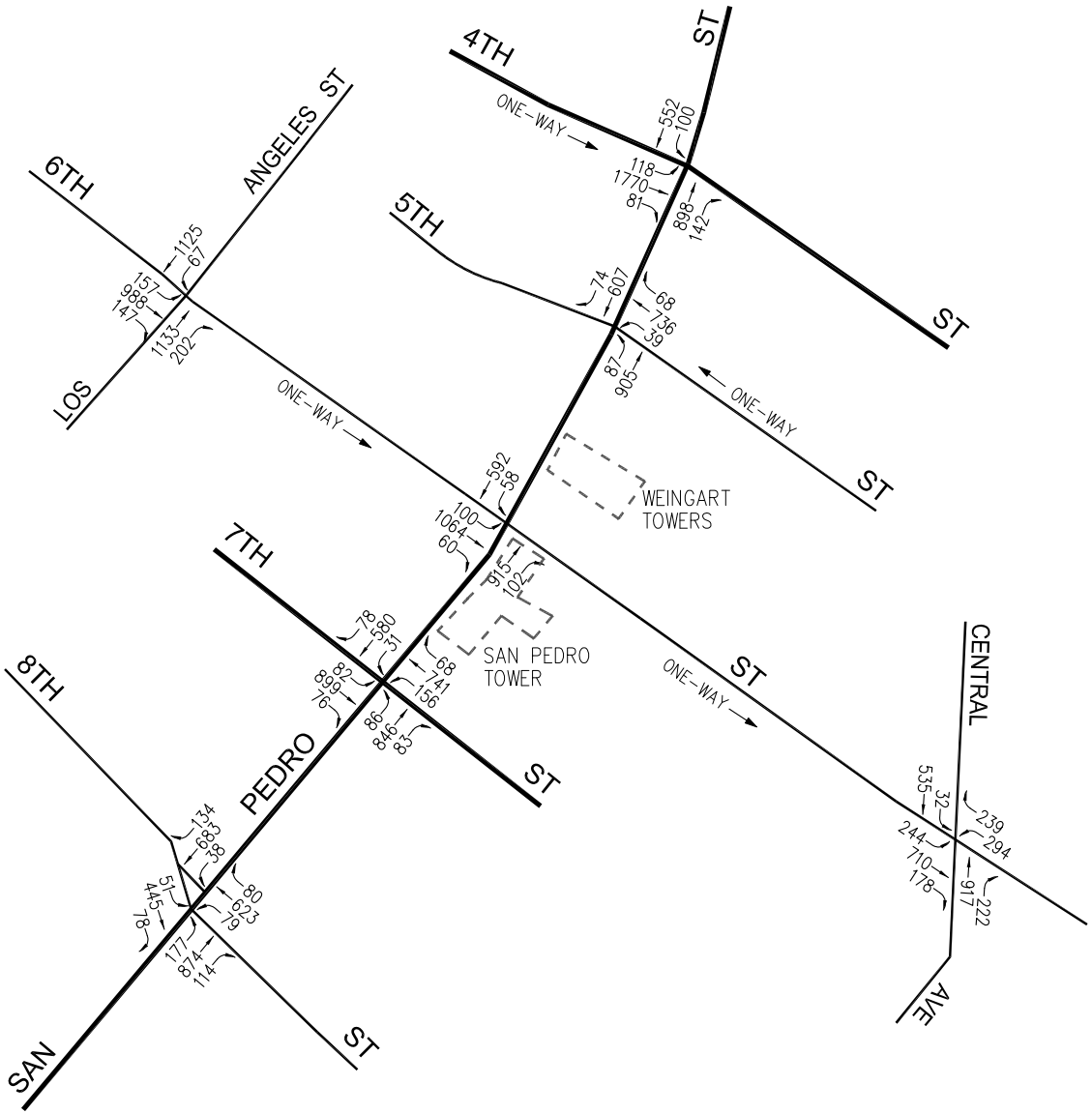


Figure 6-20
Future With Project Traffic Volumes
Weekday PM Peak Hour

Source: Linscott, Law & Greenspan, Engineers, 2018.

The Project's construction phase would begin with development of Tower 1A on Site 1 that would occur over approximately 17 months. During the finishing and architectural coating phase of Tower 1A, the construction phase for Tower 1B would begin and would occur over approximately 18 months. During the building construction phase for Tower 1B, Tower 1A would become operational. The construction phase for Site 2 would occur over approximately 18 months, just after Tower 1B also becomes operational.

The most intensive period of overall traffic generation during any phase of Project construction would occur during the overlap of the construction of Site 2, after Towers 1A and 1B become operational and is estimated to occur over a period of approximately 1 month. For the weekday AM peak hour, the peak construction traffic generation would occur during the Grading and Excavation activities of Site 2 overlapping with the operational traffic associated with Towers 1A and 1B. For the weekday PM peak hour, the peak construction traffic generation would occur during the building construction activities at Site 2 overlapping with the operational traffic associated with Towers 1A and 1B. At this time, it is not known if any temporary lane closures would be necessary through the course of the Project construction. However, any such lane closures likely would occur outside of the weekday AM and PM commute peak hours, so as to maintain roadway capacity when the street system is typically most heavily constrained.

Construction Assumptions

It is assumed that demolition and site preparation would occur on each site as described above. The excavation activities would require the total removal of approximately 25,244 cubic yards of material with the following totals for each building: 10,244 cubic yards for Tower 1A, 4,800 cubic yards for Tower 1B, and 10,200 cubic yards for Site 2. It is assumed that the equipment staging area during the initial phases of construction grading would occur on or within the boundaries of the Project Sites. However, it is possible that equipment staging could occur adjacent to the Project Sites within public rights of way.. Construction worker parking also could occur on-site during certain times. However, during the building construction activities, workers would likely be required to park at an adjacent lot or at other nearby public parking lots so as to avoid any construction workers parking on adjacent roadways.

The City's Noise Ordinance currently limits construction hours Monday through Friday to no earlier than 7:00 AM and no later than 9:00 PM, and to no earlier than 8:00 AM and no later than 6:00 PM on Saturdays. It is important to note that workers are expected to arrive at the construction sites by 6:30 AM and end their workday by 3:30 PM Monday through Friday. For purposes of this analysis, no Saturday construction activities are assumed and while workers would generally depart the site by 3:30 PM, some worker departures are assumed to overlap with the weekday PM peak hour (i.e., 25 percent) in order to account for supervisors' later departures as well as some overtime when it is necessary to maintain the construction schedule.

Peak Construction Traffic Trip Generation (Weekday AM Peak Hour) – Grading/Excavation Activities Associated With Site 2 Overlapping With Site 1 (Towers 1A and Tower 1B) Operational Traffic

It is assumed that heavy construction equipment would be located on-site during grading activities and would not travel to and from the Project Sites on a daily basis. However, truck trips would be generated

during the grading and corresponding export activities in order to remove material from the Project Sites. Trucks are expected to carry the export material to a receptor site(s).

It is anticipated that construction vehicles related to the export activities would have a capacity of 10 cubic yards per truck. It has also been assumed for analysis purposes that all hauling activities would be limited to no earlier than 7:00 AM and end no later than 3:30 PM (i.e., prior to the weekday PM peak hour). Thus, the analysis is conservative in that the excavation and hauling activities are assumed to overlap with the weekday AM peak hour. The export period associated with Site 2 has been estimated to require approximately 11 workdays. During this period, up to 12 truckloads per hour (i.e., 12 inbound trucks and 12 outbound trucks) are anticipated. When accounting for the application of a passenger-car equivalent (PCE) factor of 2.5 to account for the heavier weight and larger size haul trucks, a total of 30 inbound truck PCE trips and 30 outbound truck PCE trips could potentially occur during the weekday AM peak hour. In addition, the operational traffic associated with Site 1 (i.e., Towers 1A and 1B) are forecast to generate 64 inbound and 50 outbound vehicle trips during the weekday AM peak hour. Miscellaneous trucks would travel to and from the sites to account for deliveries and has been estimated at no more than one truck per hour (i.e., no more than three inbound PCE trips and three outbound PCE trips during the weekday AM peak hour). Taken together, a total of 180 trips are forecast to occur during the weekday AM peak hour during this period (i.e., 97 inbound and 83 outbound trips). In addition, it is noted that the proposed haul route would require review and approval by the City.

Given that buildout of the Project would generate approximately 229 net new vehicle trips (i.e., 120 inbound and 109 outbound net new trips) during the weekday AM peak hour (refer to Table 6-67) and no significant traffic impacts are expected (refer to Table 6-65), it can also be concluded based on a comparative review of trip generation that no significant traffic impacts are anticipated to occur during this peak construction activity of Site 2 (i.e., which overlaps with operational traffic from Site 1). The discussion below provides the forecast of the peak weekday PM peak-hour trip generation during any phase of construction/building operation.

Peak Construction Traffic Trip Generation (Weekday PM Peak Hour) – Building Construction Activities Associated With Site 2 Overlapping With Site 1 (Towers 1A and Tower 1B) Operational Traffic

As described above, the peak construction traffic generation during the weekday PM peak hour would occur during the building construction/architectural coatings construction work of Site 2 overlapping with the operational traffic of Site 1 (i.e., Towers 1A and 1B). Activities related to this phase are expected to generate the highest number of construction worker vehicle trips as compared to the other construction activities and expected to occur over a period of approximately 1 month Based on information provided by the Project Applicant, the maximum number of construction workers during this phase is expected to total 95 workers. Construction workers are expected to arrive to the Project Sites by 6:30 AM. Assuming the typical workday ends at 3:30 PM, fifty percent of the workers are assumed to leave the sites between 3:30 PM and 4:00 PM, twenty-five percent between 4:00 PM and 4:30 PM, and the remaining twenty-five percent after 4:30 PM (including supervisors). Thus, while these construction worker trips would generally occur outside of the weekday commute peak hours of adjacent street traffic, twenty-five percent of the work force (i.e., 24 workers) have been assumed to overlap with the weekday commute PM peak

hour (i.e., between 5:00 PM and 6:00 PM) in order to provide a conservative forecast of construction traffic generation.

It is anticipated that construction workers would primarily remain on-site throughout the day. The number of construction worker vehicles is estimated using an average vehicle ridership of 1.135 persons per vehicle (as provided in the SCAQMD's CEQA Air Quality Handbook). Thus, it is estimated that approximately 168 vehicle trips (84 inbound trips and 84 outbound trips) on a daily basis would be generated to and from the sites by the construction workers during this peak building construction phase. With 25 percent of the workers conservatively assumed to overlap with the weekday PM peak hour, this would result in 21 outbound construction worker vehicle trips. It is generally anticipated that construction worker-related traffic would be largely freeway oriented. Construction workers would likely arrive and depart via the on- and off-ramps serving the I-10 Freeway, I-110 Freeway, and U.S. 101 Freeway. The most commonly used freeway ramps would be nearest the Project Sites. The construction work force would likely be generated from all parts of the Los Angeles region and are, thereby, assumed to arrive from all directions.

Operational traffic associated with Site 1 (i.e., Towers 1A and 1B) is expected to overlap with this phase of Site 2 construction activities. Site 1 operations are forecast to generate 44 inbound and 60 outbound vehicle trips during the weekday PM peak hour. Miscellaneous trucks would travel to and from the sites to account for site deliveries and has been estimated at no more than one truck per hour (i.e., no more than three inbound PCE trips and three outbound PCE trips during the weekday PM peak hour). Taken together, a total of 131 trips are forecast to occur during the weekday PM peak hour during this period (i.e., 47 inbound and 84 outbound trips).

Given that buildout of the Project would generate approximately 197 net new vehicle trips (i.e., 91 inbound and 106 outbound net new trips) during the weekday PM peak hour (refer to Table 6-67) and no significant traffic impacts are expected (refer to Table 6-65), it can also be concluded based on a comparative review of trip generation that no significant traffic impacts are anticipated to occur during this peak Site 2 construction activity (i.e., which overlaps with operational traffic from Site 1).

Construction Management and Haul Route Approval

Approvals required by the City and Caltrans for implementation of the Project include a Truck Haul Route program approved by the City and an encroachment permit obtained from Caltrans for truck hauling activities on state highway facilities. With regard to other construction traffic-related issues, construction equipment would be stored within the perimeter fence of the construction site.

As a general contractor has not yet been selected, the exact extent of the construction work-site boundary cannot be determined at this time. However, during certain portions of the construction schedule it is possible that some frontage sidewalks may need to be temporarily closed. Should that be determined to be necessary, appropriate pedestrian detours would be required to be established along with the appropriate advance warning signage directing pedestrians to other available sidewalks and crosswalks/crossings. Should any such pedestrian detours or temporary travel lane closures be proposed, traffic control and management plans will be prepared for the required review and approval by the

LADOT and the Department of Public Works, Bureau of Street Services. However, the Project Applicant would be required to implement Mitigation Measure TRAFFIC-MM-1 and would be required to prepare and implement a Construction Staging and Traffic Management Plan (CSTMP).

The facility(ies) to receive the Project's export materials that would be generated during the Project's construction phase has not been identified at this time. However, several facilities are located within a 50-mile radius of the Project Site, including, but not limited to: Active Recycling MRF and Transfer Station, American Reclamation CDI Processing Facility, Downtown Diversion, and Manning Pit. The Project's haul route would be required to be approved by the City. Project haul trucks would use the most direct route to transport demolition and construction debris from the Project Sites to a designated recycling facility and/or landfill. Regional access to recycling facilities and/or landfills is available to the Project Sites via State Route 110/I-110 Freeway, located approximately 1.0 mile to the west; I-10 Freeway, located approximately 1.5 miles to the south; and State Route 110/I-10 Freeway located approximately 1.0 mile to the east. Direct local access to these freeways and the likely local haul route(s) from the Project Sites could include westbound East 6th Street to State Route 110/I-110 Freeway, southbound South San Pedro Street to the I-10 Freeway, and eastbound East 6th Street to State Route 110/I-10 Freeway.

b) Would the project conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the count congestion management agency for designated roads or highways?

Less Than Significant Impact. The Traffic Impact Analysis (TIA) Guidelines of the 2010 Congestion Management Program (CMP) for Los Angeles County require analysis of all CMP arterial monitoring locations where a project could add a total of 50 or more trips during either peak hour. Additionally, all freeway monitoring locations where a project could add 150 or more trips in either direction during the peak hours are to be analyzed.

Under SB 375, when proceeding with a SCEA, project-specific and cumulative impacts associated with cars and light trucks on the regional transportation network are not required to be assessed, pursuant to PRC 21155.2(b) and 21159.28(a). To the extent that these impacts are included herein is done so for informational purposes only.

Arterial Monitoring Locations

The following CMP arterial monitoring locations are the closest to the Project Sites:

- No. 43: Alameda Street/Washington Boulevard
- No. 44: Alvarado Street/Sunset Boulevard

The Project would not add 50 or more trips during either the AM or PM weekday peak hours (i.e., of adjacent street traffic) at the CMP arterial monitoring locations listed above based on Traffic Impact Study dated March 13, 2018 (Appendix M1). Thus, no further review of potential impacts to intersection monitoring locations that are part of the CMP highway system is necessary. Therefore, Project impacts related to CMP arterial monitoring locations would be less than significant.

Freeway Monitoring Locations

The following CMP freeway monitoring locations are closest to the Project Sites:

- No. 1036: US Route 101, north of Vignes Street
- No. 1048: Interstate 110, south of US Route 101
- No. 1049: SR-110 Freeway at Alpine Street

Based on Traffic Impact Study dated March 13, 2018 (Appendix M1) and as determined by LADOT (Appendix M2), the Project would not add 150 or more trips (in either direction) during either the AM or PM weekday peak hours to CMP freeway monitoring locations listed above Thus, no further review of potential impacts to freeway monitoring locations that are part of the CMP highway system is necessary. Therefore, Project impacts related to CMP freeway monitoring locations would be less than significant.

c) Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The maximum building height on Site 1 would be approximately 200 feet. On Site 2, the maximum building height would be approximately 219 feet. The Project's building heights would be similar to that of existing buildings located in the Downtown area. The Project Sites are not located near any airports; the nearest airport is Hollywood Burbank Airport, 16.9 miles away and thus, the proposed building would not encroach into any air traffic space. Due to the height of the proposed building, the City would be required to file a Form 7460 with the FAA, and would be required to obtain a Determination of No Hazard to Air Navigation from the FAA that would be required to be submitted to the Department of Building and Safety prior to issuance of any building permits. Thus, the Project would not 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. Therefore, no impacts related to this issue would occur.

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

Less Than Significant Impact. The Project does not include development of any new roadways or intersections. Site 1 currently has a total of three driveways (one driveway on San Pedro Street and two driveways on Crocker Street), although it appears that only the northerly driveway on Crocker Street is currently used for vehicular access. Site 2 currently has a total of three driveways (two driveways on 6th Street and one driveway on Crocker Street), although it appears that only the easterly driveway on 6th Street and the Crocker Street driveway are currently used for vehicular access.

Vehicular movements into and out of the Site 1 would be provided via a single driveway on Crocker Street, while vehicular access into and out of Site 2 would be provided via a single driveway on San Pedro Street. Descriptions of the proposed project vehicular site access driveways are provided below.

Site 1 – Crocker Street Driveway: The Site 1 driveway would be located at the northeast corner of the site along Crocker Street (i.e., along the easterly property frontage). This driveway would be located in essentially the same location as an existing site driveway that is currently inactive. One inbound lane and

one outbound lane would be provided at this location with gate control equipment located such that no vehicle queuing would extend back out onto the public right-of-way. This driveway is planned to accommodate full access (i.e., left-turn and right-turn ingress and egress turning movements) for motorists accessing Site 1. The Crocker Street driveway would be constructed to City design standards.

Site 2 – San Pedro Street Driveway: The Site 2 driveway would be located at approximately 118 feet south of the East 6th Street along South San Pedro Street (i.e., along the westerly property frontage). One inbound lane and one outbound lane would be provided at this location with gate control equipment located such that no vehicle queuing would extend back out onto the public right-of-way. Based on preliminary comments received from LADOT staff, this driveway would be restricted to right-turn ingress and egress turning movements for motorists accessing Site 2. The driveway would be constructed to City design standards.

All ingress/egress points associated with the Project would be designed and constructed in accordance with the requirements of the LADBS, the City's Department of Public Works, and LADOT. Therefore, Project impacts related to roadway hazards would be less than significant.

e) Would the project result in inadequate emergency access?

Less Than Significant Impact. Prior to issuance of a building permit, the Project Applicant would be required to submit parking and driveway plans to the Bureau of Engineering, LAFD, and LADOT for approval to ensure that the Project complies with code-required emergency access. Through compliance with existing City regulations, the Project would not result in any significant impacts related to emergency access.

f) Would the project conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Less Than Significant Impact. During the Project's construction phase, sidewalks adjacent to the Project Sites could be impeded. However, the Project Applicant would be required to comply with LAMC Section 62.45 and provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers.

As required by the *2010 Congestion Management Program*, a review has been made of the potential impacts of the Project on transit service. As discussed previously, existing transit service is provided in the vicinity of the Project Sites.

Project trip generation shown on Table 6-66 was adjusted by values set forth in the CMP (i.e., person trips equal 1.4 times vehicle trips, and transit trips equal 3.5 percent of the total person trips) to estimate transit trip generation. Pursuant to the CMP guidelines, the proposed project is forecast to generate demand for 11 and 10 transit trips during the weekday AM and PM peak hours, respectively. Over a 24-hour period, the would generate demand for approximately 100 daily transit trips. The calculations are as follows:

- Weekday AM Peak Hour = 229 × 1.4 × 0.035 = 11 Transit Trips

- Weekday PM Peak Hour = 197 × 1.4 × 0.035 = 10 Transit Trips
- Weekday Daily Trips = 2,038 × 1.4 × 0.035 = 100 Transit Trips

As shown on Table 6-62, 11 bus transit lines and routes are provided in close proximity to the Project Sites. As outlined on the table under the "No. of Buses During Peak Hour" column, these 11 transit lines provide services for an average of (i.e., average of the directional number of buses/trains during the peak hours) roughly 139 and 145 buses during the weekday AM and PM peak hours, respectively. Thus, based on the above calculated weekday AM and PM peak-hour trips, this would correspond to less than one additional transit rider per bus. It is anticipated that the existing transit service in the area of the Project Sites would adequately accommodate the increase of Project-generated transit trips. Thus, given the number of Project-generated transit trips per bus, no project impacts on existing or future transit services in the area of the Project Sites would occur as a result of the Project.

Mitigation Measures (Construction Traffic)

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

TRAFFIC-MM-1: Construction Staging and Traffic Management Plan

Prior to issuance of a demolition permit, in coordination with LADOT and the Department of Building and Safety, the Project Applicant shall prepare a detailed Construction Staging and Traffic Management Plan (CSTMP), including street closure information, detour plans, haul routes, and staging plans. The CSTMP shall outline how construction would be carried out and identify specific actions that would be required to reduce effects on the surrounding community. The CSTMP shall be based on the nature and timing of specific construction activities and other projects in the vicinity, and shall include the following elements as appropriate:

- Provide for temporary traffic control during all construction activities within public rights-of-way to improve traffic flow on public roadways (e.g., flagmen);
- Schedule of construction activities to reduce the effect on traffic flow on surrounding arterial streets;
- Reroute construction trucks to reduce travel on congested streets to the extent feasible;
- Prohibit construction-related vehicles from parking on surrounding public streets;
- Provide safety precautions for pedestrians and bicyclists through such measures as alternate routing and protection barriers in compliance with LAMC Section 62.45;
- Accommodate all equipment on-site; and

- Prepare a haul truck route program for the Project that specifies the routes to and from the Project Sites.

Cumulative Impacts

Cumulative intersection LOS impacts were addressed previously under "Future (2025) With Project Impacts." As shown on Table 6-65, no significant cumulative intersection LOS impacts would occur.

As noted previously, while there are 161 related projects that fall within a 1.5-mile radius of the Project, only a few of the related projects are located within about a four-block radius of the Project. Two related projects (Nos. 105 and 122) are located on or near eastbound East 6th Street; one related project (No. 35) is located on or near westbound East 6th Street; and two related projects (Nos. 27 and 151) are located on or near southbound South San Pedro Street. It is possible that the construction of some of these related projects could overlap with the Project's construction phase. However, similar to the Project, those projects would be required to prepare and implement a CSTMP (refer to Mitigation Measure TRAFFIC-MM-1) should any temporary lane closures or re-routing of vehicle and bicycle traffic, sidewalk closures and pedestrian re-routing be anticipated.

While the exact duration of any cumulative construction activities is unknown at this time, no other related projects are located in the immediate vicinity on San Pedro Street, 6th Street, or Crocker Street. As stated previously, the Project's construction phase is estimated to occur over approximately 49 months. Thus, the cumulative impacts during concurrent construction activities are forecast to be less than significant. Also, as discussed previously, the Project's peak-hour construction traffic generation would be much less than the Project's overall peak hour operational traffic generation, and would not be result in any significant intersection LOS impacts.

17. TRIBAL CULTURAL RESOURCES

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of size and scope of the landscape, sacred place, or object with cultural value to a California Native tribe, and that is:

i) 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

Less Than Significant Impact. The Project Sites are located in an urbanized area of the City. Site 1 is developed with a surface parking lot and a food service building; Site 2 is developed with a surface parking lot. As discussed in response to Checklist Question 5(a), the Project Sites do not contain any resources that are listed or eligible for listing in the California Register, National Register, or any other local register or historical resources. No significant tribal cultural resources are known to exist at the Project Sites. Specifically, as discussed in response to Checklist Question 5(b), based on a records search conducted by the South Central Coast Information Center, 4 archaeological sites have been recorded within a 0.5-mile radius of the Project Sites, and no sites have been recorded at the Project Sites (refer to

Appendix G). However, unknown buried remains of the Zanja Madre (a historical water conveyance system) could potentially fall within the boundaries of the Project Sites.[162] As such, it is possible that unknown tribal cultural resources could exist at the Project Sites and could be encountered during grading and excavation activities. To prevent such potential impacts, the Project Applicant would be required to implement Mitigation Measures CULT-MM-1 through CULT-MM-3, which would ensure that Project impacts related to unknown archaeological resources would be less than significant. Additionally, the Project Applicant would be required to implement the City's standard condition of approval related to the inadvertent discovery of tribal cultural resources that requires that in the event that objects or artifacts that may be tribal cultural resources are encountered during the course of any ground disturbance activities, all such activities shall temporarily cease on the project site until the potential tribal cultural resources are properly assessed and addressed pursuant to the process set forth below.[163]

- Upon a discovery of a potential tribal cultural resource, the Project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 473-9723.

- If the City determines, pursuant to Public Resources Code Section 21074 (a)(2), that the object or artifact appears to be tribal cultural resource, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Project Permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered tribal cultural resources.

- The Project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.

- The Project Permittee shall submit a tribal cultural resource monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The Project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

- If the Project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications

[162] *Record Search Results for the Weingart Project, South Central Coast Information Center, December 4, 2017. Refer to Appendix G.*

[163] *Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity*

and experience to mediate such a dispute. The Project Permittee shall pay any costs associated with the mediation.

- The Project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.

- Copies of any subsequent prehistoric archaeological study, tribal cultural resources study or report, detailing the nature of any significant tribal cultural resources, remedial actions taken, and disposition of any significant tribal cultural resources shall be submitted to the SCCIC at California State University, Fullerton.

- Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, California Public Resources Code, and shall comply with the City's AB 52 Confidentiality Protocols.

Compliance with this standard City condition of approval would ensure that Project impacts related to unknown tribal cultural resources would be less than significant.

ii) 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, the lead agency shall consider the significance of the resource to a California Native American tribe?

Less Than Significant Impact. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources, as defined in Public Resources Code Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation or Notice of Negative Declaration/Mitigated Negative Declaration (or other similar CEQA document) on or after July 1, 2015. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

Pursuant to AB 52, the Department of City Planning notified Native American tribes as to the Project with a 30-day consultation period on March 29, 2017. The City conducted consultation with the Gabrielino Tribe on May 17, 2017 (refer to Appendix N). In addition to the verbal information provided during the consultation, the representative of the Gabrielino Tribe stated that additional evidence would be provided to the City. Subsequent to the consultation the Gabrielino Tribe did not provide any evidence that tribal cultural resources are located on the Project Sites. As a result, the City closed consultation. Nonetheless, it is possible that unknown archaeological resources could exist at the Project Sites that could be encountered within the underlying alluvium, given the relative sensitivity of the Project region.

Nonetheless, the Project Applicant would be required to implement the City's standard condition of approval related to the inadvertent discovery of tribal cultural resources outlined above, which would ensure that Project impacts related to unknown tribal cultural resources would be less than significant.

Cumulative Impacts

Impacts related to tribal cultural resources tend to be site-specific and are assessed on a site-by-site basis. The City would require the applicants of each of the related projects to assess, determine, and mitigate any potential impacts related to tribal cultural resources that could occur as a result of development, as necessary. As discussed previously, through compliance with existing laws and the City's conditions of approval, Project impacts associated with historic, archaeological, and paleontological resources would be less than significant. However, the occurrence of these impacts would be limited to the Project Sites and would not contribute to any potentially significant cultural resources impacts that could occur at the sites of the related projects. As such, the proposed Project would not contribute to any potential cumulative impacts related to cultural resources. Therefore, cumulative impacts related to cultural resources would be less than significant.

18. UTILITIES AND SERVICE SYSTEMS

a) Would the project exceed wastewater treatment requirements of the applicable regional water quality control board?

No Impact. The Project Sites are located within the service area of the Hyperion Water Reclamation Plant (HWRP), which treats sewage and some stormwater from the Los Angeles area. The Project would generate approximately 99,226 gallons of wastewater per day (or 0.09 mgd) that is typically associated with residential/office/retail land uses and would not generate any wastewater, such as that from industrial and some commercial uses, which would require pre-treatment.[164] Thus, the Project would not exceed wastewater treatment requirements of the applicable regional water quality control board. Therefore, no impacts related to this issue would occur as a result of the Project.

Cumulative Impacts

Implementation of the related projects listed on Table 2-2 in Section 2 (Project Description) could increase the need for wastewater treatment. Most of the related projects would generate wastewater that would not require any special pre-treatment. Related projects that would require special wastewater treatment would be required to comply with the treatment requirements of the relevant wastewater treatment plant. For these reasons, cumulative impacts related to wastewater treatment would be less than significant.

[164] *This assumes that wastewater generation equal water consumption.*

b) Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. LADWP owns and operates the Los Angeles Aqueduct Filtration Plant (LAAFP) located in the Sylmar community of the City. The LAAFP treats City water prior to distribution throughout LADWP's Central Water Service Area. The designated treatment capacity of the LAAFP is 600 million gallons per day (mgd), with an average plant flow of 550 mgd during the summer months and 450 mgd during the remaining months of the year. Thus, the facility has between 50 to 150 mgd of remaining capacity, depending on the season. As shown on Table 6-69, the Project would consume approximately 99,226 gallons of water per day (or 0.09 mgd). (Corresponding water conservation calculations for the Project are shown on Table 6-70.) With the remaining capacity of approximately 50 to 150 mgd, the LAAFP would have adequate capacity to serve the Project. Therefore, Project impacts related to water treatment would be less than significant.

Table 6-69
Estimated Project Water Demand

Existing Water Uses to be Removed						
Existing Use[1]		**Size**			**(gpd)**	**(af/y)**
Food Services Center		7,000 sf			957	
Surface Parking		N/A			0	
		Existing to be Removed Total[2]			***957***	***1.07***
Estimated Project Water Demand						
Proposed Uses[1]	**Size**	**Water Use Factor[3] (gpd/unit)**	**Base Demand (gpd)**	**Required ordinances Water Savings[4] (gpd)**	**(gpd)**	**(af/y)**
Residential Efficiency[5]	332 du	150	49,800			
Residential: Apt. 1 bd[6]	50 du	180	9,000			
Base Demand Adj. (Residential Units)[7]			5,898			
Site 1 Residential Units Total	**382 du**		**64,698**	**10,645**	**54,053**	**60.55**
Cafeteria	271 seat	30	8,130			
Office	7,683 sf	0.12	922			
Community[8]	6,347 sf	0.12	762			
Retail	2,250 sf	0.025	56			
Base Demand Adjustment (Other)[7]			90			
		Site 1 Other Total	**9,960**	**1,750**	**8,210**	**9.20**
Residential: Efficiency[6]	303 du	150	45,450			
Base Demand Adjustment (Residential Units)[7]			4,391			
Site 2 Residential	**303 du**		**49,841**	**7,850**	**41,991**	**47.04**

Table 6-69
Estimated Project Water Demand

Units Total						
Office	17,100 sf	0.12	2,052			
Retail	3,200 sf	0.025	80			
Base Demand			138			
Adjustment (Other)[7]						
		Site 2 Other Total	**2,270**	**1,048**	**1,222**	**1.37**
Landscaping[9]	13,254 sf		1,238	557	681	0.76
Parking Structure[10]	107,335 sf	0.02	71	0	71	0.08
		Subtotal	***128,078***	***21,850***	***106,226***	***119.00***
		Less Existing to be Removed Total			*-957*	*-1.07*
		Less Additional Conservation[11]			*-6,045*	*-6.77*
		Net Total Water Demand			**99,226**	**111.16**

[1] *Provided by City of Los Angeles Department of City Planning in the Request for Water Supply Assessment letter and Scope Confirmation e-mail. See Appendix A of the WSA.*

[2] *The existing water demand is based on the LADWP billing data (annual average from 2010 to 2017).*

[3] *Proposed indoor water uses are based on 2012 City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer. Generation Rates table available at https://wwww.lacitysan.org/fmd/pdf/sfcfeerates.pdf.*

[4] *The proposed development land uses will conform to City of Los Angeles Ordinance No. 184248, 2016 California Plumbing Code, 2016 California Green Building Code (CALGreen), 2017 Los Angeles Plumbing Code, and 2017 Los Angeles Green Building Code.*

[5] *Water Use Factor for Efficiency Units is based on 2 persons occupancy.*

[6] *Water Use Factor for 1 bedroom Units is based on 3 persons occupancy.*

[7] *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.*

[8] *Community water use is assumed to be similar to counseling center.*

[9] *Landscaping water use is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7. Modal Water Efficient Landscape Ordinance.*

[10] *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.*

[11] *Water Conservation due to additional conservation commitments agreed to by the Applicant. See Table 6-70.*

Abbreviations: bd-bedroom du-dwelling unit sf-square feet gpd-gallons per day af/y-acre feet per year

Source: LADWP, WSA, 2018.Refer to Appendix O.

Table 6-70
Estimated Additional Water Conservation

Conservation Measures[1]	Quantity Units	Water Saving Factor[2] (gpd/unit)	Water Saved (gpd)	Water Saved (af/y)
Total – Residential: Efficiency	635 du	3.08	1,956	2.19
Toilet – Residential: 1 Bd	50 du	4.62	231	0.26
Bathroom Faucet – Residential: Efficiency	635 du	1.62	1,029	1.15
Bathroom Faucet – Residential: 1 Bd	50 du	2.43	122	0.14
Showerhead – Residential: Efficiency	635 du	3.18	2,019	2.26
Showerhead – Residential: 1 Bd	50 du	4.77	239	0.27
Residential Unit Conservation Total			*5,596*	*6.27*
Toilet	20 ea	6.09	122	0.14
Residential Common Conservation Total			*122*	*0.14*
Toilet	5 ea	6.09	30	0.03
Cafeteria Conservation Total			*30*	*0.003*
Toilet	4 ea	6.09	24	0.03
Retail Conservation Total			*24*	*0.03*
Toilet	12 ea	6.09	73	0.06
Office Conservation Total			*73*	*0.06*
Landscaping Conservation Total[3]			*200*	*0.22*
Total Additional Water Conserved			**6,045**	**6.77**

[1] *Water conservation measures agreed to by the Applicant. See Appendix B.*
[2] *Based on LADWP estimates.*
[3] *Landscaping water conservation is estimated per California Code of Regulations Title 23, Division 2, Chapter 2.7. Model Water Efficient Landscape Ordinance.*

Abbreviations: du-dwelling unit gpd-gallons per day af/y-acre feet per year ea-each
Source: LADWP, WSA, 2018.Refer to Appendix O.

As discussed in response to Checklist Question 18(a), the Project Sites are located within the service area of the HWRP, which has been designed to treat approximately 450 million gallons per day of wastewater for full secondary treatment and currently treats approximately 275 million gallons per day.[165] Full secondary treatment prevents virtually all particles suspended in the effluent from being discharged into the Pacific Ocean and is consistent with the Los Angeles Regional Water Quality Control Board (LARWQCB) discharge polices for the Santa Monica Bay. The HWRP currently treats an average daily flow of approximately 240 mgd and thus, is operating below its design capacity.[166] Conservatively assuming that wastewater generation equals water consumption, the Project would generate approximately 99,226 gallons of wastewater per day (or 0.09 mgd). With a remaining daily capacity of 210 mgd, the HWRP would have adequate capacity to serve the Project. Additionally, detailed gauging and evaluation of the existing sewer system adjacent to the Project Sites would be required as part of the

[165] *City of Los Angeleshttps://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=xv7pssoaw_4&_afrLoop=2072052347671516#!, April 2018.*

[166] *City of Los Angeles, Sewer System Management Plan, Hyperion Sanitary Sewer System, February 2017, Overview, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdey/~edisp/cnt012544.pdf, accessed June 26, 2017.*

permitting process to identify a specific sewer connection point as is standard City practice. If necessary, the Project Applicant would be required to build improvements to convey wastewater to a point in the sewer system with sufficient capacity. A final approval for sewer capacity and connection permit from the City would be made at that time. Therefore, Project impacts related to wastewater treatment would be less than significant.

Cumulative Impacts

Implementation of the related projects listed on Table 2-2 in Section 2 (Project Description) increase the need for water treatment. The remaining treatment capacity of the LAAFP (50 to 150 mgd) would accommodate the wastewater treatment requirements of the related projects. As discussed previously, the Project would create the need for a fraction of one percent (approximately 0.19 to 0.07 percent) of the remaining capacity of the LAAFP, and would not result in any significant impacts related to water treatment. Further, the remaining treatment capacity of the HWRP (210 mgd) would accommodate the wastewater treatment requirements of the related projects. As discussed previously, the Project would create the need for a fraction of one percent (approximately 0.09) of the remaining capacity of the HWRP, and would not result in any significant impacts related to sewer treatment. No new or upgraded treatment facilities would be required. As such, the Project's incremental effect on cumulative impacts to water treatment capacity would not be cumulatively considerable, and cumulative wastewater impacts would be less than significant.

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

Less Than Significant Impact. As discussed in response to Checklist Question 9(e), Project impacts related to storm water drainage would be less than significant.

Cumulative Impacts

Refer to the discussion of cumulative impacts under response to Checklist Topic 9.

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

Less Than Significant Impact.

Pursuant to SB 610 and SB 221, a Water Supply Assessment (WSA) was prepared for the Project by LADWP (refer to Appendix O). As shown on Table 6-69, LADWP estimates that the Project would consume approximately 99,226 gallons of water per day. The Project Applicant has voluntarily committed to incorporate the water conservation measures listed below into the Project that are beyond those required by the City's Green Building Code (refer to PDF-1, Sustainability Measures, in Section 2 [Project Description]). The estimated additional water conservation calculations associated with this measures outlined on Table 6-70.

- High-efficiency toilets with a flush volume of 1.0 gallon per flush, or less.
- Showerheads with a flow rate of 1.5 gallons per minute (gpm) or less.
- Residential bathroom faucets equipped with aerators to reduce flow to 1.0 gpm or less.
- Drip/subsurface irrigation (micro-irrigation)
- Micro-spray
- Proper hydro-zoning/zoned irrigation (group plants with similar water requirements)
- Artificial turf
- Drought-tolerant plants – 50 percent of total landscaping

LADWP's WSA finds adequate water supplies would be available to meet the total additional water demand of 99,226 gallons per day for the Project. LADWP anticipates the projected water demand from the Project could be met during normal, single-dry, and multiple-dry water years, in addition to the existing and planned future demands on LADWP.

The basis for approving the WSA for the Project is LADWP's most recently adopted 2015 Urban Water Management Plan (2015 UWMP). LADWP's water demand forecast, as contained in the 2015 UWMP, uses long-term demographic projections for population, housing, and employment. The California Urban Water Management Planning Act requires water suppliers to develop a 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. If the projected water demand associated with the Project was not accounted for in the most recently adopted UWMP, WSA must include a discussion with regard to whether LADWP's total projected water supplies available during normal, single-dry, and multiple-dry water years during a 20-year projection would meet the projected water demand associated with the Project, in addition to LADWP's existing and planned future uses.

The City's water demand projection in the 2015 UWMP was developed based on the 2012 Regional Transportation Plan (RTP) demographic projection by SCAG using the 2010 U.S. Census for the City. The 2015 UWMP concluded there are adequate water supplies to meet projected water demands through 2040. Thus, the City's water supply projections in the 2015 UWMP are sufficient to meet the City's water demand projections based on the 2012 RTP.

The Planning Department has determined that a General Plan Amendment is required for the Project to change the Central City Community Plan land use designation from Light Manufacturing to Regional Center Commercial. Furthermore, the Planning Department has determined that the Project is consistent with the demographic projections for the City from both the 2012 and 2016 RTPs. Based on the information provided by Planning Department, anticipated water demand for the Project fall within the 2015 UWMP's projected water supplies for normal, single-dry, and multiple-dry years through the year 2040 and is within the 2015 UWMP's 25-year water demand growth projection.

Additionally, the 2015 UWMP contains a water shortage contingency plan for multi-year dry hydrological periods. This water shortage contingency plan was implemented on June 1, 2009, when the Board of Water and Power Commissioners (Board) adopted Shortage Year Rates, and the City Council implemented the landscape irrigation and prohibited use restrictions contained in the City's Water Conservation Ordinance. The City's Water Rate Ordinance, adopted in June 1995, was last amended by the Board, effective April 15, 2016. The revised rate ordinance restructured the rates to help further promote conservation. For example, single-family rates switched to a four-tier system that sends a strong price signal to deter against wasteful water use. The Board finds that the price signals contained in the Water Rate Ordinance encourage conservation and support further reduction in citywide demand. Past and current implementation of water rate price signals and higher ordinance phases have resulted in reducing the total customer water usage, on average, by approximately 20.2 percent over the time period from June 2009 to March 2018.

Cumulative Impacts

Implementation of the Project in conjunction with the related projects identified on Table 2-2 in Section 2 (Project Description) would increase demand for water services provided by the City's water supply system. Through its UWMP, LADWP (through its UWMP) anticipates its projected water supplies will meet demand through the year 2035. In terms of the City's overall water supply condition, any related project that is consistent with the City's General Plan has been taken into account in the planned growth of the water system. In addition, any related project that conforms to the demographic projections from SCAG's RTP and is located in the service area is considered to have been included in LADWP's water supply planning efforts so that projected water supplies would meet projected demands.

For projects that meet the requirements established pursuant to SB 610, SB 221, and Sections 10910-10915 of the State Water Code, a water supply assessment demonstrating sufficient water availability is required on a project-by-project basis. Similar to the Project, each related project would be required to comply with City and State water code and conservation programs for both water supply and infrastructure.

Related projects that propose changing the zoning or other characteristics beyond what is within the General Plan would be required to evaluate the change under CEQA necessary approval. The CEQA analysis would compare the existing to the proposed uses and the ability of LADWP supplies and infrastructure to provide a sufficient level of water service. Future development projects within the service area of LADWP would be subject to the locally mandated water conservation programs, and citywide water conservation efforts would also be expected to partially offset the cumulative demand for water. LADWP undertakes expansion or modification of water service infrastructure to serve future growth in the City as required in the normal process of providing water service. Additionally, as stated previously, in the WSA prepared for the Project, LADWP concluded that the Project's demand for water supply has been accounted for in the most recent UWMP, and Project-specific impacts related to water supply would be less than significant. For these reasons, cumulative impacts related to water service would be less than significant.

The WSA has demonstrated that the Project's demand for water supply can be accommodated by existing sources, and the Project would not require the need for new or expanded sources of water supply. Therefore, Project impacts related to water supply would be less than significant.

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

Less Than Significant Impact. As discussed in response to Checklist Question 18(a), with a remaining daily capacity of 210 mgd, the HWRP would have adequate capacity to serve the Project. Therefore, Project impacts related to wastewater treatment would be less than significant.

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

Less Than Significant Impact. Landfills that serve the Los Angeles area are shown on Table 6-71. As shown, the landfills serving Los Angeles have a remaining daily intake capacity of 14,920 tons per day.

Table 6-71
Landfill Capacity

Landfill Facility	Estimated Remaining Life (years)	Estimated Remaining Disposal Capacity (million tons)	Permitted Intake (tons/day)	Daily Disposal (tons/day)	Available Daily Intake (tons/day)
Sunshine Canyon	21	62.1	12,100	7,496	4,604
Chiquita Canyon Proposed Expansion	-	-	12,000	-	-
Azusa	30	56.33	6,500	1,183	5,317
Lancaster	25	10.44	3,000	550	2,450
Calabasas	20	5.95	3,500	951	2,549
				Total	**14,920**

Source: County of Los Angeles, Countywide Integrated Waste Management Plan, 2016 Annual Report, December 2017.

As shown on Table 6-72, the Project would generate approximately 1.49 tons of solid waste per day. With a remaining daily capacity of 14,920 tons per day (tpd), the existing landfill capacity in the Los Angeles area would be adequate to accommodate the Project's solid waste generation. Further, pursuant to AB 939, each city and county in the state must divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As of fiscal year 2013, the City achieved a waste diversion rate of 76.4 percent, exceeding the required 50 percent diversion rate required by AB 939. The

City is on track toward its goal to achieve a 90 percent diversion by 2025.[167] Thus, the Project would not require new or expanded landfill capacity. Therefore, Project impacts related to solid waste would be less than significant.

Table 6-72
Estimated Solid Waste Generation

Land Use	Size	Generation Rate[a]	Total (tpd)
Multi-Family Residential	685 du	4 lbs/day	1.37
Commercial	48,043 sf	0.005 lbs/day	0.12
		Total	**1.49**

du=dwelling unit sf =square feet lbs=pounds tpd= tons per day
[a] *Source: CalRecyclewebsite: http://www.calrecycle.ca.gov/WasteChar/WasteGenRates/default.htm, 2014*
Note: Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

Cumulative Impacts

Implementation of the related projects listed on Table 2-2 in Section 2 (Project Description) could increase the need for landfill capacity. However, all development in the City is required to comply with the City's Curbside Recycling Program and the Construction and Demolition Waste Recycling Ordinance to minimize the amount of solid waste generated by the development and the need for landfill capacity. As discussed previously, the landfills serving the Project area have available capacity. The Project would create a demand for less than a fraction of one percent of the remaining landfill capacity serving the Project area and would not result in any significant impacts. Therefore, cumulative impacts related to landfill capacity would be less than significant.

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

No Impact. As stated previously, State regulation AB 939 required every city and county to divert 50 percent of its waste from landfills by the year 2000 through such means as recycling, source reduction, and composting. In addition, AB 939 requires each county to prepare a countywide siting element for a 15-year period, specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled. Further, AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991, requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

The Project would be required to comply with all applicable federal, state, and local statutes and regulations, including the City's Construction and Demolition Waste Recycling Ordinance and the Curbside Recycling Program, and there would be no impacts related to this issue.

[167] *City of Los Angeles, Solid Waste Integrated Resources Plan (Zero Waste Plan), https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwswirp?_adf.ctrl-state=wna7nj39o_74&_afrLoop=2044262225404954#!, accessed on April 30, 2018.*

Cumulative Impacts

All development in the City, including the proposed Project and the related projects listed on Table 2-2 in Section 2 (Project Description) is required to comply with the City's recycling programs. No cumulative impacts related to this issue would occur.

ENERGY CONSERVATION

Regulatory Setting

Federal

First established by the U.S. Congress in 1975, the Corporate Average Fuel Economy (CAFE) standards reduce energy consumption by increasing the fuel economy of cars and light trucks. The National Highway Traffic Safety Administration (NHTSA) and U.S. Environmental Protection Agency (USEPA) jointly administer the CAFE standards. The U.S. Congress has specified that CAFE standards must be set at the "maximum feasible level" with consideration given for: (1) technological feasibility; (2) economic practicality; (3) effect of other standards on fuel economy; and (4) need for the nation to conserve energy.[168]

State

Building Energy Efficiency Standards

The Building Energy Efficiency Standards for Residential and Nonresidential Buildings (CCR, Title 24, Part 6) were first adopted in 1976 and have been updated periodically since then as directed by statute. The Building Energy Efficiency Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. Public Resources Code Sections 25402 subdivisions (a)-(b) and 25402.1 emphasize the importance of building design and construction flexibility by requiring the California Energy Commission (CEC) to establish performance standards, in the form of an "energy budget" in terms of the energy consumption per square foot of floor space. For this reason, the Building Energy Efficiency Standards include both a prescriptive option, allowing builders to comply by using methods known to be efficient, and a performance option, allowing builders complete freedom in their designs provided the building achieves the same overall efficiency as an equivalent building using the prescriptive option. Reference Appendices are adopted along with the Building Energy Efficiency Standards that contain data and other information that helps builders comply with the Building Energy Efficiency Standards.

The 2016 update to the Building Energy Efficiency Standards focuses on several key areas to improve the energy efficiency of newly constructed buildings and additions and alterations to existing buildings. The most significant efficiency improvements to the residential Building Energy Efficiency Standards include improvements for attics, walls, water heating, and lighting, as well as alignment with the American

[168] *United States Department of Transportation, CAFE standards, www.nhtsa.gov/fuel-economy, accessed on May 7, 2018*

Society of Heating, Refrigerating and Air-conditioning Engineers (ASHRAE) 90.1 2013 national standards. New efficiency requirements for elevators and direct digital controls are included in the nonresidential Building Energy Efficiency Standards. The 2016 Building Energy Efficiency Standards also include changes made throughout all of its sections to improve the clarity, consistency, and readability of the regulatory language. The Building Energy Efficiency Standards are enforced through the local building or individual agency permit and approval processes.[169]

California Green Building Standards Code

Part 11 of the Title 24 California Building Standards Code is referred to as the California Green Building Standards Code (CaLGreen). The purpose of CalGreen is to "improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a positive environmental impact and encouraging sustainable construction practices in the following categories: (1) Planning and design; (2) Energy efficiency; (3) Water efficiency and conservation; (4) Material conservation and resource efficiency; and (5) Environmental air quality." As of January 1, 2011, compliance with CalGreen is mandatory for all new buildings constructed in the state. CalGreen establishes mandatory measures for new residential and non□residential buildings, including energy efficiency, water conservation, material conservation, planning and design and overall environmental quality. CalGreen was most recently updated in 2016 (2016 CalGreen Code) to reflect regulatory changes that were made to Title 24 and to include Verification Guidelines for use by local building departments, builders, and designers, that is intended to highlight and clarify both mandatory and voluntary nonresidential. The updated 2016 CalGreen Code took effect on January 1, 2017. The Project would be required to comply with the lighting power requirements in the California Energy Code, CCR, Title 24, Part 6.

California Renewable Portfolio Standard

First established in 2002 under Senate Bill (SB) 1078, 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.[170] The California Public Utilities Commission (CPUC) and the CEC jointly implement the RPS program. The CPUC's responsibilities include: (1) determining annual procurement targets and enforcing compliance; (2) reviewing and approving each investor-owned utility's renewable energy procurement plan; (3) reviewing contracts for RPS-eligible energy; and (4) establishing the standard terms and conditions used in contracts for eligible renewable energy. The CEC is responsible for the certification of electrical generation facilities as eligible renewable energy resources, and adopting regulations for the enforcement of RPS procurement requirements of public-owned utilities.

[169] *CEC, 2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings, June 2015.*

[170] *CPUC, California Renewables Portfolio Standard (RPS), www.cpuc.ca.gov/RPS_Homepage/, accessed May 7, 2018.*

Senate Bill 50

Senate Bill (SB) 350, signed October 7, 2015, is the Clean Energy and Pollution Reduction Act of 2015. The objectives of SB 350 are: (1) to increase the procurement of electricity from renewable sources from 33 percent to 50 percent by 2030, and (2) to double the energy efficiency savings in electricity and natural gas final end uses of retail customers through energy efficiency and conservation.[171]

Assembly Bill 32

Assembly Bill (AB) 32 (Health and Safety Code Sections 38500–38599), also known as the California Global Warming Solutions Act of 2006, commits the State to achieving year 2000 GHG emission levels by 2010 and year 1990 levels by 2020. To achieve these goals, AB 32 tasked the CPUC and the CEC with providing information, analysis, and recommendations to the California Air Resources Board (CARB) regarding ways to reduce GHG emissions in the electricity and natural gas utility sectors.[172]

Assembly Bill 1493/Pavley Regulations

AB 1493 (commonly referred to as CARB's Pavley regulations) was the first legislation to regulate GHG emissions from new passenger vehicles. Under this legislation, CARB adopted regulations to reduce GHG emissions from non-commercial passenger vehicles (cars and light-duty trucks) for model years 2009–2016. The Pavley regulations are expected to reduce GHG emissions from California's passenger vehicles by about 30 percent in 2016, all while improving fuel efficiency and reducing motorists' costs.[173]

Low Carbon Fuel Standard

The Low Carbon Fuel Standard (LCFS), established in 2007 through Executive Order S-1-07 and administered by CARB, requires producers of petroleum-based fuels to reduce the carbon intensity of their products, starting with 0.25 percent in 2011 and culminating in a 10-percent total reduction in 2020. Petroleum importers, refiners and wholesalers can either develop their own low carbon fuel products, or buy LCFS credits from other companies that develop and sell low carbon alternative fuels, such as biofuels, electricity, natural gas, and hydrogen.[174]

CARB's Advanced Clean Cars Regulation

Closely associated with the Pavley regulations, the Advanced Clean Car Standards emissions-control program (ACC program) was approved by CARB in 2012. The program combines the control of smog, soot, and GHG emissions with requirements for greater numbers of zero-emission vehicles for model

[171] *Senate Bill 350 (2015–2016 Reg, Session) Stats 2015, ch. 547.*

[172] *Ibid.*

[173] *Clean Car Standards - Pavley, Assembly Bill 1943, www.energy.ca.gov/low_carbon_fuel_standard/*

[174] *Low Carbon Fuel Standard: Fuels and Transportation Division Emerging Fuels and Technologies Office, www.energy.ca.gov/low_carbon_fuel_standard/*

years 2017-2025. The components of the ACC program include the Low-Emission Vehicle (LEV) regulations that reduce criteria pollutants and GHG emissions from light- and medium-duty vehicles, and the Zero-Emission Vehicle (ZEV) regulation, which requires manufacturers to produce an increasing number of pure ZEVs (meaning battery electric and fuel cell electric vehicles), with provisions to also produce plug-in hybrid electric vehicles (PHEV) in the 2018 through 2025 model years.[175]

Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling

The Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling (Title 13, California Code of Regulations, Division 3, Chapter 10, Section 2435) was adopted to reduce public exposure to diesel particulate matter and other air contaminants by limiting the idling of diesel-fueled commercial motor vehicles. This section applies to diesel-fueled commercial motor vehicles with gross vehicular weight ratings of greater than 10,000 pounds that are or must be licensed for operation on highways. Reducing idling of diesel-fueled commercial motor vehicles reduces the amount of petroleum-based fuel used by the vehicle.

Senate Bill 375, Sustainable Communities Strategy

The Sustainable Communities and Climate Protection Act of 2008, or Senate Bill 375 (SB 375), coordinates land use planning, regional transportation plans, and funding priorities to help California meet the GHG emissions reduction mandates established in AB 32. SB 375 specifically requires the Metropolitan Planning Organization (MPO) to prepare a "sustainable communities strategy" (SCS) as a part of its Regional Transportation Plan (RTP) that will achieve GHG emission reduction targets set by CARB for the years 2020 and 2035 by reducing vehicle miles traveled (VMT) from light-duty vehicles through the development of more compact, complete, and efficient communities.[176]

SCAG is the MPO for the area in which the Project Sites are located. SCAG's first-ever SCS is included in the 2012–2035 Regional Transportation Plan/Sustainable Communities Strategy (2012–2035 RTP/SCS), which was adopted by SCAG in April 2012. The goals and policies of the SCS that reduce VMT (and result in corresponding decreases in transportation-related fuel consumption) focus on transportation and land use planning that include building infill projects, locating residents closer to where they work and play, and designing communities so there is access to high quality transit service. In 2016, SCAG adopted the 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS).[177] The goals and policies of the 2016-2040 RTP/SCS are the same as those in the 2012–2035 RTP/SCS.

[175] *CARB, California's Advanced Clean Cars Program, www.arb.ca.gov/msprog/acc/acc.htm, last reviewed by CARB January 18, 2017.*

[176] *Sustainable Communities, www.arb.ca.gov/cc/sb375/sb375.htm*

[177] *SCAG, 2016 RTP/SCS, dated April 2016.*

Senate Bill 1389

SB 1389 (Public Resources Code Sections 25300–25323) requires the development of an integrated plan for electricity, natural gas, and transportation fuels. The CEC must adopt and transmit to the Governor and Legislature an Integrated Energy Policy Report every two years. The most recently completed report, the 2016 Integrated Energy Policy Report, addresses a variety of issues including the environmental performance of the electricity generation system, landscaped-scale planning, the response to the gas leak at the Aliso Canyon natural gas storage facility, transportation fuel supply reliability issues, update on the Southern California electricity reliability, methane leakage, climate adaptation activities for the energy sector, climate and sea level rise scenarios, and includes the *California Energy Demand Forecast*. [178]

California Environmental Quality Act

In accordance with the California Environmental Quality Act (CEQA) and Appendix G, Energy Conservation, of the CEQA Guidelines, in order to assure that energy implications are considered in project decisions, EIRs are required to include a discussion of the potentially significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix G of the CEQA Guidelines provides a list of energy-related topics that should be analyzed in the EIR. In addition, while not described or required as significance thresholds for determining the significance of impacts related to energy, Appendix G provides the following topics that the lead agency may consider in the discussion of energy use in an EIR, where topics are applicable or relevant to the project:

- The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
- 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;
- The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

[178] *CEC, 2016 Integrated Energy Policy Report, docketed January 18, 2017.*

Regional

SCAG's 2016-2040 RTP/SCS presents a long-term transportation vision through the year 2040 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura Counties. On April 7, 2016, the SCAG Regional Council adopted the 2016-2040 RTP/SCS, the mission of which is "leadership, vision and progress which promote economic growth, personal well-being, and livable communities for all Southern Californians."[179] The 2016-2040 RTP/SCS includes land use strategies that focus on urban infill growth and walkable, mixed-use communities in existing urbanized and opportunity areas. More mixed-use, walkable, and urban infill development would be expected to accommodate a higher proportion of growth in more energy-efficient housing types like townhomes, apartments, and smaller single-family homes, as well as more compact commercial building types. Furthermore, the 2016-2040 RTP/SCS includes transportation investments and land use strategies that encourage carpooling, increase transit use, active transportation opportunities, and promoting more walkable and mixed-use communities, which would potentially help to reduce VMT.

The 2016-2040 RTP/SCS also establishes High-Quality Transit Areas (HQTA), which are described as generally walkable transit villages or corridors that are within 0.5 mile of a well-serviced transit stop or a transit corridor with 15-minute or less service frequency during peak commute hours.[180] Local jurisdictions are encouraged to focus housing and employment growth within HQTAs to reduce VMT. The Project Sites are located within an HQTA as designated by the 2016-2040 RTP/SCS.[181]

Local

Green LA: An Action Plan to Lead the Nation in Fighting Global Warming and ClimateLA

Green LA is the City's climate action plan. The plan, released in May 2007, sets forth a goal of reducing the City's GHG emissions to 35 percent below 1990 levels by the year 2030.[182] ClimateLA is the implementation program that provides detailed information about each action item discussed in the Green LA framework. ClimateLA includes focus areas addressing environmental issues including but not limited to energy, water, transportation, and waste.[183] The energy focus area includes action items with measures that aim to increase the use of renewable energy to 35 percent by 2020, reduce the use of coal-fired power plants, and present a comprehensive set of green building policies to guide and support private sector development.[184]

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[179] *SCAG, 2016–2040 Regional Transportation Plan/Sustainable Communities Strategy, dated April 2016.*

[180] *SCAG, 2016–2040 RTP/SCS, p. 8.*

[181] *SCAG, 2016–2040 RTP/SCS; Exhibit 5.1: High Quality Transit Areas in the SCAG Region for 2040 Plan, p. 77.*

[182] *City of Los Angeles, Green LA: An Action Plan to Lead the Nation In Fighting Global Warming, May 2007.*

[183] *City of Los Angeles, Climate LA: Municipal Program Implementing the GreenLA Climate Action Plan, 2008.*

[184] *Ibid.*

City of Los Angeles Green Building Code

The City's Green Building Code is based on CalGreen (discussed above), which was developed and mandated by the state to attain consistency among the various jurisdictions within the state with the specific goals to reduce a building's energy and water use, reduce waste, and reduce the carbon footprint. The following types of projects are subject to the City's Green Building Code:

- All new buildings (residential and non-residential)
- All additions (residential and nonresidential)
- Alterations with building valuations over $200,000 (residential and non-residential)

Specific measures that may be incorporated into the Project could include, but are not limited to:

- Recycling of asphalt, concrete, metal, wood and cardboard waste generated during demolition and construction;
- Installation of a "cool roof" that reflects the sun's heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed concrete
- Use of sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Use of energy efficient lighting;
- Use of Energy Star appliances in residential units;
- Use of high energy efficiency rooftop heating and conditioning systems;
- 15 percent of the roof area set aside for future solar panels;
- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets in public facilities;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping;
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to storm drain systems; and
- Provision of EV charging stations in the parking structure.

On December 20, 2016, the Los Angeles City Council approved Ordinance No. 184,692, which amended Chapter IX (Green Building Code) of the LAMC, by amending certain provisions of Article 9 to reflect local administrative changes and incorporating by reference portions of the 2016 CalGreen Code. Projects filed on or after January 1, 2017, must comply with the provisions of the City's Green Building Code. 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. Article 9, Division 5 includes mandatory measures for newly constructed nonresidential and high-rise residential buildings.

City of Los Angeles Solid Waste Programs and Ordinances

The recycling of solid waste materials also contributes to reduced energy consumption. Specifically, when products are manufactured using recycled materials, the amount of energy that would have otherwise been consumed to extract and process virgin source materials is reduced. For example, in 2015, 3.61 million tons of aluminum was produced by recycling in the United States, saving enough energy to provide electricity to 7.5 million homes.[185] In 1989, California enacted AB 939, the California Integrated Waste Management Act, which establishes a hierarchy for waste management practices such as source reduction, recycling, and environmentally safe land disposal.[186] The City includes programs and ordinances related to solid waste. They include: (1) the City of Los Angeles Solid Waste Management Policy Plan, which was adopted in 1993 and is a long-range policy plan promoting source reduction for recycling for a minimum of 50 percent of the City's waste by 2000 and 70 percent of the waste by 2020; (2) the RENEW LA Plan, which is a Resource Management Blueprint with the aim to achieve a zero waste goal through reducing, reusing, recycling, or converting the resources now going to disposal so as to achieve an overall diversion level of 90 percent or more by 2025; (3) the Waste Hauler Permit Program (Ordinance 181,519), which requires all private waste haulers collecting solid waste, including construction and demolition waste, to obtain AB 939 Compliance Permits and to transport construction and demolition waste to City certified construction and demolition processing facilities; and (4) the Exclusive Franchise System Ordinance (Ordinance No. 182,986), which, among other requirements, sets maximum annual disposal levels and specific diversion requirements for franchised waste haulers in the City to promote solid waste diversion from landfills in an effort to meet the City's zero waste goals. These solid waste reduction programs and ordinances help to reduce the number of trips to haul solid waste, therefore reducing the amount of petroleum-based fuel, and also help to reduce the energy used to process solid waste.

2017 Power Strategic Long-Term Resource Plan

The 2017 Power Strategic Long-Term Resource Plan (2017 SLTRP) document serves as a comprehensive 20-year roadmap that guides LADWP's Power System in its efforts to supply reliable electricity in an environmentally responsible and cost effective manner. The 2017 SLTRP re-examines and expands its

[185] *American Geosciences Institute, How Does Recycling Save Energy?, www.americangeosciences.org/critical-issues/faq/how-does-recycling-save-energy, accessed May 7, 2018.*

[186] *CalRecycle, History of California Solid Waste Law, 1985–1989 www.calrecycle.ca.gov/laws/legislation/calhist/1985to1989.htm, accessed May 7, 2018.*

analysis on the 2016 Final Power Integrated Resource Plan resource cases with updates in line with latest regulatory framework, and updates to case scenario assumptions that include a 65 percent RPS, advanced energy efficiency, and higher levels of local solar, energy storage, and transportation electrification.

Recent updates include an updated 2016/17 Energy Efficiency Potential Study results with a target of 15 percent energy efficiency from 2017 through 2027, revised energy storage procurement targets, and completion of a distributed energy resources study titled, "Distributed Energy Resources Implementation Study (DERIS)." The 2017 SLTRP also includes numerous updates including new renewable projects, associated transmission upgrade cost and fuel cost assumptions, along with a host of other updates. The 2017 SLTRP uses system modeling tools to analyze and determine the long-term economic, environmental, and operational impact of alternative resource portfolios by simulating the integration of new resource alternatives within the existing mix of assets and providing the analytic results to inform the selection of a recommended case that is cost effective in reducing greenhouse gas emissions and maintains superior system reliability.

Early coal replacement and energy efficiency continue to be key strategies to reduce greenhouse gas emissions. Increasing the RPS to 55 percent by 2030 and 65 percent by 2036, including increased amounts of energy efficiency, local solar and energy storage, are other key initiatives to reduce greenhouse gas emissions. The 2017 SLTRP analyzed electrification of the transportation sector as a strategy to further reduce overall greenhouse gas emissions and to significantly reduce local emissions such as VOC, NO_x, CO, and $PM_{2.5}$ that would result from electrifying local transportation and therefore recommends expanding existing programs to promote increased workplace and residential electric vehicle charging stations to support greater electric vehicle adoption while collaborating with regulatory agencies to develop mutually beneficial policies.

The 2017 SLTRP also includes a general assessment of the revenue requirements and rate impacts that support the recommended resource plan through 2037. While this assessment will not be as detailed and extensive as the financial analysis that was completed for 2015-16 fiscal year rate action, it clearly outlines the general requirements. As a long-term planning process, the 2017 SLTRP examines a 20-year horizon in order to secure adequate supplies of electricity.

Existing Conditions

Electricity

Electricity, a consumptive utility, is a man-made resource. The production of electricity requires the consumption or conversion of energy resources, including water, wind, oil, gas, coal, solar, geothermal, and nuclear resources, into energy. The delivery of electricity involves a number of system components, including substations and transformers that lower transmission line power (voltage) to a level appropriate for on-site distribution and use. The electricity generated is distributed through a network of transmission and distribution lines commonly called a power grid. Conveyance of electricity through transmission lines is typically responsive to market demands.

Energy capacity, or electrical power, is generally measured in watts (W), while energy use is measured in watt-hours (Wh). For example, if a light bulb has a capacity rating of 100 W, the energy required to keep

the bulb on for 1 hour would be 100 Wh. If ten 100-W bulbs were on for 1 hour, the energy required would be 1,000 Wh or 1 kilowatt-hour (kWh). On a utility scale, a generator's capacity is typically rated in megawatts (MW), which is one million W, while energy usage is measured in megawatt-hours (MWh) or gigawatt-hours (GWh), which is one billion Wh.

LADWP provides electrical service throughout the City and many areas of the Owens Valley, serving approximately 4.0 million people within a service area of approximately 465 square miles, excluding the Owens Valley. Electrical service provided by the LADWP is divided into two planning districts: Valley and Metropolitan. The Valley Planning District includes LADWP's service area north of Mulholland Drive, and the Metropolitan Planning District includes LADWP's service area south of Mulholland Drive. The Project Sites are located within LADWP's Metropolitan Planning District. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2016 IRP, LADWP has a net dependable generation capacity greater than 7,531 MW.[187] In 2017, LADWP's power system experienced an instantaneous peak demand of 6,432 MW.[188] Approximately 29 percent of LADWP's 2016 electricity purchases were from renewable sources, which is similar to the 25 percent statewide percentage of electricity purchases from renewable sources.[189]

LADWP supplies electrical power to the Project Sites from electrical service lines located in the Project Sites' vicinity. Electricity is provided to the Project Sites through a network of utility poles that are operated and maintained by LADWP. Overhead electrical lines run north-south on South San Pedro Street and Crocker Street and east-west on East 6th Street adjacent to the Project Sites.

Existing Electricity Consumption at the Project Sites

Electricity is provided to the Project Sites through a network of utility poles that are operated and maintained by the LADWP. Site 1 is developed with a surface parking lot and a 7,000-square-foot food service building; Site 2 is developed with a surface parking lot. The existing parking lot uses do not consume any electricity. Based on CalEEMod calculations for the existing uses, the existing food service building consumes approximately 90,930 kilowatt-hours (kw-h) per year.[190]

Natural Gas

Natural gas is a combustible mixture of simple hydrocarbon compounds (primarily methane) that is used as a fuel source. Natural gas consumed in California is obtained from naturally occurring reservoirs, mainly located outside the state, and delivered through high-pressure transmission pipelines. The natural gas transportation system is a nationwide network and thus, resource availability is typically not an issue.

[187] *LADWP, 2016 Final Power Integrated Resource Plan.*

[188] *LADWP, 2017 Retail Electric Sales and Demand Forecast, p. 6.*

[189] *CEC, Utility Annual Power Content Labels for 2016, www.energy.ca.gov/pcl/labels/, accessed on May 7, 2018.*

[190] *Refer to Appendix F.*

Natural gas provides almost one-third of the state's total energy requirements and is used in electricity generation, space heating, cooking, water heating, industrial processes, and as a transportation fuel.

Natural gas is provided to the Project Sites by the Southern California Gas Company (SCG). SCG is the principal distributor of natural gas in Southern California, serving residential, commercial, and industrial markets. SCG serves approximately 21.6 million customers in more than 500 communities encompassing approximately 20,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.

SCG receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies. The traditional, southwestern United States sources of natural gas will continue to supply most of SCG's natural gas demand. The Rocky Mountain supply is available but is used as an alternative supplementary supply source, and the use of Canadian sources provides only a small share of SCG supplies due to the high cost of transport. Gas supply available to SCG from California sources averaged 122 million cf per day in 2015 (the most recent year for which data are available).[191]

SCG supplies natural gas to the Project Sites from natural gas service lines located in the Project Sites' vicinity. Natural gas is provided to the Project Sites through a network of underground pipelines that are operated and maintained by SCG.

Existing Natural Gas Consumption at the Project Sites

Natural gas is provided to the Project Sites through a network of underground pipelines that are operated and maintained by the Southern California Gas Company (SCG). The existing parking lot uses do not consume any natural gas. Based on CalEEMod calculations for the existing uses, the existing food service building consumes approximately 72,870 thousand British thermal units (kBTU) per year.[192]

Transportation Energy

According to the CEC, transportation accounts for nearly 37 percent of California's total energy consumption in 2014.[193] In 2015, California consumed 15.1 billion gallons of gasoline and 2.82 billion gallons of diesel fuel.[194] Petroleum-based fuels currently account for 90 percent of California's transportation energy sources.[195] However, the state is now working on developing flexible strategies to

[191] *Southern California Gas Company, 2016 California Gas Report, July 2016.*

[192] *Refer to Appendix F.*

[193] *CEC, 2016 Integrated Energy Policy Report, docketed January 18, 2017, p. 4.*

[194] *California Board of Equalization, Net Taxable Gasoline Gallons 10-Year Report.*

[195] *CEC, 2016–2017 Investment Plan Update for the Alternative and Renewable Fuel and Vehicle Technology Program, March 2016.*

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 GHG emissions from the transportation sector, and reduce VMT. Accordingly, gasoline consumption in California has declined. The CEC predicts that the demand for gasoline will continue to decline over the next 10 years, and there will be an increase in the use of alternative fuels.[196] According to CARB's EMFAC Web Database, Los Angeles County on-road transportation sources consumed 4.42 billion gallons of gasoline and 0.69 billion gallons of diesel fuel in 2015.[197]

The existing food service building on Site 1 currently generates a demand for transportation-related fuel use as a result of vehicle trips to and from the site. The estimate of annual VMT associated with this use is 135,930 per year.[198] A study by Caltrans found that the statewide average fuel economy for all vehicle types (automobiles, trucks, and motorcycles) is approximately 20.4 miles per gallon (mpg) of gasoline and approximately 5.71 mpg of diesel.[199] Thus, the existing VMT associated with existing conditions of the Project Sites translates to the consumption of approximately 6,064 gallons of gasoline and approximately 2,143 gallons of diesel for transportation per year.[200]

Environmental Impacts

Thresholds of Significance

Appendix G of the State CEQA Guidelines

Appendix G of the CEQA Guidelines was prepared in response to the requirement in Public Resources Code Section 21100(b)(3), which states that an EIR shall include a detailed statement setting forth "[m]itigation measures proposed to minimize significant effects of the environment, including, but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy."

In addition, with regard to potential impacts to energy, the *L.A. CEQA Thresholds Guide* (Thresholds Guide) states that a determination of significance shall be made on a case-by case basis, considering the following factors:

- The extent to which the project would require new (off-site) energy supply facilities and distribution infrastructure; or capacity-enhancing alterations to existing facilities;
- Whether and when the needed infrastructure was anticipated by adopted plans; and

[196] *CEC, 2015 Integrated Energy Policy Report, docketed June 29, 2016, p. 113.*

[197] *CARB, EMFAC2014 Web Database, www.arb.ca.gov/emfac/2014/*

[198] *Refer to the CalEEMod calculations in Appendix D that include existing VMT.*

[199] *Caltrans, 2007 California Motor Vehicle Stock, Travel and Fuel Forecast, Table 7, http://www.energy.ca.gov/2008publications/CALTRANS-1000-2008-036/CALTRANS-1000-2008-036.PDF, accessed February 21, 2017.*

[200] *Refer to Appendix F for detailed calculations.*

- The degree to which the project design and/or operations incorporate energy- conservation measures, particularly those that go beyond City requirements.

Significance Threshold No. 1—With regard to energy use and consumption, a Project would result in significant impacts, if it would result in wasteful, inefficient, or unnecessary consumption of energy based on the evaluation of the following criteria:

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

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

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

4. The degree to which the project complies with existing energy standards;

5. The effects of the project on energy resources;

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

7. The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements.

8. Whether the Project conflicts with adopted energy conservation plans.

Significance Threshold No. 2—With regard to energy infrastructure, the Project would result in significant impacts if it would result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Project Design Features

The following measures are included as part of the Project to reduce energy consumption:

- The Project shall not include natural gas-fueled fireplaces in the proposed residential units.

- Twenty percent of the Project's provided vehicle parking spaces would be capable of accommodating EV charging stations, and an additional five percent would be wired as EV charging stations for immediate use.

- The Project would incorporate approximately 10,500 square feet of solar voltaic panes on building roof levels. Approximately 4,500 square feet would be included on Site 1, and approximately 6,000 square feet would be included on Site 2.

- Windows would be included in all living units and common spaces for natural daylight, reducing the need for overhead lighting impacting the need for electricity. High-performance dual-pane windows and exterior materials would be used in order to reduce the need for energy driven mechanical systems.

- Active energy conservation strategies would include implementing LED lighting with daylighting controls and dimming capabilities, installing motion detector controls for all circulation and auxiliary spaces, providing Energy Star qualified appliances.

- Materials selection for the building would be made taking into consideration energy conservation, durability, reduction of air pollutants and recycling. Products would be chosen for their resiliency and durability in order to help offset maintenance costs. Finish materials would have no or low-VOC compounds, in order to help reduce the introduction of harmful chemicals into the building. Materials would be chosen for their pre/post-consumer content to reduce the amount of virgin material being used and reduce amount of waste.

- Plants and their substrate would act as a natural water filter reducing the contamination of water that leaves the site. Low-maintenance native and adapted plants would be chosen for landscaped areas and will take into consideration creating create mini-ecosystems with habitats for birds and beneficial insects in order to increase the biodiversity at the site. The landscaped area could reduce the urban heat island effect and smog as the plants act as a natural air filter and absorb heat versus reflecting it. Pervious paving areas may also be used to reduce the amount of hardscape, decrease storm water run-off, and cool the microclimate of the building.

- High-efficiency toilets with a flush volume of 1.0 gallon per flush, or less.

- Showerheads with a flow rate of 1.5 gpm or less.

- Residential bathroom faucets equipped with aerators to reduce flow to 1.0 gpm or less.

- Drip/subsurface irrigation (micro-irrigation)

- Micro-spray

- Proper hydro-zoning/zoned irrigation (group plants with similar water requirements)

- Artificial turf

- Drought-tolerant plants – 50 percent of total landscaping

Analysis of Project Impacts

Significance Threshold No. 1: Would the Project result in wasteful, inefficient, or unnecessary use of energy based on the stated criteria?

The analysis below considers the eight criteria identified in the Thresholds of Significance subsection above to determine whether this significance threshold would be exceeded.

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

The Project would consume energy during construction and operational activities. Sources of energy for these activities would include electricity usage, natural gas consumption, and transportation fuels such as diesel and gasoline. The analysis below includes the Project's energy requirements and energy use efficiencies by fuel type for each stage of the Project (construction, operations, maintenance and removal activities).

For purposes of this analysis, Project maintenance would include activities such as repair of structures, landscaping, and architectural coatings. Energy usage related to Project maintenance activities are assumed to be included as part of Project operations. Project removal activities would include demolition or abandonment of the site. However, it is not known when the Project would be removed. Therefore, analysis of energy usage related to Project removal activities would be speculative. For this reason, energy usage related to Project removal was not analyzed.

Construction

During Project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. As discussed below, construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Project construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment on the Project Sites, construction worker travel to and from the Project Sites, and delivery and haul truck trips (e.g., hauling of demolition material to off-site reuse and disposal facilities).

As shown on Table 6-73 and as discussed further below, Project construction would consume approximately a total of 1,182 kWh of electricity, 330,664 gallons of gasoline, and 32,892 gallons of diesel. Project construction is expected to be completed by 2025.

Table 6-73
Summary of Energy Use During Project Construction

Fuel Type	Quantity
Electricity	
Water Consumption	1,182 kWh
Lighting, electronic equipment, and other construction activities necessitating electrical power	N/A
Total Electricity	**1,182 kWh**
Gasoline	
On-Road Construction Equipment	330,664 gallons
Off-Road Construction Equipment	0 gallons
Total Gasoline	***330,664 gallons***
Diesel	
On-Road Construction Equipment	22,286 gallons
Off-Road Construction Equipment	10,606 gallons
Total Diesel	***32,892 gallons***
Total Petroleum-Based Fuel	**363,556 gallons**

kWh = kilowatt-hours
Detailed calculations are included in Appendix P.

Electricity

During construction of the Project, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Sites by LADWP and would be obtained from the existing electrical lines that connect to the Project Sites. This would be consistent with suggested measures in the Threshold Guide to use electricity from power poles rather than temporary gasoline or diesel-powered generators.

As shown on Table 6-73, a total of approximately 1,182 kWh of electricity is anticipated to be consumed during Project construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

The estimated construction electricity usage represents approximately 0.05 percent of the estimated net annual operational demand, which is discussed below, would be within the supply and infrastructure service capabilities of LADWP. Moreover, construction electricity usage would replace the existing electricity usage at the Project Sites during construction.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction.

Transportation Energy

The petroleum-based fuel use summary provided above on Table 6-73 represents the amount of transportation energy that could potentially be consumed during Project construction based on a conservative set of assumptions outlined in Appendix P of this SCEA. As shown, on- and off-road vehicles would consume an estimated 330,664 gallons of gasoline and approximately 32,892 gallons of diesel fuel throughout the Project's construction. For comparison purposes, the fuel usage during Project construction would represent approximately 0.007 percent of the 2017 annual on-road gasoline-related energy consumption and 0.005 percent of the 2017 annual diesel fuel-related energy consumption in Los Angeles County, as shown in Appendix P of this SCEA.

Operation

During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to HVAC; refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during Project operations related to water usage, solid waste disposal, and vehicle trips. As shown on Table 6-74, the Project's net demand for electricity would be approximately 2,238,713 kWh per year. As shown on Table 6-75, the Project's net demand for natural gas would be 3,361,259 kBTU per year. As shown on Table 6-76, the Project's net demand for gasoline and diesel would be 192,464 and 68,006 gallons per year, respectively.

Table 6-74
Project Estimated Electricity Demand

Land Use	Size	Total (kw-h/yr)[1]
Residential	685 du	1,512,700
Commercial	48,043 sf	265,329
Enclosed Parking	93,452 sf	467,347
	Project Total	**2,245,376**
	Less Existing	***6,663***
	Net Total	**2,238,713**

du = dwelling unit sf =square feet kw-h = kilowatt-hour yr = year
[1] Calculated via CalEEMod. Refer to Appendix D.
Note: LADWP does not provide or comment on generation rates to provide an estimate of demand.

Table 6-75
Project Estimated Natural Gas Demand

Land Use	Size	Total (kBTU/yr)[1]
Residential	685 du	3,520,870
Commercial	48,043 sf	183,259
Enclosed Parking	93,452 sf	0
	Project Total	**3,704,129**
	Less Existing	***72,870***
	Net Total	**3,631,259**

du = dwelling unit sf =square feet kBTU = 1,000 British Thermal Units yr = year
[1] Calculated via CalEEMod. Refer to Appendix D.
Note: SCG does not provide or comment on generation rates to provide an estimate of demand.

Table 6-76
Estimated Project Transportation Petroleum-Based Fuel

Fuel Type	Gallons Per Year
Gasoline	
Project	198,528
Less Existing	*6,064*
Net Total Gasoline	***192,454***
Diesel	
Project	70,148
Less Existing	*2,142*
Net Total Diesel	***68,006***
Total Fuel	**260,470**
Detailed calculations are included in Appendix P.	

Electricity

With compliance with 2016 Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project would result in a projected net increase in the on-site demand for electricity totaling approximately 2,238,713 kWh per year (refer to Table 6-75). In addition, LADWP is required to procure at least 33 percent of their energy portfolio from renewable sources by 2020. The current sources procured by LADWP include wind, solar, and geothermal sources. These sources account for 29 percent of LADWP's overall energy mix in 2016, the most recent year for which data are available.[201] This represents the available off-site renewable sources of energy that would meet the Project's energy demand. Furthermore, the Project would incorporate approximately a total of 10,500 square feet of solar voltaic panes on building roof levels and other active energy conservation strategies, such as LED lighting with day-lighting controls and dimming capabilities, and Energy Star light bulbs.

[201] *CEC, Utility Annual Power Content Labels for 2016, www.energy.ca.gov/pcl/labels/.*

Based on LADWP's 2017 STLRP, LADWP forecasts that its total energy sales in the 2024-2025 fiscal year (the Project's buildout year) will be 23,286 GWh of electricity.[202] As such, the Project-related net increase in annual electricity consumption of 2,238,713 kWh per year would represent approximately 0.009 percent of LADWP's projected sales in 2024-205.

Natural Gas

With compliance with 2016 Title 24 standards and applicable requirements of the City's Green Building Code, buildout of the Project is projected to generate a net increase in the on-site demand for natural gas totaling approximately 3,631,259 kBTU per year, or approximately 9,949 kBTU per day (9,753 cf per day).[203] Based on the 2016 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SCG's planning area will be approximately 2,526 million cf per day in 2021 (the year of the California Gas Report that is closest to Project's buildout year). The Project would account for approximately 0.0003 percent of the forecasted 2021 consumption in SCG's planning area. In addition, the Project would incorporate a variety of energy conservation measures as required under the City's Green Building Code to reduce energy usage and those included as PDF-1.

Transportation Energy

During operation, Project-related traffic would result in the consumption of petroleum-based fuels related to vehicular travel to and from the Project Sites. As noted previously, the Project Sites are located in an HQTA designated by SCAG that indicates that the Project Sites are an appropriate site for increased density and employment opportunities from a "smart growth" regional planning perspective. As discussed in response to Checklist Question 16(a) (Transportation/Traffic) of this SCEA, extensive public bus and rail transit service is provided within the Project study area. Public bus transit service in the immediate Project study area is currently provided by Metro, City of Gardena Transit, and City of Montebello Bus Lines. Additional public bus transit service in the Downtown Los Angeles area is provided by Foothill Transit, LADOT DASH Transit Service, Orange County Transportation Authority, and Torrance Transit Service. The Metro Red and Gold lines also are provided in proximity to the Project Sites. Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, as noted previously, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. Walk Score calculates a transit score based on the number and proximity of bus and rail routes, which generates a transit score of approximately 95 (Rider's Paradise) out of 100 for the Project Sites.[204] The existing transit services in the vicinity of the Project

[202] *2017 Power Strategic Long-Term Resource Plan, December 2017, LADWP, Appendix A.*

[203] *kBTU = 1,000 BTU. One BTU equals 1,020 cubic feet. 3,631,259 x 1,000 = 3,631,259,000 BTU. 13,190,078,000 BTU/1,020 cf = 3,560,057 cf. 3,560,057/365 days = 9,753 cf/day.*

[204] *Refer to http://www.walkscore.com/, which generates the transit score for the project site. Walk Score calculates the transit score of an address by locating nearby bus/rail transit routes and stops. Walk Score measures how easy it is to live a car-lite lifestyle—not how pretty the area is for using transit service.*

Sites would provide Project employees, residents, and guests with various public transportation opportunities in lieu of driving. Additionally, the Project would provide bicycle storage areas for Project residents and guests. The Project would also incorporate characteristics that would reduce trips and VMT as compared to standard ITE trip generation rates. The Project characteristics listed below are consistent with the CAPCOA guidance document, *Quantifying Greenhouse Gas Mitigation Measures*, which provides emission reduction values for recommended mitigation measures, and would reduce vehicle trips to the Project Sites and VMT to the Project Sites. These Project characteristics would result in a corresponding reduction in VMT and associated transportation energy consumption and reduce the potential for inefficient, wasteful, and unnecessary use of energy. Qualifying measures applicable to the Project include the following:

- **Increase Density (LUT-1):** Increased density, measured in terms of persons, jobs, or dwelling units per unit area, reduces emissions associated with transportation as it reduces the distance people travel for work or services and provides a foundation for the implementation of other strategies, such as enhanced transit services. On Site 1, the Project would increase the density from a 7,000-square-foot food service building and surface parking to 382 dwelling units, 25,493 square feet of philanthropic institution, and 2,250 square feet of commercial retail use. On Site 2, the Project would increase the density from a surface parking lot to 303 dwelling units, 17,100 square feet uses. Both sites are in an area rich in transit services.

- **Increase Diversity of Urban and Suburban Developments (Mixed-Uses) (LUT-3):** The Project would introduce new residential and commercial uses on the Project Sites. The Project would co-locate complementary commercial and residential land uses in proximity to other existing off-site commercial and residential uses. The increases in land use diversity and mix of uses on the Project Sites would reduce vehicle trips and VMT by encouraging non-automotive forms of transportation (i.e. walking and biking), which would result in corresponding reductions in transportation-related emissions.

- **Increase Destination Accessibility (LUT-4):** The Project Sites are located in an area that offers access to multiple nearby retail and entertainment destinations. In addition, the Project Sites are located in Downtown Los Angeles, a primary job center, also easily accessible by public transportation. The access to multiple destinations in proximity to the Project Sites would reduce vehicle trips and VMT and would encourage walking and non-automotive forms of transportation, and would result in corresponding reductions in transportation-related emissions.

- **Increase Transit Accessibility (LUT-5):** The Metro Red and Gold rail lines also are provided in proximity to the Project Sites. Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. The Project would also provide adequate bicycle parking spaces for residential and commercial uses to encourage utilization of alternative modes of transportation.

- **Improve Design of Development (LUT-9)**: The Project would include improved design elements including developing ground floor retail, open space, and improved streetscape which would enhance walkability in the Project Sites' vicinity. The Project would also locate a development in an area with a high level of street accessibility and connectivity.

- **Provide Pedestrian Network Improvements (SDT-1):** Providing links and minimizing barriers to the Project Sites with existing or planned external streets would encourage people to walk instead of drive. The Project would link to the existing off-site pedestrian network, including existing off-site sidewalks, to encourage and increase pedestrian activities in the area that would further reduce VMT and associated transportation-related emissions. Furthermore, the Project would result in an improved and aesthetically appealing streetscape that would promote pedestrian activity, particularly between the 0.7 miles from the Purple/Red line station at Pershing Square to the Project Sites.

- **Traffic Calming Measures (SDT-2):** Providing traffic calming measures encourages people to walk or bike instead of using a vehicle. This mode shift results in a decrease in VMT. Streets within a half mile of the Project Sites are equipped with sidewalks, and approximately many of the intersections include marked crosswalks and/or count-down signal timers that calm traffic.

When accounting for the measures that would be implemented to reduce VMT, the Project's estimated petroleum-based fuel usage would be approximately 198,528 gallons of gasoline and 70,148 gallons of diesel per year, or a total of 260,470 gallons of petroleum-based fuels annually.

Summary of Energy Requirements and Energy Use Efficiencies

Appendix G of the CEQA Guidelines recommends quantification of a 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 Project's energy requirements were calculated based on the methodology contained in CalEEMod for electricity and natural gas usage. Project VMT data was calculated based on CAPCOA guidelines. The calculations also took into account energy efficiency measures such as Title 24, CalGreen and vehicle fuel economy standards. Tables 6-75 through 6-77 provide a summary of Project construction and operational energy usage. During Project construction activities, a total of 1,182 kWh of electricity would be consumed along with approximately 363,556 gallons of transportation fuel (gasoline and diesel). During Project operations, a total of 2,238,713 kWh of electricity, 3,631,259,150 kBTU of natural gas, and 260,470 gallons of transportation fuel would be consumed on an annual basis.

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

Construction

As discussed above, electricity would be intermittently consumed during the conveyance of the water used to control fugitive dust, as well as to provide electricity for temporary lighting and other general construction activities. The electricity demand at any given time would vary throughout the construction

period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. The estimated construction electricity usage represents approximately 0.05 percent of the estimated net annual operational demand and would be within the supply and infrastructure service capabilities of LADWP. Furthermore, the electricity demand during construction would be somewhat offset with the removal of the existing on-site uses which currently generate a demand for electricity. Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction, resulting in a net decrease when compared to existing operations. Transportation fuel usage during Project construction activities would represent approximately 0.007 percent of gasoline usage and 0.005 percent of diesel usage within Los Angeles County, respectively.[205] As energy consumption during Project construction activities would be relatively negligible, the Project would not likely affect regional energy consumption in years during the construction period.

Operation

As stated previously, based on LADWP's 2017 STRLP, LADWP forecasts that its total energy sales in the 2021–2022 fiscal year (the Project's buildout year) will be 26,835 GWh of electricity. LADWP forecasts that its total energy sales in the 2024-2025 fiscal year (the Project's buildout year) will be 23,286 GWh of electricity. As such, the Project-related net increase in annual electricity consumption of 2,238,713 kWh per year would represent approximately 0.009 percent of LADWP's projected sales in 2024-205.

As stated above, the Project's estimated net increase in demand for natural gas is 3,631,259 kBTU per year (3,560,057 cf per year), or approximately 9,949 kBTU per day (9,753 cf per day). Based on the 2016 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SCG's planning area will be approximately 2,526 million cf per day in 2021 (the year of the California Gas Report that is closest to Project's buildout year). The Project would account for approximately 0.0003 percent of the forecasted 2021 consumption in SCG's planning area.

At buildout, the Project would consume a net total of 192,454 gallons of gasoline and 68,006 gallons of diesel per year, or a net total of 260,470 gallons of petroleum-based fuels per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.005 percent of the 2017 annual on-road gasoline- and diesel-related energy consumption in Los Angeles County, as shown in Appendix P of this SCEA.

In sum, energy consumption during Project operations would be relatively negligible, and energy requirements would be within LADWP's and SCG's service provision.

[205] *Refer to County fuel calculations in Appendix P.*

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

As discussed above, electricity demand during construction and operation of the Project would have a negligible effect on the overall capacity of LADWP's power grid and base load conditions. With regard to peak load conditions, LADWP's power system experienced an all time high peak of 6,432 MW on August 31, 2017.[206] LADWP also estimates a peak load based on two years of data known as base case peak demand to account for typical peak conditions. Based on LADWP estimates for 2017, the base case peak demand for the power grid is 5,854 MW.[207] Under peak conditions, the Project would consume 4,538,308 kWh on an annual basis, equivalent to 255 kW. In comparison to the LADWP power grid base peak load of 5,854 MW in 2017, the Project would represent approximately 0.002 percent of the LADWP base peak load conditions. In addition, LADWP's annual growth projection in peak demand of the electrical power grid of 0.4 percent would be sufficient to account for future electrical demand by the Project.[208] Therefore, Project electricity consumption during operational activities would have a negligible effect on peak load conditions of the power grid.

4) The degree to which the project complies with existing energy standards.

Although Title 24 requirements typically apply to energy usage for buildings, construction equipment would also comply with Title 24 requirements where applicable. Electricity and natural gas usage during Project operations presented on Tables 6-74 through 6-76 would comply with 2016 Title 24 standards and applicable 2016 CalGreen Code requirements and the City's Green Building Code. Therefore, Project construction and operational activities would comply with existing energy standards with regards to electricity and natural gas usage.

With regard to transportation fuels, trucks and equipment used during proposed construction activities, the Project would comply with CARB's anti-idling regulations as well as the In-Use Off-Road Diesel-Fueled Fleets regulation. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in efficient use of construction-related energy. During Project operations, vehicles travelling to and from the Project Sites are assumed to comply with CAFE fuel economy standards. Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operational activities would comply with existing energy standards with regards to transportation fuel consumption.

[206] *LADWP, 2017 Retail Electric Sales and Demand Forecast. p. 6.*

[207] *Ibid.*

[208] *Ibid.*

5) Effects of the Project on Energy Resources

As discussed above, LADWP's electricity generation is derived from a mix of non-renewable and renewable sources such as coal, natural gas, solar, geothermal, wind, and hydropower. LADWP's 2017 STLRP identifies adequate resources (natural gas, coal) to support future generation capacity.

Natural gas supplied to the Southern California is mainly sourced from out of state with a small portion originating in California. Sources of natural gas for the Southern California region are obtained from locations throughout the western United States as well as Canada.[209] According to the U.S. Energy Information Administration (EIA), the United States currently has over 80 years of natural gas reserves based on 2015 consumption.[210] Compliance with energy standards is expected to result in more efficient use of natural gas (lower consumption) in future years. Therefore, Project construction and operation activities would have a negligible effect on natural gas supply.

Transportation fuels (gasoline and diesel) are produced from crude oil, which is imported from various regions around the world. Based on current proven reserves, crude oil production would be sufficient to meet over 50 years of consumption.[211] The Project would also comply with CAFE fuel economy standards, which would result in more efficient use of transportation fuels (lower consumption). Project-related vehicle trips would also comply with Pavley and Low Carbon Fuel Standards, which are designed to reduce vehicle GHG emissions but would also result in fuel savings in addition to CAFE standards. Therefore, Project construction and operation activities would have a negligible effect on the transportation fuel supply.

As discussed above in the Regulatory Framework, one of the objectives of SB 350 is to increase procurement of California's electricity from renewable sources from 33 percent to 50 percent by 2030. Accordingly, LADWP is required to procure at least 50 percent of their energy portfolio from renewable sources by 2030. The current sources of renewable energy procured by LADWP include wind, solar, and geothermal sources. These sources account for 29 percent of LADWP's overall energy mix in 2016, the most recent year for which data are available.[212] This represents the available off-site renewable sources of energy that would meet the Project's energy demand.

With regard to on-site renewable energy sources, as required under the City's Green Building Code, the Project would include the provision of conduit that is appropriate for future photovoltaic and solar thermal collectors. However, due to the Project Sites' location, other on-site renewable energy sources would not be feasible to install on-site as there are no local sources of energy from the following sources: biodiesel, biomass hydroelectric and small hydroelectric, digester gas, fuel cells, landfill gas, municipal

[209] *California Gas and Electric Utilities, 2016 California Gas Report, 2016.*

[210] *U.S. Energy Information Administration, Frequently Asked Questions, www.eia.gov/tools/faqs/faq.php?id=58&t=8, accessed May 7, 2018.*

[211] *BP Global, Oil reserves, https://www.bp.com/en/global/corporate/energy-economics/statistical-review-of-world-energy/oil/oil-reserves.html, accessed May 7, 2018.*

[212] *CEC, Utility Annual Power Content Labels for 2016, www.energy.ca.gov/pcl/labels/.*

solid waste, ocean thermal, ocean wave, and tidal current technologies, or multi- fuel facilities using renewable fuels. Furthermore, while methane is a renewable derived biogas and was found beneath the Project Sites, it is not available on the Project Sites in commercially viable quantities or form, and its extraction and treatment for energy purposes would result in secondary impacts. Additionally, wind-powered energy is not viable on the Project Sites due to the lack of sufficient wind in the Los Angeles basin.

Specifically, based on a map of California's wind resource potential, the Project Sites are not identified as an area with wind resource potential.[213]

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

The Project's high-density design and proximity to job centers and retail uses would allow for more residents to live closer to work and shopping areas, reducing associated VMT. The design of the Project, which includes dedicated bicycle parking facilities and an improved streetscape with pedestrian amenities, also would encourage non-automotive forms of transportation such as walking or biking to destinations. In addition, extensive public bus and rail transit service is provided within the area of the Project Sites and provide regular service intervals of 15 minutes during the peak hours. Public bus transit service in the immediate Project study area is currently provided by Metro, City of Gardena Transit, and City of Montebello bus lines. Additional public bus transit service in the Downtown Los Angeles area is provided by Foothill Transit, LADOT DASH Transit Service, Orange County Transportation Authority, and Torrance Transit Service. The Metro Red and Gold rail lines also are provided in proximity to the Project Sites. Metro's nearest Purple/Red line station is the Pershing Square station, which is located approximately 0.7 miles northwest of the Project Sites, while the nearest Metro Gold Line station is situated approximately 0.8 miles northeast of the Project Sites at the Little Tokyo/Arts District station. Additionally, the Project Sites are located less than 1.0 mile from Metro's Regional Connector 1st Street portal, which is currently under construction. As shown previously on Table 6-67 (refer to Response to Checklist Question 16[a] [Transportation/Traffic]), due to the Project's mixed-use nature, the Project would result in a reduction of approximately 177 daily trips, resulting in an associated reduction of VMT. Therefore, the Project would encourage the use of efficient transportation alternatives.

7) The degree to which the project design and/or operations incorporate energy-conservation measures, particularly those that go beyond City requirements

The City's current Green Building Code requires compliance with the CalGreen Code and California's Building Energy Efficiency Standards (Title 24). The Project would be required to comply with the City's Green Building Code.

[213] *CEC, National Renewable Energy Laboratory (NREL) Wind Prospector, https://maps.nrel.gov/wind-prospector/#/?aL=kM6jR-%255Bv%255D%3Dt%26qCw3hR%255Bv%255D%3Dt%26qCw3hR%255Bd%255D%3D1&bL=groad&cE=0&lR=0&mC=36.416862115300304%2C-120.421142578125&zL=8, accessed May 7, 2018.*

The City has also adopted several plans and regulations to promote the reduction, reuse, recycling, and conversion of solid waste going to disposal systems. These regulations include the City of Los Angeles Solid Waste Management Policy Plan, the RENEW LA Plan, and the Exclusive Franchise System Ordinance (Ordinance No. 182,986). These solid waste reduction programs and ordinances help to reduce the number of trips associated with hauling solid waste, thereby reducing the amount of petroleum-based fuel consumed. Furthermore, recycling efforts indirectly reduce the energy necessary to create new products made of raw material, which is an energy- intensive process. Thus, through compliance with the City's construction-related solid waste recycling programs, the Project would contribute to reduced fuel-related energy consumption.

8) Whether the Project conflicts with adopted energy conservation plans.

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the 2016 CalGreen Code and California's Building Energy Efficiency Standards, which have been incorporated into the City's Green Building Code.

With regard to transportation uses, the Project design would reduce the VMT throughout the region and encourage use of alternative modes of transportation. The Project would be consistent with regional planning strategies that address energy conservation. As discussed in Section 3 (SCEA Criteria and Transit Priority Project Consistency Analysis), SCAG's 2016-2040 RTP/SCS focuses on creating livable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most critical to the future of the region. As part of the approach, the 2016-2040 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources. The Project would be consistent with the energy efficiency policies emphasized in the 2016-2040 RTP/SCS. Most notably, the Project would be a mixed-use development consisting of 685 dwelling units, 25,493 square feet of philanthropic institution uses, 5,450 square feet of retail uses, and 17,100 square feet of office uses, located in "Skid Row," which is characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well served by existing public transportation, including Metro bus lines and rail lines. This is evidenced by the Project Sites' location within a designated HQTA. The introduction of new housing and job opportunities within an HQTA, as proposed by the Project, is consistent with numerous policies in the 2016-2040 RTP/SCS related to locating new housing and jobs near transit. The 2016-2040 RTP/SCS would result in an estimated 8 percent decrease in VMT by 2020, an 18 percent decrease in VMT by 2035, and a 21 percent decrease in VMT by 2040. By meeting and exceeding the SB 375 targets for 2020 and 2035, as well as achieving an approximately 21 percent decrease in VMT by 2040 (an additional 3 percent reduction in the 5 years between 2035 [18 percent] and 2040 [21 percent]), the 2016-2040 RTP/SCS is expected to fulfill and exceed its portion of SB 375 compliance with respect to meeting the state's GHG emission reduction goals. Thus, consistent with the 2016-2040 RTP/SCS, the Project would reduce VMT and associated petroleum-based fuel. As such, based on the above, the Project would be consistent with adopted energy conservation plans.

Conclusion Regarding Significance Threshold No. 1

As demonstrated in the analysis of the eight criteria discussed above, the Project would not result in any wasteful, inefficient, or unnecessary consumption of energy during construction or operation. The Project's energy requirements would not significantly affect local and regional supplies or capacity. The Project's energy usage during peak and base periods would also be consistent with electricity and natural gas future projections for the region. Electricity generation capacity and supplies of natural gas and transportation fuels would also be sufficient to meet the needs of Project-related construction and operations. During operations, the Project would comply with the City's existing energy efficiency requirements under the City's Green Building Code. In summary, the Project's energy demands would not significantly affect available energy supplies and would comply with existing energy efficiency standards. Therefore, Project impacts related to energy use under Significance Threshold No. 1 would be less than significant during construction and operation.

Significance Threshold No. 2: Would the Project result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Construction

Electricity

As discussed above, construction activities at the Project Sites would require minor quantities of electricity for lighting, power tools, and other support equipment. Heavy construction equipment would be powered with diesel fuel.

During Project construction activities, electricity usage represents 0.05 percent of the estimated net annual Project operational demand, which as described below, LADWP's existing electrical infrastructure currently has enough capacity to provide service for. Moreover, construction electricity usage would replace the existing electricity usage at the Project Sites during construction since the existing on-site uses, which currently generate a demand for electricity would be removed. As existing power lines are located in the vicinity of the Project Sites, temporary power poles may be installed to provide electricity during Project construction. Existing off-site infrastructure would not have to be expanded or newly developed to provide electrical service to the project during construction or demolition. Therefore, the Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

With regard to existing electrical distribution lines, the Project Applicant would be required to coordinate electrical infrastructure removals or relocations with LADWP and comply with site-specific requirements set forth by LADWP, which would ensure that service disruptions and potential impacts associated with grading, construction, and development within LADWP easements are minimized. Project contractors would notify and coordinate with SCG to identify the locations and depth of all existing gas lines and

avoid disruption of gas service to other properties. As such, construction of the Project is not anticipated to adversely affect the electrical infrastructure serving the surrounding uses or utility system capacity.

Natural Gas

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Accordingly, natural gas would not be supplied to support Project construction activities; thus there would be no demand generated by construction. However, the Project would involve installation of new natural gas connections to serve the Project Sites. Since the Project Sites are located in an area already served by existing natural gas infrastructure, it is anticipated that the Project would not require extensive off-site infrastructure improvements to serve the Project Sites. Construction impacts associated with the installation of natural gas connections would be confined to trenching in order to place the lines below surface. In addition, prior to ground disturbance, Project contractors would notify and coordinate with SCG to identify the locations and depth of all existing gas lines and avoid disruption of gas service to other properties. Therefore, construction of the Project would not result in an increase in demand for natural gas to affect available supply or distribution infrastructure capabilities and would not result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects.

Operation

Electricity

As shown on Table 6-74, the Project's operational electricity usage would be 2,238,713 kWh per year, which is approximately 0.009 percent of LADWP's projected sales in 2024-2025. In addition, during peak conditions, the Project would represent approximately 0.008 percent of the LADWP estimated peak load. LADWP has confirmed that the Project's electricity demand can be served by the facilities in the Project area. Therefore, during Project operations, it is anticipated that LADWP's existing and planned electricity capacity and electricity supplies would be sufficient to support the Project's electricity demand.

Natural Gas

As stated above, the Project's estimated net increase in demand for natural gas is 3,631,259 kBTU per year (3,560,057 cf per year), or approximately 9,949 kBTU per day (9,753 cf per day). Based on the 2016 California Gas Report, the California Energy and Electric Utilities estimates natural gas consumption within SCG's planning area will be approximately 2,526 million cf per day in 2021 (the year of the California Gas Report that is closest to Project's buildout year). The Project would account for approximately 0.0003 percent of the forecasted 2021 consumption in SCG's planning area. Therefore, it is anticipated that SCG's existing and planned natural gas supplies would be sufficient to support the Project's net increase in demand for natural gas.

Conclusion Regarding Significance Threshold No. 2

As demonstrated in the analysis above, construction and operation of the Project would not result in an increase in demand for electricity or natural gas that exceeds available supply or distribution

infrastructure capabilities that could result in the construction of new energy facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Therefore, Project impacts related to energy infrastructure capacity would be less than significant during construction and operation.

Cumulative Impacts

Significance Threshold No. 1 (Use and Consumption of Energy)

Cumulative impacts occur when impacts that are significant or less than significant from a proposed project combine with similar impacts from other past, present, or reasonably foreseeable projects in a similar geographic area. Based on the information presented in on Table 2-2 in Section 2 (Project Description), there are 161 related projects located within the vicinity of the Project Sites. 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 SCG's service area. While the geographic context for transportation-related energy use is more difficult to define, it is meaningful to consider the Project in the context of countywide consumption. 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 forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. As stated previously, LADWP forecasts that its total energy sales for the 2024-2025 fiscal year (the Project buildout year) will be 23,286 GWh of electricity. Based on the Project's estimated net new electrical consumption of 2,238,713 kWh per year, the Project would account for approximately 0.009 percent of LADWP's total projected sales for the Project's buildout year. Thus, although Project development would result in the use of renewable and non-renewable electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures making the Project more energy-efficient, and would be consistent with growth expectations for LADWP's service area. Furthermore, as with the Project, during 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. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of electricity would not be cumulatively considerable and thus, would be less than significant.

Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SCG's service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. As stated previously, based on the 2016 California Gas Report, the CEC estimates natural gas consumption within SCG's planning area will be approximately 2,526 million cf per day in 2021 (the year of the California Gas Report that is closest to Project's buildout year). The Project would account for approximately

0.0003 percent of the forecasted 2021 consumption in SCG's planning area. SCG's forecasts take into account projected population growth and development based on local and regional plans. Although Project development would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy-efficient, and would be consistent with regional and local growth expectations for SCG's service area. Furthermore, 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. As such, the Project's contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of natural gas would not be cumulatively considerable and thus, would be less than significant.

Transportation Energy

Buildout of the Project, related projects, and additional forecasted growth would cumulatively increase the demand for transportation-related fuel in the state and region. As described above, at buildout, the Project would consume a net total of 192,454 gallons of gasoline and 68,006 gallons of diesel per year, or a total of 260,470 gallons of petroleum-based fuels per year. For comparison purposes, the transportation-related fuel usage for the Project would represent approximately 0.005 percent of the 2017 annual on-road gasoline- and diesel-related energy consumption in Los Angeles County, as shown in Appendix P of this SCEA.

Additionally, as described above, petroleum currently accounts for 90 percent of California's transportation energy sources; however, over the last decade the state has implemented several policies, rules, and regulations to improve vehicle efficiency, increase the development and use of alternative fuels, reduce air pollutants and GHG emissions from the transportation sector, and reduce VMT, which would reduce reliance on petroleum fuels. According to the CEC, gasoline consumption has declined by 6 percent since 2008, and the CEC predicts that the demand for gasoline will continue to decline over the next 10 years and that there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity. As with the Project, other future development projects would be expected to reduce VMT by encouraging the use of alternative modes of transportation and other design features that promote VMT reductions.

Furthermore, as discussed previously, the Project would be consistent with the energy efficiency policies emphasized by the 2016-2040 RTP/SCS. Specifically, the Project would be a mixed-use development consisting of 685 dwelling units, 25,483 square feet of philanthropic institution uses, 5,450 square feet of retail uses, and 17,100 square feet of office uses, located in "Skid Row," which is characterized by a high degree of pedestrian activity. The Project would provide greater proximity to neighborhood services, jobs, and residences and would be well served by existing public transportation, including Metro bus lines and rail line. The Project also would introduce new housing and job opportunities within an HQTA, which is consistent with numerous policies in the 2016-2040 RTP/SCS related to locating new jobs near transit. These features would serve to reduce VMT and associated transportation fuel consumption. By its very nature, the 2016-2040 RTP/SCS is a regional planning tool that addresses cumulative growth and resulting environmental effects. Since the Project is consistent with the 2016-2040 RTP/SCS, its

contribution to cumulative impacts related to wasteful, inefficient and unnecessary use of transportation fuel would not be cumulatively considerable and thus, would be less than significant.

Significance Threshold No. 2 (Infrastructure Capacity Analysis)

Electricity

Electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As described in LADWP's 2017 STLRP, 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. The 2017 STLRP 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 area of the Project Sites. As such, the Project's contribution to cumulative impacts with respect to electricity infrastructure would not be cumulatively considerable and thus, would be less than significant.

Natural Gas

Natural gas infrastructure is typically expanded in response to increasing demand and system expansion and improvements by SCG occur as needed. It is expected that SCG would continue to expand delivery capacity if necessary to meet demand increases within its service area. Development projects within its service area, including the Project and related projects also served by the existing SCG infrastructure, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. As such, the Project's contribution to cumulative impacts with respect to natural gas infrastructure would not be cumulatively considerable and thus, would be less than significant.

19. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant With Mitigation Incorporated. As discussed under Checklist Topic 4 (Biological Resources), with implementation of mitigation, the Project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal. As discussed under Checklist Topics 5 (Cultural Resources), with implementation of mitigation, the Project would not

eliminate important examples of the major periods of California history or prehistory. Therefore, with implementation of the mitigation measures outlined in Section 6 (Sustainable Communities Environmental Impact Analysis) of the SCEA, Project impacts related to these issues would be less than significant.

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

Less Than Significant Impact. Cumulative impacts for each checklist topic listed in Section 6 (Sustainable Communities Environmental Analysis) of the SCEA have been addressed. As discussed in this section, the Project would not contribute a cumulatively considerable impact to any cumulative impacts outlined in this section. Therefore, cumulative impacts would be less than significant

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

Less Than Significant With Mitigation Incorporated. As discussed in response to Checklist Topic 3 (Air Quality), Checklist Question Topic 8 (Hazards and Hazardous Materials), Checklist Topic 10 (Land Use and Planning), Checklist Topic 12 (Noise), and Checklist Question 16 (Transportation/Traffic), with implementation of mitigation, the Project's construction-related noise impacts would be less than significant. All other potential impacts are less than significant without mitigation. Therefore, with implementation of the mitigation measures outlined in Section 6 (Sustainable Communities Environmental Analysis) of the SCEA, the Project would not have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly.

ROSE APARTMENTS

THIS NOTICE WAS POSTED

ON March 08 2019

UNTIL April 08 2019

REGISTRAR – RECORDER/COUNTY CLERK

DOCUMENT FILED
City Clerk's Office

CITY CLERK'S USE

No: NE-19-005-PL

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Date: 3/8/19

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
200 NORTH SPRING STREET, ROOM 360
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(California Environmental Quality Act Section 15062)

Filing of this form is optional. If filed, the form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, CA 90650, pursuant to Public Resources Code Section 21152 (b). Pursuant to Public Resources Code Section 21167 (d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project. Failure to file this notice with the County Clerk results in the statute of limitations being extended to 180 days.

LEAD CITY AGENCY	COUNCIL DISTRICT
City of Los Angeles Department of City Planning	**11 - Bonin**

PROJECT TITLE	LOG REFERENCE
CPC-2018-2140-CU-DB-CDP-SPP-MEL and TT-82253	**ENV-2018-2141-CE**

PROJECT LOCATION
718-720 East Rose Avenue

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
The proposed project includes the demolition of commercial office and institutional uses and the construction, use and maintenance of a four-story, mixed-use, 35-unit permanent supportive housing development with 1,885 square feet of administrative and program offices and a maximum building height of 43 feet, eight (8) inches (43'-8"). The project includes a total of 17 automobile parking spaces and 47 bicycle parking spaces.

NAME OF PERSON OR AGENCY CARRYING OUT PROJECT, IF OTHER THAN LEAD CITY AGENCY:
Becky Dennison, Venice Community Housing Corporation

CONTACT PERSON	AREA CODE	TELEPHONE NUMBER	EXT.
Jonathan Lonner, Burns and Bouchard, Inc.	**310**	**802-4261**	

EXEMPT STATUS: (Check One)

		STATE CEQA GUIDELINES	CITY CEQA GUIDELINES
☐	MINISTERIAL	Sec. 15268	Art. II, Sec. 2b
☐	DECLARED EMERGENCY	Sec. 15269	Art. II, Sec. 2a (1)
☐	EMERGENCY PROJECT	Sec. 15269 (b) & (c)	Art. II, Sec. 2a (2) & (3)
√	CATEGORICAL EXEMPTION	Sec. 15300 *et seq.*	Art. III, Sec. 1

Class 32 Category _____ (City CEQA Guidelines)

☐ OTHER (See Public Resources Code Sec. 21080 (b) and set forth state and City guideline provision.

JUSTIFICATION FOR PROJECT EXEMPTION: In-fill development meeting the conditions described in this section. (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations. (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses. (c) The project site has no value as habitat for endangered, rare or threatened species. (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality. (e) The site can be adequately served by all required utilities and public services.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT ISSUED BY THE CITY PLANNING DEPARTMENT STATING THAT THE DEPARTMENT HAS FOUND THE PROJECT TO BE EXEMPT.

SIGNATURE	TITLE	DATE
	City Planner	**August 22, 2018**

FEE:	RECEIPT NO.	REC'D. BY	DATE
$81.00	**0102876788**	**Danalynn Dominguez**	**May 13, 2018**

DISTRIBUTION: (1) County Clerk, (2) City Clerk, (3) Agency Record
Rev. 11-1-03 Rev. 1-31-06 Word

IF FILED BY THE APPLICANT:

NAME (PRINTED)

SIGNATURE

DATE

2019 061305

FILED
Mar 08 2019

Dean C. Logan, Registrar – Recorder/County Clerk

Electronically signed by TODD TRAN

I hereby certify and attest this to be a true and correct copy of the official record on file in the office of the Department of City Planning of the City of Los Angeles designated as ENV-2018-2141-CE

Department Representative

2019 061305

FILED
Mar 08 2019

Dean C. Logan, Registrar – Recorder/County Clerk

Electronically signed by TODD TRAN

This is a true and certified copy of the record
if it bears the seal, imprinted in purple ink,
of the Registrar-Recorder/County Clerk

MAR 08 2019

Dean C. Logan REGISTRAR-RECORDER/COUNTY CLERK
LOS ANGELES COUNTY, CALIFORNIA

03/08/2019 01:19 PM PST

LOS ANGELES CO RR/CC NORWALK BUSINESS FILINGS
12400 IMPERIAL HIGHWAY
NORWALK, CA 90650

TERMINAL NAME: E3469306

ORDER #: 88665550

PAYMENT

BUSINESS FILINGS 20190308125002Z	$77.00
AGENCY SUBTOTAL:	$77.00
LEXISNEXIS SERVICE FEE:	$1.75
TOTAL USD:	$78.75

CARD #: 7893	MASTERCARD
PAYMENT: CREDIT	CHIP READ-CONTACT
MODE:	ISSUER
MID:	*469*
TID:	xxxxxxxxx160
AUTH CODE:	93391P
APP LABEL:	MasterCard
CVM:	NO SIG REQUIRED
AID:	A0000000041010
TC:	6B6FF1B0A2369FC7
AMOUNT:	$78.75

xxx CARD APPROVED xxx

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AMOUNT PAID:
$78.75

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720 Rose - NOE

Dean C. Logan
Los Angeles County Registrar / Recorder
12400 Imperial Highway, Norwalk, CA
(800)201-8999

BUSINESS FILINGS REGISTRATION

NORWALK DEPARTMENT HEADQUARTER

Cashier: T. TRAN

20190308125002Z

Friday, March 08, 2019 1:18 PM

Item(s)

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NoE - County Posting Fee 2019061305	1	$75.00
Notice - Certified Copy 2019061305	1	$2.00
Total		**$77.00**

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PALM VISTA APARTMENTS

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

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(213) 978-1300

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
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http://planning.lacity.org

DENSITY BONUS & AFFORDABLE HOUSING INCENTIVES & SITE PLAN REVIEW

March 16, 2018

Applicant
Keyvan Rahbar and Tannaz Rahbar
1326 Capri Drive
Pacific Palisades, CA 90272

Representative
Dana A. Sayles, AICP
three6ixty
4309 Overland Avenue
Culver City, CA 90230

Case No.	DIR-2017-779-DB-SPR
CEQA:	ENV-2017-780-CE
Location:	20116 West Sherman Way
Council District:	3 – Blumenfield
Neighborhood Council	Winnetka
Community Plan Area:	Canoga Park – Winnetka – Woodland Hills – West Hills
Land Use Designation:	Community Commercial
Zone:	C2-1VL-RIO
Legal Description:	Lot FR LT1, TR 23017
Last Day to File an Appeal:	April 2, 2018

DETERMINATION

Pursuant to the Los Angeles Municipal Code (LAMC) Section 12.22 A.25 and Section 16.05, as the designee of the Director of Planning, I hereby:

Approve with Conditions the following two (2) incentives requested by the applicant for a project totaling 99 dwelling units, reserving 10 dwelling units (10 percent) for Very Low Income tenants for a period of 55 years:

a. **Floor Area Ratio.** An approximate 28 percent increase in the allowable Floor Area Ratio allowing a total Floor Area Ratio of 1.92:1 in lieu of 1.5:1.

b. **Height.** An 8-foot increase in the allowable height, allowing 53 feet in lieu of the maximum permitted 45 feet.

Approve a **Site Plan Review** for the construction of an approximately 84,996 square foot development containing 99 units of dwelling units; and

Determine based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 1, Class 32, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

Adopt the attached Findings.

CONDITIONS OF APPROVAL

Approval of the subject development project is made with the following Terms and Conditions imposed, in order to ensure compliance .with applicable requirements of Section 12.22 A.25, Affordable Housing Incentives- Density Bonus, of the LAMC, Section 16.05, Site Plan Review, and the project's environmental clearance.

DENSITY BONUS COMPLIANCE CONDITIONS

1. **Residential Density**. The project shall be limited to a maximum density of 99 residential units including Density Bonus Units.

2. **Affordable Units.** A minimum of 10 units, that is 10 percent of the base dwelling units, shall be reserved as affordable units, as defined by the State Density Bonus Law 65915 (C)(2).

3. **Changes in Restricted Units**. Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Section 12.22 A.25 (a-d).

4. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make 10 units available to Very Low Income Households, for rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with any monitoring requirements established by the HCIDLA. Refer to the Density Bonus Legislation Background section of this determination.

5. **Floor Area Ratio (FAR).** The project qualifies for an approximate 32.5 percent increase in the allowed FAR, and shall therefore be limited to a total FAR of 1.98:1.

6. **Height.** The project qualifies for an 11-foot increase in height beyond the normally imposed 45-foot height limit. The project may be built no higher than 55 feet in height.

7. **Automobile Parking**. Based upon the number and type of dwelling units proposed, 126 automobile parking spaces shall be provided for the project. Automobile parking shall be provided consistent with LAMC Section 12.22 A.25, Parking Option 1, which permits one on-site parking space for each residential unit with one or fewer bedrooms; two on-site parking spaces for each residential unit with two to three bedrooms; and two-and-one-half parking spaces for each residential unit with four or more bedrooms. Non-Restricted Affordable Units (including any manager's units) shall provide parking consistent with LAMC Section 12.21 A.4.

8. **Adjustment of Parking**. In the event that the number of Restricted Affordable Units should increase, or the composition of such units should change (i.e. the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), or the applicant selects another Parking Option (including Bicycle Parking Ordinance) and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth above.

9. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC 12.21 A.16. Long-term bicycle parking shall be provided at a rate of one per dwelling unit or guest

room. Additionally, short-term bicycle parking shall be provided at a rate of one per ten dwelling units or guest rooms, with a minimum of two short-term bicycle parking spaces. Based upon the number of dwelling units, 99 long-term and 10 short-term bicycle parking spaces shall be provided onsite.

SITE PLAN REVIEW CONDITIONS

10. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped **"Exhibit A,"** and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning, Valley Project Planning Division, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Municipal Code or the project conditions.

11. **Building Materials.** The Project shall provide aesthetic and building materials/elements as depicted in "**Exhibit A**" that includes but is not limited to the following: glass guardrails, cable guardrails, metal awnings, hard plank lap siding, and decorative paving. A note shall be added to the Project Elevations to indicate that metal materials incorporated into the design shall be of a non-reflective material.

12. **Ground Floor Green Screen.** The ground floor landscape planter along the northern facade shall feature a green screen of live plantings in order to soften the appearance of the block wall from the right of way. As the façade is north facing, appropriate 'shade-loving' perennial climbing vines shall be utilized.

13. **Trees.** Shade-producing trees shall be planted within the front yard, rear yard, and within the parkway, substantially consistent with the landscape plan submitted by the Applicant, stamped **"Exhibit B"**. New trees planted within the public right-of-way shall be spaced not more than an average of 30 feet on center, unless otherwise required by the Urban Forestry Division, Bureau of Street Services.

14. **Landscaping.** The property shall be developed in substantial conformance with the submitted landscape plans, labeled **"Exhibit B"**. All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped, including an automatic irrigation system, and maintained in accordance with a landscape plan prepared by a licensed landscape architect or licensed architect, and submitted for approval to the Department of City Planning according to LAMC 12.40 and Landscape Ordinance Guidelines "O".

15. **Los Angeles River Improvement Overlay District.** The project shall comply with the applicable provisions of Ordinance Nos. 183,144 and 183,145 pertaining to the Los Angeles River Improvement Overlay District.

16. **Open Space.** The project shall provide as follows:

    a. A minimum of 10,575 square feet of total usable open space.

    b. Required common open space shall include two courtyards that provide a minimum combined area of 3,650 square-feet and are open to the sky.

17. **Mechanical Equipment.** All mechanical equipment on the roof shall be screened from view. The transformer, located in the front yard, shall be screened with landscaping.

18. **Window Transparenc,** A note shall be added to the Northern . ,oject Elevation to indicate that all ground floor windows shall be comprised of non-reflective, transparent glass.

ADMINISTRATIVE CONDITIONS

19. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Final Plans". A copy of the Final Plans, supplied by the applicant, shall be retained in the subject case file.

20. **Notations on Plans.** Plans submitted to the Department of Building and Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet, and shall include any modifications or notations required herein.

21. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

22. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

23. **Department of Building and Safety**. The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

24. **Enforcement.** Compliance with these conditions and the intent of these conditions shall be to the satisfaction of the Department of City Planning.

25. **Covenant.** Prior to the issuance of any permits relative to this matter, an agreement concerning all the information contained in these conditions shall be recorded in the County Recorder's Office. The agreement shall run with the land and shall be binding on any subsequent property owners, heirs or assign. The agreement must be submitted to the Department of City Planning for approval before being recorded. After recordation, a copy bearing the Recorder's number and date shall be provided to the Department of City Planning for attachment to the file.

26. **Indemnification and Reimbursement of Litigation Costs.**

    Applicant shall do all of the following:

    (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of

subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

(ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

PROJECT BACKGROUND

The proposed project is the demolition of a one-story auto-repair center, restaurant, and surface parking lot and the construction of a four-story, 53-foot tall building with 99 residential units, including a minimum of 10 units for Very Low Income households. The project site consists of one lot that measures approximately 44,224.8 square-feet in area. The project proposes a total of 191 parking spaces in one level of subterranean parking and on the ground floor. The proposed Project includes 10,575 square-feet of usable open space. The total project size is approximately 84,996 square-feet of floor area in the Canoga Park - Winnetka - Woodland Hills - West Hills Community Plan Area, zoned C2-1VL-RIO with a Community Commercial land use designation.

In accordance with California State Law (including Senate Bill 1818, and Assembly Bills 2280 and 2222), the applicant is proposing to utilize Section 12.22 A.25 (Density Bonus) of the Los Angeles Municipal Code (LAMC), which permits a density bonus of up to 35 percent. The applicant has applied for a 32.5 percent density bonus, which would allow for 146 total dwelling units in lieu of the otherwise maximum density limit of 110 dwelling units on the property. The applicant is not utilizing this 32.5 percent density bonus for additional dwelling units and is instead proposing a structure with 99 dwelling units – less than the base density. By setting aside a portion of the dwelling units, in this case 10 units (10 percent), for habitation by Very Low Income households for a period of 55 years, the applicant is automatically granted a reduction in the required parking based on two Parking Options and is eligible to request two on-menu incentives. The Applicant selected Option No. 1, which requires a total of 126 parking spaces for the residential units and requested on-menu incentives for a 28 percent increase in Floor Area Ratio and a building height of 53 feet in lieu of the maximum allowable height of 45 feet.

Housing Replacement

With Assembly Bill 2222, applicants of Density Bonus projects filed as of January 1, 2015 must demonstrate compliance with the housing replacement provisions which require replacement of rental dwelling units that either exist at the time of application of a Density Bonus project, or have been vacated or demolished in the five-year period preceding the application of the project. This applies to all pre-existing units that have been subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income; subject to any other form of rent or price control; or occupied by Low or Very Low Income Households.

The property is currently developed with a one-story auto-repair center, restaurant, and surface parking lot which were constructed on the site in 1960, and as such, there are no dwelling units on-site which require replacement.

Code Criteria

As permitted by LAMC Section 12.22 A.25 the applicant is requesting two incentives that will facilitate the provision of affordable housing at the site: an increase in Floor Area Ratio and an increase in maximum allowable height. Pursuant to LAMC Section 12.22 A.25 (e)(2), in order to be eligible for any on-menu incentives, a Housing Development Project (other than an Adaptive Reuse Project) shall comply with the following criteria, which it does:

a. *The façade of any portion of a building that abuts a street shall be articulated with a change of material or a break in plane, so that the façade is not a flat surface.*

   The proposed building has a façade facing Sherman Way. As evident in Exhibit "A", the street facing façade will be articulated with a differentiation in material type and color, and in the form of various architectural elements. Such materials and architectural elements include projecting balconies, stucco exteriors, wood lap siding,

metal awnings and louvers, canopied entrances, and metal and glass balcony railings and fixtures, all of which will create sufficient breaks in plane and articulation.

b. *All buildings must be oriented to the street by providing entrances, windows architectural features and/or balconies on the front and along any street facing elevation.*

The proposed building is oriented to Sherman Way, as the main entrance is easily accessed from the sidewalk with metal awnings which provide shelter and protection. Additionally, many windows face the street and provide projecting balconies along the front façade, in order to further establish the main entrance.

c. *The Housing Development Project shall not involve a contributing structure in a designated Historic Preservation Overlay Zone (HPOZ) and shall not involve a structure that is a City of Los Angeles designated Historic-Cultural Monument (HCM).*

The proposed project is not located within a designated Historic Preservation Overlay Zone, nor does it involve a property that is designated as a City Historic-Cultural Monument.

d. *The Housing Development Project shall not be located on a substandard street in a Hillside Area or in a Very High Fire Hazard Severity Zone as established in Section 57.25.01 of the LAMC.*

The project is not located in a Hillside Area, nor is it located in a Very High Fire Hazard Severity Zone.

DENSITY BONUS/AFFORDABLE HOUSING INCENTIVES COMPLIANCE FINDINGS

1. **Pursuant to Section 12.22 A.25(c) of the LAMC, the Director shall approve a density bonus and requested incentive(s) unless the director finds that:**

   a. *The incentives are not required to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.*

   The record does not contain substantial evidence that would allow the Director to make a finding that the requested incentives are not necessary to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for Very Low, Low, and Moderate Income Households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed 25 percent gross income based on area median income thresholds dependent on affordability levels.

   The list of on-menu incentives in 12.22 A.25 were pre-evaluated at the time the Density Bonus Ordinance was adopted to include types of relief that minimize restrictions on the size of the project. As such, the Director will always arrive at the conclusion that the density bonus on-menu incentives are required to provide for affordable housing costs because the incentives by their nature increase the scale of the project.

   The requested incentives, an increase in the floor area ratio and height, are expressed in the Menu of Incentives per LAMC 12.22 A.25(f) and, as such, permit exceptions to zoning requirements that result in building design or construction efficiencies that provide for affordable housing costs. The requested incentives allow the developer to expand the building envelope so the additional restricted affordable units can be constructed and the overall space dedicated to residential uses is increased. These incentives support the applicant's decision to set aside 10 Very Low Income dwelling units for 55 years.

   Floor Area Ratio Increase: The subject site is zoned C2-1VL which allows 110 units on the 44,224.8 square foot site, with a maximum 1.5 Floor Area Ratio (FAR) and a maximum height of 45 feet. The 1.5 FAR would allow a total of 66,337.2 square-feet in floor area. The FAR Increase incentive permits a percentage increase in the allowable FAR equal to the percentage of Density Bonus for which the Housing Development Project is eligible, not to exceed 35 percent. While the proposed project qualifies for a maximum 1.98:1 FAR, or 87,565 square-feet, the proposed project is actually providing a maximum floor area of 84,996 square feet or a 1.92:1 FAR. The proposed 1.92:1 FAR is an approximate 28 percent increase and creates 18,658.8 additional square feet.

FAR by-right	Buildable Lot Area (sf)	Total Floor Area (sf)
1.5	44,224.8	44,224.8 x 1.5 = 66,337.2

FAR Proposed 28%	Buildable Lot Area (sf)	Total Floor Area (sf)	Additional Floor Area (sf)
1.92:1	44,224.8	84,996	84,996 – 66,337.2 = **18,658.2**

Height Increase. The 1VL Height District allows for a building with a maximum height of 45 feet. The requested on-menu incentive allows for an 11 foot increase in height, to a maximum height of 56 feet, however the maximum building height will be 53 feet. LAMC Section 12.22 A.25(f)(5) provides an incentive to increase the allowable building height if the site is in a zone where the height is limited, is not within 15 feet of any property zoned R2, and is not within 50 feet of or share a lot line with any R1 property. The project site is in Height District 1VL which allows a maximum height of 45 feet, and is not within the buffer distance requirements set forth for R1 and R2 zones, therefore, it qualifies for the height increase incentive.

b. *The Incentive will have a specific adverse impact upon public health and safety or the physical environment, or on any real property that is listed in the California Register of Historical Resources and for which there is no feasible method to satisfactorily mitigate or avoid the specific adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.*

There is no evidence in the record that the proposed density bonus incentives will have a specific adverse impact. A "specific adverse impact" is defined as, "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (LAMC Section 12.22.A.25(b)). The finding that there is no evidence in the record that the proposed incentives will have a specific adverse impact is further supported by the recommended CEQA finding. The findings to deny an incentive under Density Bonus Law are not equivalent to the findings for determining the existence of a significant unavoidable impact under CEQA. However, under a number of CEQA impact thresholds, the City is required to analyze whether any environmental changes caused by the project have the possibility to result in health and safety impacts. For example, CEQA Guidelines Section 15065(a)(4), provides that the City is required to find a project will have a significant impact on the environment and require an EIR if the environmental effects of a project will cause a substantial adverse effect on human beings. The proposed project and potential impacts were analyzed in accordance with the City's Environmental Quality Act (CEQA) Guidelines, as the Project is exempt from CEQA pursuant to City CEQA Guidelines, Article III, Section 1, Class 32 and there is no substantial evidence demonstrating that an exception to the Categorical Exemption per Section 15300.2 applies; and therefore, none of the potential environmental effects of the proposed Project would cause substantial adverse effects on human beings. Based on all of the above, there is no basis to deny the requested incentive.

SITE PLAN REVIEW FINDINGS

2. The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

The Land Use Element of the City's General Plan divides the City into 35 Community Plans. The project is located within the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan area which designates the subject site for Community Commercial land uses corresponding to the CR, C2, C4, RAS3 and RAS4 Zones. The subject site is zoned C2-1VL-RIO, consistent with the range of zones associated with the site's corresponding land use designation.

The General Plan promotes the provision of services throughout the City in locations that are convenient to the public, but that do not negatively impact neighboring properties. As

described in detail below, the proposed housing development is in conformance with the relevant goals, and objectives of the General Plan:

General Plan Housing Element

Goal 1 of the General Plan's Housing Element is "Housing Production and Preservation." In support of this Goal is Objective 1.1: "Produce an adequate supply of rental and ownership housing in order to meet current and projected needs." The General Plan's Housing Element includes the following relevant Policies in support of this Objective:

> Policy 1.1.2, "Expand affordable rental housing for all income groups that need assistance."
>
> 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."

The proposed project will result in the development of 99 residential apartment units, including ten units reserved for Very Low Income Households, within a new modern residential building. The project site is served by Metro Bus Lines 162/163 and 243/242, with stops for both lines approximately 300 feet to the east of the site, located 200 feet east of the project site with connections from Sun Valley to West Hills, and from Porter Ranch to Woodland Hills. In addition, the project is located one mile from the Winnetka Orange Line Station, which provides connections from Chatsworth to Warner Center and North Hollywood. In addition, the proposed project is in substantial compliance with the purposes, intent, and provisions of the General Plan and with the Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan as shown below:

Canoga Park – Winnetka – Woodland Hills – West Hills Community Plan

The Community Plan designates the site for Community Commercial land uses, corresponding to the CR, C2, C4, RAS3 and RAS4 Zones. The site is classified in the C2-1VL Zone, does not propose to modify its zone designation, and, thus, is consistent with the planning and zoning of the Community Plan. The subject site's C2-1VL Zone allows a maximum density of 1 dwelling unit per 400 square feet and a maximum floor area ratio (FAR) of 1.5:1. As the site is 44,224.8 square-feet in lot area, this would entitle the project to a density of 110 dwelling units by right, and 146 dwelling units with a 32.5 percent density bonus, in exchange for the set aside of 10 percent of the units for Very Low Income households.

The Applicant has not utilized the density bonus to gain additional dwelling units, instead the project is for a 99-unit apartment building and 10 percent of the dwelling units are set aside for Very Low Income households in order to be eligible for two on-menu density bonus incentives and a density bonus parking option. This allows the applicant to increase the height of the project from 45 feet by a maximum of 11 feet and to increase the floor area of the project 32.5 percent from 1.5:1 to a maximum of 1.98:1. The Applicant is therefore requesting a maximum height of 53 feet and a floor area ratio of 1.92:1, consistent with the provisions of the density bonus entitlement. Approval of the requested incentive and off-menu waiver would allow for the development of a residential project

which is consistent with the following goals, objectives, and policies of the Community Plan:

Goal 1 A safe, secure, and high quality residential environment for all economic, age, and ethnic segments of the Canoga-Park-Winnetka-Woodland Hills-West Hills Community Plan area.

Policy 1-1.1 Maintain an adequate supply and distribution of multi-family housing opportunities in the Community Plan Area.

Policy 1-1.4 Protect the quality of the residential environment through attention to the physical appearance of communities.

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

Policy 1-2.2 Encourage multiple residential development in commercial zones.

Policy 1-4.1 Promote greater individual choice in type, quality, price and location of housing.

In addition, the project complies with the following Design Policies identified in the Community Plan's Urban Design Chapter:

- Require use of articulation, recesses, surface perforations, porticoes to break up long, flat building facades.
- Use accenting, complementary building materials for building facades.
- Maximize application of architectural features or articulation of building facades.
- Screen of mechanical and electrical equipment from public view.
- Screen all rooftop equipment and building appurtenances from public
- Require the enclosure of trash areas for all projects.
- Design of parking structure exteriors to match the style, materials and color of the main building.
- Use landscaping to screen parking structures not architecturally integrated with the main building.
- All multiple residential projects of five or more units shall be designed around a landscaped focal point or courtyard to serve as an amenity for residents.

Development of the proposed residential building will be compatible with existing and future development of the neighborhood while providing an adequate supply of multi-family housing opportunities for a variety in household incomes. Additionally, the project is sited along a commercial corridor, which provides residents with the opportunity to connect with public transit and with easy access to neighborhood serving commercial uses. Lastly, the project is conditioned to ensure the design is consistent with the Community Plan Design Guidelines, as well as with the Citywide Design Guidelines.

3. **The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development on adjacent properties and neighboring properties.**

The project site is located at the southwest corner of Sherman Way and Winnetka Avenue within the Winnetka Community of the City of Los Angeles. The proposed project consists of the construction of a four-story apartment building comprised of 99 apartment units (10 units restricted for Very Low Income Households) with a maximum building height of 53 feet. The project has been designed with a modern aesthetic and includes design features to reduce the massing of the building and will provide landscaping that will result in a project that will be compatible with future and existing development, as described below:

Height

The proposed project has a total building height 53 feet, with three residential stories and two levels of parking (one street level and one subterranean level). There is a 45-foot height limitation for the C2-1VL Zone. The requested incentive, an increase in the allowable height, allows an 11-foot increase in the permitted 45-foot maximum height limit to 56 feet. Therefore, as the project is 53 feet in height, it is within the allowable maximum height for the zone.

Bulk/Massing

The building is designed as a subterranean level of parking, a parking podium, and a 'ring' of residential units atop the podium. The mass of the building is modified to provide for a front yard and rear yard which would be consistent with residential apartments in an R4 Zone. The front yard is utilized as a landscape planter area, a hardscape entrance, and a convenient location for short-term bicycle parking, whereas the rear yard is designed as a passive green space with seating. Additionally, courtyards are provided at the center of the podium level to allow units in the center of the building to have access to natural light.

This design and massing is consistent with the objectives identified in the Residential and Commercial Citywide Design Guidelines (also known as the 'Citywide Design Guidelines'). The front yard area activates the area adjacent to the street, and provides bicycle racks which are placed in a safe, well-lit location, which is convenient for residents and visitors. Additionally, the elevations have been designed with an equal level of detail, articulation, and rigor in order to comply with the objectives of the Citywide Design Guidelines.

Building Materials

The primary components of the exterior facade consist of architecturally unique projecting balconies, stucco exteriors, wood lap siding, metal awnings and louvers, canopied entrances, and metal and glass balcony railings and fixtures. The projecting balconies are integrated into the building facade. The architectural components of the building are defined by a change in building material and through a change in architectural details. The main entrance of the building is framed by a metal canopy, glass façade, and a contrasting vertical wood siding design that highlights the entrance of the building and anchors the overall design.

Consistent with the objectives of the Citywide Design Guidelines, the changes in material are purposefully designed to correspond to variations in the building mass, and the metal canopies and details are applied in a harmonious manner, consistent with the proportions and scale of the building.

Entrances

The primary pedestrian entrance will be located along Sherman Way and is easily accessible from the sidewalk. As recommended in the Citywide Design Guidelines, the primary ground floor entrance is distinct and visible, with landscaping elements, outdoor lighting and canopy framed doorways to provide an inviting pedestrian experience.

The project also complies with the building orientation outlined in the Citywide Design Guidelines, in that the gathering spaces are located at the ground level and accessible from the street. The communal spaces consisting of the recreation room, fitness room, the lounge, mail room and lobby are accessible from the main pedestrian entrance and are located along the ground floor façade. A pathway is also provided from the front entrance to the rear façade to access two bicycle rooms, a storage room, a secondary lobby, and rear yard. Both stairways on the ground floor provide access to all residential floors above.

Consistent with the driveway objectives outlined in the Citywide Design Guidelines, the project prioritizes pedestrians first and automobiles second, by placing the driveway at the edge of the parcel, incorporating the parking structure into the architectural design of the building, and by utilizing landscaping along the street façade.

Setbacks

Per LAMC Section 12.14 C., the project is not required to provide a front yard setback, however it is required to provide a side yard setback and a rear yard setback consistent with the R4 Zone as it is a residential development. Per the R4 Zone, the side yard is required to be a minimum of five feet (5') plus an additional one foot (1') for each floor above the second floor and the rear yard setback is required to be a minimum of 15 feet (15') in depth plus an additional one foot (1') for each floor above the third floor. As the project is a four-story structure, it is required to provide a seven foot (7') side yard setback and a 16 foot (16') rear yard setback. As shown in Exhibit "A", the setbacks are all provided as required by the LAMC – the front yard setback is over 15 feet (15'), the side yard setbacks are seven feet (7') on each side, and the rear yard setback is over 17 feet (17').

Parking

The project is required to provide a minimum of 126 vehicle parking spaces for the residential uses, 1 parking spaces for each of the 18 studio units and 54 one bedroom/one bathroom units and 2 spaces for each of the 27 two bedroom/two bathroom units. However, the applicant is providing 191 parking spaces, 65 spaces in excess of the parking required.

As recommended in the Citywide Design Guidelines, long-term and short-term bicycle parking is easily accessible. A total of 100 long-term bicycle parking spaces will be located within two dedicated storage rooms on the ground floor: one room with 44 bicycle stalls located near the front lobby and a second room with 56 bicycle stalls located near the rear lobby. 10 short-term bicycle parking spaces will be provided at the ground floor, near the pedestrian entrance and adjacent to the front yard landscaping area.

Lighting

Consistent with the lighting objectives referenced in the Citywide Design Guidelines, security lighting will be provided to illuminate the building, entrances, walkways, and parking areas. All project-related lighting will be directed onsite and shielded to eliminate spillover onto adjacent properties. In addition, all of the project's lighting will meet the Green Building Code requirements.

Landscaping

Various types of vegetation and trees will be provided along the northerly and southerly portions of the building, and will complement the design of the building facades to minimize the visual impact of the proposed structure, as shown in Exhibit B.

The proposed project's landscaping creates a pedestrian-friendly ground floor level and provides an inviting environment for inhabitants of the building. Additionally, the plant species have been specially selected to comply with the River Implementation Overlay requirements, as all plants have been selected from the Los Angeles County River Master Plan Landscaping Guidelines.

On the ground floor, a sun deck and rear yard will be constructed and on the second floor, two common courtyards will be provided for use by the residents. These spaces on the first and second floors will provide passive open space and active recreational space will be provided within the envelope of the building, along the front façade.

Trash Collection

The trash and recycling areas are located next to the front lobby elevators and are not visible from public view on each floor. They will include both trash and recycling areas.

4. **The residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.**

The proposed multifamily residential project incorporates 10,779 square feet of open space required by Section 12.21 G.2 of the Los Angeles Municipal Code. The open space areas consist of interior spaces, consisting of a lounge/business center, fitness room, recreation room totaling on the ground floor, as well as outdoor spaces consisting of a 3,999 square-foot sun deck and rear yard on the ground floor and two courtyards totaling 3,650 on the podium/first floor. Additionally, there will be 29 private balconies, 50 square-feet each, for a total of 1,450 square-feet. Collectively, these spaces are a total of 10,779 square-feet, thereby complying with the code required minimum of 10,575 square-feet.

The project site is served by Metro Bus Lines 162/163 and 243/242, with stops for both lines approximately 300 feet to the east of the site, located 200 feet east of the project site with connections from Sun Valley to West Hills, and from Porter Ranch to Woodland Hills. In addition, the project is located one mile from the Winnetka Orange Line Station, which provides connections from Chatsworth to Warner Center and North Hollywood. Therefore, the proposed project provides a variety of recreational and service amenities to improve habitability for its residents, and is within proximity to transit services, which will contribute to the habitability of the building's residents and will minimize the impacts on neighboring properties.

ENVIRONMENTAL FINDING

5. On November 15, 2017, based on the whole of the administrative record, the City determined that the Project is exempt from CEQA pursuant to CEQA Guidelines, Section 15332, Class 32, and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

DENSITY BONUS LEGISLATION BACKGROUND

The California State Legislature has declared that "[t]he availability of housing is of vital statewide importance," and has determined that state and local governments have a responsibility to "make adequate provision for the housing needs of all economic segments of the community." Section §65580, subds. (a), (d). Section 65915 further provides that an applicant must agree to, and the municipality must ensure, the "continued affordability of all low and very low income units that qualified the applicant" for the density bonus.

With Senate Bill 1818 (2004), state law created a requirement that local jurisdictions approve a density bonus and up to three "concessions or incentives" for projects that include defined levels of affordable housing in their projects. In response to this requirement, the City created an ordinance that includes a menu of incentives (referred to as "on-menu" incentives) comprised of eight zoning adjustments that meet the definition of concessions or incentives in state law (California Government Code Section 65915). The eight on-menu incentives allow for: 1) reducing setbacks; 2) reducing lot coverage; 3) reducing lot width, 4) increasing floor area ratio (FAR); 5) increasing height; 6) reducing required open space; 7) allowing for an alternative density calculation that includes streets/alley dedications; and 8) allowing for "averaging" of FAR, density, parking or open space. In order to grant approval of an on-menu incentive, the City utilizes the same findings contained in state law for the approval of incentives or concessions.

California State Assembly Bill 2222 went into effect January 1, 2015, and with that Density Bonus projects filed as of that date must demonstrate compliance with the housing replacement provisions which require replacement of rental dwelling units that either exist at the time of application of a Density Bonus project, or have been vacated or demolished in the five-year period preceding the application of the project. This applies to all pre-existing units that have been subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income; subject to any other form of rent or price control (including Rent Stabilization Ordinance); or is occupied by Low or Very Low Income Households (i.e., income levels less than 80 percent of the area median income [AMI]). The replacement units must be equivalent in size, type, or both and be made available at affordable rent/cost to, and occupied by, households of the same or lower income category as those meeting the occupancy criteria. Prior to the issuance of any Director's Determination for Density Bonus and Affordable Housing Incentives, the Housing and Community Investment Department (HCIDLA) is responsible for providing the Department of City Planning, along with the applicant, a determination letter addressing replacement unit requirements for individual projects. The City also requires a Land Use Covenant recognizing the conditions be filed with the County of Los Angeles prior to granting a building permit on the project.

Assembly Bill 2222 also increases covenant restrictions from 30 to 55 years for projects approved after January 1, 2015. This determination letter reflects these 55 year covenant restrictions.

Under Government Code Section § 65915(a), § 65915(d)(2)(C) and § 65915(d)(3) the City of Los Angeles complies with the State Density Bonus law by adopting density bonus regulations and procedures as codified in Section 12.22 A.25 of the Los Angeles Municipal Code. Section 12.22 A.25 creates a procedure to waive or modify Zoning Code standards which may prevent, preclude or interfere with the effect of the density bonus by which the incentive or concession is granted, including legislative body review. The Ordinance must apply equally to all new residential development.

In exchange for setting aside a defined number of affordable dwelling units within a development, applicants may request up to three incentives in addition to the density bonus and parking relief which are permitted by right. The incentives are deviations from the City's development standards, thus providing greater relief from regulatory constraints. Utilization of the Density

Bonus/Affordable Housing Incentives Program supersedes requirements of the Los Angeles Municipal Code and underlying ordinances relative to density, number of units, parking, and other requirements relative to incentives, if requested.

For the purpose of clarifying the Covenant Subordination Agreement between the City of Los Angeles and the United States Department of Housing and Urban Development (HUD) note that the covenant required in the Conditions of Approval herein shall prevail unless pre-empted by State or Federal law.

FINANCIAL ANALYSIS/PRO-FORMA

Pursuant to the Affordable Housing Incentive Density Bonus provisions of the LAMC (Section 12.22 A.25), proposed projects that involve on-menu incentives are required to complete the Department's Master Land Use Permit Application form, and no supplemental financial data is required. The City typically has the discretion to request additional information when it is needed to help make required findings. However, the City has determined that the level of detail provided in a pro forma is not necessary to make the findings for on-menu incentives. This is primarily because each of the City's eight on-menu incentives provides additional buildable area, which, if requested by a developer, can be assumed to provide additional project income and therefore provide for affordable housing costs. When the menu of incentives was adopted by ordinance, the impacts of each were assessed in proportion to the benefits gained with a set-aside of affordable housing units. Therefore, a pro-forma illustrating construction costs and operating income and expenses is not a submittal requirement when filing a request for on-menu incentives. The City's Density Bonus Ordinance requires "a pro forma or other documentation" with requests for off-menu incentives but has no such requirement for on-menu requests.

TIME LIMIT – OBSERVANCE OF CONDITIONS

All terms and conditions of the Director's Determination shall be fulfilled before the use may be established. Pursuant to LAMC 12.25 A.2, the instant authorization is further conditional upon the privileges being utilized within **three years** after the effective date of this determination and, if such privileges are not utilized, building permits are not issued, or substantial physical construction work is not begun within said time and carried on diligently so that building permits do not lapse, the authorization shall terminate and become void.

TRANSFERABILITY

This determination runs with the land. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent that you advise them regarding the conditions of this grant. If any portion of this approval is utilized, then all other conditions and requirements set forth herein become immediately operative and must be strictly observed.

VIOLATIONS OF THESE CONDITIONS, A MISDEMEANOR

The applicant's attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any condition of this grant is violated or not complied with, then the applicant or his successor in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code, or the approval may be revoked.

Section 11.00 of the LAMC states in part (m): "It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this Code. Any person violating any of the provisions or failing to comply with any of the mandatory requirements of this Code shall be guilty of a misdemeanor unless that violation or failure is declared in that section to be an infraction. An infraction shall be tried and be punishable as provided in Section 19.6 of the Penal Code and the provisions of this section. Any violation of this Code that is designated as a misdemeanor may be charged by the City Attorney as either a misdemeanor or an infraction.

Every violation of this determination is punishable as a misdemeanor unless provision is otherwise made, and shall be punishable by a fine of not more than $1,000 or by imprisonment in the County Jail for a period of not more than six months, or by both a fine and imprisonment."

APPEAL PERIOD - EFFECTIVE DATE

The Determination in this matter will become effective and final fifteen (15) days after the date of mailing of the Notice of Director's Determination unless an appeal there from is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of this Determination, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. Forms are available on-line at http://planning.lacity.org.

Planning Department public offices are located at:

Downtown Office
Figueroa Plaza
201 North Figueroa Street, 4th Floor
Los Angeles, CA 90012
(213) 482-7077

Valley Office
Marvin Braude Constituent Service Center
6262 Van Nuys Boulevard, Suite 251
Van Nuys, CA 91401
(818) 374-5050

West Los Angeles Office
1828 Sawtelle Boulevard, 2nd Floor
Los Angeles, CA 90025
(310) 231-2901

Only an applicant or any owner or tenant of a property abutting, across the street or alley from, or having a common corner with the subject property can appeal this Density Bonus Compliance Review Determination. Per the Density Bonus Provision of State Law (Government Code Section §65915) the Density Bonus increase in units above the base density zone limits and the appurtenant parking reductions are not a discretionary action and therefore cannot be appealed. Only the requested incentives are appealable. Per Section 12.22 A.25 of the LAMC, appeals of Density Bonus Compliance Review cases are heard by the City Planning Commission.

Verification of condition compliance with building plans and/or building permit applications are done at the Development Services Center of the Department of City Planning at either Figueroa Plaza in Downtown Los Angeles or the Marvin Braude Building in the Valley. In order to assure that you receive service with a minimum amount of waiting, applicants are encouraged to schedule an appointment with the Development Services Center either through the Department of City Planning website at http://planning.lacity.org or by calling (213) 482-7077 or (818) 374-5050. The applicant is further advised to notify any consultant representing you of this requirement as well.

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedures Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.

Applicant is hereby advised to file the Notice of Exemption for the associated categorical exemption after the issuance of this letter. If filed, the form shall be filed with the County of Los Angeles, 12400 Imperial Highway, Norwalk, CA 90650, pursuant to Public Resources Code Section 21152 (b). More information on the associated fees can be found online here: https://www.lavote.net/home/county-clerk/environmental-notices-fees. The best practice is to go in person and photograph the posted notice in order to ensure compliance. Pursuant to Public Resources Code Section 21167 (d), the filing of this notice of exemption starts a 35-day statute of limitations on court challenges to the approval of the project. Failure to file this notice with the County Clerk results in the statute of limitations, and the possibility of a CEQA appeal, being extended to 180 days.

VINCENT P. BERTONI, AICP
Director of Planning

Approved by:

Michelle Levy, Senior City Planner

Prepared by:

Valentina Knox-Jones, City Planner
Valentina.knox.jones@lacity.org

SOUTH LIBRARY

Donald Dean

From: Cindy Kha
Sent: Wednesday, July 24, 2019 2:50 PM
To: Donald Dean
Cc: Beatriz Lopez
Subject: FW: CEQA: South Library Leffingwell entitlement

Hi Don,

Please see below e-mail from LA County Planning regarding South Library CEQA exemption per SB35.

From: Elsa Rodriguez <ERodriguez@planning.lacounty.gov>
Sent: Wednesday, July 24, 2019 1:56 PM
To: Cindy Kha <Cindy.Kha@lacda.org>
Cc: William Sager <WSager@linchousing.org>; Michael de la Torre <Mdelatorre@linchousing.org>
Subject: RE: CEQA: South Library Leffingwell entitlement

Hi Cindy,
I am the planner working on the Leffingwell affordable housing site. The project is exempt from CEQA requirements due to streamlining/ministerial review guidelines per SB35 Gov. Code Section 65913.4. Please let me know if I can answer any questions.

Thanks,

Elsa M. Rodriguez | *Senior Regional Planner*
Land Development Coordinating Center #1360
L.A. County Department of Regional Planning
320 W. Temple St. Los Angeles, CA 90012
http://planning.lacounty.gov (213) 974-6411

Department Front Counter Hours:
M, Tu, Th 7:30 a.m.-5:30 p.m. & W 8:30 a.m.-5:30 p.m.
Closed every Friday

Effective February 28, 2019, the County has a new Title 22 (Planning and Zoning Code)! Visit planning.lacounty.gov/title22 for more information.

From: Michael de la Torre [mailto:Mdelatorre@linchousing.org]
Sent: Wednesday, July 24, 2019 11:23 AM
To: Elsa Rodriguez <ERodriguez@planning.lacounty.gov>
Cc: William Sager <WSager@linchousing.org>
Subject: FW: CEQA: South Library Leffingwell entitlement

Hi Elsa,

Hope all is well. We are working with LACDA to finalize our financing commitment and they are requesting information regarding CEQA.

Per the email below would you be able to provide a email response that the S. Whittier site is CEQA exempt based on the SB 35 approval?

Thanks and I appreciate the help. Please let me know if you need additional information.

Also, we spoke with Ryan Mosley and he should be providing you the approval letter today.

Michael de la Torre
Director of Acquisitions
LINC Housing Corporation
3590 Elm Avenue
Long Beach, CA 90807
Ph: 562.684.1120
F: 562.684.1137
mdelatorre@linchousing.org

LINC Housing
CORPORATION

From: Cindy Kha <Cindy.Kha@lacda.org>
Sent: Wednesday, July 24, 2019 11:04 AM
To: William Sager <WSager@linchousing.org>
Cc: Michael de la Torre <Mdelatorre@linchousing.org>
Subject: RE: CEQA: South Library

Yes, if we can get an e-mail from the County planning in the meantime. I'll see if my Environmental Officer will be okay with that.

From: William Sager <WSager@linchousing.org>
Sent: Wednesday, July 24, 2019 10:08 AM
To: Cindy Kha <Cindy.Kha@lacda.org>
Cc: Michael de la Torre <Mdelatorre@linchousing.org>
Subject: RE: CEQA: South Library

Cindy,

County planning is still working on the approval letter. This is the first SB35 project that they've processed, so they've had to invent some new processes, which is taking a little more time than normal. Would an email confirmation from County planning work stating that the project is tentatively approved and that, due to the SB35 law, the project is CEQA exempt?

Will Sager
Senior Project Manager

(o) (562) 684-1127 | (f) (562) 684-1137 | wsager@linchousing.org

LINC Housing
CORPORATION

3590 Elm Avenue | Long Beach, CA 90807
http://secure-web.cisco.com/1hen2HuoM0cyD4aIXACMt-vjUx_HqTvQSm1hbcgqIa_-uM9WX1J2cKIkp76GvHwOwCioaQYRfHe3knV6GWHuVslaT1tvdrdHY9avpgzf0UXqT6Xg4En-51v5U6WcQq9yUjZV6k4Aj2oBRPxOq6IwnrWzAbYTVjNqkZpuaH6F9loXBjLrhiz2T8Me0px8uK8rEu0ERn4hqumnl4-c596vGfqILIQVFRLNxDNsRrsAHfsSvM4rZ176lBHN_wMrUNZaR0ETr2SdAYhG9dGI4xxNYr22K5QmXkQeM1Q-ucN7Fs9LnSzbFQ1pe7iFgo78o7sN7S4D3TEQnyYK3PWd9QADp1ppOB0Ueyze_OA9SZPXTWMPL_1D9drj3ENGbX_QWAc94f4A31FgLfKWxyxZp8XdZLQ/http%3A%2F%2Fwww.linchousing.org

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Please note that LINC is closed every Friday.

From: Cindy Kha <Cindy.Kha@lacda.org>
Sent: Wednesday, July 24, 2019 10:03 AM
To: William Sager <WSager@linchousing.org>
Subject: RE: CEQA: South Library

Hi Will,

Do you have an update on the CEQA docs? We need them today in order to file to the Board for approval for the Board meeting date on 8/13. We can't provide a commitment without Board approval of the project.

From: Cindy Kha
Sent: Wednesday, July 17, 2019 3:00 PM
To: William Sager <WSager@linchousing.org>
Subject: RE: CEQA: South Library

Thanks, please keep me posted.

From: William Sager <WSager@linchousing.org>
Sent: Wednesday, July 17, 2019 2:19 PM
To: Cindy Kha <Cindy.Kha@lacda.org>
Subject: RE: CEQA: South Library

Cindy,

Let me reach out to County Planning. I believe we were supposed to have our final approvals mid-this week.

Will Sager
Senior Project Manager
(o) (562) 684-1127 | (f) (562) 684-1137 | wsager@linchousing.org

LINC Housing
CORPORATION

3590 Elm Avenue | Long Beach, CA 90807
http://secure-web.cisco.com/1hen2HuoM0cyD4aIXACMt-vjUx_HqTvQSm1hbcgqIa_-uM9WX1J2cKIkp76GvHwOwCioaQYRfHe3knV6GWHuVslaT1tvdrdHY9avpgzf0UXqT6Xg4En-51v5U6WcQq9yUjZV6k4Aj2oBRPxOq6IwnrWzAbYTVjNqkZpuaH6F9loXBjLrhiz2T8Me0px8uK8rEu0ERn4hqumnl4-c596vGfqILIQVFRLNxDNsRrsAHfsSvM4rZ176lBHN_wMrUNZaR0ETr2SdAYhG9dGI4xxNYr22K5QmXkQeM1Q-ucN7Fs9LnSzbFQ1pe7iFgo78o7sN7S4D3TEQnyYK3PWd9QADp1ppOB0Ueyze_OA9SZPXTWMPL_1D9drj3ENGbX_QWAc94f4A31FgLfKWxyxZp8XdZLQ/http%3A%2F%2Fwww.linchousing.org

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Please consider the environment before printing this e-mail.

Please note that LINC is closed every Friday.

From: Cindy Kha <Cindy.Kha@lacda.org>
Sent: Wednesday, July 17, 2019 1:00 PM
To: William Sager <WSager@linchousing.org>
Subject: CEQA: South Library

Hi Will,

I'm reaching out to see if you have CEQA approval and docs to provide for the project listed above?

Cindy Kha, Project Manager
Finance & Development Unit
Los Angeles County Development Authority
700 West Main Street
Alhambra, CA 91801
Phone: (626) 586-1555
Fax: (626) 943-3816
http://secure-web.cisco.com/1Np4tpeoUfNxhszPBFm4S5lQdxQzy5WxcuROdnJQWpXYauGzRTFvmp6eMfCQ5G3bS3tNALPpC68ei8E9P2yLVwQtvEytT8ai3jr5Ins0j9v4J6lHQFpDfhXZLn9_EG_egWwtZkag2SexEnA-aZxgqrMejMONJY9lYVsK4QGJGFxGWsbDSM5Ad77q2-717oFVERR3mC4k8pMjqu0rwEmf4Y4-7eteSZW_SUQjtVC-KEAie39xEPPc9ntuVYo_45tYAmTpQdXHUIzXxPOAKvw0P7yUDqgUgFq6feYf9umDriJqCxXbJEv0IsCsHYc748c3fk-xXS-iDYKHjip3z0t6lQi_gvzbicy9KBUYrdpjPM279hFKlG2-ZdAOJF7iO3hmXu7GuYTX8R0m0t0zGPgpATA/http%3A%2F%2Fwww.lacda.org

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68th & MAIN

State of California

Tax Credit Allocation Committee

ATTACHMENT 26
Approvals Necessary to Begin Construction

Project Name:	Marcella Gardens	Housing Type:	Special Needs
Site Address:	6714 S. Main Street	City:	Los Angeles
County:	Los Angeles	Number Of Units:	60
Census Tract Number:	2393.2	APN(s):	6011-003-064, -060, -034, -035, -036, -037

Note: Multiple forms may be needed. Each agency with individual responsibility for the items below must complete the particular item(s) under its jurisdiction.

This letter is to confirm that the following public or tribal approvals (except building permits) and all land use environmental clearances for this project are issued or are unnecessary and the expiration dates of all required appeal periods for each item are listed and have expired, or will expire no later than 30 days beyond the application deadline date.

Check All Required Items	Approval Date	Appeal Expiration Date*	☒ if N/A	If N/A, MUST provide a detailed explanation**
☐ CEQA			☒	Ministerial TOC
☐ NEPA***(see note below)			☒	Ministerial TOC (TBD by HCID)
☐ Site Plan Review Completed			☒	Base density < 50 units
☐ Conditional Use Permit			☒	Project allowed by-right
☐ Variance Approval			☒	Project allowed by-right
☐ Toxic Report			☒	TBD by HCID
☐ Soils Report			☒	Ministerial
☐ Other Discretionary Review: _____			☒	No discretionary approval
☐ Streamlined Ministerial Approval (SB35)			☒	Not needed
☐ Article 34 of State Constitution			☒	TBD by HCID
☐ Coastal Commission Approval			☒	Not in Coastal
☐ Tribal Land Environmental Review			☒	TBD by other agencies or applicant
☐ Other Requirements: _____			☐	

**A detailed explanation must be provided for each of the above items that have been checked, "N/A." Please attach an extra sheet of paper if unable to fit entire explanation, as this is important for the review process.

☒ ***By checking box, THE APPLICANT acknowledges responsibility to re-submit Attachment 26, Approvals Necessary to Begin Construction form, due to a final appeal period permitted to run up to 30 days beyond the application due date (by July 31, 2019). The applicant is aware that in order to garner these readiness points, the applicant must provide proof/documentation that either no appeals were received, or that any appeals received during that time period were resolved within that 30-day period. The updated/re-submitted Attachment 26 and documentation must be provided within 7 days of the expiration of the 30-day appeal period (by August 7, 2019).**

☐ ***By checking box, THE LOCAL AGENCY is confirming that for the "Approval Date" proof/documentation, the Request for Release of Funds (HUD Form 7015.15) or equivalent is/was submitted to the federal entity by the application due date (by July 1, 2019) – Please attach proof/documentation and for the "Appeal Expiration Date" proof/documentation, the Authority to Use Grant Funds (HUD Form 7015.16) or equivalent is/was issued no later than 30 days beyond the application due date (by July 31, 2019) – Please attach proof/documentation. For projects exempt from NEPA, the appropriate documentation verifying exemption must be attached.**

I/We, as the local jurisdiction/agency, certify and guarantee, under penalty of perjury, that each of the above items identified have been met and all appeals have been exhausted or all time limits of those appeals have or will expire no later than 30 days beyond the application deadline date.

LADBS, City of Los Angeles	(213)482-0432	
PRINT AGENCY / JURISDICTION NAME	PHONE	
Tienjen Wang	tienjen.wang@lacity.org	
PRINT NAME	EMAIL	
Sr. Structural Engineer		8-29-19
PRINT TITLE	SIGNATURE	DATE

WASHINGTON ARTS COLLECTIVE

E.3 – CEQA Approvals

ENV-2018-5416-CE was adopted on January 9, 2019 with cases DIR-2018-5417-TOC & DIR-2018-5415-TOC. The appeal expiration date was January 24, 2019.

DEPARTMENT OF
CITY PLANNING

CITY PLANNING COMMISSION

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VAHID KHORSAND
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ROCKY WILES
COMMISSION OFFICE MANAGER
(213) 978-1300

CITY OF LOS ANGELES
CALIFORNIA

ERIC GARCETTI
MAYOR

EXECUTIVE OFFICES
200 N. SPRING STREET, ROOM 525
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EXECUTIVE OFFICER
(213) 978-1272

LISA M. WEBBER, AICP
DEPUTY DIRECTOR
(213) 978-1274

http://planning.lacity.org

DIRECTOR'S DETERMINATION

TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM

January 9, 2019

Applicant
Chris Maffris
Meta Housing Corporation
11150 Olympic Boulevard, Unit 620
Los Angeles, CA 90064

Owner
City of Los Angeles
200 North Main Street
Los Angeles, CA 90012

Representative
Chris Murray & Erika Iverson
Rosenheim and Associates
21600 Oxnard Street, Unit 630
Woodland Hills, CA 91367

Case No.	DIR-2018-5415-TOC
CEQA:	ENV-2018-5416-CE
Location:	4601-4615 West Washington Boulevard, 1857-1865 South Vineyard Avenue
Council District:	10 – Wesson, Jr.
Community Plan Area:	West Adams – Baldwin Hills - Leimert
Specific Plan Subarea:	West Adams Community Plan Implementation Overlay (CPIO)
Land Use Designation:	Neighborhood Commercial
Zone:	C2-1VL-O-CPIO
Legal Description:	Lots 39, 41, 43, Block 1, Tract ARLINGTON HEIGHTS TERRACE SUBDIVISION NO. 1
Last Day to File an Appeal:	January 24, 2019

DETERMINATION – Transit Oriented Communities Affordable Housing Incentive Program
Pursuant to the Los Angeles Municipal Code (LAMC) Section 12.22 A.31, I have reviewed the proposed project and as the designee of the Director of Planning, I hereby:

DETERMINED, based on the whole of the administrative record, that the Project is exempt from the California Environmental Quality Act (CEQA) pursuant to State CEQA Guidelines, Article 19, Section 15332 (Class 32), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

APPROVE a **Transit Oriented Communities Compliance Review** for a project totaling 33 dwelling units, reserving 3 units for Extremely Low Income and 29 units for Low Income Household occupancy for a period of 55 years, with the following requested incentives:

Height. A one-story increase in the building height, allowing four (4) stories in lieu of the maximum three (3) stories, per the C2-1VL-O-CPIO Zone;

The project approval is based upon the attached Findings, and subject to the attached Conditions of Approval:

CONDITIONS OF APPROVAL

1. **Site Development.** Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped "Exhibit A," and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning, West/South/Coastal Project Planning Division, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Los Angeles Municipal Code or the project conditions.

2. **Residential Density.** The project shall be limited to a maximum density of 33 residential units per Exhibit "A".

3. **Affordable Units.** A minimum of 3 units, that is 9 percent On-Site Restricted Affordable Units, shall be reserved for Extremely Low Income Households, as defined in Section 50106 of the California Health and Safety Code. The Transit Oriented Communities Affordable Housing Incentive Program Guidelines also requires a Housing Development to meet any applicable housing replacement requirements of California Government Code Section 65915(c)(3), as verified by the Department of Housing and Community Investment (HCIDLA) prior to the issuance of any building permit. Replacement housing units required per this section may also count towards other On-Site Restricted Affordable Units requirements.

4. **Changes in Restricted Units.** Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall be consistent with LAMC Section 12.22-A.31 and comply with the Transit Oriented Communities Affordable Housing Incentive Program Guidelines adopted by the City Planning Commission.

5. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make 3 units for Extremely Low Income Households for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The Applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with any monitoring requirements established by the HCIDLA. Refer to the Transit Oriented Communities Affordable Housing Incentive Program Background section of this determination. In addition to the affordable units pursuant to TOC Tier requirements, the applicant shall provide an additional 29 units for Low Income Households at affordability schedule as determined by HCIDLA for a period of 55 years.

6. **100% Affordable Housing Project.** In accordance with the TOC Guidelines, the project shall consist of 100% On-Site Restricted Affordable units, exclusive of a building manager's unit or units, in order to be eligible for one increase in Tier than otherwise would be provided.

7. **Floor Area Ratio (FAR).** The project shall be limited to a floor area ratio of approximately 2.175:1 per Exhibit "A".

8. **Height.** The project shall be limited to four (4) stories and approximately 45 feet in height per Exhibit "A".

9. **Automobile Parking.** For Eligible Housing Developments consisting of 100 percent On-Site Restricted Affordable Units, exclusive of a manager's unit, no automobile parking is

required for all residential units. Commercial automobile parking shall be provided consistent with LAMC Section 12.21 A.4.

10. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC 12.21 A.16.

11. **Community Plan Implementation Overlay**. Prior to the issuance of a building permit, the applicant shall demonstrate compliance with the West Adams – Baldwin Hills – Leimert Community Plan Implementation Overlay ("CPIO") pursuant to Ordinance No. 189,794.

Administrative Conditions

12. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Plans Approved". A copy of the Plans Approved, supplied by the applicant, shall be retained in the subject case file.

13. **Notations on Plans.** Plans submitted to the Department of Building and Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet, and shall include any modifications or notations required herein.

14. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

15. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

16. **Department of Building and Safety**. The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

17. **Indemnification and Reimbursement of Litigation Costs.**
Applicant shall do all of the following:

    (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including <u>but not limited to</u>, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

(ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

(iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with <u>any</u> federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

PROJECT BACKGROUND

The project site is located at the northwest corner of Washington Boulevard and Vineyard Avenue in the West Adams – Baldwin Hills – Leimert Community Plan area. The Community Plan Map designates the site for Neighborhood Commercial use with corresponding zones of C1, C1.5, C2, C4, R3, and RAS3. The property is zoned C2-1VL-O-CPIO with Height District No. 1VL and is limited to a Floor Area Ratio (FAR) of 1.5:1. The project is located within the Transit Oriented Communities Tier 1, Mid City Recovery Redevelopment Project, City of Los Angeles Transit Priority Area, and West Adams Community Plan Implementation Overlay (CPIO) District Commercial Corridors Subarea. The CPIO contains additional regulations for height, density, building disposition, building design, and parking.

The project site consists of three (3) lots totaling approximately 24,357 square feet, with approximately 150 feet of frontage along the north side of Washington Boulevard and 148 feet of frontage along the west side of Vineyard Avenue. The site is currently improved as a surface parking lot. There are no known designated historic resources or cultural monuments on the subject site.

Surrounding properties are zoned C2-1VL-O-CPIO, R3-1VL-O, and RD1.5-1-O and developed with commercial establishments and multi-family and single-family residential uses. Adjoining properties to the west and across Vineyard Avenue to the east are zoned C2-1VL-O-CPIO and developed with single-story commercial structures. Adjoining properties to the north are zoned R3-1VL-O and RD1.5-1-O and developed with one-story and two-story single-family and multi-family dwellings. Across Washington Boulevard to the south is zoned C2-1VL-O-CPIO and proposed for new development (related Case No. DIR-2018-5417-TOC).

The proposed project is a four-story mixed-use development containing 33 residential dwelling units and 3,175 square feet of commercial in the form of art studios. The building will be four (4) stories with a maximum height of approximately 45 feet and encompasses approximately 44,939 square feet of floor area. As a 100% affordable housing project, exclusive of a manager's unit, no residential parking is required for the residential uses. A minimum of six (6) parking spaces are required for the commercial uses. The project provides 27 parking spaces located at the ground floor and 47 parking spaces in one subterranean level, with vehicular access off Vineyard Avenue. The project also provides 34 long-term and 4 short-term bicycle parking spaces. The main pedestrian entrance for the residential lobby is provided along Washington Boulevard. The existing surface parking lot on site is proposed to be demolished.

Transit Oriented Communities Guidelines

The subject site is located within 2,640 feet from the Major Transit Stop located at the intersection of Washington Boulevard and La Brea Avenue, which serves multiple bus lines including the Metro 35 and 212 buses. The subject property is therefore located in Tier 1 of the Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines). Per Section IV of the TOC Guidelines, projects that consist of 100% On-Site Restricted Affordable Units, exclusive of a building manager's unit, shall be eligible for one increase in Tier than otherwise would be provided. Accordingly, the project is eligible for Tier 2 density and base incentives.

Tier 2 would require On-Site Restricted Affordable Units at the rate of 9 percent Extremely Low Income, 12 percent Very Low Income, or 21 percent Lower Income. The project is providing 9 percent of total units at Extremely Low Income, and is therefore eligible for Tier 2 Base Incentives. Furthermore, up to two (2) additional incentives may be granted for projects that include at least 7 percent of the base units for Extremely Low Income, 10 percent for Very Low

Income, and 20 percent for Lower Income. The project is providing over 7 percent at Extremely Low Income, and is therefore eligible for two (2) Additional Incentives.

As Base Incentives, the project is eligible to (1) increase the maximum allowable number of dwelling units permitted by 60%, (2) increase the maximum allowable floor area ratio by 45% for an overlay district that regulates FAR, and (3) provide no automobile parking for an Eligible Housing Development that consists of 100% On-Site Restricted Affordable units, exclusive of a manager's unit. The project is in request of one (1) Additional Incentive for a 1-story increase in the building height to four (4) stories in lieu of the three (3) stories otherwise permitted in the C2-VL-O-CPIO Zone. The project is eligible for an 11-foot increase in the building height to 56 feet and four (4) stories.

Housing Replacement

The TOC Guidelines require a Housing Development to meet any applicable housing replacement requirements of California Government Code Section 65915(c)(3), as verified by the Department of Housing and Community Investment (HCIDLA) prior to the issuance of any building permit. California Government Code Section 65915(c)(3), as amended by Assembly Bill 2222 and 2556, requires applicants of Density Bonus projects to demonstrate compliance with the housing replacement provisions which require replacement of rental dwelling units that either exist at the time of application of a Density Bonus project, or have been vacated or demolished in the five-year period preceding the application of the project. This applies to all pre-existing units that have been subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income; subject to any other form of rent or price control; or occupied by Low or Very Low Income Households. Pursuant to the Determination made by the Los Angeles Housing and Community Investment Department (HCIDLA) dated August 20, 2018, no replacement affordable units are required. This is reflected in the Conditions of Approval.

TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM /AFFORDABLE HOUSING INCENTIVES COMPLIANCE FINDINGS

Pursuant to Section 12.22 A.31(e) of the LAMC, the Director shall review a Transit Oriented Communities Affordable Housing Incentive Program project application in accordance with the procedures outlined in LAMC Section 12.22 A.25(g).

1. **Pursuant to Section 12.22 A.25(g) of the LAMC, the Director shall approve a density bonus and requested incentive(s) unless the director finds that:**

   a. ***The incentives are <u>not required</u> to provide for affordable housing costs as defined in California Health and Safety Code Section 50052.5 or Section 50053 for rents for the affordable units.***

      The record does not contain substantial evidence that would allow the Director to make a finding that the requested incentives are not necessary to provide for affordable housing costs per State Law. The California Health & Safety Code Sections 50052.5 and 50053 define formulas for calculating affordable housing costs for very low, low, and moderate income households. Section 50052.5 addresses owner-occupied housing and Section 50053 addresses rental households. Affordable housing costs are a calculation of residential rent or ownership pricing not to exceed a predetermined percentage of income based on area median income thresholds dependent on affordability levels.

The list of on-menu incentives in the TOC Guidelines were pre-evaluated at the time the Transit Oriented Communities Affordable Housing Incentive Program Ordinance was adopted to include types of relief that minimize restrictions on the size of the project. As such, the Director will always arrive at the conclusion that the on-menu incentives are required to provide for affordable housing costs because the incentives by their nature increase the scale of the project.

Increased Height: The proposed project requests an increase of one (1) additional story to allow four (4) stories in lieu of the otherwise permitted three (3) stories in the C2-1VL-O-CPIO Zone. Per the TOC Guidelines, the proposed project qualifies for one (1) additional story up to 11 additional feet, resulting in a maximum height of four (4) stories and 56 feet. The limitation on the height could limit the ability to construct the residential dwelling units permitted by-right and the Restricted Affordable Units which are of a sufficient size. The building as proposed would have a maximum height of approximately 45 feet and would have a total of four (4) stories. As proposed, the additional height would allow for the construction of the affordable residential units.

b. ***The Incentive will have a specific adverse impact upon public health and safety or the physical environment, or on any real property that is listed in the California Register of Historical Resources and for which there are no feasible method to satisfactorily mitigate or avoid the specific adverse Impact without rendering the development unaffordable to Very Low, Low and Moderate Income households. Inconsistency with the zoning ordinance or the general plan land use designation shall not constitute a specific, adverse impact upon the public health or safety.***

There is no evidence in the record that the proposed incentive will have a specific adverse impact. A "specific adverse impact" is defined as, "a significant, quantifiable, direct and unavoidable impact, based on objective, identified written public health or safety standards, policies, or conditions as they existed on the date the application was deemed complete" (LAMC Section 12.22.A.25(b)). The finding that there is no evidence in the record that the proposed incentive(s) will have a specific adverse impact is further supported by the recommended CEQA finding. The findings to deny an incentive under Density Bonus Law are not equivalent to the findings for determining the existence of a significant unavoidable impact under CEQA. However, under a number of CEQA impact thresholds, the City is required to analyze whether any environmental changes caused by the project have the possibility to result in health and safety impacts. For example, CEQA Guidelines Section 15065(a)(4), provides that the City is required to find a project will have a significant impact on the environment and require an EIR if the environmental effects of a project will cause a substantial adverse effect on human beings. The proposed project and potential impacts were analyzed in accordance with the City's Environmental Quality Act (CEQA) Guidelines. Analysis of the proposed Project determined that it is Categorically Exempt from environmental review pursuant to Article 19, Class 32 of the CEQA Guidelines. The Categorical Exemption (CE) could be adopted, including, on the basis that none of the potential environmental effects of the proposed Project would cause substantial adverse effects on human beings, the physical environment, on public health and safety, or on property listed in the California Register of Historic Resources. Based on all of the above, there is no basis to deny the requested incentive.

CEQA FINDINGS

As the designee of the Director of Planning, I have determined, based on the whole of the administrative record, that the Project is exempt from CEQA pursuant to State CEQA Guidelines, Article 19, Section 15332 (Class 32), and there is no substantial evidence demonstrating that an exception to a categorical exemption pursuant to CEQA Guidelines, Section 15300.2 applies.

The projects analyzed under Environmental Case No. DIR-2018-5416-CE comprises two (2) mixed-use residential developments that are across the street from one another, and filed under separate entitlements, as follows:

Site 1 (Subject Project, Case No. DIR-2018-5415-TOC, located at 4601-4615 West Washington Boulevard and 1857-1865 S. Vineyard Avenue): The project is for the construction of a four-story mixed-use development containing 33 residential dwelling units and 3,175 square feet of commercial in the form of art studios. The building will be four (4) stories with a maximum height of approximately 45 feet and encompasses approximately 44,939 square feet of floor area. The project provides 27 parking spaces located at the ground floor and 47 parking spaces in one subterranean level, with vehicular access off Vineyard Avenue. The project also provides 34 long-term and 4 short-term bicycle parking spaces. The existing surface parking lot on site is proposed to be demolished.

Site 2 (Related Project, Case No. DIR-2018-5417-TOC, located at 4600-4614 West Washington Boulevard): The project is for the construction of a four-story mixed-use development containing 23 dwelling units and 1,000 square feet of commercial in the form of an art gallery. The building will be four (4) stories with a maximum height of approximately 45 feet and encompasses approximately 23,455 square feet of floor area. The project provides 16 parking spaces in one grade level, with vehicular access off Vineyard Avenue and Claudina Avenue. The project also provides 25 long-term and 4 short-term bicycle parking spaces. The existing surface parking lot on site is proposed to be demolished.

In total, the projects will provide 56 dwelling units and 90 parking spaces, will involve the export of approximately 20,000 cubic yards of dirt, and the removal of 28 on-site non-protected trees. Six trees along the public right-of-way will remain with the proposed projects.

As two mixed-use residential buildings, and a project which is characterized as in-fill development, the project qualifies for the Class 32 Categorical Exemption.

CEQA Determination – Class 32 Categorical Exemption Applies

A project qualifies for a Class 32 Categorical Exemption if it is developed on an infill site and meets the following criteria:

(a) **The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations.**

The subject sites are located within the West Adams – Baldwin Hills – Leimert Community Plan and are designated for Neighborhood Commercial Land Uses with corresponding zones of C1, C1.5, C2, C4, R3, and RAS3. The site is zoned C2-1VL-O-CPIO and is consistent with the land use designation. As shown in the case file, the projects are consistent with the applicable West Adams – Baldwin Hills – Leimert Community Plan designation and policies and all applicable zoning designations and regulations.

(b) **The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.**

The subject sites are wholly within the City of Los Angeles, on a site that is approximately 0.57 acres (Site 1) and 0.27 acres (Site 2) in size. Lots adjacent to the subject sites are developed with the following urban uses: single-family and multi-family dwellings, and commercial establishments.

(c) **The project site has no value as habitat for endangered, rare or threatened species.**

The sites have previously disturbed and surrounded by development and therefore are not, and have no value as, a habitat for endangered, rare or threatened species. According to the Tree Determination prepared by Peter C. Harnisch, dated July 22, 2018, there are no protected trees on the sites. 28 non-protected trees (crape myrtle, guava, myoporum trees) are proposed to be removed from the subject sites and replaced.

(d) **Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality.**

The projects will be subject to Regulatory Compliance Measures (RCMs), which require compliance with the City of Los Angeles Noise Ordinance, pollutant discharge, dewatering, stormwater mitigations; and Best Management Practices for stormwater runoff. More specifically, RCMs include but are not limited to:

- **Regulatory Compliance Measure RC-AQ-1(Demolition, Grading and Construction Activities): Compliance with provisions of the SCAQMD District Rule 403.** The project shall comply with all applicable standards of the Southern California Air Quality Management District, including the following provisions of District Rule 403:
    - All unpaved demolition and construction areas shall be wetted at least twice daily during excavation and construction, and temporary dust covers shall be used to reduce dust emissions and meet SCAQMD District Rule 403. Wetting could reduce fugitive dust by as much as 50 percent.
    - The construction area shall be kept sufficiently dampened to control dust caused by grading and hauling, and at all times provide reasonable control of dust caused by wind.
    - All clearing, earth moving, or excavation activities shall be discontinued during periods of high winds (i.e., greater than 15 mph), so as to prevent excessive amounts of dust.
    - All dirt/soil loads shall be secured by trimming, watering or other appropriate means to prevent spillage and dust.
    - All dirt/soil materials transported off-site shall be either sufficiently watered or securely covered to prevent excessive amount of dust.
    - General contractors shall maintain and operate construction equipment so as to minimize exhaust emissions.
    - Trucks having no current hauling activity shall not idle but be turned off.
- **Regulatory Compliance Measure RC-GEO-1 (Seismic):** The design and construction of the project shall conform to the California Building Code seismic standards as approved by the Department of Building and Safety.
- **Regulatory Compliance Measure RC-NO-1 (Demolition, Grading, and Construction Activities):** The project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or

creation of noise beyond certain levels at adjacent uses unless technically infeasible.

- **Regulatory Compliance Measure RC-NO-1 (Demolition, Grading, and Construction Activities):** The project shall comply with the City of Los Angeles Noise Ordinance and any subsequent ordinances, which prohibit the emission or creation of noise beyond certain levels at adjacent uses unless technically infeasible.

These RCMs will ensure the project will not have significant impacts on noise and water. Furthermore, per Inter-Departmental Correspondence dated October 4, 2018, the Los Angeles Department of Transportation (LADOT) has reviewed the project Trip Generation and Traffic Impact Analysis prepared by Hirsch/Green Transportation Consulting, Inc. dated July 27, 2018, and determined that none of the three (3) studied intersections would be significantly impacted by the project-related traffic. The traffic analysis also accounted for other known development projects in evaluating potential cumulative impacts and adequately evaluated the project's traffic impacts on the surrounding community. Therefore, the project will not have any significant impacts to traffic. Interim thresholds were developed by DCP staff based on California Emissions Estimator Model (CalEEMod) runs relying on reasonable assumptions, consulting with AQMD staff, and surveying published air quality studies for which criteria air pollutants did not exceed the established SCAQMD construction and operational thresholds. Furthermore, CalEEMod runs dated July 11, 2018 were submitted by Parker Environmental Consultants to analyze construction and operational air quality impacts, and concluded the project will not result in impacts to air quality.

(e) **The site can be adequately served by all required utilities and public services.**

The project site will be adequately served by all public utilities and services given that the construction of a mixed-use residential building will be on a site which has been previously developed and is consistent with the General Plan. Therefore, the project meets all of the Criteria for the Class 32.

CEQA Section 15300.2: Exceptions to the Use of Categorical Exemptions

There are five (5) Exceptions which must be considered in order to find a project exempt under Classes 4 and 32:

(a) **Cumulative Impacts.** *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

There is not a succession of known projects of the same type and in the same place as the subject project. The projects at Site 1 and Site 2 are analyzed under the same Environmental Case No. DIR-2018-5416-CE as described herein. The traffic analysis prepared by Hirsch/Green Transportation Consulting, Inc. dated July 27, 2018 accounted for other known development projects in evaluating potential cumulative impacts and adequately evaluated the project's traffic impacts on the surrounding community. The traffic analysis was reviewed and accepted by LADOT which confirmed no impacts in correspondence dated October 4, 2018.

(b) **Significant Effect Due to Unusual Circumstances.** *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*

As mentioned, the project proposes mixed-use residential buildings in an area zoned and designated for such development. All adjacent lots are developed with single-family and multi-family dwellings, and commercial establishments, and the subject site is of a similar size and slope to nearby properties. The projects both propose a Floor Area Ratio (FAR) of 2.175:1 on sites that are permitted to have a maximum FAR of 2.175:1 through the TOC Guidelines and pursuant to LAMC Section 12.22 A.31. The project size and height is not unusual for the vicinity of the subject site, and is similar in scope to other existing multi-family dwellings in the area. Thus, there are no unusual circumstances which may lead to a significant effect on the environment.

(c) **Scenic Highways.** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway.*

The only State Scenic Highway within the City of Los Angeles is the Topanga Canyon State Scenic Highway, State Route 27, which travels through a portion of Topanga State Park. The State Route 27 is approximately 13 miles west of the subject site. Therefore the subject sites will not create any impacts within a designated as a state scenic highway.

(d) **Hazardous Waste Sites.** *A categorical exemption shall not be used for a project located on a site which is included on any list complied pursuant to Section 65962.5 of the Government Code*

According to Envirostor, the State of California's database of Hazardous Waste Sites, neither of the subject sites, nor any site in the vicinity, are identified as a hazardous waste site.

(e) **Historical Resources.** *A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

The project sites have not been identified as a historic resource by local or state agencies, and the project site has not been determined to be eligible for listing in the National Register of Historic Places, California Register of Historical Resources, the Los Angeles Historic-Cultural Monuments Register, and/or any local register; and were not found to be a potential historic resource based on the City's HistoricPlacesLA website or SurveyLA, the citywide survey of Los Angeles. Finally, the City does not choose to treat the sites as a historic resource. Based on this, the projects will not result in a substantial adverse change to the significance of a historic resource and this exception does not apply.

TRANSIT ORIENTED COMMUNITIES AFFORDABLE HOUSING INCENTIVE PROGRAM BACKGROUND

Measure JJJ was adopted by the Los Angeles City Council on December 13, 2016. Section 6 of the Measure instructed the Department of City Planning to create the Transit Oriented Communities (TOC) Affordable Housing Incentive Program, a transit-based affordable housing incentive program. The measure required that the Department adopt a set of TOC Guidelines, which establish incentives for residential or mixed-use projects located within ½ mile of a major transit stop. Major transit stops are defined under existing State law.

The TOC Guidelines, adopted September 22, 2017 and amended on February 26, 2018, establish a tier-based system with varying development bonuses and incentives based on a project's distance from different types of transit. The largest bonuses are reserved for those

areas in the closest proximity to significant rail stops or the intersection of major bus rapid transit lines. Required affordability levels are increased incrementally in each higher tier. The incentives provided in the TOC Guidelines describe the range of bonuses from particular zoning standards that applicants may select.

OBSERVANCE OF CONDITIONS - TIME LIMIT - LAPSE OF PRIVILEGES

All terms and conditions of the Director's Determination shall be fulfilled before the use may be established. The instant authorization is further conditioned upon the privileges being utilized within three years after the effective date of this determination and, if such privileges are not utilized, building permits are not issued, or substantial physical construction work is not begun within said time and carried on diligently so that building permits do not lapse, the authorization shall terminate and become void.

TRANSFERABILITY

This determination runs with the land. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent that you advise them regarding the conditions of this grant. If any portion of this approval is utilized, then all other conditions and requirements set forth herein become immediately operative and must be strictly observed.

VIOLATIONS OF THESE CONDITIONS, A MISDEMEANOR

The Applicant's attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any condition of this grant is violated or not complied with, then the Applicant or his successor in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code, or the approval may be revoked.

Section 11.00 of the LAMC states in part (m): "It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this Code. Any person violating any of the provisions or failing to comply with any of the mandatory requirements of this Code shall be guilty of a misdemeanor unless that violation or failure is declared in that section to be an infraction. An infraction shall be tried and be punishable as provided in Section 19.6 of the Penal Code and the provisions of this section. Any violation of this Code that is designated as a misdemeanor may be charged by the City Attorney as either a misdemeanor or an infraction.

Every violation of this determination is punishable as a misdemeanor unless provision is otherwise made, and shall be punishable by a fine of not more than $1,000 or by imprisonment in the County Jail for a period of not more than six months, or by both a fine and imprisonment."

APPEAL PERIOD - EFFECTIVE DATE

The Determination in this matter will become effective and final fifteen (15) days after the date of mailing of the Notice of Director's Determination unless an appeal there from is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of this Determination, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. Forms are available on-line at http://planning.lacity.org.

Planning Department public offices are located at:

Downtown	San Fernando Valley	West Los Angeles
Figueroa Plaza 201 North Figueroa Street, 4th Floor Los Angeles, CA 90012 (213) 482-7052	Marvin Braude San Fernando Valley Constituent Service Center 6262 Van Nuys Boulevard, Rm 251 Van Nuys, CA 91401 (818) 374-5050	West Los Angeles Development Services Center 1828 Sawtelle Boulevard, 2nd Floor Los Angeles, CA 90025 (310) 231-2598

*Please note the cashiers at the public counters close at 3:30 PM.

Only an applicant or any owner or tenant of a property abutting, across the street or alley from, or having a common corner with the subject property can appeal this Density Bonus Compliance Review Determination. Per the Density Bonus Provision of State Law (Government Code Section §65915) the Density Bonus increase in units above the base density zone limits and the appurtenant parking reductions are not a discretionary action and therefore cannot be appealed. Only the requested incentives are appealable. Per Section 12.22 A.25 of the LAMC, appeals of Density Bonus Compliance Review cases are heard by the City Planning Commission.

Verification of condition compliance with building plans and/or building permit applications are done at the Development Services Center of the Department of City Planning at either Figueroa Plaza in Downtown Los Angeles or the Marvin Braude Building in the Valley. In order to assure that you receive service with a minimum amount of waiting, applicants are encouraged to schedule an appointment with the Development Services Center either through the Department of City Planning website at http://planning.lacity.org or by calling (213) 482-7052 or (818) 374-5050. The applicant is further advised to notify any consultant representing you of this requirement as well.

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedures Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.

VINCENT P. BERTONI, AICP
Director of Planning

Approved by:

Faisal Roble, Principal City Planner

Reviewed by:

Michelle Singh, Senior City Planner

Prepared by:

Connie Chauv, City Planning Associate

11408 S. CENTRAL AVE.

DEPARTMENT OF
CITY PLANNING

COMMISSION OFFICE
(213) 978-1300

CITY PLANNING COMMISSION

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DEPUTY DIRECTOR

LISA M. WEBBER, AICP
DEPUTY DIRECTOR

DIRECTOR'S DETERMINATION

SITE PLAN REVIEW

August 1, 2019

Applicant
Cody Snyder
LINC Housing Corporation
3590 Elm Avenue
Long Beach, CA 90807

Owner
Ermias Hagos
440 Shatto Place, Unit 409
Los Angeles, CA 90020

Representative
Gary Benjamin
Alchemy Planning + Land Use
4470 West Sunset Boulevard, Suite 547
Los Angeles, CA 90027

Case No.	DIR-2019-3117-SPR-PSH-SIP
Related Case:	ADM-2019-4110-CPIO
CEQA:	Exempt from CEQA per AB 2162
Location:	11408-11502 South Central Avenue
Council District:	15 – Buscaino
Community Plan Area:	Southeast Los Angeles
CPIO Subarea:	Southeast Los Angeles Community Plan Implementation Overlay (CPIO) Subarea TOD Low
Land Use Designation:	Community Commercial
Zone:	C2-2D-CPIO
Legal Description:	Lots FR 4-10, 11, FR 12-15; Block 1; Tract TR 5306
Last Day to File an Appeal:	August 16, 2019

DETERMINATION – Site Plan Review

Pursuant to the Los Angeles Municipal Code (LAMC) Section 16.05, I have reviewed the proposed project and as the designee of the Director of Planning, I hereby:

APPROVE a **Site Plan Review** for a development project which creates, or results in an increase of, 50 or more dwelling units.

DETERMINE, pursuant to California Government Code Section 65650 through 65654, that the project is a Supportive Housing Project that satisfies all of the requirements and objective planning standards of Government Code Section 65651(a) and (b), and is therefore subject to the streamlined, ministerial approval process provided by Government Code Section 65653.

DETERMINE, pursuant to Government Code Section 65651 and Public Resources Code Section 21080(b)(1), based on the whole of the record, that the Supportive Housing Project is Statutorily Exempt from the California Environmental Quality Act ("CEQA") as a ministerial project.

The project approval is based upon the attached Findings, and subject to the attached Conditions of Approval:

CONDITIONS OF APPROVAL

1. **Site Development**. Except as modified herein, the project shall be in substantial conformance with the plans and materials submitted by the Applicant, stamped "Exhibit A," and attached to the subject case file. No change to the plans will be made without prior review by the Department of City Planning, West/South/Coastal Project Planning Division, and written approval by the Director of Planning. Each change shall be identified and justified in writing. Minor deviations may be allowed in order to comply with the provisions of the Los Angeles Municipal Code or the project conditions.

2. **Residential Density**. The project shall be limited to a maximum density of 64 residential units per Exhibit "A".

3. **Affordable Units.** The project shall provide 100% On-Site Restricted Affordable units, exclusive of a building manager's unit, that is 63 units, reserved to Very Low Income Households, as defined in Section 50105 of the California Health and Safety Code.

4. **Changes in Restricted Units**. Deviations that increase the number of restricted affordable units or that change the composition of units or change parking numbers shall comply with the CPIO Affordable Housing Project requirements of the Southeast Los Angeles Community Plan Implementation Overlay ("CPIO").

5. **Housing Requirements.** Prior to issuance of a building permit, the owner shall execute a covenant to the satisfaction of the Los Angeles Housing and Community Investment Department (HCIDLA) to make 63 units for Very Low Income Households for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years. Enforcement of the terms of said covenant shall be the responsibility of HCIDLA. The Applicant will present a copy of the recorded covenant to the Department of City Planning for inclusion in this file. The project shall comply with any monitoring requirements established by the HCIDLA. Refer to the CPIO Affordable Housing Project Background section of this determination.

6. **Floor Area Ratio (FAR)**. The project shall be limited to a Floor Area Ratio of 2.2:1 per Exhibit "A".

7. **Height**. The project shall be limited to four (4) stories and 51 feet and 5 inches in height per Exhibit "A".

8. **Yard/Setback**. The southerly side yard setback shall be no less than 6 feet per Exhibit "A", pursuant to the CPIO Affordable Housing Project requirements.

9. **Open Space**. The project shall provide a minimum 5,180 square feet of open space in lieu of the 6,475 square feet otherwise required, pursuant to the CPIO Affordable Housing Project requirements. The common open space shall meet the requirements of LAMC Section 12.21 G per the satisfaction of the Department of Building and Safety.

10. **Zoning**. The project shall comply with all other requirements of the C2-2D-CPIO zone.

11. **Department of Building and Safety**. The project shall comply with all comments and corrections received from the Department of Building and Safety under Permit No. 19010-10000-02212.

12. **Community Plan Implementation Overlay**. Prior to the issuance of a building permit, the applicant shall demonstrate compliance with the Southeast Los Angeles Community Plan Implementation Overlay ("CPIO") pursuant to Ordinance No. 185,925.

13. **Assembly Bill 2162.** The project shall comply with all state requirements of Assembly Bill 2162 and Government Code Sections 65650 through 65654.

14. **Supportive Services Plan.** The applicant shall submit a plan for providing supportive services, to the satisfaction of the Department of City Planning, with documentation demonstrating that supportive services will be provided onsite to residents in the project. The description of those services shall include all of the following:

    a. The name of the proposed entity or entities that will provide supportive services.

    b. The proposed funding source or sources for the provided onsite supportive services.

    c. Proposed staffing levels.

15. **Onsite Supportive Services**. At least 3 percent of the total nonresidential floor area shall be provided for onsite supportive services that are limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens. The project will provide 4 supportive service offices totaling 791 square feet, a 147-square foot wellness room, 272-square foot computer room, 1,788-square foot community room and kitchen, for on-site supportive services, as provided in Exhibit "A".

16. **Unit Requirements**. All units within the development, excluding manager's units, shall include at least one bathroom and a kitchen or other cooking facilities including, at minimum, a stovetop, a sink, and a refrigerator.

17. **Automobile Parking**. Pursuant to California Government Code Section 65654, no parking requirements shall apply for Supportive Housing Projects located within one-half mile of a public transit stop. Based on the number and/or type of dwelling units proposed under Density Bonus Parking Option 1, two (2) parking spaces shall be provided in the project for the manager's unit.

18. **Adjustment of Parking**. In the event that the number of Restricted Affordable Units should increase, or the composition of such units should change (i.e. the number of bedrooms, or the number of units made available to Senior Citizens and/or Disabled Persons), or the applicant selects another Parking Option (including Bicycle Parking Ordinance) and no other Condition of Approval or incentive is affected, then no modification of this determination shall be necessary, and the number of parking spaces shall be re-calculated by the Department of Building and Safety based upon the ratios set forth above.

19. **Bicycle Parking.** Bicycle parking shall be provided consistent with LAMC 12.21 A.16.

20. **Landscaping.** The landscape plan shall indicate landscape points for the project equivalent to **10% more than otherwise required** by LAMC 12.40 and Landscape Ordinance Guidelines "O". All open areas not used for buildings, driveways, parking areas, recreational facilities or walks shall be attractively landscaped, including an automatic irrigation system, and maintained in accordance with a landscape plan prepared by a licensed landscape architect or licensed architect, and submitted for approval to the Department of City Planning.

Administrative Conditions

21. **Final Plans.** Prior to the issuance of any building permits for the project by the Department of Building and Safety, the applicant shall submit all final construction plans that are awaiting issuance of a building permit by the Department of Building and Safety for final review and approval by the Department of City Planning. All plans that are awaiting issuance of a building permit by the Department of Building and Safety shall be stamped by Department of City Planning staff "Plans Approved". A copy of the Plans Approved, supplied by the applicant, shall be retained in the subject case file.

22. **Notations on Plans.** Plans submitted to the Department of Building and Safety, for the purpose of processing a building permit application shall include all of the Conditions of Approval herein attached as a cover sheet, and shall include any modifications or notations required herein.

23. **Approval, Verification and Submittals.** Copies of any approvals, guarantees or verification of consultations, review of approval, plans, etc., as may be required by the subject conditions, shall be provided to the Department of City Planning prior to clearance of any building permits, for placement in the subject file.

24. **Code Compliance.** Use, area, height, and yard regulations of the zone classification of the subject property shall be complied with, except where granted conditions differ herein.

25. **Department of Building and Safety**. The granting of this determination by the Director of Planning does not in any way indicate full compliance with applicable provisions of the Los Angeles Municipal Code Chapter IX (Building Code). Any corrections and/or modifications to plans made subsequent to this determination by a Department of Building and Safety Plan Check Engineer that affect any part of the exterior design or appearance of the project as approved by the Director, and which are deemed necessary by the Department of Building and Safety for Building Code compliance, shall require a referral of the revised plans back to the Department of City Planning for additional review and sign-off prior to the issuance of any permit in connection with those plans.

26. **Indemnification and Reimbursement of Litigation Costs.**
Applicant shall do all of the following:

    (i) Defend, indemnify and hold harmless the City from any and all actions against the City relating to or arising out of, in whole or in part, the City's processing and approval of this entitlement, including but not limited to, an action to attack, challenge, set aside, void, or otherwise modify or annul the approval of the entitlement, the environmental review of the entitlement, or the approval of subsequent permit decisions, or to claim personal property damage, including from inverse condemnation or any other constitutional claim.

    (ii) Reimburse the City for any and all costs incurred in defense of an action related to or arising out of, in whole or in part, the City's processing and approval of the entitlement, including but not limited to payment of all court costs and attorney's fees, costs of any judgments or awards against the City (including an award of attorney's fees), damages, and/or settlement costs.

    (iii) Submit an initial deposit for the City's litigation costs to the City within 10 days' notice of the City tendering defense to the Applicant and requesting a deposit. The initial deposit shall be in an amount set by the City Attorney's Office, in its sole

discretion, based on the nature and scope of action, but in no event shall the initial deposit be less than $50,000. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(iv) Submit supplemental deposits upon notice by the City. Supplemental deposits may be required in an increased amount from the initial deposit if found necessary by the City to protect the City's interests. The City's failure to notice or collect the deposit does not relieve the Applicant from responsibility to reimburse the City pursuant to the requirement in paragraph (ii).

(v) If the City determines it necessary to protect the City's interest, execute an indemnity and reimbursement agreement with the City under terms consistent with the requirements of this condition.

The City shall notify the applicant within a reasonable period of time of its receipt of any action and the City shall cooperate in the defense. If the City fails to notify the applicant of any claim, action, or proceeding in a reasonable time, or if the City fails to reasonably cooperate in the defense, the applicant shall not thereafter be responsible to defend, indemnify or hold harmless the City.

The City shall have the sole right to choose its counsel, including the City Attorney's office or outside counsel. At its sole discretion, the City may participate at its own expense in the defense of any action, but such participation shall not relieve the applicant of any obligation imposed by this condition. In the event the Applicant fails to comply with this condition, in whole or in part, the City may withdraw its defense of the action, void its approval of the entitlement, or take any other action. The City retains the right to make all decisions with respect to its representations in any legal proceeding, including its inherent right to abandon or settle litigation.

For purposes of this condition, the following definitions apply:

"City" shall be defined to include the City, its agents, officers, boards, commissions, committees, employees, and volunteers.

"Action" shall be defined to include suits, proceedings (including those held under alternative dispute resolution procedures), claims, or lawsuits. Actions includes actions, as defined herein, alleging failure to comply with any federal, state or local law.

Nothing in the definitions included in this paragraph are intended to limit the rights of the City or the obligations of the Applicant otherwise created by this condition.

PROJECT BACKGROUND

The project site is located in the Southeast Los Angeles Community Plan, on a rectangular-shaped site comprised of ten (10) contiguous parcels having frontage on the east side of Central Avenue, approximately mid-block between 114th Street on the north and Imperial Highway on the south. The Community Plan Map designates the site for Community Commercial use with corresponding zones of C2, C4, RAS3, R3, RAS4, and R4. The property is zoned C2-2D-CPIO with Height District No. 2D and is permitted unlimited height with a Floor Area Ratio (FAR) of 6:1. The project is located within the Watts Corridors Recovery Redevelopment Project, South Los Angeles Alcohol Sales Specific Plan, Los Angeles State Enterprise Zone, and Southeast Los Angeles Community Plan Implementation Overlay (CPIO) District General Corridors Subarea No. 3950. The CPIO contains additional regulations for height, density, floor area, building disposition, building design, and parking.

The project site consists of ten (10) contiguous parcels totaling approximately 26,579 square feet in lot area. The site is currently improved with 5 single-story commercial buildings including a carpet store, automotive uses, vacant buildings, and surface parking. There are no known designated historic resources or cultural monuments on the subject site.

The surrounding area is developed with a combination of multi-family residential and commercial uses, and several adjacent properties are also within Southeast Los Angeles CPIO Districts. The remaining three properties to the north and six properties to the south on the block fronting along Central Avenue are zoned C2-2D-CPIO in the TOD Low CPIO Subarea and improved with a carpet store, recycling center, tire shop, surface parking, and vacant lots. Properties across Central Avenue to the west are zoned C2-2D-CPIO in the TOD Low CPIO Subarea and improved with an office building, parking lot, and vacant land. To the east of the site is a 20-foot wide alley that runs along the rear of the subject site. Further east are properties zoned RD2-1 and improved with the Nickerson Gardens apartment housing project comprised of two-story multi-family residential buildings. Properties further north of 114th Street are improved with churches, parking lots, tire shop, preschool, harbor shop, iron shop, and barber shop. Properties further south of Imperial Highway are improved with a gas station, auto store, and vacant land, and is also the City's boundary. Approximately 500 feet to the south is the 105 Freeway.

The project is for the construction of a 4-story supportive housing project that will provide 64 dwelling units and on-site supportive services. The building will have a maximum height of 51 feet and 5 inches, encompass approximately 57,302 square feet of floor area, and have a maximum Floor Area Ratio (FAR) of 2.2:1. The project will provide eight parking spaces at grade level in an enclosed garage that is accessed from the alley to the rear. The project will provide 51 long-term and 6 short-term bicycle parking spaces. The project will provide 4 supportive service offices totaling 791 square feet, a 147-square foot wellness room, 272-square foot computer room, 1,788-square foot community room and kitchen, for on-site supportive services, The applicant has submitted an application for Building Permit No. 19010-10000-02212 with the Department of Building and Safety ("LADBS") for a 64-unit permanent supportive housing project. The Building Permit is pending, and has not been issued at the time of preparing this report. The case is also subject to administrative review for compliance with the Southeast Los Angeles Community Plan Implementation Overlay ("CPIO") under Related Case No. ADM-2019-4110-CPIO.

CPIO AFFORDABLE HOUSING INCENTIVE PROGRAM BACKGROUND

The Southeast Los Angeles Community Plan Implementation Overlay ("CPIO") District was adopted by the Los Angeles City Council and became effective on December 29, 2018 under Ordinance No. 185,925. The Ordinance established a Transit-Oriented Development Program

around fixed light rail transit and Metro Rapid bus lines, to: (1) encourage the construction of 100 percent affordable housing projects and mixed-housing projects by providing specific density, FAR, and height bonuses and streamlined procedures to approve such projects; (2) foster project designs that are pedestrian oriented; and (3) improve the quality of new development as well as its compatibility with existing neighborhoods through the implementation of supplemental development regulations. The incentives provided in the CPIO describe the range of bonuses and incentives from particular zoning standards that applicants may select.

The subject site is located within Subarea TOD Low (Subarea E) of the Southeast Los Angeles CPIO, and is providing 100% affordable housing units, exclusive of a manager's unit, to qualify as a CPIO Affordable Housing Project as defined by the CPIO. Therefore, as a CPIO Affordable Housing Project, the project is eligible for and has requested the following bonuses and incentive under the CPIO TOD Program:

a. **Density**. A bonus density of 1 dwelling unit per 300 square feet of lot area.

b. **Height**. A bonus height of 4 stories and 60 feet.

c. **FAR**. A bonus FAR maximum of 3:1

d. **Yard/Setback**. A yard incentive for a 20 percent decrease in the required width or depth of any individual yard or setback except along any property line that abuts a R1 or more restrictively zoned property.

e. **Open Space**. An open space incentive for a 20 percent decrease from open space requirements.

HOUSING REPLACEMENT

The CPIO requires a CPIO Affordable Housing Development to meet any applicable housing replacement requirements of California Government Code Section 65915(c)(3), as verified by the Department of Housing and Community Investment (HCIDLA) prior to the issuance of any building permit. California Government Code Section 65915(c)(3), as amended by Assembly Bill 2222 and 2556, requires applicants of Density Bonus projects to demonstrate compliance with the housing replacement provisions which require replacement of rental dwelling units that either exist at the time of application of a Density Bonus project, or have been vacated or demolished in the five-year period preceding the application of the project. This applies to all pre-existing units that have been subject to a recorded covenant, ordinance, or law that restricts rents to levels affordable to persons and families of lower or very low income; subject to any other form of rent or price control; or occupied by Low or Very Low Income Households. Pursuant to the Determination made by the Los Angeles Housing and Community Investment Department (HCIDLA) dated May 14, 2019, no replacement affordable units are required. This is reflected in the Conditions of Approval.

SUPPORTIVE HOUSING PROJECT FINDINGS

Assembly Bill ("AB") 2162 amended Sections 65583 and 65650-65656 of the California Government Code, and went into effect on January 1, 2019. The bill requires that supportive housing be a use by right in zones where multifamily and mixed uses are permitted, including nonresidential zones permitting multifamily uses, if the proposed housing development meets specified criteria. The local government is required to complete the review of a supportive housing development that complies with the specified criteria within specified time periods. For projects with 50 or fewer units, the review shall be complete within 60 days after the application is complete. For projects with more than 50 units, the review shall be completed within 120 days

after the application is complete. In addition, AB 2162 clearly states that the developer is not precluded or limited in seeking a density bonus for the supportive housing project.

Pursuant to AB 2162 and Government Code Section 65651, a Supportive Housing Project that satisfies all of the requirements and objective planning standards of Government Code Section 65651(a) and (b) shall be a use by right and subject to the approval process provided in Government Code Section 65653. The term "use by right" shall have the same meaning as defined in subdivision (i) of Section 65583.2. Therefore, pursuant to Government Code Section 65651 and Public Resources Code Section 210801(b)(1), the Supportive Housing Project is Statutorily Exempt from the California Environmental Quality Act ("CEQA") as a ministerial project.

In accordance with AB 2162, a Supportive Housing Project will be considered a use by-right where multifamily and mixed uses are permitted if the proposed housing development meets specified criteria. The specified criteria of AB 2162 are as follows:

1. **Units within the development are subject to a recorded affordability restriction for 55 years.**

   There will be 64 units in the project and all of them, except for the manager's unit, will be restricted to Very Low Income Supportive Housing units.

2. **One hundred percent of the units, excluding managers' units, within the development are dedicated to lower income households and are receiving public funding to ensure affordability of the housing to lower income Californians. For purposes of this paragraph, "lower income households" has the same meaning as defined in Section 50079.5 of the Health and Safety Code.**

   There will be 64 units in the project and all of them, except for the manager's unit, will be restricted to Very Low Income Supportive Housing units, as defined in Section 50105 of the California Health and Safety Code. The housing development will also receive public funding to provide rental subsidies to all of the affordability units.

3. **At least 25 percent of the units in the development or 12 units, whichever is greater, are restricted to residents in supportive housing who meet criteria of the target population. If the development consists of fewer than 12 units, then 100 percent of the units, excluding managers' units, in the development shall be restricted to residents in supportive housing.**

   The development will restrict 100 percent of units, excluding a manager's unit, that is 63 out of 64 units, for residents in supportive housing.

4. **The developer provides the planning agency with the information required by Section 65652.**

   The developer has provided to the Department of City Planning a plan for providing supportive services. The plan identifies an organization called The People Concern as the provider for supportive services. The Los Angeles County Department of Health Services will provide funding in the amount of $340,200 per year for Intensive Case Management Services. The staffing levels will be provided at approximately 3.2 full time employees' worth of hours weekly to administer services.

5. **Nonresidential floor area shall be used for onsite supportive services. For a development with 20 or fewer total units, at least 90 square feet shall be provided for onsite supportive services. For a development with more than 20 units, at least**

3 percent of the total nonresidential floor area shall be provided for onsite supportive services that are limited to tenant use, including, but not limited to, community rooms, case management offices, computer rooms, and community kitchens.

The 64-unit project is required to provide at 3 percent of the total nonresidential floor area for on-site supportive services. The project will provide 4 supportive service offices totaling 791 square feet, a 147-square foot wellness room, 272-square foot computer room, 1,788-square foot community room and kitchen, for on-site supportive services, as provided in Exhibit "A".

6. **The developer replaces any dwelling units on the site of the supportive housing development in the manner provided in paragraph (3) of subdivision (c) of Section 65915.**

   Per the AB 2556 Determination completed by the Los Angeles Housing and Community Investment Department (HCIDLA) dated May 14, 2019, no replacement affordable units are required.

7. **Units within the development, excluding managers' units, include at least one bathroom and a kitchen or other cooking facilities, including, at minimum, a stovetop, a sink, and a refrigerator.**

   All 64 units in the development include at least one bathroom and a kitchen with a stovetop, sink, and refrigerator.

In addition, pursuant to California Government Code Section 65654, local governments cannot impose any minimum parking requirements for units occupied by supportive housing residents if the development is located within one-half mile of a public transit stop. The site of the development is located directly north of two public transit stops (at the northeast corner of Central Avenue and Imperial Highway) that are serviced by the Los Angeles Department of Transportation ("LADOT") DASH Watts line and the Los Angeles County Metropolitan Transportation Authority ("Metro") Lines 53 and 120. The project proposes one (1) three-bedroom manager's unit, which requires two (2) parking spaces pursuant to Density Bonus Parking Option 1, and 63 supportive housing units, which require no parking spaces under AB 2162.

SITE PLAN REVIEW FINDINGS

The following is a delineation of the findings related to the request for a Site Plan Review for a development project which creates, or results in an increase of, 50 or more dwelling units.

As previously mentioned, the proposed project satisfies all of the objective planning standards and is therefore subject to the streamlined ministerial process as defined in Assembly Bill ("AB") 2162. Pursuant to Government Code Section 65653(b), ministerial processing or approval involves:

> *The local government shall notify the developer whether the application is complete within 30 days of receipt of an application to develop supportive housing in accordance with this article. The local government shall complete its review of the application within 60 days after the application is complete for a project with 50 or fewer units, or within 120 days after the application is complete for a project with more than 50 units.*

In accordance with AB 2162, and Government Code Section 65651(b), a local government must streamline the approval of a Supportive Housing Project only based on objective development standards and policies, as follows:

> *The local government may require a supportive housing development subject to this article to comply with objective, written development standards and policies; provided, however, that the development shall only be subject to the objective standards and policies that apply to other multifamily development within the same zone.*

Several findings of the Site Plan Review require the City to exercise subjective discretion that does not meet the intent of AB 2162. These subjective discretionary findings conflict with the streamlined ministerial approval process as provided in AB 2162 and therefore are not applicable to the proposed Supportive Housing Project pursuant to AB 2162. Staff has responded to these discretionary findings as not applicable in accordance with AB 2162. For the remaining objective findings of the Site Plan Review, staff has provided a response below.

8. The project is in substantial conformance with the purposes, intent and provisions of the General Plan, applicable community plan, and any applicable specific plan.

The Los Angeles General Plan sets forth goals, objectives, and programs that guide both Citywide and community specific land use policies. The General Plan is comprised of a range of State-mandated elements, including Land Use, Transportation, Noise, Safety, Housing, and Conservation. The City's Land Use Element is divided into 35 Community Plans that establish parameters for land use decisions within those sub-areas of the City.

The General Plan is a long-range document determining how a community will grow, reflecting community priorities and values while shaping the future. Policies and programs set forth in the General Plan are subjective in nature, as the General Plan serves as a constitution for development and foundation for land use decisions. As such, there are no objective development standards relevant to this finding other than those objective standards, as defined by Government Code Section 65651(a), that the project has already been determined to be consistent with.

To the extent this finding requires further analysis, the project substantially conforms with the following purposes and objectives of the General Plan Elements: Framework Element, Housing Element, Mobility Element, the Land Use Element – Southeast Los Angeles Community Plan, and the related Southeast Los Angeles Community Plan Implementation Overlay ("CPIO") District.

Framework Element

The Framework Element is a strategy for long-term growth which sets a citywide context to guide the update of the Community Plan and Citywide Elements. The Framework Element is a comprehensive, long range document containing purposes, policies, and programs for the development of the City of Los Angeles. The Citywide General Plan Framework Element text defines policies related to growth and includes policies for land use, housing, urban form/neighborhood design, open space/conservation, economic development, transportation, and infrastructure/public services.

The primary objectives of the policies in the Framework Element's Land Use Chapter are to support the viability of the City's residential neighborhoods and commercial districts, and where growth occurs, to encourage sustainable growth in a number of higher-intensity

commercial and mixed-use districts, centers, and boulevards and industrial districts particularly in proximity to transportation corridors and transit stations.

The Framework Element's Long Range Land Use Diagram for the South Los Angeles area also identifies the site as being within a Mixed Use Boulevard. A Mixed Use Boulevard is described as "connect[ing] the city's neighborhood districts and community, regional and Downtown centers. Mixed Use development is encouraged along these boulevards, with the scale, density and height of development compatible with the surrounding areas. Generally, different types of Mixed Use Boulevards will fall within a range of floor area ratios from 1.5:1 up to 4.0:1 and be generally characterized by 1- to 2-story commercial structures, up to 3- to 6-story mixed use buildings between centers and higher buildings within centers. Mixed Use Boulevards are served by a variety of transportation facilities".

The proposed project involves the construction of a 4-story supportive housing project that will provide 64 dwelling units and on-site supportive services, on a site designated for Community Commercial land uses and zoned C2-2D-CPIO. The project site is located directly north of two public transit stops (at the northeast corner of Central Avenue and Imperial Highway) that are serviced by the Los Angeles Department of Transportation ("LADOT") DASH Watts line and the Los Angeles County Metropolitan Transportation Authority ("Metro") Lines 53 and 120. As such, the project is in conformance with the purpose of the Framework Element.

Housing Element

The City's Housing Element for 2013-2021 was adopted by the City Council on December 3, 2013. The Housing Element identifies the City's housing conditions and needs, establishes the goals, objectives, and policies that are the foundation of the City's housing and growth strategy, and provides an array of programs the City intends to implement to create sustainable, mixed-income neighborhoods across the City. The Housing Element aims to provide affordable housing and amenity-rich, sustainable neighborhoods for its residents, answering the variety of housing needs of its growing population. Specifically, the Housing Element encourages affordable units to accommodate all income groups that need assistance. Additionally, the Housing Element indicates that permanent supportive housing and services must be provided to ensure the homeless population and persons who are at risk of being homeless remain housed and get the individualized help they may need.

The project will replace 5 existing commercial buildings and surface parking with 64 residential dwelling units, which reserves 100 percent exclusive of a market-rate manger's unit, that is 63 units, for Very Low Income Households. The 63 dwelling units will be permanent supportive housing units, and the project will also The project will provide 4 supportive service offices totaling 791 square feet, a 147-square foot wellness room, 272-square foot computer room, 1,788-square foot community room and kitchen, for on-site supportive services for its residents.

In addition, a portion of the site (Assessor Parcel No. 6070016015) has been identified in the 2013-2021 Housing Element's Inventory of Sites for Housing prepared by the Department of City Planning. The Inventory of Sites for Housing identifies parcels suitable for additional residential development without the need for any discretionary zoning action by the City. Therefore, the project is consistent with the Housing Element's vision of providing housing on these applicable sites. As such, the proposed project substantially conforms to the purpose of the Housing Element of the General Plan.

Mobility Element

The Mobility Plan 2035 includes goals that define the City's high-level mobility priorities. The Mobility Element sets forth objectives and policies to establish a citywide strategy to achieve long-term mobility and accessibility within the City of Los Angeles. Among other objectives and policies, the Mobility Plan aims to support ways to reduce vehicle miles traveled (VMT) per capita by increasing the availability of affordable housing options with proximity to transit stations and major bus stops and offering more non-vehicle alternatives, including transit, walking, and bicycling.

The proposed residential building is a pedestrian-oriented development that provides 63 affordable units and one (1) market-rate manager's unit in proximity to several transit options. As previously mentioned, the project site is located directly north of two public transit stops (at the northeast corner of Central Avenue and Imperial Highway) that are serviced by the Los Angeles Department of Transportation ("LADOT") DASH Watts line and the Los Angeles County Metropolitan Transportation Authority ("Metro") Lines 53 and 120. These transit stations provide access to employment centers and jobs, local and regional destinations, and other neighborhood services for project residents. The proposed project will also allow for the reduction of vehicle trips by placing a high-density residential development within proximity to public transit. The availability of many transit options along the commercial corridors creates a lesser need for the use of personal vehicles. Additionally, the project will provide a total of 57 bicycle parking stalls, including 51 long-term and 6 short-term bicycle parking stalls on the site. A long-term bicycle parking storage area is provided on the ground floor along Central Avenue, and short-term bicycle parking stalls will be located along the public right-of-way in front of the bike room. As such, the project conforms to the purpose of the Mobility Element of the General Plan.

Land Use Element – Southeast Los Angeles Community Plan

The Southeast Los Angeles Community Plan was adopted by City Council in November 2017, with related zoning ordinances effective on December 29, 2018. The Community Plan's purpose is to promote an arrangement of land use, circulation, and services which all encourage and contribute to the economic, social and physical health, safety, welfare, and convenience of the Community. The Land Use Designations and corresponding zones in the Community Plan are implemented through zoning regulations in the Los Angeles Municipal Code ("LAMC") including applicable ordinances that are codified in the LAMC.

The Southeast Los Angeles Community Plan designates the site for Community Commercial land uses. The project site is zoned C2-2D-CPIO, which is consistent with the corresponding zones of C2, C4, RAS3, R3, RAS4, and R4 in the Community Plan. The C2 Zone permits density per the R4 Zone, which permits a base density of 400 square feet of lot area per dwelling, however the CPIO permits a bonus density of 300 square feet of lot area per dwelling. The project site containing 29,079 square feet (including half-alley) is permitted a base density of 97 dwelling units. The project proposes only 64 dwelling units, and therefore complies with the base density permitted by the zone. Height District No. 2D permits unlimited building height and a maximum Floor Area Ratio (FAR) of 6:1.

The project also proposes supportive services in an area that is close to various bus routes, connecting the project site to other regional and local designations. The project will contribute to the Southeast Los Angeles area as a medium- to high-density residential development that provides housing and employment services. Furthermore, as found in

the Supportive Housing Project Findings, the project is consistent with applicable objective development standards. As such, the project conforms to the purpose of the Southeast Los Angeles Community Plan.

Southeast Los Angeles Community Plan Implementation Overlay

The Southeast Los Angeles Community Plan Implementation Overlay ("CPIO") District was adopted by the Los Angeles City Council and became effective on December 29, 2018 under Ordinance No. 185,925. The Ordinance established a Transit-Oriented Development Program around fixed light rail transit and Metro Rapid bus lines, (1) to encourage the construction of 100 percent affordable housing projects and mixed-housing projects by providing specific density, FAR, and height bonuses and streamlined procedures to approve such projects; (2) foster project designs that are pedestrian oriented; and (3) to improve the quality of new development as well as its compatibility with existing neighborhoods through the implementation of supplemental development regulations. The incentives provided in the CPIO describe the range of bonuses and incentives from particular zoning standards that applicants may select.

The subject site is located within Subarea E (TOD Low) of the Southeast Los Angeles CPIO, and is providing 100% affordable housing units, exclusive of a manager's unit, to qualify as a CPIO Affordable Housing Project as defined by the CPIO. CPIO Affordable Housing Projects are restricted by the CPIO as follows:

a. *Base. The applicable Base density, Base height and Base FAR for all CPIO Affordable Housing Projects are as set forth in CPIO Section III-3 and Table III-2.*

   The project qualifies as a CPIO Affordable Housing Project, and is therefore eligible to the Bonus density, height, and FAR as provided in CPIO Section III-3 and Table III-2.

b. *Bonuses. CPIO Affordable Housing Projects may utilize CPIO Bonuses as provided in CPIO Section III-3 and Table III-2.*

   The project complies with the following CPIO Bonuses, which are granted by-right for a CPIO Affordable Housing Project in Subarea E (TOD Low):

   i. **Density**. A bonus density of 1 dwelling unit per 300 square feet of lot area.

   ii. **Height**. A bonus height of 4 stories and 60 feet.

   iii. **FAR**. A bonus FAR of maximum 3:1

   The project site containing 29,079 square feet (including half-alley) is permitted a bonus density of 97 dwelling units. The project proposes only 64 dwelling units, and therefore complies with the bonus density permitted by the CPIO. The proposed building height is four (4) stories and 51 feet and 5 inches, which is consistent with the height limitation of the CPIO. The proposed FAR is 2.2:1, which is consistent with the FAR limitation of the CPIO.

c. *Additional Incentives: If eligible for CPIO Bonuses, then, in addition to the CPIO Bonuses above, a CPIO Affordable Housing Project may utilize up to two additional incentives from the menu of options listed in CPIO Section III-1.D.3, provided that the landscaping for the Project is sufficient to qualify for the number of landscape points equivalent to 10 percent or more than otherwise required by LAMC Section 12.40 and Landscape Ordinance Guidelines "O".*

The project requests to utilize two (2) Additional Incentives, which are granted by-right for a CPIO Affordable Housing Project in Subarea E (TOD Low):

i. **Yard/Setback.** A yard incentive for a 20 percent decrease in the required width or depth of any individual yard or setback except along any property line that abuts a R1 or more restrictively zoned property.
ii. **Open Space.** A 20 percent reduction in the required open space, to allow 5,180 square feet of open space in lieu of the 6,475 square feet otherwise required.

The project requests a southerly side yard reduction from 7 feet as otherwise required by LAMC Section 12.14 C.2 and 12.11 C.2 to 6 feet, which represents a reduction of less than 20 percent. The project also requests an open space reduction of 20 percent from the open space requirements of LAMC Section 12.21 G. Open space will be provided in the form of open-air courtyards at the first and second floors, and private balconies across all upper levels. The project is conditioned to provide a landscape plan that shall indicate landscape points for the project equivalent to 10 percent more than otherwise required by LAMC Section 12.40 and Landscape Ordinance Guidelines "O". The common open space shall meet the requirements of LAMC Section 12.21 G per the satisfaction of the Department of Building and Safety.

d. *Administrative Clearance. CPIO Affordable Housing Projects that utilize CPIO Bonuses and incentives in Subsections b and c above, and that comply with all other requirements of the CPIO, shall be approved with an Administrative Clearance pursuant to Section I-6.C.2 of this ordinance.*

The project has been reviewed for consistency with the CPIO, and has been conditioned to demonstrate compliance with the CPIO prior to the issuance of a building permit.

e. *Replacement Housing. Projects that qualify as a CPIO Affordable Housing Project must meet any applicable housing replacement requirements of Government Code Section 65915(c)(3), (as it may be amended from time to time), subject to verification by HCIDLA prior to the issuance of any building permit. Replacement housing units required per this subsection may also count towards any required Restricted Affordable Units.*

The project qualifies as a CPIO Affordable Housing Project, and has been reviewed by HCIDLA for compliance with Government Code Section 65913(c)(3). Pursuant to the Determination made by HCIDLA dated May 14, 2019, no replacement affordable units are required.

f. *Affordability Covenants. Prior to the issuance of an Administrative Clearance for a CPIO Affordable Housing Project, the following shall apply:*

i. For Projects that provide Lower, Very Low and Extremely Low Income Housing, a covenant shall be recorded in a form and manner approved by HCIDLA, guaranteeing that the affordability criteria will be observed for at least 55 years from the issuance of the certificate of occupancy or for a longer period of time if required by the construction or mortgage financing assistance program, mortgage assistance program, or rental subsidy program, or any other government requirement.

ii. *Any covenant described in this paragraph must provide for a private right of enforcement by the City, any tenant, or owner of any building to which a covenant and agreement applies.*

The project is conditioned to provide a covenant to the satisfaction of HCIDLA to make 63 units for Very Low Income Households for sale or rental as determined to be affordable to such households by HCIDLA for a period of 55 years.

g. *Targeted Commercial Use Covenants. Prior to issuance of an Administrative Clearance for a CPIO Affordable Housing Project that includes a Targeted Commercial Use, covenant requirements of CPIO Section III-1.D.7 shall apply.*

The project does not propose a Targeted Commercial Use. Therefore, this requirement does not apply.

h. *Unit Quality. Affordable dwelling units within the CPIO Mixed-Income Housing Projects shall be no less than 90 percent of the average square footage of market-rate dwelling units with the same number of bedrooms, be interspersed throughout the development, and shall have access to the same amenities and use of the same entrances. Building materials shall be consistent throughout.*

The project qualifies as a CPIO Affordable Housing Project and CPIO 100 Percent Affordable Housing Project, as it provides 100 percent of the residential dwelling units, excluding any manager unit(s), as Restricted Affordable Units. Therefore, this requirement does not apply.

9. **The project consists of an arrangement of buildings and structures (including height, bulk and setbacks), off-street parking facilities, loading areas, lighting, landscaping, trash collection, and other such pertinent improvements that is or will be compatible with existing and future development on adjacent properties and neighboring properties.**

There are no objective zoning development standards relevant to this finding other than those objective standards, as defined by Government Code Section 65651(a), that the project has already been determined to be consistent with. Therefore, this finding is not applicable to the proposed Supportive Housing Project pursuant to AB 2162.

10. **The residential project provides recreational and service amenities to improve habitability for its residents and minimize impacts on neighboring properties.**

There are no objective zoning development standards relevant to this finding other than those objective standards, as defined by Government Code Section 65651(a), that the project has already been determined to be consistent with. Therefore, this finding is not applicable to the proposed Supportive Housing Project pursuant to AB 2162.

CEQA FINDINGS

Pursuant to Assembly Bill ("AB") 2162 and California Government Code (Gov.) Sections 65583 and 65650 through 65654, a project that satisfies all of the objective planning standards of Gov. Section 65651(a) and (b) is subject to the streamlined, ministerial approval process provided by Gov. Section 65653(a) and (b). Therefore, pursuant to Gov. Section 65651 and Public Resources Code Section 21080(b)(1), the Supportive Housing Project is Statutorily Exempt from the California Environmental Quality Act ("CEQA") as a ministerial project.

OBSERVANCE OF CONDITIONS - TIME LIMIT - LAPSE OF PRIVILEGES

All terms and conditions of the Director's Determination shall be fulfilled before the use may be established. The instant authorization is further conditioned upon the privileges being utilized within three years after the effective date of this determination and, if such privileges are not utilized, building permits are not issued, or substantial physical construction work is not begun within said time and carried on diligently so that building permits do not lapse, the authorization shall terminate and become void.

TRANSFERABILITY

This determination runs with the land. In the event the property is to be sold, leased, rented or occupied by any person or corporation other than yourself, it is incumbent that you advise them regarding the conditions of this grant. If any portion of this approval is utilized, then all other conditions and requirements set forth herein become immediately operative and must be strictly observed.

VIOLATIONS OF THESE CONDITIONS, A MISDEMEANOR

The Applicant's attention is called to the fact that this grant is not a permit or license and that any permits and licenses required by law must be obtained from the proper public agency. Furthermore, if any condition of this grant is violated or not complied with, then the Applicant or his successor in interest may be prosecuted for violating these conditions the same as for any violation of the requirements contained in the Municipal Code, or the approval may be revoked.

Section 11.00 of the LAMC states in part (m): "It shall be unlawful for any person to violate any provision or fail to comply with any of the requirements of this Code. Any person violating any of the provisions or failing to comply with any of the mandatory requirements of this Code shall be guilty of a misdemeanor unless that violation or failure is declared in that section to be an infraction. An infraction shall be tried and be punishable as provided in Section 19.6 of the Penal Code and the provisions of this section. Any violation of this Code that is designated as a misdemeanor may be charged by the City Attorney as either a misdemeanor or an infraction.

Every violation of this determination is punishable as a misdemeanor unless provision is otherwise made, and shall be punishable by a fine of not more than $1,000 or by imprisonment in the County Jail for a period of not more than six months, or by both a fine and imprisonment."

APPEAL PERIOD - EFFECTIVE DATE

The Determination in this matter will become effective and final fifteen (15) days after the date of mailing of the Notice of Director's Determination unless an appeal there from is filed with the City Planning Department. It is strongly advised that appeals be filed early during the appeal period and in person so that imperfections/incompleteness may be corrected before the appeal period expires. Any appeal must be filed on the prescribed forms, accompanied by the required fee, a copy of this Determination, and received and receipted at a public office of the Department of City Planning on or before the above date or the appeal will not be accepted. Forms are available on-line at http://planning.lacity.org.

Planning Department public offices are located at:

Downtown	San Fernando Valley	West Los Angeles
Figueroa Plaza 201 North Figueroa Street, 4th Floor Los Angeles, CA 90012 (213) 482-7052	Marvin Braude San Fernando Valley Constituent Service Center 6262 Van Nuys Boulevard, Rm 251 Van Nuys, CA 91401 (818) 374-5050	West Los Angeles Development Services Center 1828 Sawtelle Boulevard, 2nd Floor Los Angeles, CA 90025 (310) 231-2598

*Please note the cashiers at the public counters close at 3:30 PM.

Verification of condition compliance with building plans and/or building permit applications are done at the Development Services Center of the Department of City Planning at either Figueroa Plaza in Downtown Los Angeles or the Marvin Braude Building in the Valley. In order to assure that you receive service with a minimum amount of waiting, applicants are encouraged to schedule an appointment with the Development Services Center either through the Department of City Planning website at http://planning.lacity.org or by calling (213) 482-7052 or (818) 374-5050. The applicant is further advised to notify any consultant representing you of this requirement as well.

The time in which a party may seek judicial review of this determination is governed by California Code of Civil Procedures Section 1094.6. Under that provision, a petitioner may seek judicial review of any decision of the City pursuant to California Code of Civil Procedure Section 1094.5, only if the petition for writ of mandate pursuant to that section is filed no later than the 90th day following the date on which the City's decision becomes final.

VINCENT P. BERTONI, AICP
Director of Planning

Approved by:

Faisal Roble, Principal City Planner

Reviewed by:

Michelle Singh, Senior City Planner

Prepared by:

Connie Chauv, City Planning Associate

MONTECITO II SENIOR HOUSING

Montecito II Senior Housing
6668 Franklin Ave.
APN #: 5547-003-023; 5547-003-024
Los Angeles CA 90028

E.3 CEQA APPROVALS

Per the City's Sustainable Communities Environmental Assessment (SCEA), no EIR or negative declaration is required for approval of Montecito II Senior Housing.

Please see attached City approval letter and published SCEA.

2019 072691

FILED
Mar 20 2019

Dean C. Logan, Registrar – Recorder/County Clerk

Electronically signed by HELEN SOTO

CITY OF LOS ANGELES
CALIFORNIA ENVIRONMENTAL QUALITY ACT
NOTICE OF DETERMINATION

(California Environmental Quality Act Guidelines Section 15094)

THIS NOTICE WAS POSTED

ON March 20 2019

UNTIL April 19 2019

REGISTRAR – RECORDER/COUNTY CLERK

Public Resources Code Section 21152(a) requires local agencies to submit this information to the County Clerk. Guideline 15094(c) requires submittal of this notice to the State OPR if the project requires discretionary approval from a state agency. (State OPR, 1400 Tenth St, Rm 121 Sacramento, CA 95814). The filing of the notice starts a 30-day statute of limitations on court challenges to the approval of the project pursuant to Public Resources Code Section 21167. Failure to file the notice results in the statute of limitations being extended to 180 days.

LEAD CITY AGENCY AND ADDRESS (Bldg, Street, City, State)	COUNCIL DISTRICT
Los Angeles Department of City Planning 200 N. Spring Street, Room 763 Los Angeles, CA 90012	13 – O'Farrell

PROJECT TITLE (INCLUDING ITS COMMON NAME, IF ANY)	CASE NO.
Montecito II Senior Housing Project	ENV-2017-1504-SCEA

PROJECT DESCRIPTION AND LOCATION

A Sustainable Communities Environmental Assessment (SCEA) pursuant to Public Resources Code Section 21155.2 for the future consideration of a transit priority project located at 6650-6668 Franklin Avenue and 1855 N. Cherokee Avenue, Los Angeles, CA 90028 as identified in Planning Case Nos. CPC-2017-1503-DB-CU-SPR and AA-2017-1505-PMLA. [The associated Proposed Project would include 68 new multi-family residential units (67 affordable senior units and one on-site-manager's unit), ancillary spaces, onsite recreation/open space areas, and parking. The Proposed Project would be six stories tall, up to a maximum of 76'-8" feet in height and physically connected by a new common lobby to the existing Montecito Apartments Building. Up to 27 trees may be removed and replaced under the Proposed Project.]

NAME OF PERSON OR AGENCY CARRYING OUT THE PROJECT IF OTHER THAN LEAD AGENCY

Thomas Safran & Associates, Attn. Tyler Monroe

CONTACT PERSON	STATE CLEARING HOUSE NUMBER	TELEPHONE NUMBER
Jenna Monterrosa, City of Los Angeles		213-978-1377

This is to advise that on February 20, 2019 the City of Los Angeles has approved the above described project and has made the following determinations:

SIGNIFICANT EFFECT	☐ Project **will** have a significant effect on the environment. X Project **will not** have a significant effect on the environment.
MITIGATION MEASURES	X Mitigation measures **were** made a condition of project approval. ☐ Mitigation measures **were not** made a condition of project approval.
MITIGATION REPORTING / MONITORING	☐ A mitigation reporting or monitoring plan **was** adopted for the project. X A mitigation reporting or monitoring plan **was not** adopted for the project.
OVERRIDING CONSIDERATION	☐ Statement of Overriding Considerations **was** adopted. X Statement of Overriding Considerations **was not** adopted. X Statement of Overriding Considerations **was not** required.
ENVIRONMENTAL IMPACT REPORT	☐ An Environmental Impact Report **was** prepared and certified and findings **were** made for project pursuant to the provisions of CEQA. The final Environmental Impact Report with comments and responses and record of project approval may be examined at the Office of the City Clerk.* X An Environmental Impact Report **was not** prepared for the project.
NEGATIVE DECLARATION	X A Negative Declaration or Mitigated Negative Declaration **was** prepared for the project and may be examined at the Office of the City Clerk.* ☐ A Negative Declaration or Mitigated Negative Declaration **was not** prepared for the project.

SIGNATURE (Lead Agency)	TITLE	DATE OF PREPARATION
	City Planner	3/11/19

SIGNATURE (Office of Planning and Research if applicable)	TITLE	DATE

DISTRIBUTION:
- Part 1 - County Clerk
- Part 2 - City Clerk
- Part 3 - Agency Record
- Part 4 - Resp. State Agency (if any)
- Part 5 - Office of Planning and Research (if applicable)

*** OFFICE OF THE CITY CLERK**
Room 395, City Hall
200 N. Spring Street
Los Angeles, CA 90012

2019 072691

FILED
Mar 20 2019

Dean C. Logan, Registrar–Recorder/County Clerk

Electronically signed by HELEN SOTO

I hereby certify and attest this to be a true and correct copy of the original record on file in the office of the Department of City Planning of the City of Los Angeles designated as NOD for ENV-2017-1504-SCEA

Department Representative

HOLLY L. WOLCOTT
CITY CLERK

SHANNON D. HOPPES
EXECUTIVE OFFICER

When making inquiries relative to this matter, please refer to the Council File No.: 18-0412

City of Los Angeles
CALIFORNIA

ERIC GARCETTI
MAYOR

OFFICE OF THE
CITY CLERK

Council and Public Services Division
200 N. SPRING STREET, ROOM 395
LOS ANGELES, CA 90012
GENERAL INFORMATION - (213) 978-1133
FAX: (213) 978-1040

PATRICE Y. LATTIMORE
DIVISION MANAGER

CLERK.LACITY.ORG

OFFICIAL ACTION OF THE LOS ANGELES CITY COUNCIL

February 22, 2019

Council File No.: 18-0412

Council Meeting Date: February 20, 2019

Agenda Item No.: 14

Agenda Description: SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT, MITIGATION MEASURES, MITIGATION MONITORING PROGRAM, ENVIRONMENTAL FINDINGS and PLANNING AND LAND USE MANAGEMENT COMMITTEE REPORT relative to the future development for the properties located at 6650-6668 Franklin Avenue and 1855 North Cherokee Avenue.

Council Action: PLANNING AND LAND USE MANAGEMENT COMMITTEE REPORT - ADOPTED

Council Vote:

ABSENT	BOB BLUMENFIELD
ABSENT	MIKE BONIN
ABSENT	JOE BUSCAINO
YES	GILBERT A. CEDILLO
YES	MARQUEECE HARRIS-DAWSON
ABSENT	JOSE HUIZAR
YES	PAUL KORETZ
YES	PAUL KREKORIAN
YES	NURY MARTINEZ
YES	MITCH O'FARRELL
YES	CURREN D. PRICE
YES	MONICA RODRIGUEZ
YES	DAVID RYU
ABSENT	GREIG SMITH
YES	HERB WESSON

HOLLY L. WOLCOTT
CITY CLERK

Adopted Report(s)

Title	Date
Report from Planning and Land Use Management Committee	02/05/2019

City of Los Angeles

Department of City Planning

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

SUSTAINABLE COMMUNITUES ENVIRONMENTAL ASSESSMENT

Hollywood Community Plan Area

Montecito II Senior Housing Project

Case Number: ENV-2017-1504-SCEA

Project Location: 6650-6668 Franklin Avenue, 1850 N. Cherokee Avenue, Los Angeles, California, 90028

Council District: 13 – Mitch O'Farrell

Project Description:

The Proposed Project is a senior residential housing development at 6650-6668 Franklin Avenue, 1850 N. Cherokee Avenue in the Hollywood Community Plan Area of the City of Los Angeles. The 33,750 square-foot corner site (0.77 acres) is bounded by Franklin Avenue to the north, North Cherokee Avenue to the east, the Las Palmas Senior Center and Canyon Co-Op School to the west, and a multi-family residential building to the south. Existing development on the site includes the Montecito Apartments and an outdoor courtyard.

The Proposed Project would include 68 new multi-family residential units (67 affordable senior units and one on-site-manager's unit) and ancillary spaces, totaling approximately 53,370 square feet of new building area, approximately 7,000 square feet of recreation/open space areas, and 57 new parking spaces on two subterranean levels, for a total of 104 on-site parking spaces. The Proposed Project would be six stories tall, up to a maximum of 76'-8" feet in height. The new building would be physically connected by a new common lobby to the existing Montecito Apartments Building, providing the residents access to both facilities and the amenities within. Up to 27 trees may be removed and replaced under the Proposed Project; no trees to be removed are within the public right-of-way.

The applicant is requesting: (1) A Density Bonus (DB) pursuant to CA Government Code Section 65915(f)(3) and LAMC Section 12.22.A.25 to permit a Senior Residential Housing Development Project with 118 existing non-conforming units and 68 new units, dedicating 99% of proposed units restricted to Low and Very Low Income Households in exchange for the following incentives: (a) An On-Menu Incentive for an increase in height to permit a new building with 76-feet, 8-inches in height in lieu of the otherwise permitted 72-foot height limit pursuant to Ordinance 165,656 and LAMC 12.21.1 B.2 for a site with more than 20 feet of grade change; (b) An Off-Menu Incentive for a decrease in yards to permit a 4-foot, 6-inch northerly side yard fronting Franklin Boulevard in lieu of the otherwise required 9-foot front yard for a 6-story building pursuant to LAMC 12.11 C.2; (c) An Off-Menu Incentive for a decrease in yards to permit a 10-foot rear yard in lieu of the otherwise required 18-foot rear yard for a 6-story building pursuant to LAMC 12.11 C.3; (2) A Conditional Use Permit to permit pursuant to 12.24 U.26, to permit a housing development project with a density increase greater than the maximum permitted in LAMC 12.22 A.25, for a total of 186 units; (3) Site Plan Review (SPR) pursuant to LAMC 16.05 C, to permit the construction, use, and maintenance of more than 50 new residential units; (4) Preliminary Parcel Map (PMLA) pursuant to LAMC 17.50, a to permit the merger and re-subdivision of five (5) ground lots into one (1) ground lot and two (2) air space lots; (5) Approval of other permits, ministerial or discretionary, in order to execute and implement the Project such as: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits; and (6) Adoption of the Sustainable Communities Environmental Assessment (SCEA).

ON BEHALF OF:

City of Los Angeles
Department of City Planning

PREPARED BY:

Impact Sciences, Inc.
28 N. Marengo Avenue
Pasadena, CA 91101

APPLICANT:

Thomas Safran & Associates
11812 San Vicente Blvd, #600
Los Angeles, CA 90049

February 2018

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I. INTRODUCTION

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

Project Information

Project Title:	Montecito II Senior Housing Project
Project Location:	6650-6668 W. Franklin Avenue, 1850 N. Cherokee Avenue Los Angeles, CA 90028 Hollywood Community Plan Area
Lead Agency:	City of Los Angeles Department of City Planning 200 N. Spring St., Room 720 Los Angeles, CA 90012
City Staff Contact:	Jenna Monterrosa, City Planner 213-978-1377
Project Applicant:	Thomas Safran & Associates 11812 San Vicente Blvd, #600 Los Angeles, CA 90049

Project Summary

The subject of this Sustainable Communities Environmental Assessment (SCEA) is a proposed senior residential housing development at 6650 Franklin Avenue[1] in the Hollywood Community Plan Area of the City of Los Angeles. The 33,750 square-foot corner site (0.77 acres) is bounded by Franklin Avenue to the north, North Cherokee Avenue to the east, the Las Palmas Senior Center and Canyon Co-Op School to the west, and a multi-family residential building to the south. Existing development on the project site includes the Montecito Apartments, a 118-unit, 10-story residential apartment building containing affordable senior housing, and an outdoor courtyard.

The Proposed Project would construct a 6-story, 68 unit (67 senior housing units, and one manager's unit) multi-family residential building with approximately 53,370 square feet (sf) of

[1] *Additional addresses affiliated with the proposed project include: 6668 Franklin Avenue, and 1850 N. Cherokee Avenue.*

building area, and approximately 7,000 sf of recreation/open space areas, with 57 new parking spaces in two levels of subterranean parking for a total of 104 on-site parking spaces. The proposed project would be six stories tall, up to a maximum of 76'-8" feet in height.

The applicant is requesting:

- A **Density Bonus** (DB) pursuant to CA Government Code Section 65915(f)(3) and LAMC Section 12.22.A.25 to permit a Senior Residential Housing Development Project with 118 existing non-conforming units and 68 new units, dedicating 99% of proposed units restricted to Low and Very Low Income Households in exchange for the following incentives:
    - An **On-Menu Incentive** for an increase in height to permit a new building with 76-feet, 8-inches in height in lieu of the otherwise permitted 72-foot height limit pursuant to Ordinance 165,656 and LAMC 12.21.1 B.2 for a site with more than 20 feet of grade change;
    - An **Off-Menu Incentive** for a decrease in yards to permit a 4-foot, 6-inch northerly side yard fronting Franklin Boulevard in lieu of the otherwise required 9-foot front yard for a 6-story building pursuant to LAMC 12.11 C.2;
    - An **Off-Menu Incentive** for a decrease in yards to permit a 10-foot rear yard in lieu of the otherwise required 18-foot rear yard for a 6-story building pursuant to LAMC 12.11 C.3;
- A **Conditional Use Permit** (CUP) to permit pursuant to 12.24 U.26, to permit a housing development project with a density increase greater than the maximum permitted in LAMC 12.22 A.25, for a total of 186 units;
- A **Site Plan Review** (SPR) pursuant to LAMC 16.05 C, to permit the construction, use, and maintenance of 50 or more new residential units;
- A **Preliminary Parcel Map** (PMLA) pursuant to LAMC 17.50, a to permit the merger and re-subdivision of five (5) ground lots into one (1) ground lot and two (2) air space lots;
- Approval of other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits, and
- Adoption of the Sustainable Communities Environmental Assessment (SCEA).

Required Findings

The City of Los Angeles finds, upon a review of the entire administrative record, that:

- The Proposed Project qualifies as a transit priority project pursuant to Public Resources Code Section 21155;
- The Proposed Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the project area in the Regional Transportation Plan/Sustainable Communities Strategy *(RTP/SCS)* prepared by the Southern California Association of Governments (SCAG);
- The Proposed Project contains more than 50% residential; provides a minimum net density greater than 20 units an acre; and is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan;
- The Proposed Project is a residential or mixed-use project as defined by Public Resources Code Section 21159.28(d);
- The Proposed Project incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior environmental reports, including the *RTP/SCS* Program Environmental Impact Report;
- All potentially significant or significant effects required to be identified and analyzed pursuant to the California Environmental Quality Act (CEQA) in an initial study have been identified and analyzed in an initial study; and
- With respect to each significant effect on the environment required to be identified in the initial study, changes or alterations have been required in or incorporated into the project that avoids or mitigates the significant effects to a level of insignificance.

Therefore, the City of Los Angeles finds that the Proposed Project complies with the requirements of CEQA for using an SCEA as authorized pursuant to Public Resources Code Section 21155.2(b).

The attached Section V, Sustainable Communities Environmental Analysis, has been prepared by Impact Sciences, Inc. on behalf of the Project Applicant and in conjunction with the City of Los Angeles, as Lead Agency in support of this SCEA.

Organization of the SCEA

This SCEA is organized into seven sections as follows:

I. Introduction: This section provides introductory information such as the Project title, the Project Applicant, and the lead agency for the Proposed Project.

II. Project Description: This section provides a detailed description of the Proposed Project including the environmental setting, Project characteristics, related Project information, Project objectives, and environmental clearance requirements.

III. Transit Priority Projects Consistency Analysis: This section contains the Transit Priority Project Criteria and the analysis of the Project's consistency with the SCAG RTP/SCS.

IV. SCEA Checklist: This section contains the completed SCEA Checklist showing the significance level under each environmental impact category.

V. Sustainable Communities Environmental Analysis: Each environmental issue identified in the SCEA Checklist contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, as identified in the Checklist, mitigation measures are provided to reduce such impacts to a less than significant level. This section also discusses applicable mitigation measures from prior EIRs.

VI. List of Preparers: This section provides a list of City personnel, other governmental agencies, and consultant team members that participated in the preparation of the SCEA.

VII. References, Acronyms and Abbreviations.

Appendices: Includes various documents, technical reports, and information used in the SCEA and can be found in the case file for ENV-2017-1504-SCEA.

II. PROJECT DESCRIPTION

PROJECT LOCATION

Project Site

The Project Site is located at 6650 West Franklin Avenue[1] in the Hollywood Community Plan Area of the City of Los Angeles. The rectangular-shaped site is comprised of five legal parcels totaling approximately 33,793 square feet (0.78 acres); bounded by West Franklin Avenue to the north, North Cherokee Avenue to the west, the Las Palmas Senior Center on the west and a multi-family housing building to the south; multi-family housing buildings are located immediately north, east, and west of the project site, along Franklin Avenue. The site is currently improved with one structure, a 118-unit, 10-story residential apartment building containing affordable senior housing. The Property fronts approximately 130 feet along the southerly side of Franklin Avenue and 150 feet on the westerly side of Cherokee Avenue. (see **Figure II-1, Regional and Project Vicinity Map**).

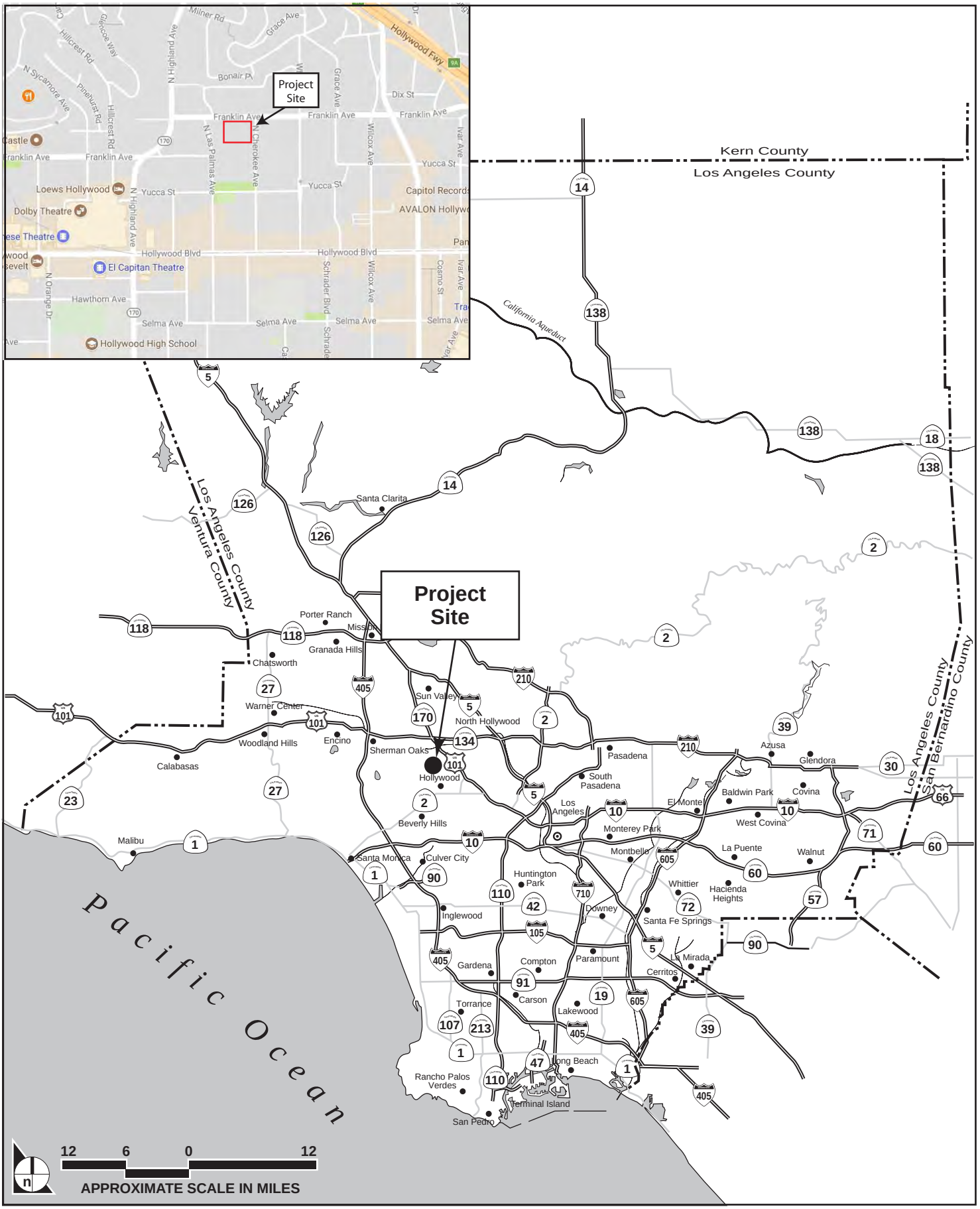
The Property is currently zoned [Q]R4-2, which permits by-right uses and area limitations consistent with the R4 Zone and a maximum Floor Area Ratio of 6:1. Pursuant to the Q condition established by Ordinance No. 165,656 the density and height of the underlying R4 zoning is restricted to 1 unit per 600 square feet of lot area and a maximum height of 60 feet. With a grade change of more than 20 feet, the Project is permitted an additional 12 feet in height for a maximum height of 72 feet.[2]

Regional access to the Project Site is provided by U.S. Highway 101 (US 101), approximately 0.4 miles to the east of the Project Site. Other regional access is provided by Hollywood Boulevard, two blocks south of the Site, and Highland Avenue, two blocks to the west. The Site is served by the DASH Hollywood line, directly abutting the property. Additionally, there are several major bus routes running along Franklin Avenue, Highland Avenue, Hollywood Boulevard, and Cahuenga Boulevard. The Project Site is less than one-half mile from the Hollywood/Highland Station of the Metro Red Line.

---

[1] *Additional addresses affiliated with the Project Site include 6669 West Franklin Avenue and 1855 North Cherokee Avenue*

[2] *A base height of 60 feet was established by Ordinance 165,656; LAMC 12.21.1 B.2 allows projects to exceed the base height by 12 feet for sites with a grade change of more than 20 feet.*



SOURCE: Impact Sciences, Inc., 2017

FIGURE **II-1**

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Regional and Project Vicinity Map

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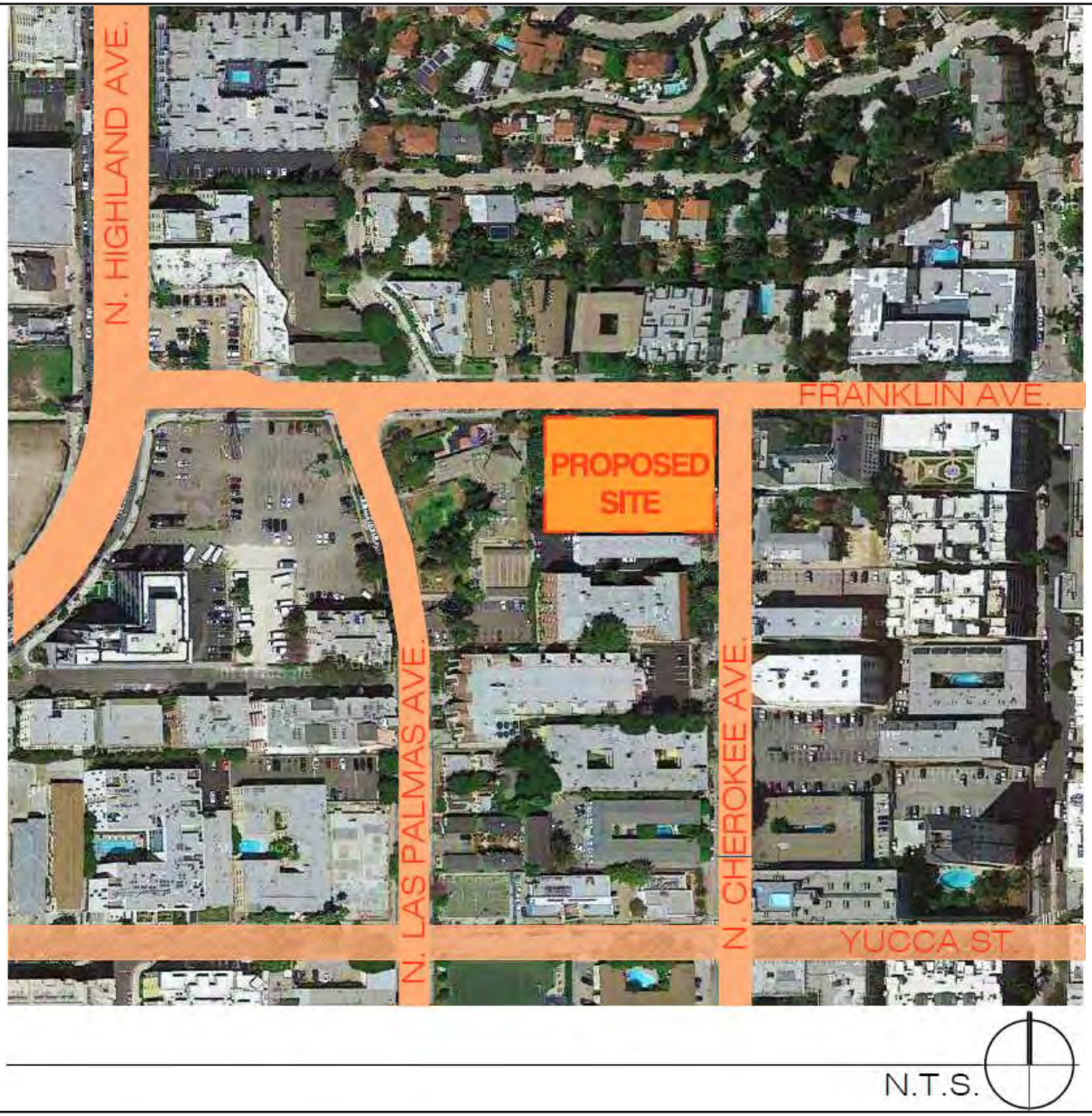

SOURCE: Thomas Safran & Associates, 2017

FIGURE **II-2**

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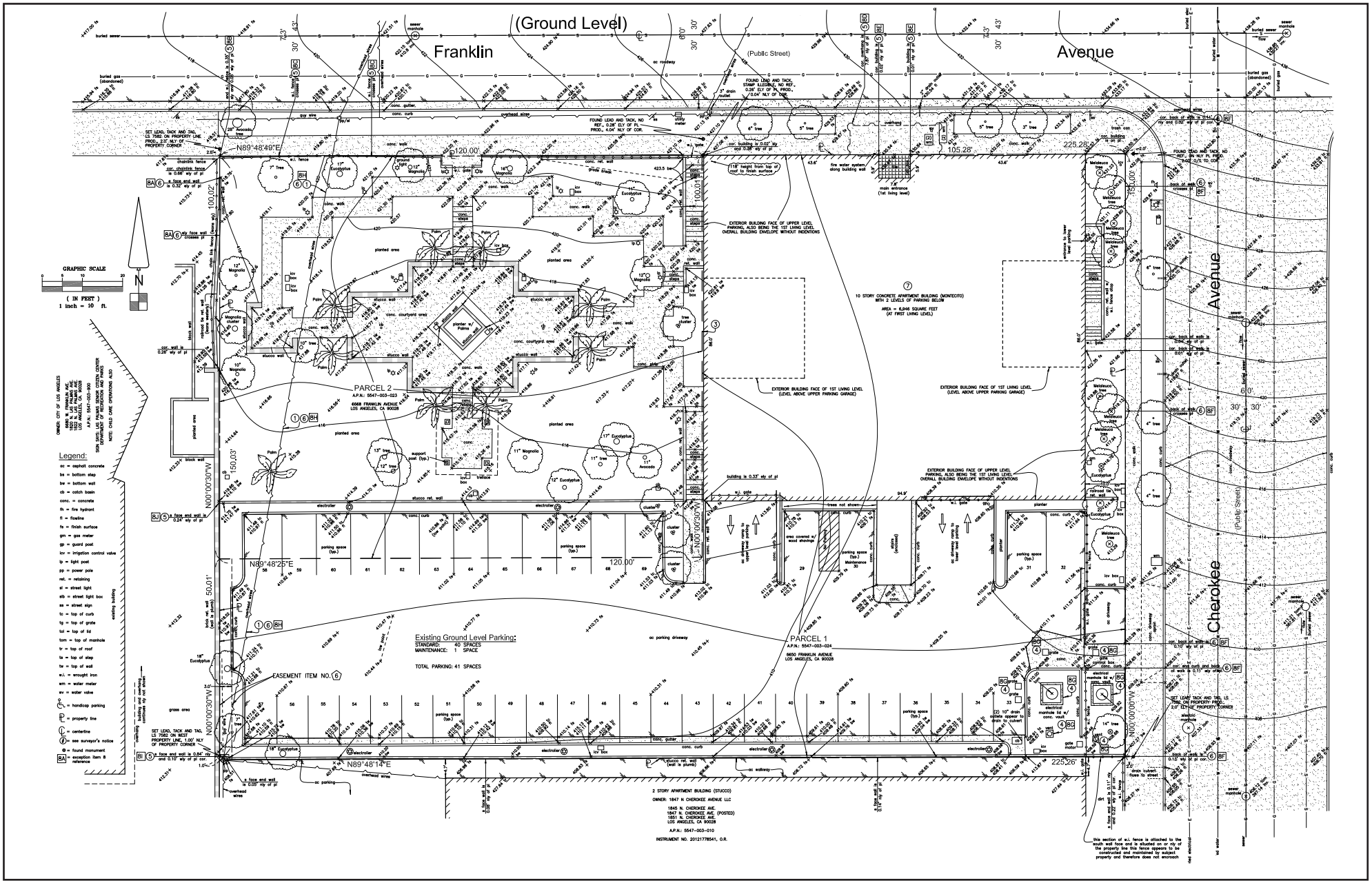
Aerial View of the Project Site



SOURCE: Thomas Safran & Associates, 2017

FIGURE **II-3**

IMPACT SCIENCES

Project Site Survey

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Project Characteristics

The Project Site is currently improved with an existing, legally non-conforming apartment building with 118 units, known as The Montecito (Building A), which is a registered National and California Historic Resource (1985). Building A is currently operated as an affordable senior living facility. No demolition is proposed to the existing building.

The Proposed Project would construct a new 6-story, 76'-8" high building with 67 affordable units for senior residents and one (1) market-rate unit for an on-site manager (Building B). Building A and Building B would be physically connected by a new common lobby providing access to both facilities and the amenities within. One unit would be modified from a one bedroom to a studio to allow for the connection from the common lobby to Building B. The total residential floor area of Building B, including corridors, lobby, and amenity areas would be 53,370 square feet. With the existing Building A at approximately 71,450 square feet, the total site's Floor Area Ratio (FAR) would be 4.57 to 1.

Vehicle parking for the Project, as well as replacement parking for the existing surface spaces displaced by the new Building B will be provided in a subterranean structure on-site. Vehicular access to the Project is proposed via the existing driveway on the west side of Cherokee Avenue.

The new Building B would contain 68 new residential units, 32 studio units and 36 one-bedroom units, ranging from approximately 420 to 520 square feet. An open plan concept is employed in the common areas of the units to maximize interior space and flexibility. This unit plan layout would maximize the natural light in all common areas offering a visual connection to the outside from the living, kitchen and dining areas. Most units would feature a minimum 50 square feet of private balcony space off the living room providing private open space for relaxing and living. The kitchens would be furnished with Energy Star rated appliances. All bathroom and plumbing fixtures will be water-conserving fixtures.

Design and Architectural Features

The new building provides a variety of architectural materials and building planes, with special attention to create a pedestrian-scaled project at the street level. The architectural design of the building references the adjacent historical Montecito Apartment building without attempting to copy the 1920's art deco theme. The building incorporates clean lines, articulated details, quality materials, and dignified presentation. The design alternates textures, colors, materials, and distinctive architectural treatments to add visual interest while avoiding dull and repetitive

facades. Prior to the issuance of a building permit, the type or categories of all exterior glass and architectural features on the building façades and rooftops would be submitted for review to the Department of Building and Safety to ensure that highly reflective materials are not utilized. The proposed landscaping plan provides a mix of ground cover and trees to compliment the architecture. Plant material has been selected for temperature hardiness and low water use.

Open Space

Per LAMC 12.21 G, the Proposed Project is required to provide 100 square feet of useable open space for each studio and one-bedroom unit for a total requirement of 6,800 square feet of total usable open space. Fifty percent of the total usable open space is required to be designed as common open space in the new Project. The existing Montecito is non-conforming as to open space and does not require the provision of open space. The Applicant proposes approximately 2,300 square feet of private open space in the form of balconies, a 1,300-square-foot indoor community room, a 500-square-foot rooftop deck, and a 2,900-square-foot courtyard at the podium level. Therefore, Building B provides 7,000 square feet of total useable open space, including 4,700 square feet of common open space. A minimum of 25 percent of the outdoor common open space will be landscaped with a palette of drought-tolerant plantings. All of the Project open space will be shared by the residents of both buildings.

Green Building and Sustainability

The Project's infill location would promote the concentration of development in a developed location with extensive infrastructure. The proposed Project's proximity to public transportation and services would aid in reducing vehicle miles traveled for residents and employees.

The building will be sustainably designed to meet and/or exceed all City of Los Angeles current building code and Title 24 requirements. As such, the Project will incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-VOC paints/adhesives, drought tolerant planting, and high performance building envelopment.

CALGreen Building Code

The 2016 California Green Building Standards Code (*CAL*Green), set forth in Part 11 of Title 24 of the California Code of Regulations, became effective on January 1, 2017. *CAL*Green sets minimum standards that all new structures must meet to minimize significantly the state's overall carbon

output. Local jurisdictions retain the administrative authority to exceed the new *CAL*Green standards.

*CAL*Green requires that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant emitting finish materials. *CAL*Green's mandatory measures establish a minimum for green construction practices, and incorporate environmentally responsible buildings into the everyday fabric of California cities without significantly driving up construction costs.

*CAL*Green also has 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 within 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.

The code uses the existing building code enforcement infrastructure to verify compliance. *CAL*Green measures are inspected and verified by local building departments, in this case the City of Los Angeles Department of Building and Safety, during permitting and construction.

Los Angeles Green Building Code

The City of Los Angeles implemented Ordinance No. 184,691 as the most recent update to the Los Angeles Green Building Code (LA Green Building Code). The LA Green Building Code is based on the 2016 *CAL*Green code discussed above. The following types of projects are subject to the LA Green Building Code:

- All new buildings (residential and non-residential)
- All additions (residential and non-residential)
- Alterations with building valuations over $200,000 (residential and non-residential)

Specific measures to be incorporated into the proposed Project to the extent feasible would include, but are not limited to:

- Recycling of asphalt, concrete, metal, wood and cardboard waste generated during demolition and construction;
- Installation of a "cool roof" that reflects the sun's heat and reduces urban heat island effect;
- Use of recycled construction materials, including recycled steel framing, crushed-concrete sub-base in parking lots, fly ash-based concrete and recycled content in joists and joist girders when feasible;
- Use of locally (within 500 miles) manufactured construction materials, where possible;
- Central tracking of waste compactor loads, ensuring that compactors are full thereby reducing trips to landfills;
- Use of energy efficient lighting;
- Use of ENERGY STAR(®)[3] appliances in residential units;
- Use of high energy efficiency rooftop heating and conditioning systems;
- 15 percent of the roof area set aside for future solar panels;
- Use of ultra-low-flow toilets and low-flow metered hand-wash faucets in public facilities;
- Use of smart irrigation systems to avoid over-watering of landscape;
- Use of indigenous and/or water-appropriate plants in landscaping; and
- Use of low-impact development measures using innovative design to filter and infiltrate stormwater runoff and reduce water sent to stormdrain systems.
- Provision of electric vehicle charging stations in the parking structure; five (5) percent of total spaces would be designated for low emitting, fuel efficient and carpool/van pool vehicles.

---

[3] *The ENERGY STAR program, developed by the US Environmental Protection Agency in 1992, is a voluntary measure intended to reduce energy consumption and improve energy efficiency, which has resulted in appliance companies, car companies, home builders, and more stepping in to create and promote more energy efficient products. For products to be designated as ENERGY STAR they must be certified by an independent third-party to provide increased energy efficiency. If the product costs more than a similar non-ENERGY STAR product the purchaser must be able to recoup their investment through utility savings.*

Security

Design Out Crime/Crime Prevention through Environmental Design

Through the City's land use and building permit process, the LAPD's Crime Prevention Unit provides guidance on design techniques for new developments to incorporate crime prevention into the development design. The techniques and process are outlined in the Design Out Crime Guidelines: Crime Prevention Through Environmental Design, and include the following basic concepts:

- Natural surveillance: The placement of physical features, activities, and people in a way that maximizes visibility.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting.
- Territorial reinforcement: The use of physical attributes to define ownership and separate public and private space.

The Proposed Project would include installation of security and fire sprinkler alarm systems that would be connected to a UL (Underwriters Laboratories Inc.) listed 24-hour monitoring station and local police and/or fire departments.

Closed circuit television (CCTV) cameras would be mounted on the building exteriors, in the various residential lobbies at plaza level and throughout all levels of the parking garage that would record activity on the property at all times. The cameras would also be connected to a computer screen in the main lobby at the daytime concierge desk.

The main and other residential lobbies at plaza level would have intercom access/controlled access. Residential parking would be gated with intercom access/controlled (card key or 'clicker') access.

Project Design Features

SEC-PDF-1: The Project Applicant will submit Site plans and building plans as necessary to the LAPD Crime Prevention Unit to ensure the design incorporates building design standards that enhance police protection and meet *Design Out Crime* Guidelines. The Project includes, but is not limited to, the following features:

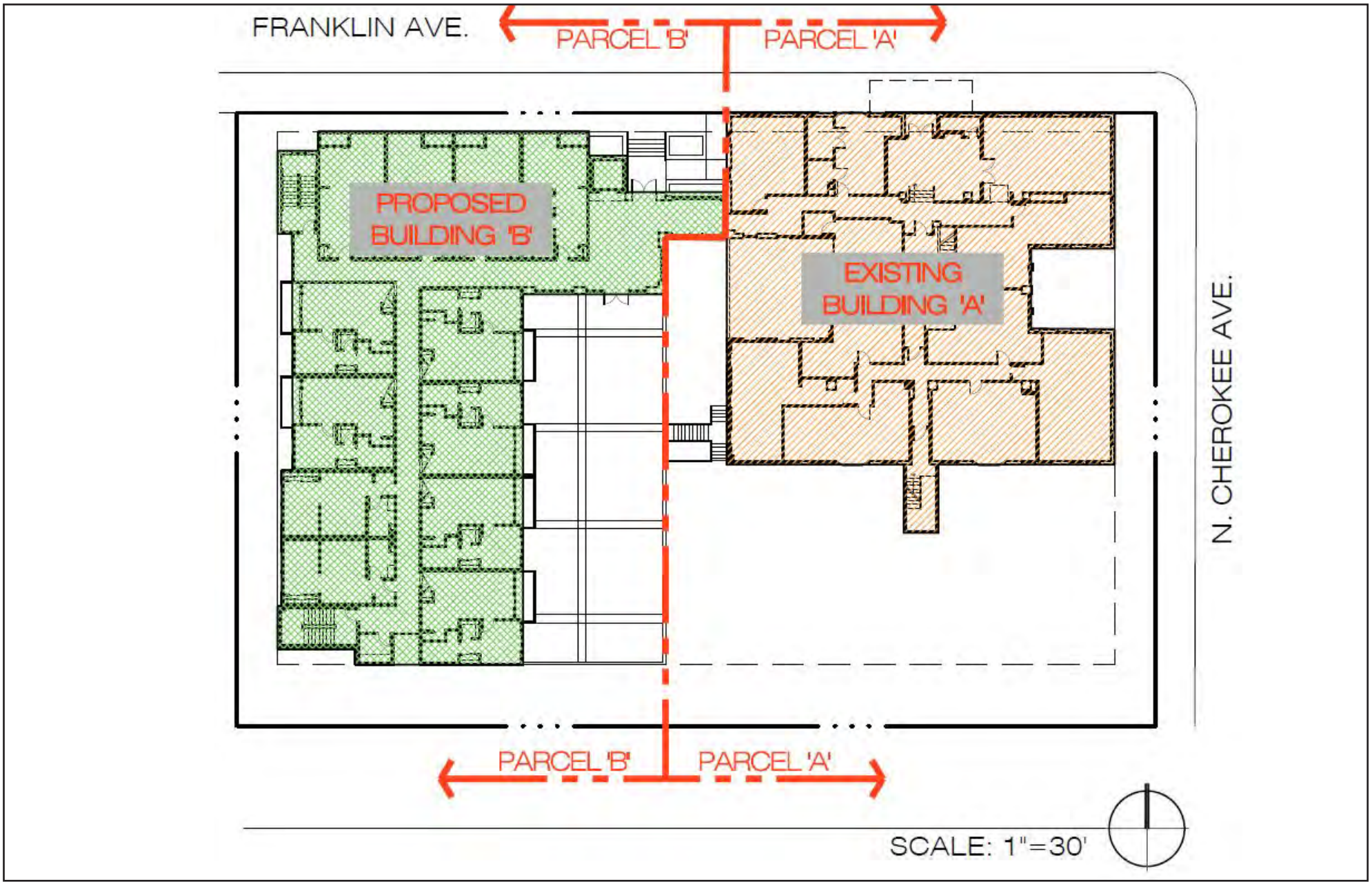
- Natural surveillance: Physical features, activities, and people gathering areas are placed in a way that maximizes visibility.
- Mix of uses that provide good visual connection between uses, and no ambiguous unassigned spaces.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting, which provide nighttime vision for pedestrians, homeowners and business people to permit pedestrians to see one another.
- Clear well-lit paths from the street to the development through parking and landscape areas and within the development to building entries.
- Territorial reinforcement: The establishment of the building perimeter creates physical attributes to define ownership and separate public and private spaces.

SEC-PDF-2: During construction, security measures will be provided including security fencing, lighting, and locked entries around the construction zones.

PROJECT CONSTRUCTION

The Proposed Project construction would take approximately 20 months.

Construction worker parking and building material laydown during construction of the Proposed Project would take place on the Project Site.

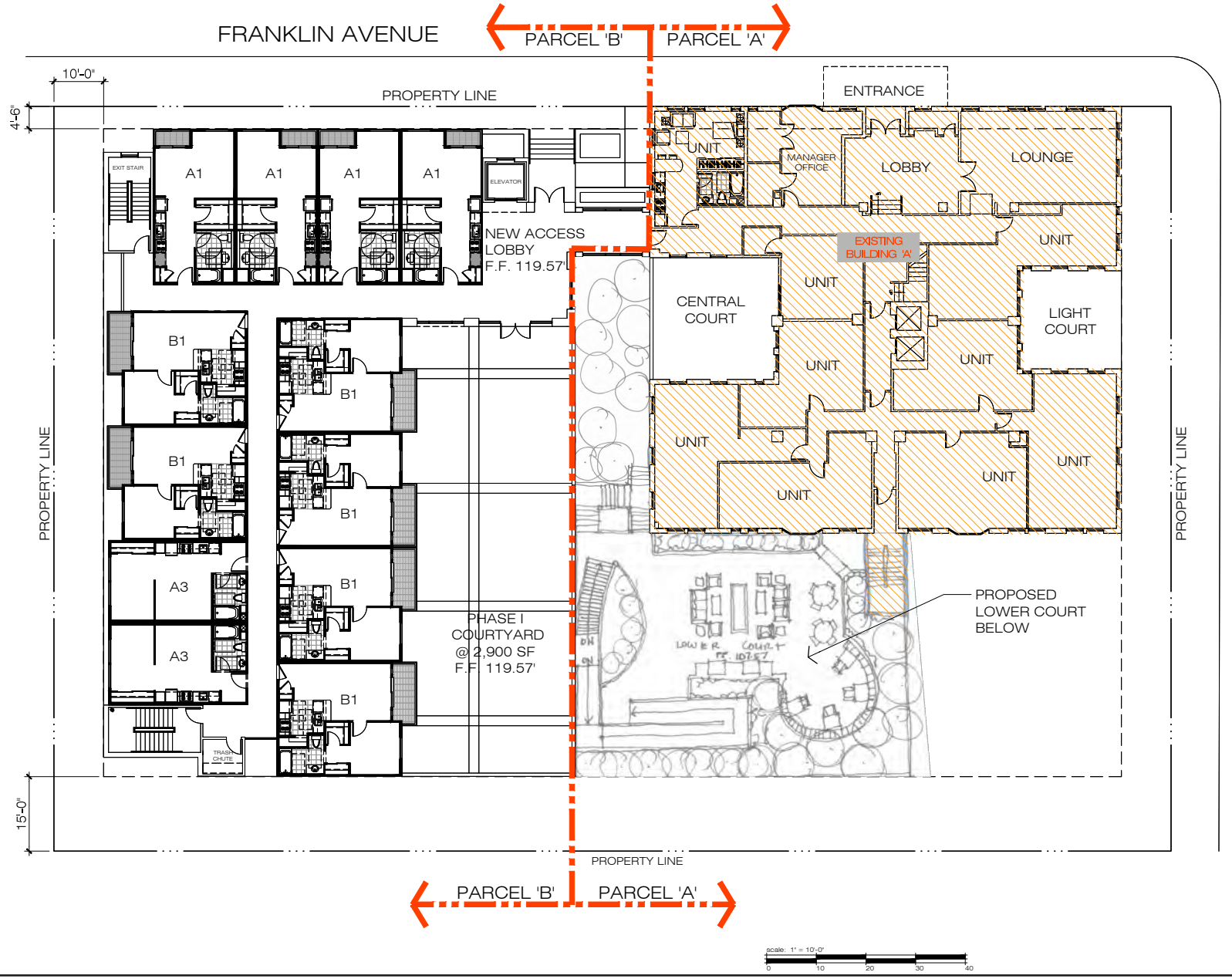


SOURCE: Thomas Safran & Associates, 2017

FIGURE **II-4**

IMPACT SCIENCES

Project Site Plan



SOURCE: Thomas Safran & Associates, 2017

FIGURE **II-5**

IMPACT SCIENCES

Ground Floor Plan

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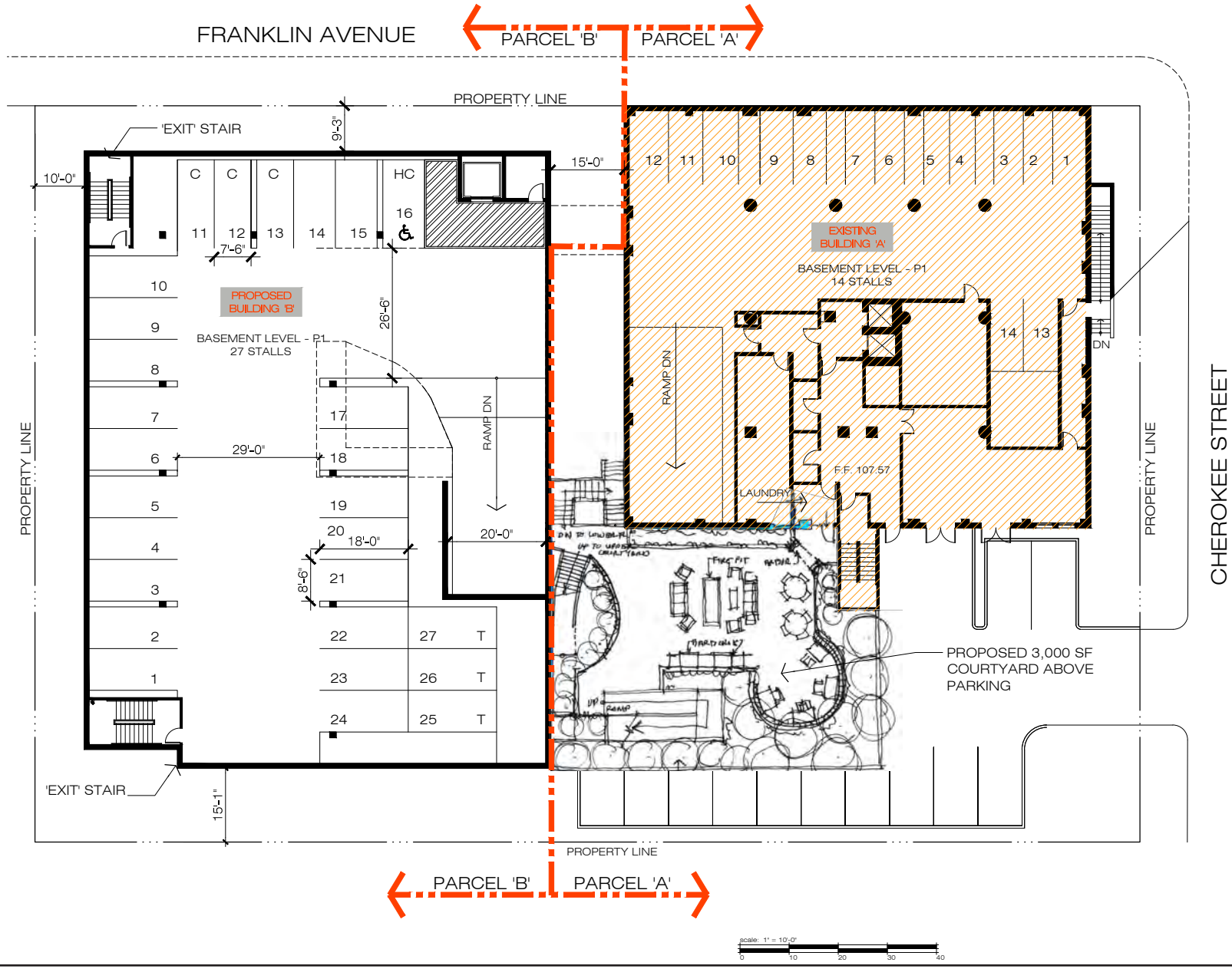

SOURCE: Thomas Safran & Associates, 2017

FIGURE **II-6**

IMPACT SCIENCES

Basement Level (Upper) Plan

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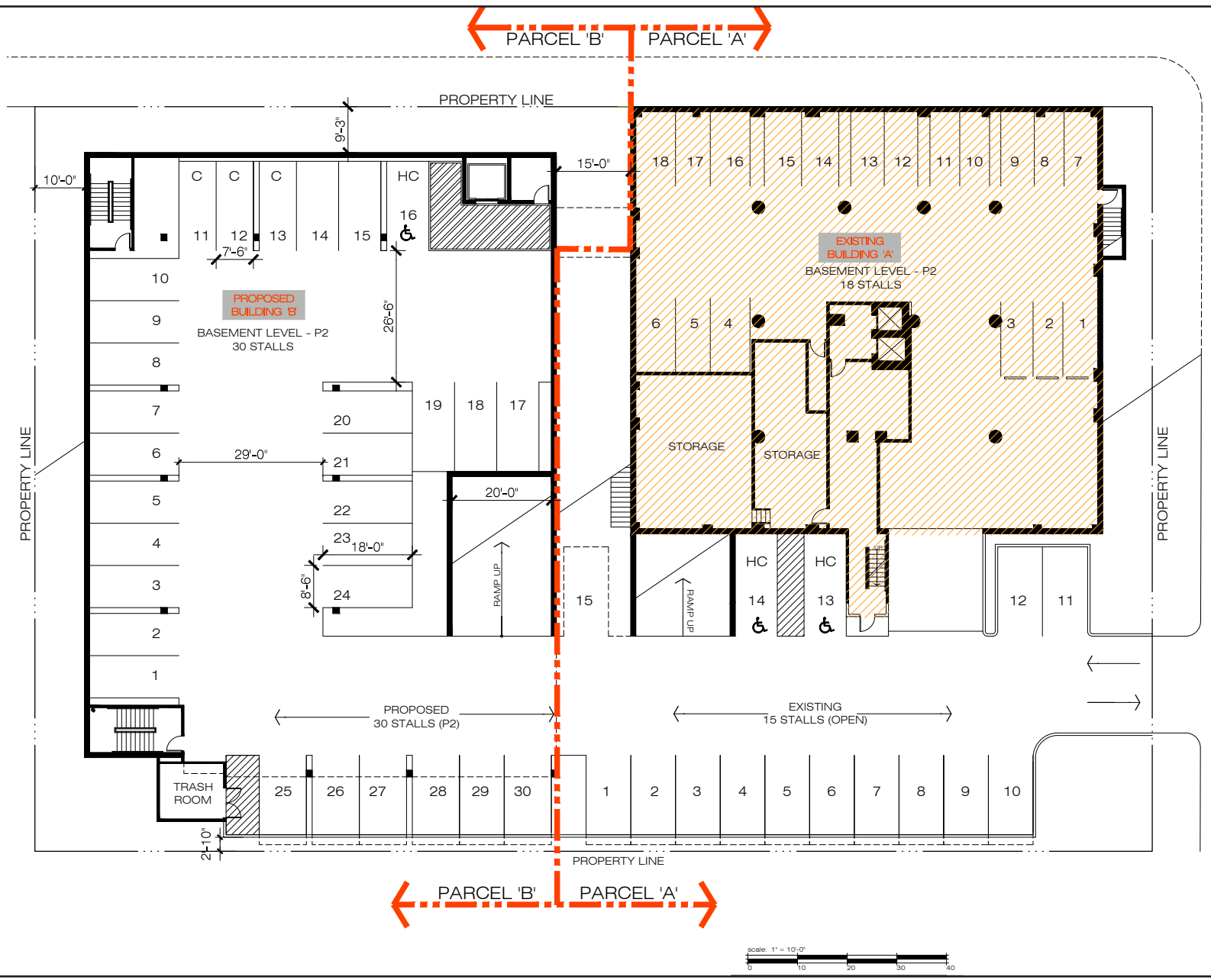
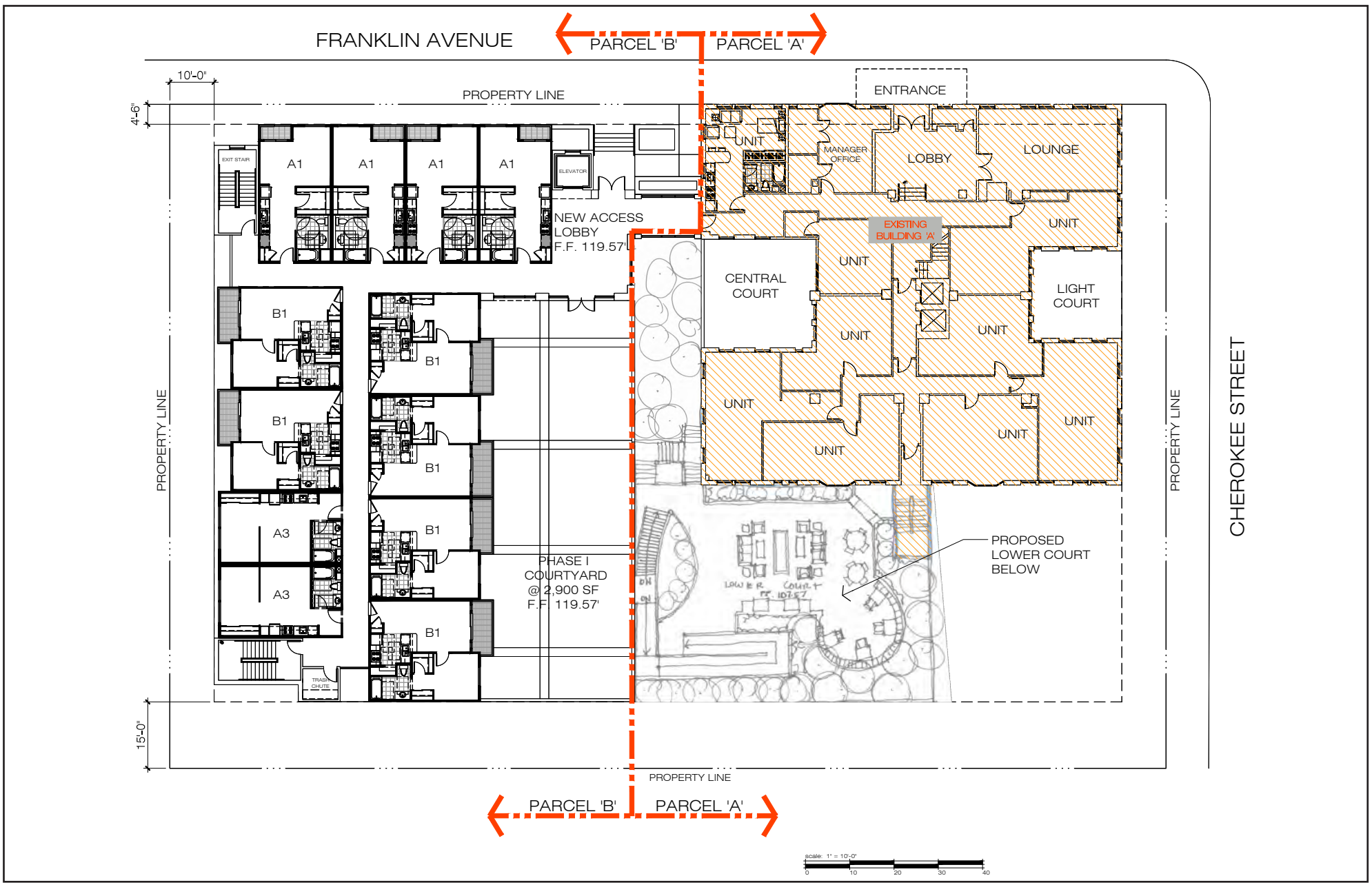


SOURCE: Thomas Safran & Associates, 2017

FIGURE **II-7**

IMPACT SCIENCES

Basement Level (Lower) Plan



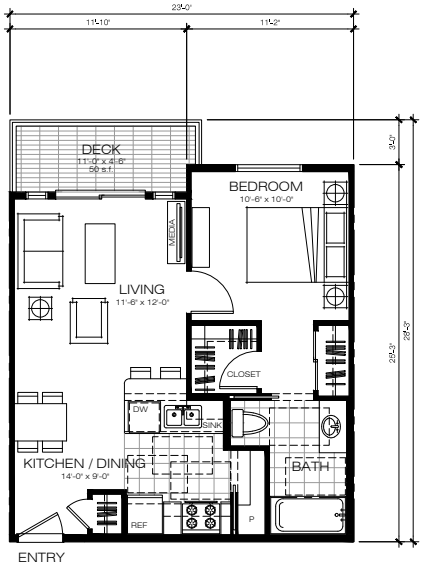
SOURCE: Thomas Safran & Associates, 2017

FIGURE **II-8**

IMPACT SCIENCES

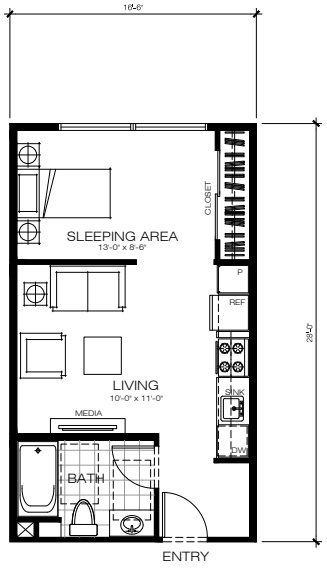
Typical Upper Story Floor Plan

1291.001•09/17



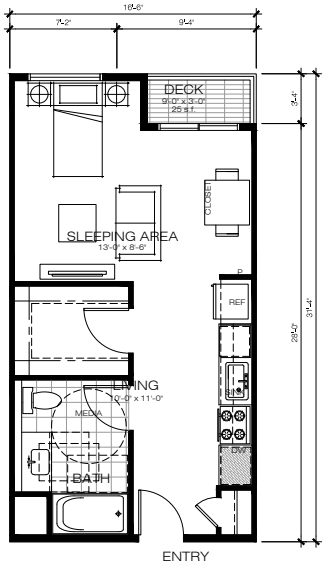
UNIT B-1

1BEDROOM / 1 BATH
NET UNIT SF = 520 S.F.
DECK AREA = 50 S.F.



UNIT A-2

STUDIO / 1 BATH
NET UNIT SF = 420 S.F.
DECK AREA = N/A



UNIT A-1

STUDIO / 1 BATH
NET UNIT SF = 440 S.F.
DECK AREA = 25 S.F.

SOURCE: Thomas Safran & Associates, 2017

FIGURE **II-9**

Typical Unit Plans

IMPACT SCIENCES

SOURCE: Thomas Safran & Associates, 2017

FIGURE **II-10**

IMPACT SCIENCES

Franklin Avenue Elevation

1. VIEW ON FRANKLIN AVENUE LOOKING EAST

scale: 1" = 10'-0"
0 10 20 30

SOURCE: Thomas Safran & Associates, 2017

FIGURE **II-11**

IMPACT SCIENCES

Franklin and Las Palmas Elevation

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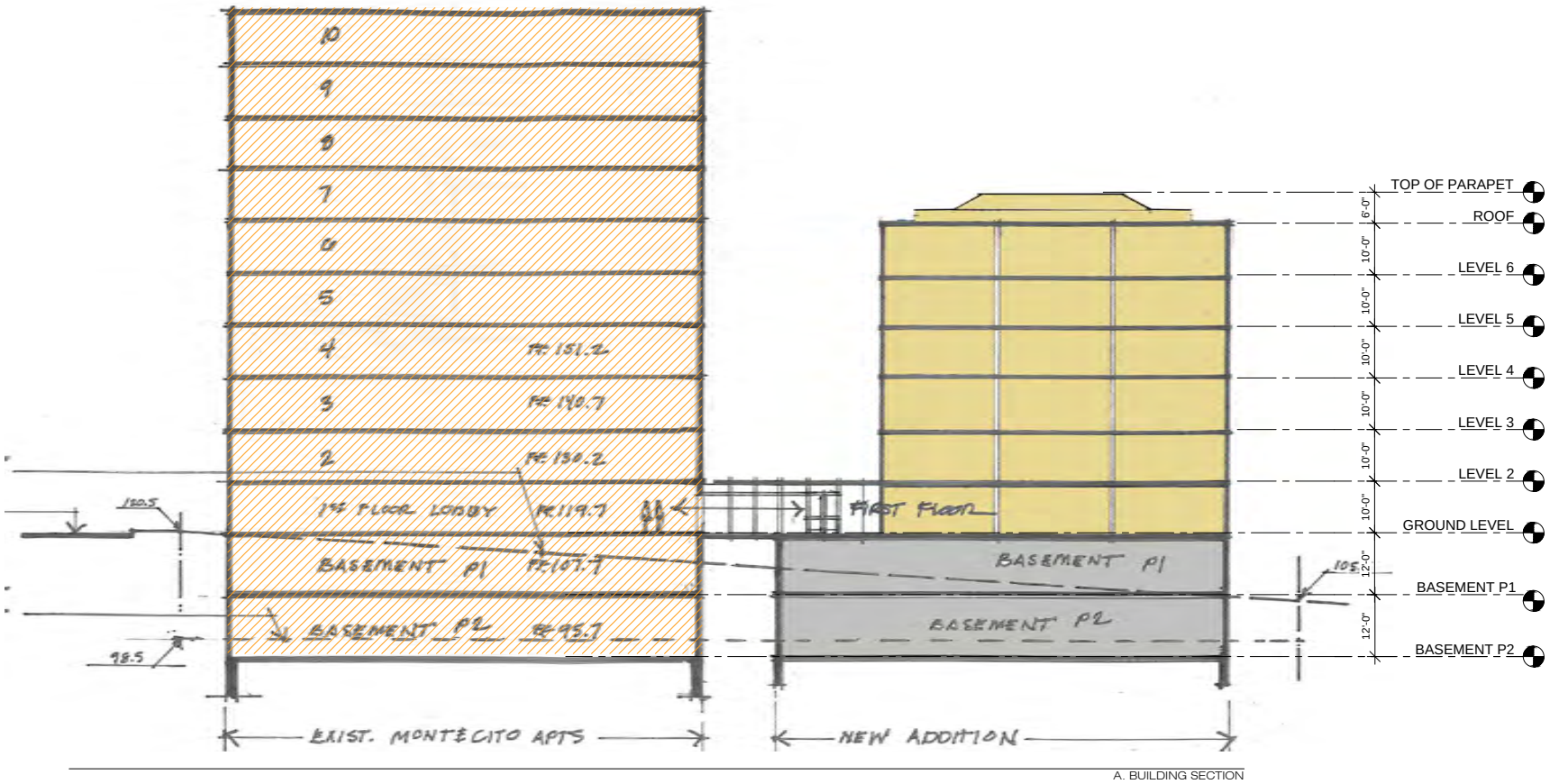


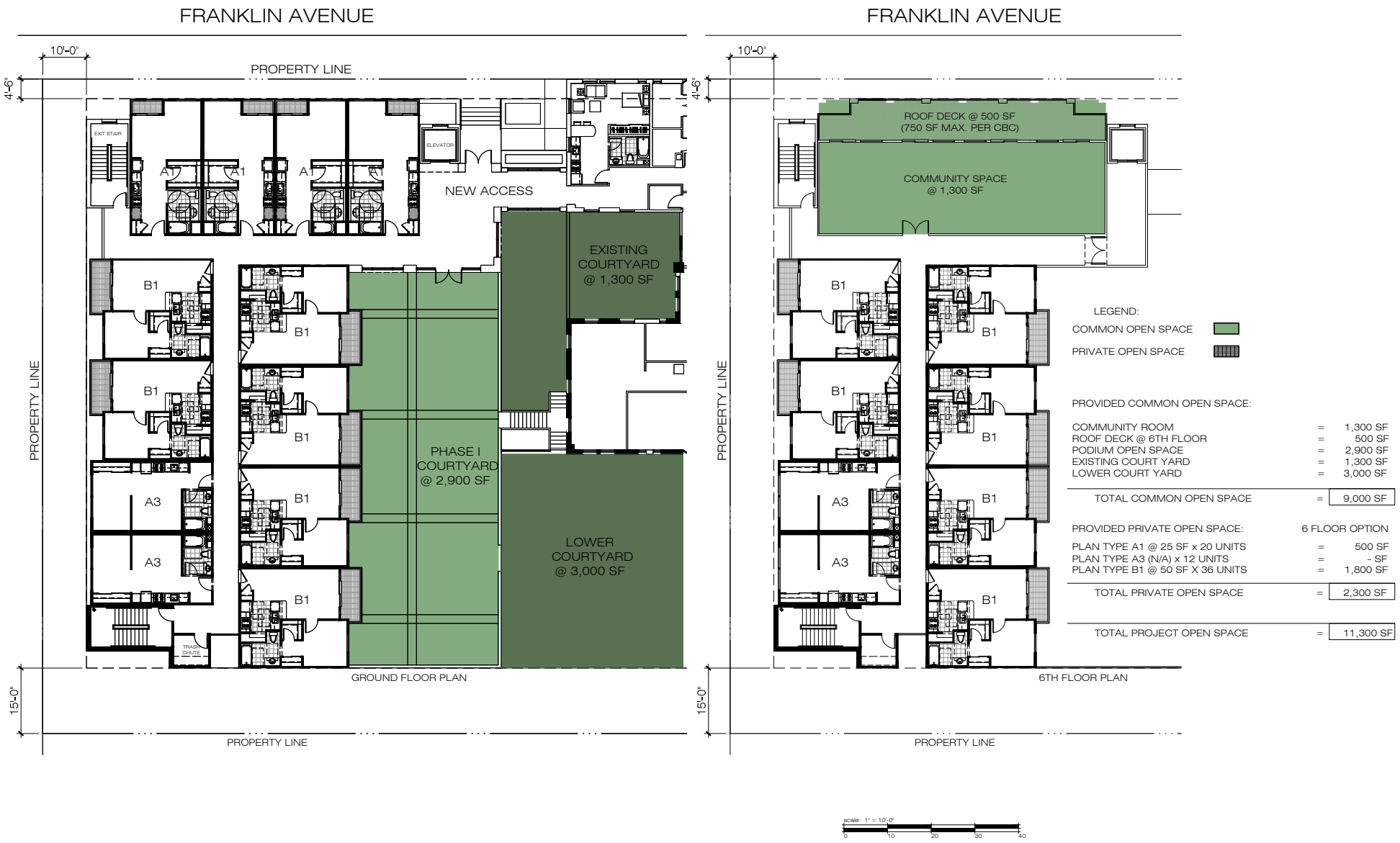
A. BUILDING SECTION

SOURCE: Thomas Safran & Associates, 2017

FIGURE **II-12**

IMPACT SCIENCES

Project Building Sections



SOURCE: Thomas Safran & Associates, 2017

FIGURE **II-13**

Project Open Space Diagram

IMPACT SCIENCES

PROJECT OBJECTIVES

The Site is designated High Density Residential by the Hollywood Community Plan. The Project advances a number of specific goals and objectives of the Community Plan:

HOUSING. *The intensity of residential land use in this Plan and the density of the population which can be accommodated thereon shall be limited in accordance with the following criteria:*

> *The adequacy of the existing and assured circulation and public transportation systems within the area;*

Complies. As an infill development site, the property has outstanding access to community resources, particularly public transportation. The site is serviced by the DASH Hollywood line, directly abutting the property. Additionally, there are several major bus routes running along Franklin Avenue, Highland Avenue, Hollywood Boulevard and Cahuenga Boulevard. The Project Site is less than one-half mile from the Hollywood/Highland Station of the Metro Red Line. The Project Site's proximity to Highway 101, Hollywood Boulevard, and Highland Avenue also ensures adequate access to arterials roads and freeways for regional vehicular travel.

> *The availability of sewers, drainage facilities, fire protection services and facilities, and other public utilities;*

Complies. As an infill development site, the property has existing connections to sewer and drainage facilities, and is served by Los Angeles Fire Department, Fire Station 27 (1327 Cole Avenue - 1 miles from Project Site) and the Los Angeles Police Department, Hollywood Division (1358 N. Wilcox Avenue – 0.9 miles from Project Site).

> *The steepness of the topography of the various parts of the area, and the suitability of the geology of the area for development.*

Complies. The Project Site is located on a sloping site improved with an existing residential building and surrounding by other multi-family residential buildings and is therefore suitable for the development of multi-family residential uses. A full seismic hazard study has been conducted on the site including trenching required for a project in an Alquist-Priolo Zone and has cleared the Project Site for development by LADBS.

Additional low and moderate-income housing is needed in all parts of this Community. Density bonuses for provision of such housing through Government Code 65915 may be granted in the Low-Medium I or less restrictive residential categories.

Complies. The Proposed Project is in an area designated for High Density Residential uses and surrounding by other medium- and high-density residential development. The Proposed Project is using Government Code 65915 to achieve development waivers that will produce 67 new affordable senior housing units in the Hollywood Community Plan Area.

GENERAL PLAN FRAMEWORK ELEMENT

Policy 3.1.4: *Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram (Figures 3-1 to 3-4) and Table 3-1.*

According to the General Plan Framework Long-Range Land Use Diagram for the Metro Subarea (Figure 3-1), the Project site is located in or adjacent to a designated Regional Center around the intersection of Hollywood Boulevard and La Brea Avenue. Residential development in proximity of these Regional Centers will shorten and lessen the need for vehicle trips and vehicle miles traveled. Thus, the Project is consistent with Policy 3.1.4 of the General Plan Framework.

Furthermore, Chapter 4 outlines Goals, Objectives and Policies with regard to Housing in the City of Los Angeles:

Goal 4A: *An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*

Objective 4.1: *Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City sub-region to meet the projected housing needs by income level of the future population to the year 2010.*

Policy 4.1.1: *Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City sub-region to meet the twenty-year projections of housing needs.*

Policy 4.1.6*: Create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City.*

HOUSING ELEMENT

The Housing Element of the General Plan provides land use policies and programs that encourage development of affordable housing across the City. The Project is consistent with the following policies of the Housing Element of the General Plan:

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.*

The fastest growing age group aligns broadly with the "baby boom" generation, which is currently between about 45 and 65 years old. There are about 190,000 more people in the City within this age group, compared to 10 years ago. In fact, the number of "new seniors" (from 2000 to 2010) increased faster in the Los Angeles region than New York or any other metropolitan area[4] (p. 1-5).

According to demographers, the next decade will be marked by growth of households without children, primarily by those headed by householders aged 55 and older[5]. While the City's overall population is projected to increase by about 4.5% between 2010 and 2020, its senior population (65 and older) is expected to grow by approximately 45% percent during this time period (to approximately 562,992).[6] By 2020, seniors are expected to account for more than 14% of the City's households, compared to 10.5% in 2010. This far exceeds the growth of any other age groups in the City. The increasing numbers of older Angelenos will have important effects on the demand for housing to come (p.1-6).

Older adults over the age of 65 own their homes at the highest rate of any age group (58%).[7] While most are likely to want to stay in their homes as long as they can, many older adults may seek out alternative housing options. When seniors move, they are most likely to move into rental apartments. Statewide projections for California indicate that, of those turning 65 in 2011,

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[4] *Referenced in the Housing Element: Mcllwain, John K "Seniors: In Which Metro Region are They Living?" Urban Land Institute February 23, 2012 http://urbanland uli org/ Articles/2012/Feb/McIlwainSeniors1*

[5] *Referenced in the Housing Element: Nelson, Arthur C "The New California Dream: How Demographic and Economic Trends May Shape the Housing Market," Urban Land Institute, Washington DC (2011)*

[6] *Referenced in the Housing Element: Economic Roundtable "Affordable Housing Benefit Fee Study" (2011) Underwritten by the HCIDLA and DCP*

[7] *Referenced in the Housing Element: U S Census Bureau 2010 Census, Tenure by Age of Householder SF1*

approximately 60% will have moved into apartments by 2029[8]. The additional demand placed on the City's rental stock by the aging population will be highly significant. (p. 1-18)

Seniors should have options allowing them to live in the most integrated setting possible. To provide for this, a full spectrum of affordable housing is needed, from conventional residences to transitional and permanent supportive housing, including group, congregate, and independent housing. Independent, supported living in the most integrated setting possible is preferable, either through individual or shared single-family homes or apartments, providing each individual with his/her own bedroom and optional access to support services and auxiliary amenities. Persons who use wheelchairs need affordable, conveniently-located housing which has been specially adapted for wheelchair accessibility, along with other physical needs (p. 1-22). The Project seeks to provide these options, by expanding the number of affordable units for seniors and augmenting the existing Montecito Senior Apartments.

DISCRETIONARY ACTIONS

The Proposed Project would require the following discretionary actions from the City of Los Angeles Department of City Planning and other governmental agencies:

- A **Density Bonus** (DB) pursuant to CA Government Code Section 65915(f)(3) and LAMC Section 12.22.A.25 to permit a Senior Residential Housing Development Project with 118 existing non-conforming units and 68 new units, dedicating 99% of proposed units restricted to Low and Very Low Income Households in exchange for the following incentives:
    - An **On-Menu Incentive** for an increase in height to permit a new building with 76-feet, 8-inches in height in lieu of the otherwise permitted 72-foot height limit pursuant to Ordinance 165,656 and LAMC 12.21.1 B.2 for a site with more than 20 feet of grade change;
    - An **Off-Menu Incentive** for a decrease in yards to permit a 4-foot, 6-inch northerly side yard fronting Franklin Boulevard in lieu of the otherwise required 9-foot front yard for a 6-story building pursuant to LAMC 12.11 C.2;

[8] *Referenced in the Housing Element: Nelson, Arthur C "The New California Dream: How Demographic and Economic Trends May Shape the Housing Market," Urban Land Institute, Washington DC (2011)*

- An **Off-Menu Incentive** for a decrease in yards to permit a 10-foot rear yard in lieu of the otherwise required 18-foot rear yard for a 6-story building pursuant to LAMC 12.11 C.3;

- A **Conditional Use Permit** (CUP) to permit pursuant to 12.24 U.26, to permit a housing development project with a density increase greater than the maximum permitted in LAMC 12.22 A.25, for a total of 186 units;

- A **Site Plan Review** (SPR) pursuant to LAMC 16.05 C, to permit the construction, use, and maintenance of more than 50 new residential units;

- A **Preliminary Parcel Map** (PMLA) pursuant to LAMC 17.50, a to permit the merger and re-subdivision of five (5) ground lots into one (1) ground lot and two (2) air space lots;

- Adoption of the **Sustainable Communities Environmental Assessment** (SCEA); and

- Approval of other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits.

III. TRANSIT PRIORITY PROJECTS CONSISTENCY ANALYSIS

I. SUSTAINABLE COMMUNITIES STRATEGY		
	Yes	No
The project is consistent with the general land use designation, density, building intensity, and applicable policies specified for the project areas in SCAG's adopted Sustainable Communities Strategy.	**X**	
II. TRANSIT PRIORITY PROJECT		
To be considered a Transit Priority Project (TPP) as defined by PRC Section 21155(b), the project must meet all of the following criteria.		
	Yes	No
Based on total building square footage, the project contains at least 50 percent residential use.	**X**	
AND, if the project contains between 26 percent and 50 percent non-residential uses, the Floor Area Ratio (FAR) is greater than 0.75.	**n/a**	
The project includes a minimum net density of at least 20 dwelling units per acre.	**X**	
The project site is located within one-half mile of either the following which have been included in the SCAG Regional Transportation Plan: (a) a major transit stop that contains an existing rail station, a ferry terminal served by transit, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during peak commute periods; or (b) a high quality transit corridor that has fixed route bus service with service intervals no longer than 15 minutes during peak commute hours.	**X**	

1. SENATE BILL 375

The State of California adopted Senate Bill (SB) 37, the Sustainable Communities and Climate Protection Act of 2008, to outline growth strategies and better integrate regional land use and transportation planning which will help the State meet its greenhouse gas reduction mandates. SB 375 requires that State's 18 metropolitan planning organizations to incorporate a "sustainable communities strategy" with the regional transportation plans to achieve their respective region's greenhouse gas emission reduction targets set by the California Air Resources Board (CARB). The Southern California Association of Governments (SCAG) is the metropolitan planning organization that has jurisdiction over the Project site.

SCAG adopted the 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy (2016 RTP/SCS) on April 7, 2016. For the SCAG region, CARB has set greenhouse gas reduction

targets to eight percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035. The 2016 RTP/SCS outlines strategies to meet or exceed the targets set by ARB.[1]

2. TRANSIT PRIORITY PROJECT CRITERIA

SB 375 provides CEQA streamlining benefits to transit priority projects (TPPs). A TPP is a project that meets the following four criteria (See Public Resources Code Section (PRC §) 21155 (a) and (b)):

1. Be consistent with the use designation, density, building intensity, and applicable policies specified for the project area in either a sustainable communities strategy or an alternative planning strategy, for which the CARB has accepted a metropolitan planning organization's determination that the sustainable communities strategy or the alternative planning strategy would, if implemented achieve the greenhouse gas emission reduction targets established by CARB;
2. Contains at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent of the 50 percent nonresidential uses, a floor area ratio of not less than 0.75;
3. Provide a minimum net density of at least 20 units per acre; and
4. Be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

Consistency with Criterion #1

On April 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy *(RTP/SCS):* A Plan for Mobility, Accessibility, Sustainability, and a High Quality of Life. The *RTP/SCS* is the culmination of a multi-year effort involving stakeholders from across the SCAG Region. The 2016-2040 *RTP/SCS* balances the Southern California region's future mobility and housing needs with economic, environmental, and public health goals. On June 28, 2016, ARB accepted SCAG's quantification of GHG emission reductions from the 2016-2040 *RTP/SCS* and determined that the 2016-2040 *RTP/SCS*

[1] *Southern California Association of Governments, 2016-2040 Regional Transportation Plan / Sustainable Communities Strategy, Introduction, April* 19, *2012.*

would, if implemented, achieve the 2020 and 2035 GHG emission reduction targets established by ARB.[2]

Use Designation, Density, and Building Intensity

The Project Site area is located within an Urban Land Development Category. The 2016-2040 *RTP/SCS* describes the Urban Land Development Category as:

> *These areas are often found within and directly adjacent to moderate and high density urban centers. Nearly all urban growth in these areas would be considered infill or redevelopment. The majority of housing is multifamily and attached single-family (townhome), which tend to consume less water and energy than the larger types found in greater proportion in less urban locations. These areas are supported by high levels of regional and local transit service. They have well-connected street networks, and the mix and intensity of uses result in a highly walkable environment. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.*[3]

The Proposed Project would be consistent with the Urban Land Use Development Category. The Proposed Project is located within a highly urbanized area within the City of Los Angeles, within the Hollywood Community Plan Area. The Proposed Project is an infill multi-family residential project that would provide 68 net new housing units. The Proposed Project is located within a High Quality Transit Area (HQTA) as defined by SCAG and a Transit Priority Area (TPA) as defined by SB 743, which supports transit opportunities and promotes a walkable environment. Additionally, access to the Project Site is served by a well-connected street network, which consists of a grid pattern as is most of the City of Los Angeles. As such, the Proposed Project is highly connected and provides accessibility for persons who choose not to drive or do not have access to a vehicle.

The 2016-2040 RTP/SCS further demonstrates that HQTAs may include high-density development, support pedestrian and bike infrastructure, reduce parking requirements, and retain affordable housing near transit. The Proposed Project is an affordable senior housing project, which includes 68 units. The Proposed Project promotes pedestrian activity and

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2 *ARB Executive Order No. 16-066*

3 Southern California Association of Governments, *Final 2016-2040 Regional Transportation Plan/ Sustainable Communities Strategy*, Adopted April 2016, Chapter 2, 'Where We Are Today', http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_02_WhereWeAreToday.pdf, page 20, accessed January 8, 2018.

bicycling activity by providing landscaping along the public right-of-way, outdoor courtyard area, and outdoor green space and walking paths.

The Proposed Project would restrict 67 out of its proposed 68 units as senior citizen, Very Low Income units. The Proposed Project would provide parking that is consistent with LAMC standards. Therefore, the Proposed Project is similar to other developments within HQTAs.

The RTP/SCS includes various urban footprint place types, including mixed use, residential, commercial, office, research and development, industrial, civic and open space.[4] The Proposed Project is consistent with the 'Urban Residential' place type within the urban land development category:

> *"The most intense residential-focused type, Urban Residential areas are typically found within or adjacent to major downtowns. They include high- and mid-rise residential towers, with some ground-floor retail space. Parking usually structured below or above ground. Residents are well served by transit, and can walk or bicycle for many of their daily needs."*

The land use mix for this place type is typically approximately 64 percent residential, 4 percent employment, 12 percent mixed use, and 21 percent open space/civic. The residential mix is 100 percent multifamily. The average total net Floor Area Ratio (FAR) is 9.0, floors range from 5-60 feet, and the gross density ranges from 0-50+ employees per acre and 75-500+ households per acre.[5]

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4 Southern California Association of Governments, *2016-2040 RTP/SCS Background Documentation*, 'Place Types Categorized Into Land Development Categories (LDCs); SCAG 2016-2040 RTP/SCS, Urban Footprint Place Types, http://scagrtpscs.net/Documents/2016/draft/d2016RTPSCS_SCSBackgroundDocumentation.pdf, accessed January 8, 2018.

5 Southern California Association of Governments, *2016-2040 RTP/SCS Urban Footprint Place Types Summary*, page 1, http://scagrtpscs.net/documents/2016/supplemental/UrbanFootprint_PlaceTypesSummary.pdf, accessed January 8, 2018.

Table III-1
SCAG Population and Housing Projections for the
City of Los Angeles, Los Angeles County, and the SCAG Region

Population			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City	3,845,500	4,609,400	20
Los Angeles County	9,923,000	11,514,000	16
SCAG Region	18,322,000	22,138,000	21
Households			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City	1,325,500	1,690,300	28
Los Angeles County	3,257,000	3,946,000	21
SCAG Region	5,885,000	7,412,000	26
Employment			
Region	**2012**	**2040**	**% Growth (2012-2040)**
Los Angeles City	1,696,400	2,169,100	28
Los Angeles County	4,246,000	5,226,000	23
SCAG Region	7,440,000	9,872,000	33

Source: SCAG, adopted 2016-2040 RTP/SCS Growth Forecast, Demographics and Growth Forecast Appendix, adopted April 2016.

Based on the Hollywood Community Plan Area's current household (e.g., an average of 2.74 persons per multi-family household for the Hollywood Community Plan area), the construction of 68 new multi-family residential dwelling units[6] would result in a potential increase of approximately 186 net new residents in the City of Los Angeles. The proposed increase in housing units and population would be consistent with SCAG's forecast of 364,800 additional households and approximately 763,900 persons in the City of Los Angeles between 2012 and 2040.

6 There would be a total of 67 new senior housing units and one unit set aside for an on-site manager. Thus the number of potential new residents presented is a worst-case scenario, given that the senior housing units will in all likelihood be occupied by a maximum of two persons, and in many cases by a sole occupant. Census statistics show that average household size decreases with age, especially after age 45, and is below two persons per household for households over age 65. National Association of Home Builders 50+ Housing Council, *Approving 55+ Housing: Facts That Matter*, https://www.winchester.us/DocumentCenter/View/1182, accessed October 16, 2017.

Applicable Policies Specified for the Project Area

The Proposed Project is consistent with SCAG's growth projections for the City of Los Angeles, which supports the conclusion that the Proposed Project is consistent with SCAG policies. Refer to Section V, Sustainable Communities Environmental Assessment, Section 13, Population and Housing, for a discussion on the Proposed Project's consistency with SCAG's population and housing growth. The Proposed Project would be consistent with applicable goals and policies presented within SCAG's 2016-2040 RTP/SCS. Refer to Table III-2 below for the Proposed Project's consistency analysis.

Table III-2
Consistency Analysis with the
2016-2040 Regional Transportation Plan / Sustainable Community Strategy

Goals and Policies	Consistency Assessment
2016-2040 RTP/SCS Goal 1: Align the plan investments and policies with improving regional economic development and competitiveness.	**Not Applicable.** This Goal is directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project.
2016-2040 RTP/SCS Goal 2: Maximize mobility and accessibility for all people and goods in the region.	**Consistent.** The Project Site is located in a highly urbanized area in the City of Los Angeles within a High Quality Transit Area (HQTA)[7] and a Transit Priority Area (TPA). The Proposed Project would develop 67 affordable units for seniors, one (1) market-rate unit for an on-site manager, 32 studio units, and 36 one-bedroom units. The Project Site is located less than one-half mile from the intersection of two major bus lines, 217 and 780 Metro, with frequency of service intervals of 20 minutes or less during peak commute periods. The Project Site is also located less than one-half mile of the Metro Red Line Hollywood/Highland station. The Proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal.

7 *As defined by SCAG, a High Quality Transit Area features frequent transit service and/or major transit stations. http://scagrtpscs.net/SiteAssets/ExecutiveSummary/assets/resources/Exhibit5-1_HighQualityTransitAreaInTheSCAGregionFor2040Plan.pdf, accessed September 12, 2018*

Goals and Policies	Consistency Assessment
2016-2040 RTP/SCS Goal 3: Ensure travel safety and reliability for all people and goods in the region.	**Not Applicable/Consistent.** While not necessarily applicable on a project-specific basis, the Project would support this action/strategy improving local access, with appropriate design considerations to ensure travel safety and reliability.
2016-2040 RTP/SCS Goal 4: Preserve and ensure a sustainable regional transportation system.	**Not Applicable.** This goal is directed towards SCAG and dos not apply to the Proposed Project. The 2016-2040 RTP states, "A transportation system is sustainable if it maintains its overall performance over time in an equitable manner with minimum damage to the environment, and at the same time does not compromise the ability of future generations to address their transportation needs. Sustainability, therefore, pertains to how our decisions today impact future generations. One of the measures used to evaluate system sustainability is the total inflation-adjusted cost per capita to maintain our overall multimodal transportation system performance at current conditions. The 2016 RTP/SCS includes two additional new measures to support this outcome: State Highway System pavement condition and local roads pavement condition."[8] As discussed in the Proposed Project's Traffic Study, the Proposed Project would create a less than significant impact at any of the study intersections.
2016-2040 RTP/SCS Goal 5: Maximize the productivity of our transportation system.	**Consistent.** The Proposed Project includes 68 new multi-family residential units and is located close to a variety of transit options as a mode of transportation to and from the Project Site. Thus, the Proposed Project will contribute to the productivity and use of the regional transportation system by providing housing near transit. Moreover, as discussed in the Proposed Project's Traffic Study, the Proposed Project would have a less than significant impact at all of the study intersections.

8 *SCAG, 2016-2040 RTP/SCS, April 2016 (page 164).*

Goals and Policies	Consistency Assessment
2016-2040 RTP/SCS Goal 6: Protect the environment and health of our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking).	**Consistent.** The Proposed Project would place new residential units in a HQTA and a TPA. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking and the use of public transportation.
2016-2040 RTP/SCS Goal 7: Actively encourage and create incentives for energy efficiency, where possible.	**Consistent.** The Proposed Project would comply with the City of Los Angeles Green Building Code, the California Green Building Standards Code (CALGreen), and the Project will incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-VOC paints/adhesives, drought tolerant planting, and high performance building envelopment.
2016-2040 RTP/SCS Goal 8: Encourage land use and growth patterns that facilitate transit and active transportation.	**Consistent.** As stated above, the Project Site is located in a highly urbanized area in the City of Los Angeles within a HQTA and a TPA. The Project Site is located less than one-half mile from the intersection of two major bus lines, 217 and 780 Metro, with frequency of service intervals of 20 minutes or less during peak commute periods. The Project Site is also located less than one-half mile of a Metro Red Line station. The Proposed Project would provide residents and visitors with convenient access to public transit and opportunities for walking and biking. The location of the Proposed Project encourages a variety of transportation options and access and is therefore consistent with this Goal as well.
2016-2040 RTP/SCS Goal 9: Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies.	**Not Applicable.** This goal is directed towards SCAG to ensure the safety and security of the regional transportation system. No further discussion is required.

Goals and Policies	Consistency Assessment
2016-2040 RTP/SCS Guiding Policy 1: Transportation investments shall be based on SCAG's adopted regional Performance Indicators.	**Not Applicable.** This policy is directed towards SCAG in allocating transportation investments. This goal does not apply to the individual development projects and no further analysis is required.
2016-2040 RTP/SCS Guiding Policy 2: Ensuring safety, adequate maintenance and efficiency of operations on the existing multimodal transportation system should be the highest RTP/SCS priorities for any incremental funding in the region.	**Not Applicable.** This policy is directed towards SCAG in allocating transportation system funding. Nevertheless, the Proposed Project would contribute to a safe, well maintained, and efficient multimodal transportation system. As discussed in the Proposed Project's Transportation Analysis[9], the Proposed Project would create a less than significant impact at the study intersections. Additionally, the Proposed Project would not create a significant impact at any CMP monitoring location.
2016-2040 RTP/SCS Guiding Policy 3: RTP/SCS land use and growth strategies in the RTP/SCS will respect local input and advance smart growth initiatives.	**Not Applicable.** This Goal is directed towards SCAG and the City of Los Angeles and does not apply to the Proposed Project. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Proposed Project promotes the use of a variety of transportation options, which includes walking and the use of public transportation
2016-2040 RTP/SCS Guiding Policy 4: Transportation demand management (TDM) and active transportation will be focus areas, subject to Policy 1.	**Not Applicable.** This policy is directed towards transportation investment by SCAG. However, the Proposed Project's location within a HQTA and a TPA promotes the use of public transit and pedestrian activity.
2016-2040 RTP/SCS Guiding Policy 5: HOV gap closures that significantly increase transit and rideshare usage will be supported and encouraged, subject to Policy 1.	**Not Applicable.** The policy is directed towards transportation investment by SCAG to support HOV, transit and rideshare. Although this policy is not applicable to the Proposed Project, the Proposed Project's location in a HQTA and a TPA promotes the use of public transit and pedestrian activity.

9 **Transportation Impact Analysis for the Proposed Senior Apartments At 6650 Franklin Avenue,** Linscott Law & Greenspan Engineers, October 20, 2016. Approved by Los Angeles Department of Transportation (LADOT) January 26, 2017, incorporated herein by reference and included as Appendix G to this analysis.

Goals and Policies	Consistency Assessment
2016-2040 RTP/SCS Guiding Policy 6: The RTP/SCS will support investments and strategies to reduce non-recurrent congestion and demand for single occupancy vehicle use, by leveraging advanced technologies.	**Not Applicable.** This Guiding Policy relates to SCAG goals in supporting investments and strategies to reduce congestion and the use of single occupancy vehicles. However, the Proposed Project would support the policy as it is located within a HQTA and a TPA and would support public transportation and other alternative methods of transportation.
2016-2040 RTP/SCS Guiding Policy 7: The RTP/SCS will encourage transportation investments that result in cleaner air, a better environment, a more efficient transportation system and sustainable outcomes in the long run.	**Not Applicable.** This policy is directed towards SCAG and governmental agencies to encourage and support transportation investments.
2016-2040 RTP/SCS Guiding Policy 8: Monitoring progress on all aspects of the Plan, including the timely implementation of projects, programs, and strategies, will be an important and integral component of the Plan.	**Not Applicable.** This policy directed towards SCAG and the City of Los Angeles and not does apply to the Proposed Project.
2016-2040 RTP/SCS Land Use Policy 1: Identify regional strategies areas for infill and investment.	**Not Applicable.** This policy is directed towards SCAG to identify regional strategic areas. The Proposed Project is an infill development in a HQTA and within a transit priority area. The Proposed Project would be providing affordable housing units in a highly urbanized area within the City of Los Angeles.
2016-2040 RTP/SCS Land Use Policy 2: Structure the plan on a three-tiered system of centers development.[10]	**Not Applicable.** This Land Use Policy is directed towards SCAG and does not apply to the Proposed Project.

10 The 2016-2040 RTP/SCS reaffirms the 2008 Advisory Land Use Policies that were incorporated into the 2012-2035 RTP/SCS. The complete language from the original SCAG Advisory Land Use Policies is "Identify strategic centers based on a three-tiered system of existing, planned and potential relative to transportation infrastructure. This strategy more effectively integrates land use planning and transportation investment." A more detailed description of these strategies and policies can be found on pages 90-92 of the SCAG 2008 Regional Transportation Plan, adopted in May 2008.

Goals and Policies	Consistency Assessment
2016-2040 RTP/SCS Land Use Policy 3: Develop "Complete Communities"	**Consistent.** SCAG describes the development of "complete communities" to provide areas that encourages households to be developed with a range of mobility options to complete short trips. The 2016-2040 RTP/SCS supports the creation of these districts through a concentration of activities with housing, employment, and a mix of retail and services, located in close proximity to each other, where most daily needs can be met within a short distance of home, providing residents with the opportunity to patronize their local area and run daily errands by walking or cycling rather than traveling by automobile.[11] As stated above, the Proposed Project would place senior housing units in a transit-rich area and in the proximity of other existing senior housing units. The Project Site's location near mass transit and in proximity to services, retail stores, and employment opportunities promotes the use of a variety of transportation options, which include walking, cycling, and the use of public transportation. Therefore, the Proposed Project would be consistent with SCAG's goals of increasing mixed commercial/residential uses in transit-rich areas near services, retail, and employment opportunities to reduce vehicles-per-miles traveled.
2016-2040 RTP/SCS Land Use Policy 4: Develop nodes on a corridor.	**Not Applicable.** The 2016-2040 RTP/SCS describes nodes as mixed-use development centers at key locations that meet most of residents' daily needs and that support livable corridors. This policy is directed towards SCAG and the City goals to identify and develop locations that promote nodes. The Proposed Project is located within a HQTA and a transit-priority area. The Proposed Project's mixed-use design and location encourages the use of alternative transportation and walking and bicycling opportunities.

11 SCAG, 2016-2040 RTP/SCS, April 2016 (page 79).

Goals and Policies	Consistency Assessment
2016-2040 RTP/SCS Land Use Policy 5: Plan for additional housing and jobs near transit.	**Consistent.** As stated above, the Proposed Project would provide senior housing units in a HQTA and a TPA. The Project Site is located less than one-half mile from the intersection of two major bus lines, 217 and 780 Metro, with frequency of service intervals of 20 minutes or less during peak commute periods, which would promote the use of a variety of transportation options, which includes walking and the use of public transportation.
2016-2040 RTP/SCS Land Use Policy 6: Plan for changing demand in types of housing.	**Consistent.** The Proposed Project would provide 67 affordable senior housing units and manager's unit within the City of Los Angeles. The units would help meet the increasing demand for senior housing in proximity to transit and other forms of alternative transportation such as walking and cycling, to get to basic needs.
2016-2040 RTP/SCS Land Use Policy 7: Continue to protect stable, existing single-family areas.	**Not Applicable.** This Land Use Policy is not applicable to the Proposed Project because the Proposed Project would not demolish any existing single-family homes. Additionally, the Project site is in an area designated for High Density Residential uses and surrounding by other medium- and high-density residential development.
2016-2040 RTP/SCS Land Use Policy 8: Ensure adequate access to open space and preservation of habitat.	**Not Applicable.** This Land Use Policy is directed towards SCAG and does not apply to the Proposed Project. The Proposed Project is located within an urbanized area within the City of Los Angeles. Development of the Proposed Project would not remove any areas that have significant value as wildlife habitat since the Project Site is fully developed. The Proposed Project would provide approximately 2,300 square feet of new private open space in the form of balconies, a 1,300-square-foot indoor community room, a 500-square-foot rooftop deck, and a 2,900-square-foot courtyard at the podium level. The new building (described as 'Building B' in the section II, Project Description) provides 7,000 square feet of total useable open space, including 4,700 square feet of common open space. Therefore, the open space exceeds the required amount pursuant to LAMC 12.21 G.

Goals and Policies	Consistency Assessment
2016-2040 RTP/SCS Land Use Policy 9: Incorporate local input and feedback on future growth.	**Not Applicable.** This Land Use Policy is directed towards SCAG and does not apply to the Proposed Project.
2016-2040 RTP/SCS Benefit 1: The RTP/SCS will promote the development of better places to live and work through measures that encourage more compact development in certain areas of the region, varied housing options, bicycle and pedestrian improvement, and efficient transportation infrastructure.	**Consistent.** The Proposed Project will provide affordable housing for seniors in a TPA. The Proposed Project will provide a variety of dwelling units sizes, 32 studio units and 36 one-bedroom units ranging from approximately 420 to 520 square feet. The Proposed Project is dedicating 99% of proposed units restricted to Low and Very Low Income Households.
2016-2040 RTP/SCS Benefit 2: The RTP/SCS will encourage strategic transportation investments that add appropriate capacity and improve critical road conditions in the region, increase transit capacity and expand mobility options. Meanwhile, the Plan outlines strategies for developing land in coming decades that will place destinations closer together, thereby decreasing the time and cost of traveling between them.	**Not Applicable.** Benefit 2 is directed towards SCAG and not does apply to the Proposed Project. The Proposed Project is an infill, residential project located within a HQTA and a TPA, thereby decreasing time and cost of traveling between places.
2016-2040 RTP/SCS Benefit 3: The RTP/SCS is expected to result in less energy and water consumption across the region, as well as lower transportation costs for households.	**Consistent.** The Proposed Project includes numerous energy-efficient design features, such as ENERGY STAR rated appliances.[12] It will comply with the City of Los Angeles Green Building Code and the CALGreen. The Project's location near various bus and subway lines will provide future residents with various affordable transportation options.

12 The ENERGY STAR program, developed by the US Environmental Protection Agency in 1992, is a voluntary measure intended to reduce energy consumption and improve energy efficiency, which has resulted in appliance companies, car companies, home builders, and more stepping in to create and promote more energy efficient products. For products to be designated as ENERGY STAR they must be certified by an independent third-party to provide increased energy efficiency. If the product costs more than a similar non-ENERGY STAR product the purchaser must be able to recoup their investment through utility savings.

Goals and Policies	Consistency Assessment
2016-2040 RTP/SCS Benefit 4: Improved placemaking and strategic transportation investments will help improve air quality; improve health as people have more opportunities to bicycle, walk and pursue other active alternatives to driving; and better protect natural lands as new growth is concentrated in existing urban and suburban areas.	**Consistent.** The Proposed Project will encourage improved access and mobility by providing units within an urbanized area of the City of Los Angeles. Dining options surrounding the Project Site are easily accessible by transit options. The Proposed Project proposes approximately 2,300 square feet of private open space in the form of balconies, a 1,300-square-foot indoor community room, a 500-square-foot rooftop deck, and a 2,900-square-foot courtyard at the podium level. In addition, the Proposed Project will provide 7,000 square feet of total useable open space, including 4,700 square feet of common open space. A minimum of 25% of the outdoor common open space will be landscaped with a palette of drought-tolerant plantings. All of these features compliment the features designed to make affordable and accessible units for seniors in the most integrated living setting possible.
Source: SCAG, 2016-2040 RTP/SCS, April 2016, Impact Sciences, 2017.	

Consistency with Criterion #2

The Proposed Project includes the construction of a total floor area of approximately 53,370 square feet. The Proposed Project includes 68 new multi-family residential units (67 affordable senior units and one on-site-manager's unit); residential uses (which would include indoor community space and mandated outdoor open space) would comprise 100 percent of the building uses. As such, the Proposed Project would be consistent with this Criterion.

Consistency with Criterion #3

The Project Site is approximately 0.78 acres. The Proposed Project includes 68 new multi-family residential units; as such, the Proposed Project provides approximately 88.3 dwelling units per acre. As such, the Proposed Project would be consistent with this Criterion.

Consistency with Criterion #4

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

PRC §21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC §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 §21155 (b) states that a "major transit stop" is defined in PRC §21064.3, except that, for purposes of PRC §21155 (b), it also includes major transit stops that are included in the applicable regional transportation plan.

The Project Site is located less than one-half mile from the Hollywood/Highland Station of the Metro Red Line. The Site is served by the LADOT DASH Hollywood line, directly abutting the property. Additionally, there are several major bus routes running along Franklin Avenue, Highland Avenue, Hollywood Boulevard, and Cahuenga Boulevard (Metro Routes 237 and 656 on Highland Avenue, Routes 212, 217, 222, and 312 on Hollywood Boulevard). Moreover, the 2016-2040 *RTP/SCS* identifies the Project Site as being within a HQTA. Therefore, the Proposed Project is located within a high-quality transit corridor. The Proposed Project is consistent with this Criterion.

3. INCORPORATION OF APPLICABLE MITIGATION MEASURES FROM PRIOR EIRS

PRC §21151.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable EIRs, including the 2016-*2040 RTP/SCS* Draft Program Environmental Impact Report for Southern California Association of Governments on December 2015 (*RTP/SCS* PEIR).

The Mitigation Monitoring and Reporting Program for the *RTP/SCS* PEIR (SCAG MMRP) does not include project level mitigation measures that are required of the Proposed Project. The SCAG MMRP does provide a list of mitigation measures that SCAG determined a lead agency can and should consider, as applicable and feasible, where the agency has identified that a project has the potential for significant effects. The City has complied with PRC §21151.2 by reviewing all of the suggested mitigation measures in the SCAG MMRP and reviewed them for imposition on the project. No mitigation measures were imposed if the project was found to be in substantial compliance with the mitigation measure as proposed or if the SCAG MMRP mitigation measure was found not to be relevant. If the project was not found to be in

substantial compliance or the mitigation measure was found relevant, the City considered whether to use the SCAG MMRP mitigation measure or an equally effective City mitigation measure. The City's analysis is found in **Table III-3** below.

Table III-3
Consistency Analysis with the
2016-2040 RTP/SCS Project Level Mitigation Measures

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
Aesthetics		
Scenic Vistas	MM-AES-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of visual intrusions on scenic vistas, or National Scenic Byways that are in the jurisdiction and responsibility of Caltrans, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations for Caltrans scenic vistas and goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. • Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. • Use alternating facades to "break up" large facades and provide visual interest. • Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. • Replace and renew landscaping along corridors with road widenings, interchange projects, and related improvements. • Retain or replace trees bordering highways, so that clear-cutting is not evident. • Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. • Implement design guidelines, local policies, and programs aimed at protecting views of scenic corridors and avoiding visual intrusions in design of projects to minimize contrasts in scale and massing between the project and surrounding natural forms and developments. Avoid, if possible, large cuts and fills when the visual environment (natural or urban) would be substantially disrupted. Site or design of projects should minimize their intrusion into important viewsheds and use contour grading to better match surrounding terrain.	Measures not relevant. The proposed project is in a Transit Priority Area (TPA). Public Resources Code Section 21099 provides that aesthetic impacts for infill sites in TPAs shall not be considered significant.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
Visual Character	MM-AES-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of degrading the existing public viewpoints, visual character, or quality of the site that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency. • Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. • Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. • Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible, or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed include setback buffers, landscaping, color, texture, signage, and lighting criteria. • Design projects consistent with design guidelines of applicable general plans. • Apply development standards and guidelines to maintain compatibility with surrounding natural areas, including site coverage, building height and massing, building materials and color, landscaping, site grading, and so forth in accordance with general plans and adopted design guidelines, where applicable. • Require that sites are kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape.	Measures not relevant. The proposed project is in a Transit Priority Area (TPA). Public Resources Code Section 21099 provides that aesthetic impacts for infill sites in TPAs shall not be considered significant.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
Light, glare, shade.	MM-AES-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or minimizing the effects of light and glare on routes of travel for motorists, cyclists, and pedestrians, or on adjacent properties, and limit expanded areas of shade and shadow to areas that would not adversely affect open space or outdoor recreation areas that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies within county and city general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. • Restrict the operation of outdoor lighting for construction and operation activities in accordance with local regulations. • Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. • Use unidirectional lighting to avoid light trespass onto adjacent properties. • Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. • Provide structural and/or vegetative screening from light-sensitive uses. • Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. • Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. • Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	Measures not relevant. The proposed project is in a Transit Priority Area (TPA). Public Resources Code Section 21099 provides that aesthetic impacts for infill sites in TPAs shall not be considered significant.
Agricultural and Forest Resources		
Conversion of farmland to non-ag uses. Conversion of forest land.	MM-AF-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural uses that are within the jurisdiction and responsibility of the Natural Resources Conservation Service, the California Resources Agency, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Farmland Protection Act and implementing regulations, and the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the Farmland Mapping and Monitoring Program of the California Resources Agency. Such measures may include the following, or other comparable measures identified by the Lead Agency taking into	Measure not relevant because agricultural and forest land do not exist in the urban infill area where the proposed project is located.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	account project and site-specific considerations as applicable and feasible: • For projects that require approval or funding by the USDOT, comply with Section 4(f) U.S. Department of Transportation Act of 1966 (USDOT Act). • Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. • Maintain and expand agricultural land protections such as urban growth boundaries. Support the acquisition or voluntary dedication of agriculture conservation easements and other programs that preserve agricultural lands, including the creation of farmland mitigation banks. Local governments would be responsible for encouraging the development of agriculture conservation easements or farmland mitigation banks, purchasing conservation agreements or farmland for mitigation, and ensuring that the terms of the conservation easement agreements are upheld. The California Department of Fish and Wildlife provides a definition for conservation or mitigation banks on their website (please see https://www.wildlife.ca.gov/Conservation/Planning/Banking) "A conservation or mitigation bank is privately or publicly owned land managed for its natural resource values. In exchange for permanently protecting, managing, and monitoring the land, the bank sponsor is allowed to sell or transfer habitat credits to permitees who need to satisfy legal requirements and compensate for the environmental impacts of developmental projects. A privately owned conservation or mitigation bank is a free-market enterprise that: • Offers landowners economic incentives to protect natural resources; • Saves permitees time and money by providing them with the certainty of pre-approved compensation lands; • Consolidates small, fragmented wetland mitigation projects into large contiguous sites that have much higher wildlife habitat values; • Provides for long-term protection and management of habitat. • A publicly owned conservation or mitigation bank: • Offers the sponsoring public agency advance mitigation for large projects or multiple years of operations and maintenance." In 2013, the University of California published an article entitled "Reforms could boost conservation banking by landowners" that speaks specifically to the use of agricultural lands for in conjunction with conservation banking programs. • Provide for mitigation fees to support a mitigation bank that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. • Include underpasses and overpasses at reasonable intervals to maintain property access. • Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland. • Ensure individual projects are consistent with federal, state, and local policies that preserve agricultural lands and support the economic viability of agricultural activities, as well as policies that	

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	provide compensation for property owners if preservation is not feasible. • Contact the California Department of Conservation and each county's Agricultural Commissioner's office to identify the location of prime farmlands and lands that support crops considered valuable to the local or regional economy and evaluate potential impacts to such lands using the land evaluation and site assessment (LESA) analysis method (CEQA Guidelines §21095), as appropriate. Use conservation easements or the payment of in-lieu fees to offset impacts.	
Zoning for Ag use, Williamson Act Contract.	MM-AF-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from conflict with existing zoning for agricultural use or a Williamson Act contract that are within the jurisdiction and responsibility of the California Department of Conservation, other public agencies, and Lead Agencies. Where the Lead Agency has identified that a project has potential for significant effects, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of agriculture and forestry resources to ensure compliance with the goals and policies established within the applicable adopted county and city general plans to protect agricultural resources consistent with the California Land Conservation Act of 1965, the Farmland Security Zone Act, and county and city zoning codes, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible: • Project relocation or corridor realignment to avoid lands in Williamson Act contracts. • Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.), or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection. • Prior to final approval of each project, encourage enrollments of agricultural lands for counties that have Williamson Act programs, where applicable.	Measure not relevant because agricultural land does not exist in urban infill area where the proposed project is located.
Air Quality		
Violation of air quality standards.	MM-AIR-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the CARB, air quality management districts, and other regulatory agencies. Where the Lead Agency has identified that a project has the potential to violate an air quality standard or contribute substantially to an existing air quality violation, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s) and other agencies as set forth below, or other comparable measures, to facilitate consistency with plans for attainment of the NAAQS and CAAQS, as applicable and feasible.	The Proposed Project substantially complies with this measure. The following regulatory control measures would address this measure; no additional measures required: RCM AIR-1: Demolition, grading

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	CARB, South Coast AQMD, Antelope Valley AQMD, Imperial County APCD, Mojave Desert AQMD, Ventura County APCD, and Caltrans have identified project-level feasible measures to reduce construction emissions: • Minimize land disturbance. • Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. • Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. • Cover trucks when hauling dirt. • Stabilize the surface of dirt piles if not removed immediately. • Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. • Minimize unnecessary vehicular and machinery activities. • Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. • On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. • Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. • Ensure that all construction equipment is properly tuned and maintained. • Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. • Project sponsors should ensure to the extent possible that construction activities utilize grid-based electricity and/or onsite renewable electricity generation rather than diesel and/or gasoline powered generators. • Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. • As appropriate, require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior	and construction activities must comply with provisions of the SCAQMD District Rule 403, including the following: • Apply water to disturbed areas of the site three times a day • Require the use of a gravel apron or other equivalent methods to reduce mud and dirt trackout onto truck exit routes • Appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM generation. • Limit soil disturbance to the amounts analyzed in this air quality analysis. • All materials transported off-site shall be securely covered. • Apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (previously graded areas inactive for ten days or more). • Traffic speeds on all unpaved roads to be reduced to 15 mph or less. RCM AIR-2: Architectural coatings and solvents applied during construction activities shall comply with SCAQMD Rule

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	to equipment operation at the site. • Implement EPA's National Clean Diesel Program. • Diesel- or gasoline-powered equipment shall be replaced by lowest emitting feasible for each piece of equipment from among these options: electric equipment whenever feasible, gasoline-powered equipment if electric infeasible. • On-site electricity shall be used in all construction areas that are demonstrated to be served by electricity. • If cranes are required for construction, they shall be rated at 200 hp or greater equipped with Tier 4 or equivalent engines. • Use alternative diesel fuels, such as Clean Fuels Technology (water emulsified diesel fuel) or O2 diesel ethanol-diesel fuel (O2 Diesel) in existing engines • Convert part of the construction truck fleet to natural gas. • Include "clean construction equipment fleet", defined as a fleet mix cleaner than the state average, in all construction contracts • Fuel all off-road and portable diesel powered equipment with ARB-certified motor vehicle diesel fuel (non-taxed version suitable for use off-road) • Use electric fleet or alternative fueled vehicles where feasible including methanol, propane, and compressed natural gas • Use diesel construction equipment meeting ARB's Tier 4 certified engines or cleaner off-road heavy-duty diesel engines and comply with State off-road regulation • Use on-road, heavy-duty trucks that meet the ARB's 2007 or cleaner certification standard for on-road diesel engines, and comply with the State on-road regulation • Use idle reduction technology, defined as a device that is installed on the vehicle that automatically reduces main engine idling and/or is designed to provide services, e.g., heat, air conditioning, and/or electricity to the vehicle or equipment that would otherwise require the operation of the main drive engine while the vehicle or equipment is temporarily parked or is stationary • Minimize idling time either by shutting off equipment when not in use or limit idling time to 3 minutes Signs shall be posted in the designated queuing areas and/or job sites to remind drivers and operators of the 3 minute idling limit. The construction contractor shall maintain a written idling policy and distribute it to all employees and subcontractors. The on-site construction manager shall enforce this limit. • Prohibit diesel idling within 1,000 feet of sensitive receptors. • Staging and queuing areas shall not be located within 1,000 feet of sensitive receptors. • The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • The engine size of construction equipment shall be the minimum practical size. • Catalytic converters shall be installed on gasoline-powered	1113, which governs the VOC content of architectural coatings.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	equipment. • Signs shall be posted in designated queuing areas and job sites to remind drivers and operators of the idling limit. • Construction worker trips shall be minimized by providing options for carpooling and by providing for lunch onsite. • Use new or rebuilt equipment. • Maintain all construction equipment in proper working order, according to manufacturer's specifications. The equipment must be check by an ASE-certified mechanic and determined to be running in proper condition before it is operated. • Use low rolling resistance tires on long haul class 8 tractor-trailers. • Suspend all construction activities that generate air pollutant emissions during air alerts. • Install a CARB-verified, Level 3 emission control device, e.g., diesel particulate filters, on all diesel engines.	
Sensitive receptors.	MM-AIR-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures that are within the jurisdiction and authority of the air quality management district(s) where proposed 2016 RTP/SCS transportation projects would be located. Where the Lead Agency has identified that a project has the potential to expose sensitive receptors to substantial pollutant concentrations and harm public health outcomes substantially, the Lead Agency can and should consider the measures that have been identified by CARB and air district(s), or other comparable measures, to reduce cancer risk pursuant to the Air Toxics "Hot Spots" Act of 1987 (AB2588), as applicable and feasible. Such measures include those adopted by CARB designed to reduce substantial pollutant concentrations, specifically diesel, from mobile sources and equipment. CARB's strategy includes the following elements: • Set technology forcing new engine standards • Reduce emissions from the in-use fleet • Require clean fuels, and reduce petroleum dependency • Work with US EPA to reduce emissions from federal and state sources • Pursue long-term advanced technology measures.	The Proposed Project substantially complies with this measure. As previously discussed and list above, regulatory control measures would address this measure; no additional measures required.
Biological Resources		
Candidate, sensitive, or special status species. Riparian or other sensitive natural community. Wetlands. Species movement. Local	MM-BIO-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on threatened and endangered species and other special status species that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, National Marine Fisheries Service, California Department of Fish and Wildlife, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Sections 7, 9, and 10(a) of the federal Endangered Species Act; the California Endangered Species Act; the Native Plant Protection Act; the State Fish and Game Code; and the Desert Native Plant Act; and related applicable implementing regulations, as applicable and feasible. Additional compliance should adhere to applicable implementing	This Mitigation Measure is not relevant to the Proposed Project as Proposed Project site is an infill site in urban areas in close proximity to transit and therefore Proposed Project site is not anticipated to contain any critical habitat or support any species identified or designated as a candidate, sensitive, or

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	regulations from the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, and/or the California Department of Fish and Wildlife. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible • Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act of Section 2081 of the California Endangered Species Act to support issuance of an incidental take permit. A wide variety of conservation strategies have been successfully used in the SCAG region to protect the survival and recovery in the wild of federally and state-listed endangered species. • Design projects to avoid desert native plants, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies. • Develop and implement a Worker Awareness Program (environmental education) to inform project workers of their responsibilities in regards to avoiding and minimizing impacts on sensitive biological resources. • Appoint an Environmental Inspector to monitor implementation of mitigation measures. • Schedule construction activities to avoid sensitive times for biological resources (e.g., steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. • Conduct pre-construction monitoring to delineate occupied sensitive species' habitat to facilitate avoidance. • Where projects are determined to be within suitable habitat of listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel.	special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. Additionally, adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to nesting birds if present. Los Angeles Municipal Code (LAMC) Sec. 46 Tree Preservation Ordinance (Ordinance No. 177,404) applies to protected trees (4 inches and greater in diameter) that are located on public and private properties. A Tree Report completed for the Proposed Project determined that none of the trees on site are of a protected species.
Riparian or other sensitive natural community. Wetlands. Species movement. Local policies or ordinances protection biological resources.	MM-BIO-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on state-designated sensitive habitats, including riparian habitats, that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 1600 of the State Fish and Game Code, USFS Land Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino, implementing regulations for the U.S. Fish and Wildlife Service, the National Marine Fisheries Service, the California Department of Fish and Wildlife; and	This Mitigation Measure is not relevant to the Proposed Project as Proposed Project site is an infill site in an urban area in close proximity to transit and therefore would not contain riparian areas, wetlands or be expected to affect species movement or conservation plans.

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HCP, NCCP or other conservation plans.	other related federal, state, and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act. • Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal Endangered Species Act and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino • Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California Endangered Species Act, or Fully-Protected Species afforded protection pursuant to the State Fish and Game Code. • Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to lakes and streambeds. • Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season. • Consult with the CDFW for state-designated sensitive or riparian habitats where fur-bearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities. • Utilize applicable and CDFW approved plant community classification resources during delineation of sensitive communities and invasive plants including, but not limited to, the Manual of California Vegetation, the California Invasive Plant Inventory Database, and the Orange County California Native Plant Society (OCCNPS) Emergent Invasive Plant Management Program, where appropriate. • Encourage project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. • Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats. • Install fencing and/or mark sensitive habitat to be avoided during construction activities. • Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial plants for use in restoring native	

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	vegetation to all areas of temporary disturbance within the project area. • Revegetate with appropriate native vegetation following the completion of construction activities. • Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). • Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
Wetlands Species movement. Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	MM-BIO-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on protected wetlands that are in the jurisdiction and responsibility of the U.S. Army Corps of Engineers, public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 404 of the Clean Water Act and regulations of the U.S. Army Corps of Engineers (USACOE), and other applicable federal, state and local regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Require project design to avoid federally protected wetlands consistent with the provisions of Section 404 of the Clean Water Act, wherever practicable and feasible. • Where the Lead Agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters not protected under Section 404 of the Clean Water Act, seek comparable coverage for these wetlands and waters in consultation with the USACOE and applicable Regional Water Quality Control Boards (RWQCB). • Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federally protected wetlands to support issuance of a permit under Section 404 of the Clean Water Act as administered by the USACOE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACOE's Final Compensatory Mitigation Rule. The USACOE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net loss of wetlands" a USACOE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach	This Mitigation Measure is not relevant to the Proposed Project as Proposed Project site is an infill site in an urban area in close proximity to transit and therefore would not impact wetlands and would not affect species movement or, policies, or regulations protecting biological resources.

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	and watershed planning information. • Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether wetlands will be affect and, if necessary, perform a formal wetland delineation.	
Species movement. Local policies or ordinances protecting biological resources. HCP, NCCP or other conservation plans.	MM-BIO-4(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on migratory fish or wildlife species or within established native resident and/or migratory wildlife corridors, and native wildlife nursery sites that are in the jurisdiction and responsibility of U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife, U.S. Forest Service, public agencies and/or Lead Agencies, as applicable and feasible. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with regulations of the USFWS, USFS, CDFW, and related regulations, goals and polices of counties and cities, as applicable and feasible. • Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where impacts to birds afforded protection pursuant to the Migratory Bird Treaty Act during the breeding season may occur. • Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. • Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement. • Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. • Prohibit clearing of vegetation and construction within the peak avian breeding season (February 1st through September 1st), where feasible. • Conduct weekly surveys to identify active raptor and other migratory nongame bird nests by a qualified biologist with experience in conducting breeding bird surveys within three days prior to the work in the area from February 1 through August 31. • Prohibit construction activities with 300 feet (500 feet for raptors) of occupied nests of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. Delineate	The Proposed Project substantially complies with this measure. The site is located in a developed urbanized area and does not provide habitat for sensitive Biological resources. There are no SEAs within the vicinity of the Project Site.13 Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Proposed Project. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area. However, a number of mature trees are scattered along the parkways and within the Project Site. Although the trees are all ornamental and nonnative, they may provide suitable habitat, including nesting habitat, for migratory birds. A tree

13 *City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed September 8, 2017, and City of Los Angeles General Plan Draft EIR, Biological Resources section, Figure BR-1D, Biological Resources Areas (Coastal and Southern Geographical Area), Page 2.18-6, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf, accessed September 8, 2017.*

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	the non-disturbance buffer by temporary fencing and keep the buffer in place until construction is complete or the nest is no longer active. No construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project. Reductions or expansions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors. • Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. • Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. Analyze habitat linkages/wildlife movement corridors on a broader and cumulative impact analysis scale to avoid adverse impacts from linear projects that have potential for impacts on a broader scale or critical narrow choke points that could reduce function of recognized movement corridors on a larger scale. Require review of construction drawings and habitat connectivity mapping provided by the CDFW or CNDDB by a qualified biologist to determine the risk of habitat fragmentation. • Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). • Demonstrate that proposed projects would not adversely affect movement of any native resident or migratory fish or wildlife species, wildlife movement corridors, or wildlife nursery sites through the incorporation of avoidance strategies into project design, wherever practicable and feasible. • Evaluate the potential for overpasses, underpasses, and culverts in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Provide wildlife crossings in accordance with proven standards, such as FHWA's Critter Crossings or Ventura County Mitigation Guidelines and in consultation with wildlife corridor authorities with sufficient knowledge of both regional and local wildlife corridors, and at locations useful and appropriate for the species of concern. • Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. • Establish native vegetation and facilitate the enhancement and maintenance of biological diversity within existing habitat pockets in urban environments that provide connectivity to large-scale habitat areas. • Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to	survey report was conducted by Tree Case Management in May 2017. Of the 27 identified trees on the Project site, 22 would be removed, with the remaining five trees either preserved in place, or removed, depending on construction methods. The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. Implementation of MM-BIO-4(B) would require that the Proposed Project comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities. The Proposed Project will be required to comply

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	establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. • Where the Lead Agency has identified that a RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. • Project sponsors should emphasize that urban habitats and the plant and wildlife species they support are indeed valuable, despite the fact they are located in urbanized (previously disturbed) areas. Established habitat connectivity and wildlife corridors in these urban ecosystems will likely be impacted with further urbanization, as proposed in the Project. Appropriate mitigation measures should be proposed, developed, and implemented in these sensitive urban microhabitats to support or enhance the rich diversity of urban plant and wildlife species. • Establish native vegetation within habitat pockets or the "wildling of urbanized habitats" that facilitate the enhancement and maintenance of biological diversity in these areas. These habitat pockets, as the hopscotch across an urban environment, provide connectivity to large-scale habitat areas.	with the provisions of the MBTA. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found.
Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	MM-BIO-5(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts related to conflicts with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, that are in the jurisdiction and responsibility of local jurisdictions and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to comply with county, city and local policies or ordinances, protecting biological resources, such as tree preservation policies or ordinances, as applicable and feasible. • Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. • Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by a certified arborist. • If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native	The Proposed Project substantially complies with this measure. The site is located in a developed urbanized area and does not provide habitat for sensitive Biological resources. There are no SEAs within the vicinity of the Project Site.14 Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Proposed Project. A tree survey was prepared and no protected trees as

14 *City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed September 8, 2017, and City of Los Angeles General Plan Draft EIR, Biological Resources section, Figure BR-1D, Biological Resources Areas (Coastal and Southern Geographical Area), Page 2.18-6, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf, accessed September 8, 2017.*

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	species. • Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. • Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. • Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. • Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration. • If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. • Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. • Design projects to avoid conflicts with local policies and ordinances protecting biological resources. • Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit.	defined under Los Angeles Municipal Code (LAMC) Ordinance 177,404, i.e., 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 (*Umbellularia californica*), present on the project site. In addition, all significant (with 8-inch or greater trunk diameter or cumulative trunk diameter if multi-trunked, as measured 54 inches above the ground) non-protected trees on the site proposed for removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. All trees in the public right-of-way shall be provided per the current standards of the Urban Forestry Division of the Department of Public Works, Bureau of Street Services.

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Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	MM-BIO-6(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant impacts on HCP and NCCPs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act; and implementing regulations, as applicable and feasible. • Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs, NCCPs or other conservation programs. • Wherever practicable and feasible, the project shall be designed to avoid through project design lands preserved under the conditions of an HCP, NCCP, or other conservation program. • Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP or other conservation program, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California Endangered Species Act, shall be developed to support issuance of an Incidental take permit or any other permissions required for development within the HCP/NCCP boundaries.	This Mitigation Measure is not relevant to the Proposed Project as Proposed Project site is an infill site in an urban area in close proximity to transit and therefore would not affect species movement.
Cultural Resources		
Paleontological resources, unique geological features.	MM-CUL-1(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on unique paleontological resources or sites and unique geologic features that are within the jurisdiction and responsibility of National Park Service, Office of Historic Preservation, and Native American Heritage Commission, other public agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on unique paleontological resources or sites or unique geologic features. Ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible. • Obtain review by a qualified geologist or paleontologist to determine if the project has the potential to require excavation or blasting of parent material with a moderate to high potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. • Avoid exposure or displacement of parent material with a moderate to high potential to yield unique paleontological resources.	The Proposed Project substantially complies with this measure. The Proposed Project is on a previously developed site in an urban area. No unique geological features exist on the site and the potential for the discovery of any unique paleontological resources is considered extremely remote. Implementation of **MM-CUL-4** would protect paleontological resources from potential impacts associated with the Project: **CUL-MM-4** If paleontological resources are discovered during

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	• Avoid routes and project designs that would permanently alter unique features with archaeological and/or paleontological significance • Salvage and document adversely affected resources sufficient to support ongoing scientific research and education.	excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if appropriate, salvage. The paleontologist shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey,

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		study or report, and a copy of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.
Historical resources, archeological resources.	MM-CUL-2(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Section 15064.5 of the State CEQA Guidelines capable of avoiding or reducing significant impacts on historical resources, to ensure compliance with the National Historic Preservation Act, Section 5097.5 of the Public Resources Code (PRC), state programs pursuant to Sections 5024 and 5024.5 of the PRC, adopted county and city general plans and other federal, state and local regulations, as applicable and feasible. Such measures include: • Pursuant to CEQA Guidelines Section 15064.5, conduct a record search at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historic resources were identified. • Obtain a qualified architectural historian to conduct historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for historical resources within 1,000 feet of the project. • Comply with Section 106 of the National Historic Preservation Act including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: • Employ design measures to avoid historical resources and	The Proposed Project would comply with this Mitigation Measure because City imposes a MM that is equal or more effective than the SCAG MM, as it incorporates measures that avoid or reduce the significant effects on historical resources within the jurisdiction and responsibility of the Office of Historical Preservation, Native American Heritage Commission, other public agencies, and/or Local Agencies. Such measures include the following: CUL-MM-1: The applicant will engage a historic preservation consultant that meets the Secretary of the Interior's Professional Qualifications Standards to ensure that the connection from the proposed new building to the Montecito Apartments is done with a minimum loss of historic fabric in

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	undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. • Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. • Secure a qualified environmental agency and/or architectural historian, or other such qualified person to document any significant historical resource(s), by way of historic narrative, photographs, and architectural drawings, as mitigation for the effects of demolition of a resource. • Consult with the Native American Heritage Commission to determine whether known sacred sites are in the project area, and identify the Native American(s) to contact to obtain information about the project site. • Prior to construction activities, obtain a qualified archaeologist to conduct a record search at the appropriate Information Center of the California Archaeological Inventory to determine whether the project area has been previously surveyed and whether resources were identified. • Prior to construction activities, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the Information Center. In the event the records indicate that no previous survey has been conducted, the Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. • If a record search indicates that the project is located in an area rich with cultural materials, retain a qualified archaeologist to monitor any subsurface operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. • Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist familiar with the local archaeology, and/or as appropriate, an architectural historian who should make recommendations regarding the work necessary to determine importance. If the cultural resource is determined to be important under state or federal guidelines, impacts on the cultural resource will need to be mitigated. • Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine the importance of these resources	compliance with the Secretary of the Interior's Standards for Rehabilitation. The historic preservation consultant will review drawings and conduct on-site construction monitoring throughout the construction phase. CUL-MM-2: The Project shall include a shoring plan to ensure the protection of the Montecito Apartments during construction from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil.

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Human remains.	MM-CUL-4(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to human remains that are within the jurisdiction and responsibility of the Native American Heritage Commission, other public agencies, and/or Local Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency should consider mitigation measures capable of avoiding or reducing significant impacts on human remains, to ensure compliance with the California Health and Safety Code, Section 7060 and Section 18950-18961 and Native American Heritage Commission, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. • If any discovered remains are of Native American origin: Contact the County Coroner to contact the Native American Heritage Commission (NAHC) to ascertain the proper descendants from the deceased individual. The coroner should make recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains.	The Proposed Project substantially complies with this measure. The following regulatory control measure would address this measure: If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. In the event that human remains are discovered during excavation activities, the following procedure shall be observed: ▪ Stop immediately and contact the County Coroner: 1104 N. Mission Road Los Angeles, CA 90033 323-343-0512 (8 a.m. to *5* p.m. Monday through Friday) or 323-343-0714 (After Hours, Saturday, Sunday, and Holidays) • If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage Commission

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		(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 may make recommendations to the landowner or person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. • If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.
Energy		
Residential and commercial energy use.	MM-EN-2(B): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of increased residential energy consumption that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with CALGreen, local building codes, and other applicable laws and regulations governing residential building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Integrate green building measures consistent with CALGreen into project design • Use energy efficient materials in building design, construction, rehabilitation, and retrofit. • Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. • Reduce lighting, heating, and cooling needs by taking advantage of light colored roofs, trees for shade, and sunlight. • Incorporate passive environmental control systems that account for	The Proposed Project substantially complies with this measure through PDFs and RCMs. The Proposed Project is located near transit resulting in low fuel consumption and would be multi-family residential development one of the most energy efficient housing types. The Proposed Project will also be constructed to meet all CALGreen and the City's Green Building Code standards. See also regulatory control measures to reduce

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	the characteristics of the natural environment. • Use high-efficiency lighting and cooking devices. • Incorporate passive solar design. • Use high-reflectivity building materials and multiple glazing. o Prohibit gas-powered landscape maintenance equipment. • Install electric vehicle charging stations. • Reduce wood burning stoves or fireplaces. • Provide bike lanes accessibility and parking at residential developments.	GHG emissions.
Geology and Soils		
Earthquake or other seismic activity. Unstable geologic unit or soil, expansive soils.	MM-GEO-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consistent with Section 4.7.2 of the Alquist-Priolo Earthquake Fault Zoning Act, conduct a geologic investigation to demonstrate that proposed buildings would not be constructed across active faults. An evaluation and written report of a specific site can and should be prepared by a licensed geologist. If an active fault is found and unfit for human occupancy over the fault, place a setback of 50 feet from the fault. • Use site-specific fault identification investigations conducted by licensed geotechnical professionals in accordance with the requirements of the AlquistPriolo Act, as well as any applicable Caltrans regulations that exceed or reasonably replace the requirements of the Act to either determine that the anticipated risk to people and property is at or below acceptable levels or site-specific measures have been incorporated into the project design, consistent with the CBC and UBC. • Ensure that projects located within or across Alquist-Priolo Zones comply with design requirements provided in Special Publication 117, published by the California Geological Survey, as well as relevant local, regional, state, and federal design criteria for construction in seismic areas. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that projects are designed in accordance with county and city code requirements for seismic ground shaking. With respect to design, consider seismicity of the site, soil response at the site, and dynamic	The Proposed Project substantially complies with this measure. The Proposed Project would not exacerbate geologic impacts. Further, the Proposed Project already substantially conforms with this Mitigation Measure as it is subject to regulatory compliance measures, which are capable of avoiding or reducing the significant effects on the potential for projects to result in the exposure of people and infrastructure to the effects of earthquakes, seismic related ground-failure, liquefaction, and seismically induced landslides, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. GEO-RCM-1: Prior to issuance of any permit, a geology/soils report shall be submitted to the Grading Division to provide design recommendations for the proposed grading/construction along with an

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	characteristics of the structure, in compliance with the appropriate California Building Code and State of California design standards for construction in or near fault zones, as well as all standard design, grading, and construction practices in order to avoid or reduce geologic hazards. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert be required prior to preparation of project designs. These investigations shall identify areas of potential expansive soils and recommend remedial geotechnical measures to eliminate any problems. Recommended corrective measures, such as structural reinforcement and replacing soil with engineered fill, shall be implemented in project designs. Geotechnical investigations identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Adhere to design standards described in the CBC and all standard geotechnical investigation, design, grading, and construction practices to avoid or reduce impacts from earthquakes, ground shaking, ground failure, and landslides. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, design projects to avoid geologic units or soils that are unstable, expansive soils and soils prone to lateral spreading, subsidence, liquefaction, or collapse wherever feasible.	evaluation by the project geologist to confirm that the proposed habitable structures are located within the shadow zone of the fault study exploration. In compliance with GEO-RCM-1, a report has been completed and approved by the Los Angeles Department of Building and Safety, Grading Division for the Proposed Project. GEO-RCM-2: During construction, the project engineering geologist shall observe all excavations that expose the natural alluvial soils and bedrock to verify the conclusions of the fault investigation, and confirm that no Holocene faults or ground deformation are exposed. The project engineering geologist shall post a notice on the job site for the City Inspector and the Contractor stating that the excavation (or portion thereof) has been observed, documented and meets the conditions of the report. No fill or lagging shall be placed until the LADBS Inspector has verified the documentation. GEO-RCM-3: A supplemental report that summarizes the geologist's observations (including photographs and simple logs of

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		excavations) shall be submitted to the Grading Division of the Department upon completion of the excavations. If evidence of active faulting is observed, the Grading Division shall be notified immediately. (7009)
Soil erosion, loss of top soil.	MM-GEO-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the potential for projects to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with County and City Public Works and Building and Safety Department Standards, the Uniform Building Code (UBC) and the California Building Code (CBC), and other applicable laws and regulations governing building standards, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. • Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and conduct the following: • File a Notice of Intent (NOI) with the SWRCB. • Prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. • Submit to the RWQCB a copy of the SWPPP and evidence of	The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to regulatory compliance measures which are capable of avoiding or reducing the significant effects on the potential for the Proposed Project to result in substantial soil erosion or the loss of topsoil, that are in the jurisdiction and responsibility of public agencies, regulatory agencies, and/or Lead Agencies. In addition, in compliance with GEO-RCM-1, a report has been completed and approved by the Los Angeles Department of Building and Safety, Grading Division for the Proposed Project.

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	submittal of the NOI to the SWRCB. Implementation of the SWPPP should start with the commencement of construction and continue through the completion of the project. • After construction is completed, the project sponsor can and should submit a notice of termination to the SWRCB. • Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation. • Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.	
Greenhouse Gases		
GHG Emissions, plan consistency.	MM-GHG-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential to conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases, the Lead Agency can and should consider mitigation measures to mitigate the significant effects of greenhouse gas impacts to ensure compliance with all applicable laws, regulations, governing CAPs, general plans, adopted policies and plans of local agencies, and standards set forth by responsible public agencies for the purpose of reducing emissions of greenhouse gases, as applicable and feasible. Consistent with Section 15126.4(c) of the State CEQA Guidelines, compliance can be achieved through adopting greenhouse gas mitigation measures that have been used for projects in the SCAG region set forth below: • Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision. • Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines. • Off-site measures to mitigate a project's emissions. • Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions • Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to, transit-active transportation	The Proposed Project already substantially conforms with this Mitigation Measure as it is consistent with State, regional, and City of Los Angeles GHG emission reduction goals and objectives, therefore, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In addition to consistency with State, regional, and local GHG emission goals and objectives, the Proposed Project has incorporated various measures to reduce GHG emissions. For example, the Proposed Project would incorporate specific measures to the extent feasible including, but are not limited to electric vehicle charging stations in the parking

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	coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles. • Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network. • Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations. • Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs. • Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles. • Land use siting and design measures that reduce GHG emissions.	structure; five (5) percent of total spaces would be designated for low emitting, fuel efficient and carpool/van pool vehicles; and 15 percent of the roof area set aside for future solar panels.
Hazards		
Routine transport, use or disposal of hazardous materials, reasonably foreseeable upset, accident. Hazardous emissions near a school.	MM-HAZ-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the routine transport, use or disposal of hazardous materials that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Hazardous Waste Control Act, the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, the Hazardous Waste Source Reduction and Management Review Act of 1989, the California Vehicle Code, and other applicable laws and regulations, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. • Where the construction or operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. • Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notification of the anticipated schedule of transport of such materials. • Specify the need for interim storage and disposal of hazardous materials to be undertaken consistent with applicable federal, state, and local statutes and regulations in the plans and specifications of the transportation improvement project. • Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep	This Mitigation Measure is not relevant to the Project as the Proposed Project will not result in the routine transport, use, or disposal of hazardous materials other than modest amounts of typical cleaning supplies and solvents used for housekeeping and janitorial purposes, and the use of such substances would comply with State Health Codes and Regulations. Construction could involve the use of potential hazardous materials, including vehicle fuels, oils, and transmission fluids. However, all potentially hazardous materials would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance

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	the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. • Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the Operations Manual for projects. • Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. • Avoid overtopping construction equipment fuel gas tanks. • During routine maintenance of construction equipment, properly contain and remove grease and oils. • Properly dispose of discarded containers of fuels and other chemicals.	with applicable standards and regulations. According to the Phase I Environmental Site Assessment prepared on September 19, 2014 found the presence of lead-based paint on the project site. The Phase I discusses recommendations to be found in an XRF Survey of the Project under a separate cover (EMG Project No. 110951.14R-001.182), however; there are only minor alterations would be taken to the existing adjacent structure and all regulatory measures would cover any risks. Furthermore, the City of Los Angeles maintains specific code requirements when developments find lead-based paint. All construction activities would occur in adherence with these regulations guiding such activities to minimize any upset or accident release of hazardous materials into the environment.
Hazardous materials sites, Government Code section 65962.5.	MM-HAZ-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines; SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to a project placed on a hazardous materials site, that are in the jurisdiction and responsibility of regulatory agencies, other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the provisions of the Government Code Section 65962.5, Occupational Safety and Health Code of 197; the Response Conservation, and Recovery Act; the Comprehensive Environmental Response, Compensation, and Liability Act; the Hazardous Materials Release and Clean-up Act, and the Uniform	This Mitigation Measure is not relevant to the Project as a Phase I Environmental Site Assessment completed for the Proposed Project site indicates that based on review of the regulatory database report, and by cross-referencing name, address, and zip code,

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	Building Code, and County and City building standards, and all applicable federal, state, and local laws and regulations governing hazardous waste sites, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects. • Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer. • Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. • Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. • Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. • Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. • Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. • Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to: notification of regulatory agencies and	EMG was able to conclude that the Project is not 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 not create a significant hazard to the public or the environment.

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	identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. • Use best management practices (BMPs) regarding potential soil and groundwater hazards. • Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. • Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. • Prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. • Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. • If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations. • Where projects include the demolitions or modification of buildings constructed prior to 1968, complete an assessment for the potential presence or lack thereof of ACM, lead-based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. • Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health	

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	Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials. • Where a project site is determined to contain materials classified as hazardous waste by state or federal law are present, submit written confirmation to appropriate agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
Wildland fire risk.	MM-HAZ-8(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the potential exposure of people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands; that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with local general plans, specific plans, and regulations provided by County and City fire departments, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Adhere to fire code requirements, including ignition-resistant construction with exterior walls of noncombustible or ignition resistant material from the surface of the ground to the roof system. Other fire-resistant measures would be applied to eaves, vents, windows, and doors to avoid any gaps that would allow intrusion by flame or embers. • Adhere to the Multi-Jurisdictional Hazards Mitigation Plan, as well as local general plans, including policies and programs aimed at reducing the risk of wildland fires through land use compatibility, training, sustainable development, brush management, and public outreach. • Encourage the use of fire-resistant vegetation native to Southern California and/or to the local microclimate (e.g., vegetation that has high moisture content, low growth habits, ignition-resistant foliage, or evergreen growth), eliminate brush and chaparral, and discourage the use of fire-promoting species especially non-native, invasive species (e.g., pampas grass, fennel, mustard, or the giant reed) in the immediate vicinity of development in areas with high fire threat. • Encourage natural revegetation or seeding with local, native species after a fire and discourage reseeding of non-native, invasive species to promote healthy, natural ecosystem regrowth. Native vegetation is more likely to have deep root systems that prevent slope failure	This Mitigation Measure is not relevant to the Project as the Project Site is located in an urbanized area that does not contain any wildlands or urbanized areas intermixed with wildlands.

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	and erosion of burned areas than shallow-rooted non-natives. • Submit a fire safety plan (including phasing) to the Lead Agency and local fire agency for their review and approval. The fire safety plan shall include all of the fire safety features incorporated into the project and the schedule for implementation of the features. The local fire protection agency may require changes to the plan or may reject the plan if it does not adequately address fire hazards associated with the project as a whole or the individual phase. • Utilize Fire-wise Land Management by encouraging the use of fire-resistant vegetation and the elimination of brush and chaparral in the immediate vicinity of development in areas with high fire threat. • Promote Fire Management Planning that would help reduce fire threats in the region as part of the Compass Blueprint process and other ongoing regional planning efforts. • Encourage the use of fire-resistant materials when constructing projects in areas with high fire threat.	
Hydrology and Water Quality		
Violation of water quality standards or waste discharge requirements. Alteration of site drainage, runoff exceeding stormwater drainage system capacity, other degrading water quality.	MM-HYD-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Boards and other regulatory agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all applicable laws, regulations, and health and safety standards set forth by regulatory agencies responsible for regulating and enforcing water quality and waste discharge requirements in a manner that conforms with applicable water quality standards and/or waste discharge requirements, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. • Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. • Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. • Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. • Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. • Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse. • Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project.	The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to regulatory compliance measures which are capable of avoiding or reducing the potential impacts on water quality on related waste discharge requirements that are within the jurisdiction and authority of the Regional Water Quality Control Board, the City of Los Angeles Low Impact Development (LID) Ordinance and other regulatory agency requirements including, but not limited to, the National Pollution Discharge Elimination System (NPDES) permitting requirements.

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	• Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. • Provide structural storm water runoff treatment consistent with the applicable urban storm water runoff permit. Where Caltrans is the operator, the statewide permit applies. • Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. • Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. • Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. • Design projects to maintain volume of runoff, where any downstream receiving water body has not been designed and maintained to accommodate the increase in flow velocity, rate, and volume without impacting the water's beneficial uses. Pre-project flow velocities, rates, and volumes must not be exceeded. This applies not only to increases in storm water runoff from the project site, but also to hydrologic changes induced by flood plain encroachment. Projects should not cause or contribute to conditions that degrade the physical integrity or ecological function of any downstream receiving waters. • Provide culverts and facilities that do not increase the flow velocity, rate, or volume and/or acquiring sufficient storm drain easements that accommodate an appropriately vegetated earthen drainage channel. • Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs.	
Depletion of groundwater supply, interfere with groundwater supply.	MM-HYD-2(b): Consistent with the provisions of the Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts to groundwater resources that are within the jurisdiction and authority of the State Water Resources Control Board, Regional Water Quality Control Boards, Water Districts, and other groundwater management agencies. Where the Lead	This Mitigation Measure is not relevant to the Project as the Project Site is located in an urbanized area that does not contain any

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	Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with applicable laws, regulations, and health and safety standards set forth by federal, state, regional, and local authorities that regulate groundwater management, consistent with the provisions of the Groundwater Management Act and implementing regulations, including recharge in a manner that conforms with federal, state, regional, and local standards for sustainable management of groundwater basins, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: For projects requiring continual dewatering facilities, implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent possible, adverse impacts on groundwater for the life of the project, Construction designs shall comply with appropriate building codes and standard practices including the Uniform Building Code. Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimize to the greatest extent possible, new impervious surfaces, including the use of in-lieu fees and off-site mitigation. Avoid designs that require continual dewatering where feasible. Avoid construction and siting on groundwater recharge areas, to prevent conversion of those areas to impervious surface Reduce hardscape to the extent feasible to facilitate groundwater recharge as appropriate.	significant groundwater recharge areas.
Structures within 100-year floodplain hazard area, risk due to levee or dam failure, seiche, tsunami, or mud flow.	MM-HYD-8(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows in a 100-year flood hazard area that are within the jurisdiction and authority of the Flood Control District, County Public Works Departments, local agencies, regulatory agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with all federal, state, and local floodplain regulations, consistent with the provisions of the National Flood Insurance Program, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Comply with Executive Order 11988 on Floodplain Management, which requires avoidance of incompatible floodplain development, restoration and preservation of the natural and beneficial floodplain values, and maintenance of consistency with the standards and criteria of the National Flood Insurance Program. • Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of	This Mitigation Measure is not relevant to the Project as the Project Site is located in an urbanized area that is not within 100-year floodplain hazard area, or at risk due to levee or dam failure, seiche, tsunami, or mud flow.

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	floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	
Land Use		
Land use plans, policies and regulations.	MM-LU-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects regarding the potential to conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project that are within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid conflicts with zoning and ordinance codes, general plans, land use plan, policy, or regulation of an agency with jurisdiction over the project, as applicable and feasible. Such measures may include the following, and/or other comparable measures identified by the Lead Agency: • Where an inconsistency with the adopted general plan is identified at the proposed project location, determine if the environmental, social, economic, and engineering benefits of the project warrant a variance from adopted zoning or an amendment to the general plan.	The Proposed Project substantially complies with this measure. The Proposed Project is located in proximity to transit and would be consistent with plans and polices with respect to any potential physical environmental impacts.
Physically divide a community.	MM-LU-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to the physical division of an established community in a project area within the jurisdiction and responsibility of local jurisdictions and Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the goals and policies established within the applicable adopted county and city general plans within the SCAG region to avoid the creation of barriers that physically divide such communities, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Consider alignments within or adjacent to existing public rights-of-way. • Consider designs to include sections above- or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. • Wherever feasible incorporate direct crossings, overcrossings, or undercrossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). • Consider realigning roadway or interchange improvements to avoid the affected area of residential communities or cohesive neighborhoods. • Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: o Alignment shifts to minimize the area affected	This Mitigation Measure is not relevant to the Proposed Project as Proposed Project site is an infill site in an urban area and would not divide a community.

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	• Design new transportation facilities that consider access to existing community facilities. Identify and consider during the design phase of the project, community amenities and facilities in the design of the project. • Design roadway improvements that minimize barriers to pedestrians and bicyclists. Determine during the design phase, pedestrian and bicycle routes that permit connections to nearby community facilities.	
Mineral Resources		
Loss of availability of a known mineral resource.	MM-MIN-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the loss of availability of a known mineral resource that would be of value to the region and the residents of the state or a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan that are within the jurisdiction and responsibility of the California Department of Conservation, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with SMARA, California Department of Conservation regulations, local general plans, specific plans, and other laws and regulation governing mineral or aggregate resources, as applicable and feasible. Such measures may include the following, other comparable measures identified by the Lead Agency: • Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. • Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and city general plans, or other comparable measures: • Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. • Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. • Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. • Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open	This Mitigation Measure is not relevant to the Proposed Project as Proposed Project site is an infill site in an urban area where no mineral extraction is taking place.

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	space or other general plan land use categories and zoning that allow for mining of mineral resources.	
Noise		
Expose people to noise in excess of local standards. Excessive groundborne vibration or noise levels. Substantial permanent increase in noise level. Substantial temporary increase in noise levels.	MM-NOISE-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of noise impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure consistency with the Federal Noise Control Act, California Government Code Section 65302, the Governor's Office of Planning and Research Noise Element Guidelines, and the noise ordinances and general plan noise elements for the counties or cities where projects are undertaken, Federal Highway Administration and Caltrans guidance documents and other health and safety standards set forth by federal, state, and local authorities that regulate noise levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Install temporary noise barriers during construction. • Include permanent noise barriers and sound-attenuating features as part of the project design. • Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance Where construction activities are authorized outside the limits established by the noise element of the general plan or noise ordinance, notify affected sensitive noise receptors and all parties who will experience noise levels in excess of the allowable limits for the specified land use, of the level of exceedance and duration of exceedance; and provide a list of protective measures that can be undertaken by the individual, including temporary relocation or use of hearing protective devices. • Limit speed and/or hours of operation of rail and transit systems during the selected periods of time to reduce duration and frequency of conflict with adopted limits on noise levels. • Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. • Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance. • Hold a preconstruction meeting with the job inspectors and the general contractor/on-site project manager to confirm that noise measures and practices (including construction hours, neighborhood notification, posted signs, etc.) are completed. • Designate an on-site construction complaint and enforcement manager for the project. • Ensure that construction equipment are properly maintained per	The Proposed Project substantially complies with this measure. The City imposes the following MMs on the project that are equal or more effective than the SCAG MM: NOI-MM-1: All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA. NOI-MM-2: Temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA shall be erected along the Project's northern and western boundaries to obstruct line of sight noise travel from the Project site to Canyon Co-Op School, Las Palmas Senior Citizen Center, and Franklin Avenue Residences. NOI-MM-3: At the Project's eastern and southern boundaries, temporary sound barriers capable of achieving a sound attenuation of at least 15 dBA shall be erected to obstruct line of sight noise travel between the Project site and Cherokee Avenue Residences.

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	manufacturers' specifications and fitted with the best available noise suppression devices (e.g., mufflers, silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. • Ensure that impact tools (e.g., jack hammers, pavement breakers, and rock drills) used for project construction are hydraulically or electrically powered to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust can and should be used. External jackets on the tools themselves can and should be used, if such jackets are commercially available and this could achieve a reduction of 5 dBA. Quieter procedures can and should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. • Ensure that construction equipment are not idle for an extended time in the vicinity of noise-sensitive receptors. • Locate fixed/stationary equipment (such as generators, compressors, rock crushers, and cement mixers) as far as possible from noise-sensitive receptors. • Locate new roadway lanes, roadways, rail lines, transit-related passenger station and related facilities, park-and-ride lots, and other new noise-generating facilities away from sensitive receptors to the maximum extent feasible. • Where feasible, eliminate noise-sensitive receptors by acquiring freeway and rail rights-of-way. • Use noise barriers to protect sensitive receptors from excessive noise levels during construction. • Construct sound-reducing barriers between noise sources and noise-sensitive receptors to minimize exposure to excessive noise during operation of transportation improvement projects, including but not limited to earth-berms or sound walls. • Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. • Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. • Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.	In addition, , the Project in part complies with this MM under regulatory control measures relating to LAMC which regulates noise from construction activities, City of Los Angeles Building Regulations Ordinance No. 178,048, which requires a construction site notice to be provided, and LAMC Section 112.02 which requires that any heating, ventilation, and air conditioning (HVAC) system within any zone of the City not cause an increase in ambient noise levels on any other occupied property, would be applied to the Proposed Project.
Expose people to excessive groundborne vibration or noise.	MM-NOISE-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects of vibration impacts that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the Federal Transportation Authority and Caltrans guidance documents, county or city transportation commission, noise and vibration ordinances	This Mitigation Measure is not applicable to the Proposed Project, as analysis has demonstrated that no sensitive receptor would experience potentially damaging levels of ground-borne

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	and general plan noise elements for the counties and cities where projects are undertaken and other health and safety regulations set forth by federal state, and local authorities that regulate vibration levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. • For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. • For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. • For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as the use of more than one pile driver to shorten the total pile driving duration.	vibration from the Project's construction activities. *Note: On-Site sensitive receptors could be as close as a similar distance to the receptors at 1847 N Cherokee. Although on-site receptors are not required to be analyzed under CEQA, the impacts at these receptors would be similar to the impacts experienced at the neighboring 1847 N Cherokee residences, which would be less than significant.*
Population, Housing and Employment		
Displacement of housing requiring replacement housing elsewhere.	MM-PHE-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects related to displacement that are within the jurisdiction and responsibility of Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to minimize the displacement of existing housing and people and to ensure compliance with local jurisdiction's housing elements of their general plans, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. • Prioritize the use existing ROWs, wherever feasible. • Develop a construction schedule that minimizes potential neighborhood detonation from protracted waiting periods between right-of-way acquisition and construction.	This Mitigation Measure is applicable to transportation projects and would not apply to the Proposed Project. Further, the Proposed Project would involve the construction of new housing and would not involve any displacement of housing.

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Public Services		
Adverse effects associated with new or physically altered government facilities for fire protection and emergency response.	MM-PS-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable response times for fire protection and emergency response services that are within the jurisdiction and responsibility of fire departments, law enforcement agencies, and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the performance objectives established in the adopted county and city general plans, to provide sufficient structures and buildings to accommodate fire and emergency response, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking into account project and site-specific considerations as applicable and feasible: • Where the project has the potential to generate the need for expanded emergency response services which exceed the capacity of existing facilities, provide for the construction of new facilities directly as an element of the project or through dedicated fair share contributions toward infrastructure improvements. • During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would significantly impact fire protection or emergency services.
Adverse effects associated with new or physically altered government facilities for police protection.	MM-PS-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from the need for new or physically altered governmental facilities in order to maintain acceptable service ratios for police protection services that are within the jurisdiction and responsibility of law enforcement agencies and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with the Community Facilities Act of 1982, the goals and policies established within the applicable adopted county and city general plans and the standards established in the safety elements of county and city general plans to maintain police response performance objectives, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency,	This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would significantly impact police protection services.

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	taking in to account project and site-specific considerations as applicable and feasible, including: • Coordinate with public security agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for public protective security services and that any required additional construction of buildings is incorporated into the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements and/or personnel. • During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	
Adverse effects associated with new or physically altered government facilities for schools.	MM-PS-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects from 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 that are within the jurisdiction and responsibility of school districts and local jurisdictions. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures consistent with Community Facilities Act of 1982, the California Education Code, and the goals and policies established within the applicable adopted county and city general plans to ensure that the appropriate school district fees are paid in accordance with state law, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency, taking in to account project and site-specific considerations as applicable and feasible: • Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable. • During project-level review of government facilities projects, require implementation of Mitigation Measures MM-AES-1(b), MM-AES-3(b), MM-AES-4(b), MM-AF-1(b), MM-AF-2(b), MM-BIO-1(b), MM-BIO-2(b), MM-BIO-3(b), MM-CUL-1(b), MM-CUL-2(b), MM-CUL-3(b), MM-CUL-4(b), MM-GEO-1(b), MMGEO-1(b), MM-HYD-1(b), MM-USS-3(b), MM-USS-4(b), and MM-USS-6(b) to avoid or reduce significant environmental impacts associated with the construction	This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would significantly impact school services.

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	or expansion of such facilities, through the imposition of conditions required to be followed to avoid or reduce impacts associated with air quality, noise, traffic, biological resources, greenhouse gas emissions, hydrology and water quality, and others that apply to specific construction or expansion of new or expanded public service facilities.	
Recreation		
Increase use and physical deterioration of recreational facilities.	MM-REC-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on the integrity of recreation facilities, particularly neighborhood parks in the vicinity of HQTAs and other applicable development projects, that are within the jurisdiction and responsibility of other public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures capable of avoiding or reducing significant impacts on the use of existing neighborhood and regional parks or other recreational facilities to ensure compliance with county and city general plans and the Quimby Act, as applicable and feasible. Such measures may include the following, or other comparable measures identified by the Lead Agency: • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. • Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: Increasing the accessibility to natural areas for outdoor recreation, Promoting infill development and redevelopment to revitalize existing communities, Utilizing "green" development techniques, Promoting water-efficient land use and development, Encouraging multiple uses, Including trail systems and trail segments in General Plan recreation standards. • Prior to the issuance of permits, where construction and operation of projects would require the acquisition or development of protected open space or recreation lands, demonstrate that existing neighborhood parks can be expanded or new neighborhood parks developed such that there is no net decrease in acres of neighborhood park area available per capita in the HQTA.	This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would significantly impact recreational facilities. Further, the Proposed Project would substantially comply with the MM by implementing the following regulatory compliance measure : PS-RCM-4: Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.

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Traffic and Transportation		
Conflict with measures of effectiveness for performance of the circulation system.	MM-TRA-1(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency: • Institute teleconferencing, telecommute and/or flexible work hour programs to reduce unnecessary employee transportation. • Create a ride-sharing program by designating a certain percentage of parking spaces for ride sharing vehicles, designating adequate passenger loading and unloading for ride sharing vehicles, and providing a web site or message board for coordinating rides. • Provide a vanpool for employees. • Fund capital improvement projects to accommodate future traffic demand in the area. • Provide a Transportation Demand Management (TDM) plan containing strategies to reduce on-site parking demand and single occupancy vehicle travel. The TDM shall include strategies to increase bicycle, pedestrian, transit, and carpools/vanpool use, including: Inclusion of additional bicycle parking, shower, and locker facilities that exceed the requirement, Construction of bike lanes per the prevailing Bicycle Master Plan (or other similar document), Signage and striping onsite to encourage bike safety, Installation of pedestrian safety elements (such as cross walk striping, curb ramps, countdown signals, bulb outs, etc.) to encourage convenient crossing at arterials, Installation of amenities such as lighting, street trees, trash and any applicable streetscape plan, Direct transit sales or subsidized transit passes, Guaranteed ride home program o Pre-tax commuter benefits (checks), On-site car-sharing program (such as City Car Share, Zip Car, etc.), On-site carpooling program, Distribution of information concerning alternative transportation options o Parking spaces sold/leased separately, Parking management strategies; including attendant/valet parking and shared parking spaces. • Promote ride sharing programs e.g., by designating a certain percentage of parking spaces for high-occupancy vehicles, providing larger parking spaces to accommodate vans used for ride-sharing, and designating adequate passenger loading and unloading and waiting areas. • Encourage bicycling to transit facilities by providing additional bicycle parking, locker facilities, and bike lane access to transit	The Proposed Project already substantially complies with this Mitigation Measure because it incorporates project design features that avoid or reduce the potential for conflicts with the established measures of effectiveness for the performance of the circulation system that are within the jurisdiction and responsibility of Lead Agencies. In addition, a Construction Plan shall be submitted to LADOT for review and approval in accordance with the LAMC prior to the start of any construction work as well as a traffic study, approved by LADOT on January 26, 2017, determined to incorporate project design features.

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	facilities when feasible. • Encourage the use of public transit systems by enhancing safety and cleanliness on vehicles and in and around stations, providing shuttle service to public transit, offering public transit incentives and providing public education and publicity about public transportation services. • Encourage bicycling and walking by incorporating bicycle lanes into street systems in regional transportation plans, new subdivisions, and large developments, creating bicycle lanes and walking paths directed to the location of schools and other logical points of destination and provide adequate bicycle parking, and encouraging commercial projects to include facilities on-site to encourage employees to bicycle or walk to work. • Build or fund a major transit stop within or near transit development upon consultation with applicable CTCs. • Work with the school districts to improve pedestrian and bike access to schools and to restore or expand school bus service using lower-emitting vehicles. • Provide information on alternative transportation options for consumers, residents, tenants and employees to reduce transportation-related emissions. • Educate consumers, residents, tenants and the public about options for reducing motor vehicle-related greenhouse gas emissions. Include information on trip reduction; trip linking; vehicle performance and efficiency (e.g., keeping tires inflated); and low or zero-emission vehicles. • Purchase, or create incentives for purchasing, low or zero-emission vehicles. • Create local "light vehicle" networks, such as neighborhood electric vehicle systems. • Enforce and follow limits idling time for commercial vehicles, including delivery and construction vehicles. • Provide the necessary facilities and infrastructure to encourage the use of low or zero-emission vehicles. • Reduce VMT-related emissions by encouraging the use of public transit through adoption of new development standards that would require improvements to the transit system and infrastructure, increase safety and accessibility, and provide other incentives. • Project Selection: Give priority to transportation projects that would contribute to a reduction in vehicle miles traveled per capita, while maintaining economic vitality and sustainability. o Separate sidewalks whenever possible, on both sides of all new street improvement projects, except where there are severe topographic or natural resource constraints. • Public Involvement: Carry out a comprehensive public involvement and input process that provides information about transportation issues, projects, and processes to community members and other stakeholders, especially to those traditionally underserved by transportation services. • Transit and Multimodal Impact Fees: Assess transit and multimodal	

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	impact fees for new developments to fund public transportation infrastructure, bicycle infrastructure, pedestrian infrastructure and other multimodal accommodations. o Implement traffic and roadway management strategies to improve mobility and efficiency, and reduce associated emissions. • System Monitoring: Monitor traffic and congestion to determine when and where new transportation facilities are needed in order to increase access and efficiency. • Arterial Traffic Management: Modify arterial roadways to allow more efficient bus operation, including bus lanes and signal priority/preemption where necessary. • Signal Synchronization: Expand signal timing programs where emissions reduction benefits can be demonstrated, including maintenance of the synchronization system, and will coordinate with adjoining jurisdictions as needed to optimize transit operation while maintaining a free flow of traffic. • HOV Lanes: Encourage the construction of high-occupancy vehicle (HOV) lanes or similar mechanisms whenever necessary to relieve congestion and reduce emissions. • Delivery Schedules: Establish ordinances or land use permit conditions limiting the hours when deliveries can be made to off-peak hours in high traffic areas, Implement and supporting trip reduction programs, Support bicycle use as a mode of transportation by enhancing infrastructure to accommodate bicycles and riders, and providing incentives. • Establish standards for new development and redevelopment projects to support bicycle use, including amending the Development Code to include standards for safe pedestrian and bicyclist accommodations, and require new development and redevelopment projects to include bicycle facilities. • Bicycle and Pedestrian Trails: Establish a network of multi-use trails to facilitate safe and direct off-street bicycle and pedestrian travel, and will provide bike racks along these trails at secure, lighted locations. • Bicycle Safety Program: Develop and implement a bicycle safety educational program to teach drivers and riders the laws, riding protocols, routes, safety tips, and emergency maneuvers. • Bicycle and Pedestrian Project Funding: Pursue and provide enhanced funding for bicycle and pedestrian facilities and access projects. • Bicycle Parking: Adopt bicycle parking standards that ensure bicycle parking sufficient to accommodate 5 to 10 percent of projected use at all public and commercial facilities, and at a rate of at least one per residential unit in multiple-family developments (suggestion: check language with League of American Bicyclists). • Adopt a comprehensive parking policy to discourage private vehicle use and encourage the use of alternative transportation by incorporating the following: Reduce the available parking spaces for private vehicles while increasing parking spaces for shared vehicles, bicycles, and other alternative modes of transportation; Eliminate or	

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	reduce minimum parking requirements for new buildings; "Unbundle" parking (require that parking is paid for separately and is not included in the base rent for residential and commercial space); Use parking pricing to discourage private vehicle use, especially at peak times; Create parking benefit districts, which invest meter revenues in pedestrian infrastructure and other public amenities; Establish performance pricing of street parking, so that it is expensive enough to promote frequent turnover and keep 15 percent of spaces empty at all times; Encourage shared parking programs in mixed-use and transit-oriented development areas. • Establish policies and programs to reduce onsite parking demand and promote ride-sharing and public transit at large events, including: Promote the use of peripheral parking by increasing on-site parking rates and offering reduced rates for peripheral parking; Encourage special event center operators to advertise and offer discounted transit passes with event tickets; Encourage special event center operators to advertise and offer discount parking incentives to carpooling patrons, with four or more persons per vehicle for on-site parking; Promote the use of bicycles by providing space for the operation of valet bicycle parking service. • Parking "Cash-out" Program: Require new office developments with more than 50 employees to offer a Parking "Cash-out" Program to discourage private vehicle use. • Pedestrian and Bicycle Promotion: Work with local community groups and downtown business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian and bicycle modes of transportation. • Fleet Replacement: Establish a replacement policy and schedule to replace fleet vehicles and equipment with the most fuel efficient vehicles practical, including gasoline hybrid and alternative fuel or electric models.	
Conflict with applicable Congestion Management Plan.	MM-TRA-2(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding conflict with an applicable congestion management program that are within the jurisdictions of the lead agencies, including, but not limited to, VMT, VHD and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways. This measure need only be considered where it is found by the Lead Agency to be appropriate and consistent with local transportation priorities. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with the adopted Congestion Management Plan, and other adopted local plans and policies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures such as those set forth below, or through other relevant and feasible comparable measures identified by the Lead Agency. Not all measures and/or options within each measure may apply to all jurisdictions: • Encourage a comprehensive parking policy that prioritizes system management, increase rideshare, and telecommute opportunities,	This Mitigation Measure is not applicable to the Proposed Project because it is not anticipated that it would generate enough traffic to significantly impact the adopted Congestion Management Plan.

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	including investment in non-motorized transportation and discouragement against private vehicle use, and encouragement to maximize the use of alternative transportation: Advocate for a regional, market-based system to price or charge for auto trips during peak hours. Ensure that new developments incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation. Coordinate controlled intersections so that traffic passes more efficiently through congested areas. Where traffic signals or streetlights are installed, require the use of Light Emitting Diode (LED) technology or similar technology. Encourage the use of car-sharing programs. Accommodations for such programs include providing parking spaces for the car-share vehicles at convenient locations accessible by public transportation. Reduce VHDs, especially daily heavy-duty truck vehicle hours of delay, through goods movement capacity enhancements, system management, increasing rideshare and work-at-home opportunities to reduce demand on the transportation system, investments in non-motorized transportation, maximizing the benefits of the land use-transportation connection and key transportation investments targeted to reduce heavy-duty truck delay. • Determine traffic management strategies to reduce, to the maximum extent feasible, traffic congestion and the effects of parking demand by construction workers during construction of this project and other nearby projects that could be simultaneously under construction. Develop a construction management plan that include the following items and requirements, if determined feasible and applicable by the Lead Agency: A set of comprehensive traffic control measures, including scheduling of major truck trips and deliveries to avoid peak traffic hours, detour signs if required, lane closure procedures, signs, cones for drivers, and designated construction access routes. Notification procedures for adjacent property owners and public safety personnel regarding when major deliveries, detours, and lane closures will occur. Location of construction staging areas for materials, equipment, and vehicles at an approved location. A process for responding to, and tracking, complaints pertaining to construction activity, including identification of an onsite complaint manager. The manager shall determine the cause of the complaints and shall take prompt action to correct the problem. The Lead Agency shall be informed who the Manager is prior to the issuance of the first permit Provision for accommodation of pedestrian flow. As necessary, provision for parking management and spaces for all construction workers to ensure that construction workers do not park in on street spaces. Any damage to the street caused by heavy equipment, or as a result of this construction, shall be repaired, at the project sponsor's expense., within one week of the occurrence of the damage (or excessive wear), unless further damage/excessive wear may continue; in such case, Repair shall occur prior to issuance of a final inspection of the building permit. All damage that is a threat to	

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	public health or safety shall be repaired immediately. The street shall be restored to its condition prior to the new construction as established by the Lead Agency (or other appropriate government agency) and/or photo documentation, at the sponsor's expense, before the issuance of a Certificate of Occupancy. Any heavy equipment brought to the construction site shall be transported by truck, where feasible. No materials or equipment shall be stored on the traveled roadway at any time. Prior to construction, a portable toilet facility and a debris box shall be installed on the site, and properly maintained through project completion. All equipment shall be equipped with mufflers. Prior to the end of each work-day during construction, the contractor or contractors shall pick up and properly dispose of all litter resulting from or related to the project, whether located on the property, within the public rights-of-way, or properties of adjacent or nearby neighbors. Promote "least polluting" ways to connect people and goods to their destinations. • Create an interconnected transportation system that allows a shift in travel from private passenger vehicles to alternative modes, including public transit, ride sharing, car sharing, bicycling and walking, by incorporating the following, if determined feasible and applicable by the Lead Agency: Ensure transportation centers are multi-modal to allow transportation modes to intersect. Provide adequate and affordable public transportation choices, including expanded bus routes and service, as well as other transit choices such as shuttles, light rail, and rail. To the extent feasible, extend service and hours of operation to underserved arterials and population centers or destinations such as colleges. Focus transit resources on high-volume corridors and high-boarding destinations such as colleges, employment centers and regional destinations. Coordinate schedules and routes across service lines with neighboring transit authorities. Support programs to provide "station cars" for short trips to and from transit nodes (e.g., neighborhood electric vehicles). Study the feasibility of providing free transit to areas with residential densities of 15 dwelling units per acre or more, including options such as removing service from less dense, underutilized areas to do so. Employ transit-preferential measures, such as signal priority and bypass lanes. Where compatible with adjacent land use designations, right-of-way acquisition or parking removal may occur to accommodate transit-preferential measures or improve access to transit. The use of access management shall be considered where needed to reduce conflicts between transit vehicles and other vehicles. Provide safe and convenient access for pedestrians and bicyclists to, across, and along major transit priority streets. Use park-and-ride facilities to access transit stations only at ends of regional transit ways or where adequate feeder bus service is not feasible. • Upgrade and maintain transit system infrastructure to enhance public use, if determined feasible and applicable by the Lead Agency, including: Ensure transit stops and bus lanes are safe, convenient, clean and efficient. Ensure transit stops have clearly	

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	marked street-level designation, and are accessible. Ensure transit stops are safe, sheltered, benches are clean, and lighting is adequate. Place transit stations along transit corridors within mixed-use or transit-oriented development areas at intervals of three to four blocks, or no less than one half mile. • Enhance customer service and system ease-of-use, if determined feasible and applicable by the Lead Agency, including: Develop a Regional Pass system to reduce the number of different passes and tickets required of system users. Implement "Smart Bus" technology, using GPS and electronic displays at transit stops to provide customers with "real-time" arrival and departure time information (and to allow the system operator to respond more quickly and effectively to disruptions in service). Investigate the feasibility of an on-line trip-planning program. • Prioritize transportation funding to support a shift from private passenger vehicles to transit and other modes of transportation, if determined feasible and applicable by the Lead Agency, including: Give funding preference to improvements in public transit over other new infrastructure for private automobile traffic. Before funding transportation improvements that increase roadway capacity and VMT, evaluate the feasibility and effectiveness of funding projects that support alternative modes of transportation and reduce VMT, including transit, and bicycle and pedestrian access. • Promote ride sharing programs, if determined feasible and applicable by the Lead Agency, including: Designate a certain percentage of parking spaces for ride-sharing vehicles. Designate adequate passenger loading, unloading, and waiting areas for ride-sharing vehicles. Provide a web site or message board for coordinating shared rides. Encourage private, for-profit community car-sharing, including parking spaces for car share vehicles at convenient locations accessible by public transit. Hire or designate a rideshare coordinator to develop and implement ridesharing programs. • Support voluntary, employer-based trip reduction programs, if determined feasible and applicable by the Lead Agency, including: Provide assistance to regional and local ridesharing organizations. Advocate for legislation to maintain and expand incentives for employer ridesharing programs. Require the development of Transportation Management Associations for large employers and commercial/ industrial complexes. Provide public recognition of effective programs through awards, top ten lists, and other mechanisms. • Implement a "guaranteed ride home" program for those who commute by public transit, ride-sharing, or other modes of transportation, and encourage employers to subscribe to or support the program. • Encourage and utilize shuttles to serve neighborhoods, employment centers and major destinations. • Create a free or low-cost local area shuttle system that includes a	

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	fixed route to popular tourist destinations or shopping and business centers. • Work with existing shuttle service providers to coordinate their services. • Facilitate employment opportunities that minimize the need for private vehicle trips, including: o Amend zoning ordinances and the Development Code to include live/work sites and satellite work centers in appropriate locations. Encourage telecommuting options with new and existing employers, through project review and incentives, as appropriate. • Enforce state idling laws for commercial vehicles, including delivery and construction vehicles. • Organize events and workshops to promote GHG-reducing activities. • Implement a Parking Management Program to discourage private vehicle use, including: Encouraging carpools and vanpools with preferential parking and a reduced parking fee. Institute a parking cash-out program. Renegotiate employee contracts, where possible, to eliminate parking subsidies. Install on-street parking meters with fee structures designed to discourage private vehicle use. Establish a parking fee for all single-occupant vehicles. • Work with school districts to improve pedestrian and bicycle to schools and restore school bus service • Encourage the use of bicycles to transit facilities by providing bicycle parking lockers facilities and bike land access to transit facilities. • Monitor traffic congestion to determine where and when new transportation facilities are needed to increase access and efficiency. • Develop and implement a bicycle and pedestrian safety educational program to teach drivers and riders the laws, riding protocols, safety tips, and emergency maneuvers. • Synchronize traffic signals to reduce congestion and air quality. • Work with community groups and business associations to organize and publicize walking tours and bicycle evens. • Support legislative efforts to increase funding for local street repair.	
Inadequate emergency access. Impair or interfere with Emergency Response Plan or Evacuation Plan.	MM-TRA-5(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing impacts to emergency access that are in the jurisdiction and responsibility of fire departments, local enforcement agencies, and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider improving emergency access and ensuring compliance with the provisions of the county and city general plan, Emergency Evacuation Plan, and other regional and local plans establishing access during emergencies, as applicable and feasible. Compliance can be achieved through adopting transportation mitigation measures as set forth below, or through other comparable measures identified by the Lead Agency: • Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad	The Proposed Project already substantially complies with this Mitigation Measure because the design of the Proposed Project would not cause any alteration to the local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way. In addition, the Applicant will submit a parking

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: Identification of all roadway locations where special construction techniques (e.g., directional drilling or night construction) would be used to minimize impacts to traffic flow. Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. Scheduling of truck trips outside of peak morning and evening commute hours. Limiting of lane closures during peak hours to the extent possible. Usage of haul routes minimizing truck traffic on local roadways to the extent possible. Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. Storage of construction materials only in designated areas. Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. • Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. • Enhance emergency preparedness awareness among public agencies and with the public at large. • Provision for collaboration in planning, communication, and information sharing before, during, or after a regional emergency through the following: Incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities, Provide a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format, Enter into mutual aid agreements with other local jurisdictions, in coordination with the California OES, in the event that an event disrupts the jurisdiction's ability to function.	and driveway plan for review by the Los Angeles Fire Department (LAFD), the Bureau of Engineering (BOE) and the Los Angeles Department of Transportation (LADOT) to ensure compliance with all applicable code-required site access and circulation requirements, as well as code-required emergency access.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
Utilities and Service Systems		
Require new or expanded entitlements for wastewater treatment.	MM-USS-3(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on utilities and service systems, particularly for construction of storm water drainage facilities including new transportation and land use projects that are within the responsibility of local jurisdictions including the Riverside, San Bernardino, Los Angeles, Ventura, and Orange Counties Flood Control District, and County of Imperial. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures, as applicable and feasible. These mitigation measures are within the responsibility of the Lead Agencies and Regional Water Quality Control Boards of (Regions 4, 6, 8, and 9) pursuant to the provisions of the National Flood Insurance Act, stormwater permitting requirements for stormwater discharges for new constructions, the flood control act, and Urban Waste Management Plan. Such mitigation measures, or other comparable measures, capable of avoiding or reducing significant impacts on the use of existing storm water drainage facilities and can and should be adopted where Lead Agencies identify significant impacts on new storm water drainage facilities.	This Mitigation Measure is not applicable to the Proposed Project because analysis has demonstrated that the net increase of wastewater from the Proposed Project would not significantly impact the Hyperion Water Treatment Plant and no new or expanded entitlements for wastewater treatment would be required.
Require new or expanded entitlements for water supply.	MM-USS-4(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects on water supplies from existing entitlements requiring new or expanded services in the vicinity of HQTAs that are in the jurisdiction and responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance with EO B-29-15, provisions of the Porter –Cologne Water Quality Control Act, California Domestic Water Supply Permit requirements, and applicable County, City or other Local provisions. Such measures may include the following or other comparable measures identified by the Lead Agency: • Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings (xeriscaping), using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. • Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. • Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. • Ensure that projects requiring continual dewatering facilities implement monitoring systems and long-term administrative procedures to ensure proper water management that prevents degrading of surface water and minimizes, to the greatest extent	This Mitigation Measure is not applicable to the Proposed Project because analysis has demonstrated that the net increase of water demand from the Proposed Project would be within the projections of the City of Los Angeles's 2015 Urban Water Management Plan and no new or expanded entitlements for water supply would be required.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	possible, adverse impacts on groundwater for the life of the project. Comply with appropriate building codes and standard practices including the Uniform Building Code. • Maximize, where practical and feasible, permeable surface area in existing urbanized areas to protect water quality, reduce flooding, allow for groundwater recharge, and preserve wildlife habitat. Minimized new impervious surfaces to the greatest extent possible, including the use of in-lieu fees and off-site mitigation. • Avoid designs that require continual dewatering where feasible. • Where feasible, do not site transportation facilities in groundwater recharge areas, to prevent conversion of those areas to impervious surface.	
Landfill capacity.	MM-USS-6(b): Consistent with the provisions of Section 15091 of the State CEQA Guidelines, SCAG has identified mitigation measures capable of avoiding or reducing the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the responsibility of public agencies and/or Lead Agencies. Where the Lead Agency has identified that a project that has the potential for significant effects, the Lead Agency can and should consider mitigation measures to ensure compliance pursuant to the provisions of the Solid Waste Diversion Goals and Integrated Waste Management Plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Integrate green building measures consistent with CALGreen (California Building Code Title 24) into project design including, but not limited to the following: Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities, Inclusion of a waste management plan that promotes maximum C&D diversion, Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.), Reuse of existing structure and shell in renovation projects, Design for deconstruction without compromising safety, Design for flexibility through the use of moveable walls, raised floors, modular furniture, moveable task lighting and other reusable building components, Development of indoor recycling program and space, Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land buffer to minimize the potential adverse impacts of the landfill in neighboring communities, Locally generated waste should be disposed of regionally, considering distance to disposal site. Encourage disposal near where the waste originates as much as possible. Promote green technologies for long-distance transport of	The Proposed Project already substantially conforms with this Mitigation Measure as it is subject to regulatory compliance measures that avoid or reduce the significant effects to serve landfills with sufficient permitted capacity to accommodate solid waste disposal needs, in which 75 percent of the waste stream be recycled and waste reduction goal by 50 percent that are within the responsibility of public agencies and/or Lead Agencies.

Topic	2016 RTP/SCS PEIR Project Level Mitigation Measure	Applicability to Proposed Project
	waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and 2016 RTP/SCS policies can and should be required, Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 50 percent waste diversion target. o Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices, Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities, Develop alternative waste management strategies such as composting, recycling, and conversion technologies, Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts, Require the reuse and recycle construction and demolition waste (including, but not limited to, soil, vegetation, concrete, lumber, metal, and cardboard), Integrate reuse and recycling into residential industrial, institutional and commercial projects, Provide recycling opportunities for residents, the public, and tenant businesses, Provide education and publicity about reducing waste and available recycling services, Continue to adopt programs to comply with state solid waste diversion rate mandates and, where possible, encourage further recycling to exceed these rates, Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.	
SOURCE: 2016 SCAG RTP/SCS FEIR; Impact Sciences, 2018		

4. SB 375 STREAMLINING BENEFITS

Pursuant to PRC §21155.2(a), if the Proposed Project incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports and adopted in findings made pursuant to PRC §21081, shall be eligible for either the provisions of subdivision (b) (sustainable communities environmental assessment) or (c) (limited analysis EIR). The Proposed Project would follow subdivision (b), and the Proposed Project would be reviewed through a sustainable communities environmental assessment (SCEA), which provides streamlining benefits.

PRC §21155.2(b) states that an initial study shall be prepared to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to PRC §21159.28 based on substantial evidence in light of the whole record. The initial study shall identify any cumulative effects that have been adequately addressed and mitigated pursuant to the requirements of this division in prior applicable certified environmental impact reports.

Where the lead agency determines that a cumulative effect has been adequately addressed and mitigated, that cumulative effect shall not be treated as cumulatively considerable. As such streamlining benefits include:

1. Cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports shall not be treated as cumulatively considerable for the Proposed Project (PRC §21155.2(b)(1));

2. Growth-inducing impacts are not required to be referenced, described, or discussed (PRC §21159.28(a));

3. Project-specific or cumulative impacts from cars and light-duty truck trips generated by the Proposed Project on global warming or the regional transportation network are not required to be referenced, described, or discussed (PRC §21159.28(a);

4. Reduced density alternatives are not required to be referenced, described, or discussed to address the effects of car and light-duty truck trips generated by the Proposed Project (PRC §21159.28(b)).

The City of Los Angeles, Department of City Planning would incorporate all applicable streamlining benefits in the environmental review of the Proposed Project.

5. SCOPE OF ANALYSIS

Pursuant to PRC §21155.2(b), the SCEA is required to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to PRC §21159.28 based on substantial evidence in light of the whole record. The SCEA would also be required to identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. As such, the SCEA would analyze the following topics:

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

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

LEAD CITY AGENCY:		**COUNCIL DISTRICT:**
City of Los Angeles		CD 13 – MITCH O'FARRELL
PROJECT TITLE: Montecito II Senior Housing Project	**ENVIRONMENTAL CASE:** ENV-2017-1504-SCEA	**CASE NO.** CPC 2017-1503-DB-CU-SPR AA-2017-1505-PMLA

PROJECT LOCATION: 6650-6668 Franklin Avenue, 1850 N. Cherokee Avenue

PROJECT DESCRIPTION:

The Proposed Project is a senior residential housing development at 6650-6668 Franklin Avenue, 1850 N. Cherokee Avenue in the Hollywood Community Plan Area of the City of Los Angeles. The 33,750 square-foot corner site (0.77 acres) is bounded by Franklin Avenue to the north, North Cherokee Avenue to the east, the Las Palmas Senior Center and Canyon Co-Op School to the west, and a multi-family residential building to the south. Existing development on the site includes the Montecito Apartments and an outdoor courtyard.

The Proposed Project would include 68 new multi-family residential units (67 affordable senior units and one on-site-manager's unit) and ancillary spaces, totaling approximately 53,370 square feet of new building area, approximately 7,000 square feet of recreation/open space areas, and 57 new parking spaces on two subterranean levels, for a total of 104 on-site parking spaces. The Proposed Project would be six stories tall, up to a maximum of 76'-8" feet in height. The new building would be physically connected by a new common lobby to the existing Montecito Apartments Building, providing the residents access to both facilities and the amenities within. Up to 27 trees may be removed and replaced under the Proposed Project; no trees to be removed are within the public right-of-way.

The applicant is requesting: (1) A Density Bonus (DB) pursuant to CA Government Code Section 65915(f)(3) and LAMC Section 12.22.A.25 to permit a Senior Residential Housing Development Project with 118 existing non-conforming units and 68 new units, dedicating 99% of proposed units restricted to Low and Very Low Income Households in exchange for the following incentives: (a) An On-Menu Incentive for an increase in height to permit a new building with 76-feet, 8-inches in height in lieu of the otherwise permitted 72-foot height limit pursuant to Ordinance 165,656 and LAMC 12.21.1 B.2 for a site with more than 20 feet of grade change; (b) An Off-Menu Incentive for a decrease in yards to permit a 4-foot, 6-inch northerly side yard fronting Franklin Boulevard in lieu of the otherwise required 9-foot front yard for a 6-story building pursuant to LAMC 12.11 C.2; (c) An Off-Menu Incentive for a decrease in yards to permit a 10-foot rear yard in lieu of the otherwise required 18-foot rear yard for a 6-story building pursuant to LAMC 12.11 C.3; (2) A Conditional Use Permit to permit pursuant to 12.24 U.26, to permit a housing development project with a density increase greater than the maximum permitted in LAMC 12.22 A.25, for a total of 186 units; (3) Site Plan Review (SPR) pursuant to LAMC 16.05 C, to permit the construction, use, and maintenance of more than 50 new residential units; (4) Preliminary Parcel Map (PMLA) pursuant to LAMC 17.50, a to permit the merger and re-subdivision of five (5) ground lots into one (1) ground lot and two (2) air space lots; (5) Approval of other permits, ministerial or discretionary, in order to execute and implement the Project such as: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits; and (6) Adoption of the Sustainable Communities Environmental Assessment (SCEA).

NAME AND ADDRESS OF APPLICANT IF OTHER THAN CITY AGENCY

Thomas Safran & Associates
11812 San Vicente Blvd, #600
Los Angeles, CA 90049

FINDING:		
The Department of City Planning of the City of Los Angeles finds that the Proposed Project will NOT have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is NOT required		
SEE ATTACHED SHEET(S) FOR ANY MITIGATION MEASURES IMPOSED		
THE SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT PREPARED FOR THIS PROJECT IS ATTACHED.		
NAME OF PERSON PREPARING FORM Jenna Monterrosa	**TITLE** City Planner	**TELEPHONE NUMBER** 213-978-1377
ADDRESS 200 North Spring Street Room 720 Los Angeles, CA 90012	**SIGNATURE (Official)** Nicholas Hendrix Senior City Planner	**DATE** April 2, 2018

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
ROOM 395, CITY HALL
LOS ANGELES, CALIFORNIA 90012
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY and CHECKLIST (CEQA Guidelines Section 15063)

LEAD CITY AGENCY: City of Los Angeles	**COUNCIL DISTRICT:** CD 13 – MITCH O'FARRELL	**DATE:**
RESPONSIBLE AGENCIES: Department of City Planning		
ENVIRONMENTAL CASE: ENV-2017-1504-SCEA	**RELATED CASES:** CPC 2017-1503-DB-CU-SPR AA-2017-1505-PMLA	
PREVIOUS ACTIONS CASE NO.	❑ DOES have significant changes from previous actions. ❑ DOES NOT have significant changes from previous actions.	

PROJECT DESCRIPTION:

The Proposed Project is a senior housing residential development at 6650-6668 Franklin Avenue, 1850 N. Cherokee Avenue in the Hollywood Community Plan Area of the City of Los Angeles. The 33,750 square-foot corner site (0.77 acres) is bounded by Franklin Avenue to the north, North Cherokee Avenue to the east, the Las Palmas Senior Center and Canyon Co-Op School to the west, and a multi-family residential building to the south. Existing development on the site includes the Montecito Apartments and an outdoor courtyard.

The Proposed Project would include 68 new multi-family residential units (67 affordable senior units and one on-site-manager's unit) and ancillary spaces, totaling approximately 53,370 square feet of new building area, approximately 7,000 square feet of recreation/open space areas, and 57 new parking spaces on two subterranean levels, for a total of 104 on-site parking spaces. The Proposed Project would be six stories tall, up to a maximum of 76'-8" feet in height. The new building would be physically connected by a new common lobby to the existing Montecito Apartments Building, providing the residents access to both facilities and the amenities within.

ENVIRONMENTAL PROJECT DESCRIPTION:

The Proposed Project would include 68 new multi-family residential units (67 affordable senior units and one on-site-manager's unit) and ancillary spaces, totaling approximately 53,370 square feet of new building area, approximately 7,000 square feet of recreation/open space areas, and 57 new parking spaces on two subterranean levels, for a total of 104 on-site parking spaces. The Proposed Project would be six stories tall, up to a maximum of 76'-8" feet in height. Existing development includes the Montecito Apartments and an outdoor courtyard. This courtyard is the location for the Proposed Project and would be demolished prior to construction.

ENVIRONMENTAL SETTING:

The rectangular-shaped site is comprised of five legal parcels totaling approximately 33,793 square feet (0.78 acres); bounded by West Franklin Avenue to the north, North Cherokee Avenue to the west, the Las Palmas Senior Center on the west and a multi-family housing building to the south; multi-family housing buildings are located immediately north, east, and west of the Project Site, along Franklin Avenue. The site is currently improved with one structure, a 118-unit, 10-story residential apartment building containing affordable senior housing.

PROJECT LOCATION: 6650-6668 W. Franklin Avenue, 1855 N. Cherokee Avenue			
COMMUNITY PLAN AREA: Hollywood **STATUS:** ❑ Preliminary ❑ Proposed ☒ ADOPTED in 1988 ☒ Does Conform to Plan ❑ Does NOT Conform to Plan		**AREA PLANNING COMMISSION:** Central	**CERTFIED NEIGHBORHOOD COUNCIL:** Hollywood Hills West
EXISTING ZONING: (Q) R4-2	**MAX DENSITY ZONING:**	**LA River Adjacent:** No	
GENERAL PLAN LAND USE: High Density Residential	**MAX. DENSITY PLAN:**		

Determination (To be completed by Lead Agency)

On the basis of this initial evaluation:

- ❑ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ❑ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ❑ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ❑ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ❑ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

☒ I find that the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and/or a qualified "residential or mixed use residential project" that satisfies the requirements of Section 21159.28(d) of the PRC, and although the Project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because this Sustainable Communities Environmental Assessment (SCEA) identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.

Signature	**City Planner** **Title**	**213-978-1377** **Phone**

Evaluation of Environmental Impacts:

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

Environmental Factors Potentially Affected:

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

❑ **AESTHETICS**	❑ **HAZARDS AND HAZARDOUS MATERIALS**	❑ **POPULATION AND HOUSING**
❑ **AGRICULTURE AND FOREST RESOURCES**	❑ **HYDROLOGY AND WATER QUALITY**	❑ **PUBLIC SERVICES**
❑ **AIR QUALITY**	❑ **LAND USE AND PLANNING**	❑ **RECREATION**
❑ **BIOLOGICAL RESOURCES**	❑ **MINERAL RESOURCES**	❑ **TRANSPORTATION AND TRAFFIC**
❑ **CULTURAL RESOURCES**	❑ **NOISE**	❑ **TRIBAL CULTURAL RESOURCES**
❑ **GEOLOGY AND SOILS**		❑ **UTILITIES**
❑ **GREENHOUSE GAS EMISSIONS**		❑ **MANDATORY FINDINGS OF SIGNIFICANCE**

SUSTAINABLE COMMUNITIES ENVIRONMENTAL ASSESSMENT CHECKLIST

(To be completed by the Lead City Agency)

Background

PROPONENT NAME:
Thomas Safran & Associates

PHONE NUMBER:
(310) 820-4888

APPLICANT ADDRESS:
11812 San Vicente Blvd, #600
Los Angeles, CA 90049

AGENCY REQUIRING CHECKLIST:
Department of City Planning

DATE SUBMITTED:

PROPOSAL NAME (If Applicable):
Montecito II Senior Housing Project

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
PLEASE NOTE THAT EACH AND EVERY RESPONSE IN THE CITY OF LOS ANGELES INITIAL STUDY AND CHECKLIST IS SUMMARIZED FROM AND BASED UPON THE ENVIRONMENTAL ANALYSIS CONTAINED IN ATTACHEMENT B, EXPLANATION OF CHECKLIST DETERMINATIONS. PLEASE REFER TO THE APPLICABLE RESPONSE IN ATTACHMENT B FOR A DETAILED DISCUSSION OF CHECKLIST DETERMINATIONS.					
1.	**AESTHETICS**				
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON A SCENIC VISTA?	❑	❑	☒	❑
b.	SUBSTANTIALLY DAMAGE SCENIC RESOURCES, INCLUDING, BUT NOT LIMITED TO, TREES, ROCK OUTCROPPINGS, AND HISTORIC BUILDINGS, OR OTHER LOCALLY RECOGNIZED DESIRABLE AESTHETIC NATURAL FEATURE WITHIN A CITY-DESIGNATED SCENIC HIGHWAY?	❑	❑	☒	❑
c.	SUBSTANTIALLY DEGRADE THE EXISTING VISUAL CHARACTER OR QUALITY OF THE SITE AND ITS SURROUNDINGS?	❑	❑	☒	❑
d.	CREATE A NEW SOURCE OF SUBSTANTIAL LIGHT OR GLARE WHICH WOULD ADVERSELY AFFECT DAY OR NIGHTTIME VIEWS IN THE AREA?	❑	❑	☒	❑
2.	**AGRICULTURE AND FOREST RESOURCES**				
a.	CONVERT PRIME FARMLAND, UNIQUE FARMLAND, OR FARMLAND OF STATEWIDE IMPORTANCE, AS SHOWN ON THE MAPS PREPARED PURSUANT TO THE FARMLAND MAPPING AND MONITORING PROGRAM OF THE CALIFORNIA RESOURCES AGENCY, TO NON-AGRICULTURAL USE?	❑	❑	❑	☒
b.	CONFLICT WITH EXISTING ZONING FOR AGRICULTURAL USE, OR A WILLIAMSON ACT CONTRACT?	❑	❑	❑	☒
c.	CONFLICT WITH EXISTING ZONING FOR, OR CAUSE REZONING OF, FOREST LAND (AS DEFINED IN PUBLIC RESOURCES CODE SECTION 1220(G)), TIMBERLAND (AS DEFINED BY PUBLIC RESOURCES CODE SECTION 4526), OR TIMBERLAND ZONED TIMBERLAND PRODUCTION (AS DEFINED BY GOVERNMENT CODE SECTION 51104(G))?	❑	❑	❑	☒
d.	RESULT IN THE LOSS OF FOREST LAND OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	❑	❑	❑	☒
e.	INVOLVE OTHER CHANGES IN THE EXISTING ENVIRONMENT WHICH, DUE TO THEIR LOCATION OR NATURE, COULD RESULT IN CONVERSION OF FARMLAND, TO NON-AGRICULTURAL USE OR CONVERSION OF FOREST LAND TO NON-FOREST USE?	❑	❑	❑	☒
3.	**AIR QUALITY**				
a.	CONFLICT WITH OR OBSTRUCT IMPLEMENTATION OF THE SCAQMD OR CONGESTION MANAGEMENT PLAN?	❑	❑	☒	❑
b.	VIOLATE ANY AIR QUALITY STANDARD OR CONTRIBUTE SUBSTANTIALLY TO AN EXISTING OR PROJECTED AIR QUALITY VIOLATION?	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	RESULT IN A CUMULATIVELY CONSIDERABLE NET INCREASE OF ANY CRITERIA POLLUTANT FOR WHICH THE AIR BASIN IS NON-ATTAINMENT (OZONE, CARBON MONOXIDE, & PM 10) UNDER AN APPLICABLE FEDERAL OR STATE AMBIENT AIR QUALITY STANDARD?	❑	❑	☒	❑
d.	EXPOSE SENSITIVE RECEPTORS TO SUBSTANTIAL POLLUTANT CONCENTRATIONS?	❑	❑	☒	❑
e.	CREATE OBJECTIONABLE ODORS AFFECTING A SUBSTANTIAL NUMBER OF PEOPLE?	❑	❑	☒	❑
4.	**BIOLOGICAL RESOURCES**				
a.	HAVE A SUBSTANTIAL ADVERSE EFFECT, EITHER DIRECTLY OR THROUGH HABITAT MODIFICATION, ON ANY SPECIES IDENTIFIED AS A CANDIDATE, SENSITIVE, OR SPECIAL STATUS SPECIES IN LOCAL OR REGIONAL PLANS, POLICIES, OR REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE ?	❑	❑	❑	☒
b.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON ANY RIPARIAN HABITAT OR OTHER SENSITIVE NATURAL COMMUNITY IDENTIFIED IN THE CITY OR REGIONAL PLANS, POLICIES, REGULATIONS BY THE CALIFORNIA DEPARTMENT OF FISH AND GAME OR U.S. FISH AND WILDLIFE SERVICE?	❑	❑	❑	☒
c.	HAVE A SUBSTANTIAL ADVERSE EFFECT ON FEDERALLY PROTECTED WETLANDS AS DEFINED BY SECTION 404 OF THE CLEAN WATER ACT (INCLUDING, BUT NOT LIMITED TO, MARSH VERNAL POOL, COASTAL, ETC.) THROUGH DIRECT REMOVAL, FILLING, HYDROLOGICAL INTERRUPTION, OR OTHER MEANS?	❑	❑	❑	☒
d.	INTERFERE SUBSTANTIALLY WITH THE MOVEMENT OF ANY NATIVE RESIDENT OR MIGRATORY FISH OR WILDLIFE SPECIES OR WITH ESTABLISHED NATIVE RESIDENT OR MIGRATORY WILDLIFE CORRIDORS, OR IMPEDE THE USE OF NATIVE WILDLIFE NURSERY SITES?	❑	❑	❑	☒
e.	CONFLICT WITH ANY LOCAL POLICIES OR ORDINANCES PROTECTING BIOLOGICAL RESOURCES, SUCH AS TREE PRESERVATION POLICY OR ORDINANCE (E.G., OAK TREES OR CALIFORNIA WALNUT WOODLANDS)?	❑	❑	☒	❑
f.	CONFLICT WITH THE PROVISIONS OF AN ADOPTED HABITAT CONSERVATION PLAN, NATURAL COMMUNITY CONSERVATION PLAN, OR OTHER APPROVED LOCAL, REGIONAL, OR STATE HABITAT CONSERVATION PLAN?	❑	❑	❑	☒
5.	**CULTURAL RESOURCES**				
a.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF A HISTORICAL RESOURCE AS DEFINED IN STATE CEQA SECTION 15064.5?	❑	☒	❑	❑
b.	CAUSE A SUBSTANTIAL ADVERSE CHANGE IN SIGNIFICANCE OF AN ARCHAEOLOGICAL RESOURCE PURSUANT TO STATE CEQA SECTION 15064.5?	❑	❑	☒	❑
c.	DIRECTLY OR INDIRECTLY DESTROY A UNIQUE PALEONTOLOGICAL RESOURCE OR SITE OR UNIQUE GEOLOGIC FEATURE?	❑	❑	☒	❑
d.	DISTURB ANY HUMAN REMAINS, INCLUDING THOSE INTERRED OUTSIDE OF FORMAL CEMETERIES?	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
6.	**GEOLOGY AND SOILS**				
a.	EXPOSURE OF PEOPLE OR STRUCTURES TO POTENTIAL SUBSTANTIAL ADVERSE EFFECTS, INCLUDING THE RISK OF LOSS, INJURY OR DEATH INVOLVING:				
i.	RUPTURE OF A KNOWN EARTHQUAKE FAULT, AS DELINEATED ON THE MOST RECENT ALQUIST-PRIOLO EARTHQUAKE FAULT ZONING MAP ISSUED BY THE STATE GEOLOGIST FOR THE AREA OR BASED ON OTHER SUBSTANTIAL EVIDENCE OF A KNOWN FAULT? REFER TO DIVISION OF MINES AND GEOLOGY SPECIAL PUBLICATION 42.	❑	❑	☒	❑
ii.	STRONG SEISMIC GROUND SHAKING?	❑	❑	☒	❑
iii.	SEISMIC-RELATED GROUND FAILURE, INCLUDING LIQUEFACTION?	❑	❑	☒	❑
iv.	LANDSLIDES?	❑	❑	❑	☒
b.	RESULT IN SUBSTANTIAL SOIL EROSION OR THE LOSS OF TOPSOIL?	❑	❑	☒	❑
c.	BE LOCATED ON A GEOLOGIC UNIT OR SOIL THAT IS UNSTABLE, OR THAT WOULD BECOME UNSTABLE AS A RESULT OF THE PROJECT, AND POTENTIAL RESULT IN ON- OR OFF-SITE LANDSLIDE, LATERAL SPREADING, SUBSIDENCE, LIQUEFACTION, OR COLLAPSE?	❑	❑	☒	❑
d.	BE LOCATED ON EXPANSIVE SOIL, AS DEFINED IN TABLE 18-1-B OF THE UNIFORM BUILDING CODE (1994), CREATING SUBSTANTIAL RISKS TO LIFE OR PROPERTY?	❑	❑	☒	❑
e.	HAVE SOILS INCAPABLE OF ADEQUATELY SUPPORTING THE USE OF SEPTIC TANKS OR ALTERNATIVE WASTE WATER DISPOSAL SYSTEMS WHERE SEWERS ARE NOT AVAILABLE FOR THE DISPOSAL OF WASTE WATER?	❑	❑	❑	☒
7.	**GREENHOUSE GAS EMISSIONS**				
a.	GENERATE GREENHOUSE GAS EMISSIONS, EITHER DIRECTLY OR INDIRECTLY, THAT MAY HAVE A SIGNIFICANT IMPACT ON THE ENVIRONMENT?	❑	❑	☒	❑
b.	CONFLICT WITH AN APPLICABLE PLAN, POLICY OR REGULATION ADOPTED FOR THE PURPOSE OF REDUCING THE EMISSIONS OF GREENHOUSE GASES?	❑	❑	☒	❑
7.	**HAZARDS AND HAZARDOUS MATERIALS**				
a.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH THE ROUTINE TRANSPORT, USE, OR DISPOSAL OF HAZARDOUS MATERIALS	❑	❑	☒	❑
b.	CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT THROUGH REASONABLY FORESEEABLE UPSET AND ACCIDENT CONDITIONS INVOLVING THE RELEASE OF HAZARDOUS MATERIALS INTO THE ENVIRONMENT?	❑	❑	☒	❑
c.	EMIT HAZARDOUS EMISSIONS OR HANDLE HAZARDOUS OR ACUTELY HAZARDOUS MATERIALS, SUBSTANCES, OR WASTE WITHIN ONE-QUARTER MILE OF AN EXISTING OR PROPOSED SCHOOL?	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	BE LOCATED ON A SITE WHICH IS INCLUDED ON A LIST OF HAZARDOUS MATERIALS SITES COMPILED PURSUANT TO GOVERNMENT CODE SECTION 65962.5 AND, AS A RESULT, WOULD IT CREATE A SIGNIFICANT HAZARD TO THE PUBLIC OR THE ENVIRONMENT?	❑	❑	☒	❑
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR PEOPLE RESIDING OR WORKING IN THE PROJECT AREA?	❑	❑	❑	☒
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT RESULT IN A SAFETY HAZARD FOR THE PEOPLE RESIDING OR WORKING IN THE AREA?	❑	❑	❑	☒
g.	IMPAIR IMPLEMENTATION OF OR PHYSICALLY INTERFERE WITH AN ADOPTED EMERGENCY RESPONSE PLAN OR EMERGENCY EVACUATION PLAN?	❑	❑	☒	❑
h.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INJURY OR DEATH INVOLVING WILDLAND FIRES, INCLUDING WHERE WILDLANDS ARE ADJACENT TO URBANIZED AREAS OR WHERE RESIDENCES ARE INTERMIXED WITH WILDLANDS?	❑	❑	☒	❑
9.	**HYDROLOGY AND WATER QUALITY**				
a.	VIOLATE ANY WATER QUALITY STANDARDS OR WASTE DISCHARGE REQUIREMENTS?	❑	❑	☒	❑
b.	SUBSTANTIALLY DEPLETE GROUNDWATER SUPPLIES OR INTERFERE WITH GROUNDWATER RECHARGE SUCH THAT THERE WOULD BE A NET DEFICIT IN AQUIFER VOLUME OR A LOWERING OF THE LOCAL GROUNDWATER TABLE LEVEL (E.G., THE PRODUCTION RATE OF PRE-EXISTING NEARBY WELLS WOULD DROP TO A LEVEL WHICH WOULD NOT SUPPORT EXISTING LAND USES OR PLANNED LAND USES FOR WHICH PERMITS HAVE BEEN GRANTED)?	❑	❑	☒	❑
c.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, IN A MANNER WHICH WOULD RESULT IN SUBSTANTIAL EROSION OR SILTATION ON- OR OFF-SITE?	❑	❑	☒	❑
d.	SUBSTANTIALLY ALTER THE EXISTING DRAINAGE PATTERN OF THE SITE OR AREA, INCLUDING THROUGH THE ALTERATION OF THE COURSE OF A STREAM OR RIVER, OR SUBSTANTIALLY INCREASE THE RATE OR AMOUNT OF SURFACE RUNOFF IN AN MANNER WHICH WOULD RESULT IN FLOODING ON- OR OFF SITE?	❑	❑	☒	❑
e.	CREATE OR CONTRIBUTE RUNOFF WATER WHICH WOULD EXCEED THE CAPACITY OF EXISTING OR PLANNED STORMWATER DRAINAGE SYSTEMS OR PROVIDE SUBSTANTIAL ADDITIONAL SOURCES OF POLLUTED RUNOFF?	❑	❑	☒	❑
f.	OTHERWISE SUBSTANTIALLY DEGRADE WATER QUALITY?	❑	❑	☒	❑
g.	PLACE HOUSING WITHIN A 100-YEAR FLOOD PLAIN AS MAPPED ON FEDERAL FLOOD HAZARD BOUNDARY OR FLOOD INSURANCE RATE MAP OR OTHER FLOOD HAZARD DELINEATION MAP?	❑	❑	☒	❑
h.	PLACE WITHIN A 100-YEAR FLOOD PLAIN STRUCTURES WHICH WOULD IMPEDE OR REDIRECT FLOOD FLOWS?	❑	❑	☒	

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
i.	EXPOSE PEOPLE OR STRUCTURES TO A SIGNIFICANT RISK OF LOSS, INQUIRY OR DEATH INVOLVING FLOODING, INCLUDING FLOODING AS A RESULT OF THE FAILURE OF A LEVEE OR DAM?	❑	❑	☒	❑
j.	INUNDATION BY SEICHE, TSUNAMI, OR MUDFLOW?	❑	❑	❑	☒
10.	**LAND USE AND PLANNING**				
a.	PHYSICALLY DIVIDE AN ESTABLISHED COMMUNITY?	❑	❑	☒	❑
b.	CONFLICT WITH APPLICABLE LAND USE PLAN, POLICY OR REGULATION OF AN AGENCY WITH JURISDICTION OVER THE PROJECT (INCLUDING BUT NOT LIMITED TO THE GENERAL PLAN, SPECIFIC PLAN, COASTAL PROGRAM, OR ZONING ORDINANCE) ADOPTED FOR THE PURPOSE OF AVOIDING OR MITIGATING AN ENVIRONMENTAL EFFECT?	❑	❑	☒	❑
c.	CONFLICT WITH ANY APPLICABLE HABITAT CONSERVATION PLAN OR NATURAL COMMUNITY CONSERVATION PLAN?	❑	❑	❑	☒
11.	**MINERAL RESOURCES**				
a.	RESULT IN THE LOSS OF AVAILABILITY OF A KNOWN MINERAL RESOURCE THAT WOULD BE OF VALUE TO THE REGION AND THE RESIDENTS OF THE STATE?	❑	❑	❑	☒
b.	RESULT IN THE LOSS OF AVAILABILITY OF A LOCALLY-IMPORTANT MINERAL RESOURCE RECOVERY SITE DELINEATED ON A LOCAL GENERAL PLAN, SPECIFIC PLAN, OR OTHER LAND USE PLAN?	❑	❑	❑	☒
12.	**NOISE**				
a.	EXPOSURE OF PERSONS TO OR GENERATION OF NOISE IN LEVEL IN EXCESS OF STANDARDS ESTABLISHED IN THE LOCAL GENERAL PLAN OR NOISE ORDINANCE, OR APPLICABLE STANDARDS OF OTHER AGENCIES?	❑	☒	❑	❑
b.	EXPOSURE OF PEOPLE TO OR GENERATION OF EXCESSIVE GROUNDBORNE VIBRATION OR GROUNDBORNE NOISE LEVELS?	❑	❑	☒	❑
c.	A SUBSTANTIAL PERMANENT INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	❑	❑	☒	❑
d.	A SUBSTANTIAL TEMPORARY OR PERIODIC INCREASE IN AMBIENT NOISE LEVELS IN THE PROJECT VICINITY ABOVE LEVELS EXISTING WITHOUT THE PROJECT?	❑	☒	❑	❑
e.	FOR A PROJECT LOCATED WITHIN AN AIRPORT LAND USE PLAN OR, WHERE SUCH A PLAN HAS NOT BEEN ADOPTED, WITHIN TWO MILES OF A PUBLIC AIRPORT OR PUBLIC USE AIRPORT, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	❑	❑	❑	☒
f.	FOR A PROJECT WITHIN THE VICINITY OF A PRIVATE AIRSTRIP, WOULD THE PROJECT EXPOSE PEOPLE RESIDING OR WORKING IN THE PROJECT AREA TO EXCESSIVE NOISE LEVELS?	❑	❑	❑	☒
13.	**POPULATION AND HOUSING**				
a.	INDUCE SUBSTANTIAL POPULATION GROWTH IN AN AREA EITHER DIRECTLY (FOR EXAMPLE, BY PROPOSING NEW HOMES AND BUSINESSES) OR INDIRECTLY (FOR EXAMPLE, THROUGH EXTENSION OF ROADS OR OTHER INFRASTRUCTURE)?	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
b.	DISPLACE SUBSTANTIAL NUMBERS OF EXISTING HOUSING NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	❑	❑	❑	☒
c.	DISPLACE SUBSTANTIAL NUMBERS OF PEOPLE NECESSITATING THE CONSTRUCTION OF REPLACEMENT HOUSING ELSEWHERE?	❑	❑	❑	☒
14.	**PUBLIC SERVICES**				
a.	FIRE PROTECTION?	❑	❑	☒	❑
b.	POLICE PROTECTION?	❑	❑	☒	❑
c.	SCHOOLS?	❑	❑	☒	❑
d.	PARKS?	❑	❑	☒	❑
e.	OTHER PUBLIC FACILITIES (LIBRARIES)?	❑	❑	☒	❑
15.	**RECREATION**				
a.	WOULD THE PROJECT INCREASE THE USE OF EXISTING NEIGHBORHOOD AND REGIONAL PARKS OR OTHER RECREATIONAL FACILITIES SUCH THAT SUBSTANTIAL PHYSICAL DETERIORATION OF THE FACILITY WOULD OCCUR OR BE ACCELERATED?	❑	❑	☒	❑
b.	DOES THE PROJECT INCLUDE RECREATIONAL FACILITIES OR REQUIRE THE CONSTRUCTION OR EXPANSION OF RECREATIONAL FACILITIES WHICH MIGHT HAVE AN ADVERSE PHYSICAL EFFECT ON THE ENVIRONMENT?	❑	❑	☒	❑
16.	**TRIBAL CULTURAL RESOURCES**				
a.	WOULD THE PROJECT CAUSE A SUBSTANTIAL ADVERSE CHANGE IN THE SIGNIFICANCE OF A TRIBAL CULTURAL RESOURCE, DEFINED IN PUBLIC RESOURCES CODE SECTION 21074 AS EITHER A SITE, FEATURE, PLACE, CULTURAL LANDSCAPE THAT IS GEOGRAPHICALLY DEFINED IN TERMS OF THE SIZE AND SCOPE OF THE LANDSCAPE, SACRED PLACE, OR OBJECT WITH CULTURAL VALUE TO A CALIFORNIA NATIVE AMERICAN TRIBE, AND THAT IS:				
	i. 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	❑	❑	❑	☒
	ii. A RESOURCE DETERMINED BY THE LEAD AGENCY, IN ITS DISCRETION AND SUPPORTED BY SUBSTANTIAL EVIDENCE, TO BE SIGNIFICANT PURSUANT TO CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCES CODE SECTION 5024.1. IN APPLYING THE CRITERIA SET FORTH IN SUBDIVISION (C) OF PUBLIC RESOURCE CODE SECTION 5024.1, THE LEAD AGENCY SHALL CONSIDER THE SIGNIFICANCE OF THE RESOURCE TO A CALIFORNIA NATIVE AMERICAN TRIBE.	❑	❑	❑	☒

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
17.	**TRANSPORTATION/CIRCULATION**				
a.	CONFLICT WITH AN APPLICABLE PLAN, ORDINANCE OR POLICY ESTABLISHING MEASURES OF EFFECTIVENESS FOR THE PERFORMANCE OF THE CIRCULATION SYSTEM, TAKING INTO ACCOUNT ALL MODES OF TRANSPORTATION INCLUDING MASS TRANSIT AND NON-MOTORIZED TRAVEL AND RELEVANT COMPONENTS OF THE CIRCULATION SYSTEM, INCLUDING BUT NOT LIMITED TO INTERSECTIONS, STREETS, HIGHWAYS AND FREEWAYS, PEDESTRIAN AND BICYCLE PATHS AND MASS TRANSIT?	❑	❑	☒	❑
b.	CONFLICT WITH AN APPLICABLE CONGESTION MANAGEMENT PROGRAM, INCLUDING BUT NOT LIMITED TO LEVEL OF SERVICE STANDARDS AND TRAVEL DEMAND MEASURES, OR OTHER STANDARDS ESTABLISHED BY THE COUNTY CONGESTION MANAGEMENT AGENCY FOR DESIGNATED ROADS OR HIGHWAYS?	❑	❑	☒	❑
c.	RESULT IN A CHANGE IN AIR TRAFFIC PATTERNS, INCLUDING EITHER AN INCREASE IN TRAFFIC LEVELS OR A CHANGE IN LOCATION THAT RESULTS IN SUBSTANTIAL SAFETY RISKS?	❑	❑	❑	☒
d.	SUBSTANTIALLY INCREASE HAZARDS TO A DESIGN FEATURE (E.G., SHARP CURVES OR DANGEROUS INTERSECTIONS) OR INCOMPATIBLE USES (E.G., FARM EQUIPMENT)?	❑	☒	❑	❑
e.	RESULT IN INADEQUATE EMERGENCY ACCESS?	❑	❑	☒	❑
f.	CONFLICT WITH ADOPTED POLICIES, PLANS OR PROGRAMS REGARDING PUBLIC TRANSIT, BICYCLE, OR PEDESTRIAN FACILITIES, OR OTHERWISE DECREASE THE PERFORMANCE OR SAFETY OF SUCH FACILITIES?	❑	❑	☒	❑
18.	**UTILITIES**				
a.	EXCEED WASTEWATER TREATMENT REQUIREMENTS OF THE APPLICABLE REGIONAL WATER QUALITY CONTROL BOARD?	❑	❑	☒	❑
b.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW WATER OR WASTEWATER TREATMENT FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	❑	❑	☒	❑
c.	REQUIRE OR RESULT IN THE CONSTRUCTION OF NEW STORMWATER DRAINAGE FACILITIES OR EXPANSION OF EXISTING FACILITIES, THE CONSTRUCTION OF WHICH COULD CAUSE SIGNIFICANT ENVIRONMENTAL EFFECTS?	❑	❑	☒	❑
d.	HAVE SUFFICIENT WATER SUPPLIES AVAILABLE TO SERVE THE PROJECT FROM EXISTING ENTITLEMENTS AND RESOURCE, OR ARE NEW OR EXPANDED ENTITLEMENTS NEEDED?	❑	❑	☒	❑
e.	RESULT IN A DETERMINATION BY THE WASTEWATER TREATMENT PROVIDER WHICH SERVES OR MAY SERVE THE PROJECT THAT IT HAS ADEQUATE CAPACITY TO SERVE THE PROJECT'S PROJECTED DEMAND IN ADDITION TO THE PROVIDER'S EXISTING COMMITMENTS?	❑	❑	☒	❑
f.	BE SERVED BY A LANDFILL WITH SUFFICIENT PERMITTED CAPACITY TO ACCOMMODATE THE PROJECT'S SOLID WASTE DISPOSAL NEEDS?	❑	❑	☒	❑
g.	COMPLY WITH FEDERAL, STATE, AND LOCAL STATUTES AND REGULATIONS RELATED TO SOLID WASTE?	❑	❑	☒	❑

		Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less Than Significant Impact	No Impact
19.	**MANDATORY FINDINGS OF SIGNIFICANCE**				
a.	DOES THE PROJECT HAVE THE POTENTIAL TO DEGRADE THE QUALITY OF THE ENVIRONMENT, SUBSTANTIALLY REDUCE THE HABITAT OF FISH OR WILDLIFE SPECIES, CAUSE A FISH OR WILDLIFE POPULATION TO DROP BELOW SELF-SUSTAINING LEVELS, THREATEN TO ELIMINATE A PLANT OR ANIMAL COMMUNITY, REDUCE THE NUMBER OR RESTRICT THE RANGE OF A RARE OR ENDANGERED PLANT OR ANIMAL OR ELIMINATE IMPORTANT EXAMPLES OF THE MAJOR PERIODS OF CALIFORNIA HISTORY OR PREHISTORY?	❑	❑	☒	❑
b.	DOES THE PROJECT HAVE IMPACTS WHICH ARE INDIVIDUALLY LIMITED, BUT CUMULATIVELY CONSIDERABLE? ("CUMULATIVELY CONSIDERABLE" MEANS THAT THE INCREMENTAL EFFECTS OF AN INDIVIDUAL PROJECT ARE CONSIDERABLE WHEN VIEWED IN CONNECTION WITH THE EFFECTS OF PAST PROJECTS, THE EFFECTS OF OTHER CURRENT PROJECTS, AND THE EFFECTS OF PROBABLE FUTURE PROJECTS).	❑	❑	☒	❑
c.	DOES THE PROJECT HAVE ENVIRONMENTAL EFFECTS WHICH CAUSE SUBSTANTIAL ADVERSE EFFECTS ON HUMAN BEINGS, EITHER DIRECTLY OR INDIRECTLY?	❑	❑	☒	❑

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V. SUSTAINABLE COMMUNITIES ENVIRONMENTAL ANALYSIS

INTRODUCTION

This section of the SCEA contains an assessment and discussion of impacts associated with the environmental issues and subject areas identified in the Initial Study Checklist (Appendix G to the State CEQA Guidelines, C.C.R. Title 14, Chapter 3, 15000-15387). The analytical methodology and thresholds of significance are based on the *L.A. CEQA Thresholds Guide.*

Pursuant to PRC Section §21155 .2(b), the SCEA is required to identify all significant or potentially significant impacts of the transit priority project, other than those which do not need to be reviewed pursuant to Section 21159.28 based on substantial evidence in light of the whole record. The SCEA would also be required identify any cumulative effects that have been adequately addressed and mitigated in prior applicable certified environmental impact reports. The following analysis discusses the following topics:

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

IMPACT ANALYSIS

1. AESTHETICS

In January 2016 the City of Los Angeles Planning Department provided guidance in the form of Zoning Information File ZI No. 2451 regarding Transit Priority Areas (TPAs) and exemptions to analyze Aesthetics and Parking within TPAs pursuant to CEQA, as established in State Senate Bill (SB) 743.

Senate Bill 743, signed into law in September 2013, made several changes to CEQA for projects located in areas served by transit (i.e., TPAs). While the thrust of SB 743 addressed a major overhaul on how transportation impacts are evaluated under CEQA, it also limited the extent to which aesthetics and parking are defined as impacts under CEQA. Specifically, Section 21099 (d)(1) of the Public Resources Code (PRC) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

1. The project is a residential, mixed-use residential, or employment center project, and

2. The project is located on an infill site within a transit priority area.

Section 21099 (a) of the PRC defines the following terms:

(4) "Infill site" means 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.

(7) "Transit priority area" means an area within one-half mile of a major transit stop that is existing or planned.

Section 21064.3 of the PRC defines a "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.

For purposes of Section 21099 of the PRC, a transit priority area also includes major transit stops in the City of Los Angeles (city) that are scheduled to be completed within the planning horizon of the Southern California Association of Governments (SCAG) Regional Transportation Plan / Sustainable Community Strategy (RTP/SCS).

All of the lots that make up the project are surrounded by existing development, thus qualifying the Project Site as an 'infill' site. In addition, the project consists of a senior housing community that is served by the DASH Hollywood line, directly abutting the property. Additionally, there are several major bus routes running along Franklin Avenue, Highland Avenue, Hollywood Boulevard, and Cahuenga Boulevard. The Project Site is less than one-half mile from the Hollywood/Highland Station of the Metro Red Line. For these reasons, the Proposed Project qualifies for this exemption, and the analysis below is provided for **informational purposes only.**

According to Appendix G of the State CEQA Guidelines, the impacts of a proposed project related to aesthetics would be considered significant if the project would:

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

This discussion is for informational purposes only. The Proposed Project is located in the City of Los Angeles, in a highly urbanized portion of the City approximately 0.4 miles west of U.S. Highway 101 (US 101). The nearest scenic view or vista to the Project Site are the Hollywood Hills, directly north of the Project Site. Due to the topography and the density of development in the project area, views of the hillsides are available only intermittently.

Although the Proposed Project would change existing views by added new structures, scenic views are typically defined as those that provide expansive views of a highly valued landscape for the benefit of the general public. The views available along developed corridors such as Highland Avenue and Hollywood Boulevard are generally expected to be intermittent and would continue to be so with construction of the Proposed Project. Therefore, even if the Project was not exempt from aesthetic impacts, it would not block or otherwise impede an existing view of a scenic vista and would, therefore, not have an adverse impact on a scenic vista.

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

This discussion is for informational purposes only. The Project Site is not located along or near a state scenic highway. Currently, the only portion of a scenic highway officially designated by the California Department of Transportation (Caltrans) within the City of Los Angeles is a short portion of the Pasadena Freeway (also known as the Arroyo Seco Historic parkway). A portion of Pacific Coast Highway (PCH), (beginning in the City of

Santa Monica and continuing north towards the City of Malibu), is eligible to be designated as a State Scenic Highway.[1]

For the above described reasons, even if the Project was not exempt from aesthetic impacts, the Proposed Project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway, as none of these resources exist on or near the Project Site.

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

This discussion is for informational purposes only. The proposed 6-story senior housing project would alter the existing visual character of the site. The buildings surrounding the Project Site vary in age and architectural style from more contemporary structures to buildings that were constructed during the 1920's. The proposed 6-story senior housing building would be consistent with the general urban character of the surrounding area and the existing uses in the immediate vicinity of the Project Site. The design features would be compatible with the design of the existing Montecito apartment building, which is 10 stories with a maximum height of approximately 130 feet. Furthermore, the proposed landscaping would include street trees, on-site ornamental trees, and planters that would enhance the overall visual character of the proposed structure at ground level. For these purposes, even in the Project was not exempt from the aesthetic impacts, the Project would not substantially degrade the existing visual character or quality of the site and its surroundings.

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

This discussion is for informational purposes only. Light impacts are typically associated with the use of artificial light during the evening and nighttime hours. Glare may be a daytime occurrence caused by the reflection of sunlight or artificial light from highly polished surfaces, such as window glass and reflective cladding materials, and may interfere with the safe operation of a motor vehicle on adjacent streets. 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

[1] *State of California Department of Transportation, California Scenic Highway Mapping System, http://www.dot.ca.gov/hq/tsip/gis/datalibrary/Metadata/ScenicHwys.html, accessed February 23, 2016.*

mirror-like materials. Nighttime glare is primarily associated with bright point-source lighting that contrasts with existing low ambient light conditions.

The Proposed Project will be constructed on an infill site. The Project Site is located in an urban environment characterized by high levels of ambient nighttime illumination. However, nighttime illumination levels are not high at the Project Site, which does not involve any nighttime activity or illumination. Uses surrounding the Project Site that are sensitive to light levels and glare include multi-family residential uses to the east, west and south.

Redevelopment of the Proposed Project would replace the open courtyard with a building that would be up to 6-stories high. The presence of a residential use along Franklin Avenue would increase the nighttime illumination on the Project Site from current levels. Lighting associated with the proposed residential uses would include interior lights, architectural and/or thematic accent lighting to highlight building elements or details, soft accent lighting for landscaping where appropriate, exterior security lighting, and wall- or pole-mounted light fixtures. All lighting of outdoor areas will be directed onto driveways, walkways, and parking areas and away from adjacent properties and public rights of way to avoid any light impacts from lighting fixtures included in the project. For these reasons, the new lighting established on the site will not result in a substantial increase in light that could adversely affect nighttime views in the area.

Glare from building windows would increase under the Proposed Project. However, prior to the issuance of a building permit, the type or categories of all exterior glass and architectural features on the building façades and rooftops would be submitted for review to the Department of Building and Safety to ensure that highly reflective materials are not utilized, and thus the project would not result in a substantial new source of glare that would adversely affect daytime views in the area.

Finally, the project will be required to incorporate lighting design specifications to meet City standards as outlined in the Section 93.0117 of the LAMC, to ensure that the project will have a less than significant impact on light and glare.

2. AGRICULTURE AND FOREST RESOURCES

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

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

No Impact. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland." The Extent of Important Farmland Map Coverage maintained by the Division of Land Protection indicates that the Project Site is not included in the Important Farmland category.[2] The Project Site is located within an urbanized area of the City of Los Angeles and is currently developed with a surface parking lot and an open courtyard. Therefore, implementation of the Proposed Project would not convert farmland to non-agricultural use. No impacts would occur.

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

No Impact. The Proposed Project is located in the Hollywood Community Plan Area and zoned [Q]R4-2 (Residential Zone). The General Plan land use designation for the Project Site is High Density Residential. The Project Site is not zoned for agricultural uses nor do agricultural uses occur on the Project Site. Only land located within an agricultural preserve is eligible for enrollment under a Williamson Act contract. Accordingly, the Project Site does not contain any lands covered by a Williamson Act contract. Therefore, implementation of the Proposed Project would not conflict with existing agricultural zoning or a Williamson Act Contract. No impacts would occur.

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2 *State of California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program, Los Angeles County 2010 Important Farmland Map, ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2012/los12.pdf, accessed September 8, 2017.*

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

No Impact. As discussed above the Project Site is zoned [Q]R4-2 and is located in an urban area. The Project Site and the surrounding area are zoned for primarily residential uses. The site and the surrounding area do not contain any forest land or land zoned for timberland production. Implementation of the Proposed Project would not conflict with existing zoning for, or cause rezoning of forest land or timberland. No impacts would occur, and no further analysis is required.

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

No Impact. See response to **Section 2(c)**, above.

Additionally, forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits."[3] Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including Christmas trees."[4] Trees are located along the parkway and on the Project Site are all ornamental and their level of tree cover are not within the definitions of forest land or timberland.[5] There is no forest land or timberland on-site or in the project vicinity and project development would not cause a loss of forest land or timberland. No impacts would occur.

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

No Impact. See responses to **Sections 2(a)** through **2(d)**, above. The site is located in an urbanized area and there are no agricultural uses or related uses on the site. The site does not result in the conversion of farmland, to other uses. No impacts would occur.

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3 *California Public Resources Code Section 12220[g]*

4 *California Public Resources Code Section 4526*

5 ***Tree Case Management Tree Report, dated May 17, 2017*** *and included as* ***Appendix B*** *to this SCEA.*

3. AIR QUALITY

Pollutants and Effects

Criteria air pollutants are defined as pollutants for which the federal and State governments have established ambient air quality standards for outdoor concentrations. The federal and State standards have been set at levels above which concentrations could be harmful to human health and welfare. These standards are designed to protect the most sensitive persons from illness or discomfort. Pollutants of concern include carbon monoxide (CO), ozone (O_3), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter 2.5 microns or less in diameter (PM2.5), particulate matter ten microns or less in diameter (PM10), and lead (Pb). These pollutants are discussed below.

- Carbon Monoxide (CO) is a colorless and odorless gas formed by the incomplete combustion of fossil fuels. It is emitted almost exclusively from motor vehicles, power plants, refineries, industrial boilers, ships, aircraft, and trains. In urban areas, automobile exhaust accounts for the majority of emissions. CO is a non-reactive air pollutant that dissipates relatively quickly, so ambient concentrations generally follow the spatial and temporal distributions of vehicular traffic. Concentrations are influenced by local meteorological conditions, primarily wind speed, topography, and atmospheric stability. CO from motor vehicle exhaust can become locally concentrated when surface-based temperature inversions are combined with calm atmospheric conditions, a typical situation at dusk in urban areas between November and February. Inversions are an atmospheric condition in which a layer of warm air traps cooler air near the surface of the earth, preventing the normal rising of surface air. The highest concentrations occur during the colder months of the year when inversion conditions are more frequent. CO is a health concern because it competes with oxygen, often replacing it in the blood and reducing the blood's ability to transport oxygen to vital organs. Excess CO exposure can lead to dizziness, fatigue, and impair central nervous system functions.
- Ozone (O_3) is a colorless gas that is formed in the atmosphere when volatile organic compounds (VOC) and nitrogen oxides (NO_X) react in the presence of ultraviolet sunlight. O_3 is not a primary pollutant; rather, it is a secondary pollutant formed by complex interactions of these two pollutants directly emitted into the atmosphere. The primary sources of VOC and NO_X, the components of O_3, are automobile exhaust and industrial sources. Meteorology and terrain play major roles in O_3 formation. Ideal conditions occur during summer and early autumn, on days with low wind speeds or stagnant air, warm temperatures, and cloudless skies. The greatest source of smog-producing gases is the automobile. Short-term exposure (lasting for a few hours) to O_3 at

levels typically observed in Southern California can result in breathing pattern changes, reduction of breathing capacity, increased susceptibility to infections, inflammation of the lung tissue, and some immunological changes.

- Nitrogen Dioxide (NO_2) like O_3, is not directly emitted into the atmosphere but is formed by an atmospheric chemical reaction between nitric oxide (NO) and atmospheric oxygen. NO and NO_2 are collectively referred to as NO_X and are major contributors to O_3 formation. NO_2 also contributes to the formation of PM10. High concentrations of NO_2 can cause breathing difficulties and result in a brownish-red cast to the atmosphere with reduced visibility. There is some indication of a relationship between NO_2 and chronic pulmonary fibrosis. Some increase of bronchitis in children (2-3 years old) has been observed at concentrations below 0.3 parts per million (ppm).
- Sulfur Dioxide (SO_2) is a colorless, pungent gas formed primarily by the combustion of sulfur-containing fossil fuels. Main sources of SO_2 are coal and oil used in power plants and industries. Generally, the highest levels of SO_2 are found near large industrial complexes. In recent years, SO_2 concentrations have been reduced by the increasingly stringent controls placed on stationary source emissions of SO_2 and limits on the sulfur content of fuels. SO_2 is an irritant gas that attacks the throat and lungs. It can cause acute respiratory symptoms and diminished ventilator function in children. SO_2 can also yellow plant leaves and erode iron and steel.
- Particulate Matter (PM) consists of small liquid and solid particles floating in the air, including smoke, soot, dust, salts, acids, and metals and can form when gases emitted from industries and motor vehicles undergo chemical reactions in the atmosphere. Fine particulate matter, or PM2.5, is roughly 1/28 the diameter of a human hair and results from fuel combustion (e.g. motor vehicles, power generation, industrial facilities), residential fireplaces, and wood stoves. In addition, PM2.5 can be formed in the atmosphere from gases such as SO_2, NO_X, and VOC. Inhalable particulate matter, or PM10, is about 1/7 the thickness of a human hair. Major sources of PM10 include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions.

  PM2.5 and PM10 pose a greater health risk than larger-size particles. When inhaled, they can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM2.5 and PM10 can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Very small particles of substances, such as lead, sulfates, and

nitrates can cause lung damage directly. These substances can be absorbed into the blood stream and cause damage elsewhere in the body. These substances can transport absorbed gases, such as chlorides or ammonium, into the lungs and cause injury. Whereas PM10 tends to collect in the upper portion of the respiratory system, PM2.5 is so tiny that it can penetrate deeper into the lungs and damage lung tissues. Suspended particulates also damage and discolor surfaces on which they settle, as well as produce haze and reduce regional visibility.

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

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

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

Regulatory Setting

Federal

United States Environmental Protection Agency (USEPA). The USEPA is responsible for enforcing the Federal Clean Air Act (CAA), the legislation that governs air quality in the United States. USEPA is also responsible for establishing the National Ambient Air Quality Standards (NAAQS). NAAQS are required under the 1977 CAA and subsequent amendments. USEPA regulates emission sources that are under the exclusive authority of the federal government, such as aircraft, ships, and certain types of locomotives. It has jurisdiction over emission sources outside State waters (e.g., beyond the outer continental shelf) and establishes emission

standards, including those for vehicles sold in States other than California, where automobiles must meet stricter emission standards set by the State.

As required by the CAA, NAAQS have been established for seven major air pollutants: CO, NO_2, O_3, PM2.5, PM10, SO_2, and Pb. The CAA requires USEPA to designate areas as attainment, nonattainment, or maintenance for each criteria pollutant based on whether the NAAQS have been achieved. The federal standards are summarized in **Table V-1**. The USEPA has classified the Los Angeles County portion of the South Coast Air Basin as nonattainment for O_3 and $PM_{2.5}$, attainment for PM_{10}, and attainment/unclassified for CO and NO_2.

State

California Air Resources Board (CARB). 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). CARB, which became part of the California Environmental Protection Agency in 1991, is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles.

CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in **Table V-1, State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin**.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

Table V-1
State and National Ambient Air Quality Standards and Attainment Status for the South Coast Air Basin

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm (180 µg/m³)	Nonattainment	--	--
	8-hour	0.070 ppm (137 µg/m³)	/a/	0.075 ppm (147 µg/m³)	Nonattainment
Respirable Particulate Matter (PM_{10})	24-hour	50 µg/m³	Nonattainment	150 µg/m³	Attainment
	Annual Arithmetic Mean	20 µg/m³	Nonattainment	--	--
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m³	Nonattainment
	Annual Arithmetic Mean	12 µg/m³	Nonattainment	12 µg/m³	Nonattainment
Carbon Monoxide (CO)	8-hour	9.0 ppm (10 mg/m³)	Attainment	9 ppm (10 mg/m³)	Maintenance
	1-hour	20 ppm (23 mg/m³)	Attainment	35 ppm (40 mg/m³)	Maintenance
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm (57 µg/m³)	Attainment	53 ppb (100 µg/m³)	Unclassified/ Attainment
	1-hour	0.18 ppm (338 µg/m³)	Attainment	100 ppb (188 µg/m³)	Unclassified/ Attainment
Sulfur Dioxide (SO_2)	24-hour	0.04 ppm (105 µg/m³)	Attainment	--	Attainment
	1-hour	0.25 ppm (655 µg/m³)	Attainment	75 ppb (196 µg/m³)	Attainment
Lead (Pb)	30-day average	1.5 µg/m³	Attainment	--	--
	Calendar Quarter	--	--	0.15 µg/m³	Nonattainment

/a/ CARB has not determined 8-hour O_3 attainment status.
Source: California Air Resources Board, Ambient Air Quality Standards, and attainment status, accessed August 1, 2016 (www.arb.ca.gov/desig/adm/adm.htm)

Local

South Coast Air Quality Management District (SCAQMD). The 1977 Lewis Air Quality Management Act merged four air pollution control districts to create the SCAQMD to coordinate air quality planning efforts throughout Southern California. It is responsible for monitoring air quality, as well as planning, implementing, and enforcing programs designed to

attain and maintain State and federal ambient air quality standards. Programs include air quality rules and regulations that regulate stationary sources, area sources, point sources, and certain mobile source emissions. The SCAQMD is also responsible for establishing stationary source permitting requirements and for ensuring that new, modified, or relocated stationary sources do not create net emission increases.

The SCAQMD monitors air quality over its jurisdiction of 10,743 square miles, including the South Coast Air Basin, which covers 6,745 square miles and is bounded by the Pacific Ocean to the west, the San Gabriel, San Bernardino and San Jacinto mountains to the north and east, and San Diego County to the south. The Basin includes all of Orange County and the non-desert portions of Los Angeles, Riverside, and San Bernardino counties. The SCAQMD also regulates the Riverside County portion of the Salton Sea Air Basin and Mojave Desert Air Basin.

All areas designated as nonattainment under the CCAA are required to prepare plans showing how they will meet the air quality standards. The SCAQMD regularly prepares an Air Quality Management Plan (AQMP) to address CAA and CCAA requirements by identifying policies and control measures. On December 7, 2012, the SCAQMD adopted its 2012 AQMP, which is now the legally enforceable plan for meeting the 24-hour $PM_{2.5}$ strategy standard. In October 2016, the SCAQMD's released its revised Draft 2016 AQMP which proposed strategies to meet the NAAQS for the 8-hour ozone standard by 2032, the annual $PM_{2.5}$ standard by 2021-2025, the 1-hour ozone standard by 2023, and the 24-hour $PM_{2.5}$ standard by 2019. In its role as the local air quality regulatory agency, the SCAQMD also provides guidance on how environmental analyses should be prepared. This includes recommended thresholds of significance for evaluating air quality impacts.

The Southern California Association of Governments (SCAG) assists in air quality planning efforts by preparing the transportation portion of the AQMP through the adoption of its Regional Transportation Plan (RTP). This includes the preparation of a Sustainable Communities Strategy (SCS) that responds to planning requirements of SB 375 and demonstrates the region's ability to attain greenhouse gas reduction targets set forth in State law. In April 2016, SCAG adopted its 2016-2040 RTP, a plan to invest $556.5 billion in transportation systems over a six-county region.

City of Los Angeles. The City's General Plan includes an Air Quality Element that provides a policy framework governing air quality planning within the City of Los Angeles. Adopted in November 1992, the Plan includes six goals, 15 objectives, and 30 policies that help define how the City will achieve its clean air vision.

In 2006, the City released its L.A. CEQA Thresholds Guide that provides guidance in the preparation of environmental documents. This included a chapter focusing on air quality. While

it didn't set new thresholds of significance for air quality, it did suggest a process for evaluating projects and attempted to standardize analyses through prescribed protocols.

Air Pollution Climatology

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

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

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

Air Monitoring Data

The SCAQMD monitors air quality conditions at 45 locations throughout the Basin. The Project Site is located in SCAQMD's Central Los Angeles receptor area. Historical data from the area was used to characterize existing conditions in the vicinity of the Project area. **Table V-2, 2014-2016 Ambient Air Quality Data in Project Vicinity** shows pollutant levels, State and federal

standards, and the number of exceedances recorded in the area from 2014 through 2016. The one-hour State standard for O_3 was exceeded three times during this three-year period, the daily State standard for PM10 was exceeded eight times while the daily State standard for PM2.5 was exceeded five times. CO and NO_2 levels did not exceed the CAAQS from 2014-2016.

Table V-2
2014-2016 Ambient Air Quality Data in Project Vicinity

Pollutant	Pollutant Concentration & Standards	Central Los Angeles		
		2014	2015	2016
Ozone	Maximum 1-hour Concentration (ppm)	0.113	0.104	0.103
	Days > 0.09 ppm (State 1-hour standard)	3	2	2
	Days > 0.075 ppm (Federal 8-hour standard)	2	0	1
Carbon Monoxide	Maximum 1-hour Concentration (ppm)	3	3.2	1.9
	Days > 20 ppm (State 1-hour standard)	N/A	N/A	N/A
	Maximum 8-hour Concentration (ppm)	2.0	1.8	1.4
	Days > 9.0 ppm (State 8-hour standard)	N/A	N/A	N/A
Nitrogen Dioxide	Maximum 1-hour Concentration (ppm)	0.0821	0.0624	0.0647
	Days > 0.18 ppm (State 1-hour standard)	N/A	N/A	N/A
PM_{10}	Maximum 24-hour Concentration (μg/m³)	87	88	67
	Days > 50 μg/m³ (State 24-hour standard)	32	26	18
$PM_{2.5}$	Maximum 24-hour Concentration (μg/m³)	59.9	56.4	44.39
	Days > 35 μg/m³ (Federal 24-hour standard)	6	7	2
Sulfur Dioxide	Maximum 24-hour Concentration (ppm)	N/A	N/A	N/A
	Days > 0.04 ppm (State 24-hour standard)	N/A	N/A	N/A

Source: SCAQMD annual monitoring data (http://www.aqmd.gov/home/air-quality/air-quality-data-studies/historical-data-by-year) accessed January 10, 2018.
N/A: Not available at this monitoring station.

Toxic Air Pollution

According to the SCAQMD's Multiple Air Toxics Exposure Study IV (MATES IV), the incidence of cancer over a lifetime in the US population is about 1 in 3, which translates into a risk of about 300,000 in 1 million. One study, the *Harvard Report on Cancer Prevention*, estimated that, of cancers associated with known risk factors, about 30 percent were related to tobacco, 30 percent were related to diet and obesity, and about two percent were associated with environmental pollution related exposures. The potential cancer risk for a given substance is expressed as the incremental number of potential excess cancer cases per million people over a 70-year lifetime exposure at a constant annual average pollutant concentration. The risks are usually presented in chances per million. For example, if the cancer risks were estimated to be 100 per million, this

would predict an additional 100 excess cases of cancer in a population of 1 million people over a 70-year lifetime.

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

Thresholds of Significance

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

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

The *State CEQA Guidelines* Section 15064.7 provides the significance criteria established by the applicable air quality management district or air pollution control district, when available, may be relied upon to make determinations of significance. The potential air quality impacts of the Proposed Project are, therefore, evaluated according to thresholds developed by the SCAQMD

in their *CEQA Air Quality Handbook, Air Quality Analysis Guidance Handbook*, and subsequent guidance, which are listed below.

Existing Emissions

The Project Site includes is currently the site of an outdoor courtyard that supports the adjacent Montecito Apartments. As such, it does not generate anthropogenic emissions and is assumed to have de minimis emissions.

Sensitive Receptors

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

There are several existing or reasonably foreseeable sensitive receptors near the Project Site, including:

- Montecito Apartments, 6650 Franklin Avenue, directly adjacent on-site.
- Canyon Co-Op School, 1820 North Las Palmas Avenue, 20 feet west of the Project Site
- Las Palmas Senior Citizen Center, 1820 North Las Palmas Avenue, 20 feet west of the Project Site
- Multi-family residences, 1847 North Cherokee Avenue; 5 feet south of the Project site
- Chateau Des Fleurs Apartments, 6626 Franklin Avenue; 185 feet east of the Project Site
- Multi-family residences, 6643 Franklin Avenue; 80 feet north of the Project Site
- Yucca Park, 6671 Yucca Street, 450 feet south of the Project Site.

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

Would the project:

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

No Impact. The Project Site is located within the South Coast Air Basin (SoCAB) and is subject to the Air Quality Management Plan (AQMP) prepared by the South Coast Air Quality Management District (SCAQMD).

The proposed residential land use will neither conflict with the SCAQMD's 2016 Air Quality Management Plan (AQMP) nor jeopardize the region's attainment of air quality standards. The AQMP focuses on achieving clean air standards while accommodating population growth forecasts by the Southern California Association of Governments (SCAG).

The SCAQMD has adopted a 2016 AQMP that focuses on achieving clean air standards while accommodating population growth forecasts compiled by the Southern California Association of Governments (SCAG). Specifically, SCAG's growth forecasts from the 2012 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) are largely built off local growth forecasts from local governments like the City of Los Angeles. The 2016 RTP/SCS accommodates up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City of Los Angeles by 2020. The Draft 2016 RTP/SCS, released for public review on December 4, 2015, accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040.

The Project Site is located in the City's Hollywood Community Plan area. The Community Plan implements land use standards of the General Plan Framework at the local level. The Project is consistent with the City's projected growth capacity for the Community Plan area, which accommodated a projected population of 219,000 persons by 2010.[6] The City has not updated projections beyond 2010 for the Community Plan area.

The Project would develop 68 new residential units in the City of Los Angeles. The Proposed Project could add 186 residents to the Plan area, based on the City's projected

6 City of Los Angeles, *Hollywood Community Plan*, www.cityplanning.lacity.org/complan/pdf/hwdcptxt.pdf. 2014.

household density in the City of Los Angeles.[7] This would marginally increase population in the South Coast Air Basin. The Project Site is classified as "Residential" in the General Plan, a zoning classification that allows residential uses. Further, the RTP/SCS' assumptions about growth in the City accommodate housing and population growth on this site. As such, the Project does not conflict with the growth assumptions in the regional air plan and this impact is considered less than significant.

Table V-3
Project Consistency with Air Quality Management Plan's Growth Forecast

Forecast Year	Population in City of Los Angeles	Proposed Project	Households in City of Los Angeles	Proposed Project	Employment in City of Los Angeles	Proposed Project
2008	3,770,500	186	1,309,900	68	35,900	0
2020	3,991,700		1,455,700		37,100	
2035	4,320,600		1,626,600		38,600	

Source: DKA Planning 2016 based on SCAG 2012 Regional Transportation Plan Growth Forecast. Assumes 2.74 persons per household per 2016 RTP/SCS.

City of Los Angeles General Plan Air Quality Element

The City's General Plan Air Quality Element identifies 30 policies that identify specific strategies for advancing the City's clean air goals. As illustrated in **Table V-4**, **Project Consistency with City of Los Angeles General Plan - Air Quality Element**, the Proposed Project is consistent with the applicable policies in the General Plan. As such, the proposed Project's impact on the City's General Plan would be considered less than significant.

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

Strategy	Project Consistency
Policy 1.3.1. Minimize particulate emissions from construction sites.	**Consistent.** The Proposed Project would minimize particulate emissions during construction through best practices required by SCAQMD Rule 403 (Fugitive Dust) and/or mitigation measures.
Policy 1.3.2. Minimize particulate emissions from unpaved roads	**Consistent.** The Proposed Project would

7 There would be a total of 67 new senior housing units and one unit set aside for an on-site manager. Thus the number of potential new residents presented is a worst-case scenario, given that the senior housing units will in all likelihood be occupied by a maximum of two persons, and in many cases by a sole occupant. Census statistics show that average household size decreases with age, especially after age 45, and is below two persons per household for households over age 65. National Association of Home Builders 50+ Housing Council, *Approving 55+ Housing: Facts That Matter*, https://www.winchester.us/DocumentCenter/View/1182, accessed October 16, 2017.

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

Strategy	Project Consistency
and parking lots associated with vehicular traffic.	minimize particulate emissions from unpaved facilities through best practices required by SCAQMD Rule 403 (Fugitive Dust) and/or mitigation measures.
Policy 2.1.1. Utilize compressed work weeks and flextime, telecommuting, carpooling, vanpooling, public transit, and improve walking/bicycling related facilities in order to reduce vehicle trips and/or VMT as an employer and encourage the private sector to do the same to reduce work trips and traffic congestion.	**Not Applicable.** The Proposed Project is a residential project and could not implement these employer-based transportation demand management programs. Nonetheless, the Proposed Project's location in an urban area with significant public transit could support these transportation demand management goals.
Policy 2.1.2. Facilitate and encourage the use of telecommunications (i.e., telecommuting) in both the public and private sectors, in order to reduce work trips.	**Not Applicable.** The Proposed Project is a residential project and would not implement employer-based transportation telecommunications programs. Nonetheless, the Project would not interfere with the implementation of such strategies.
Policy 2.2.1. Discourage single-occupant vehicle use through a variety of measures such as market incentive strategies, mode-shift incentives, trip reduction plans, and ridesharing subsidies.	**Not Applicable.** The Proposed Project is a residential project and would not implement employer-based transportation trip reduction programs. Nonetheless, the Project would not interfere with the implementation of such strategies.
Policy 2.2.2. Encourage multi-occupant vehicle travel and discourage single-occupant vehicle travel by instituting parking management practices.	**Not Applicable.** The Proposed Project is a residential project and would not implement parking management programs. Nonetheless, the Project would not interfere with the implementation of such strategies.
Policy 2.2.3. Minimize the use of single-occupant vehicles associated with special events or in areas and times of high levels of pedestrian activities.	**Not Applicable.** The Proposed Project does not include special events that would require traffic management.
Policy 3.2.1. Manage traffic congestion during peak hours.	**Consistent.** As discussed in the approved Transportation Impact Analysis for the Proposed Project, completed by Linscott Law & Greenspan Engineers[8], the Proposed Project would minimize traffic impacts below significance thresholds.
Policy 4.1.1. Coordinate with all appropriate regional agencies on the implementation of strategies for the integration of land use, transportation, and air quality policies.	**Consistent.** The Proposed Project is being entitled through the City of Los Angeles, which coordinates with SCAG, Los Angeles County Metropolitan Transportation Authority, and other regional agencies on the coordination of land use, air quality, and transportation policies.

8 **Transportation Impact Analysis for the Proposed Senior Apartments At 6650 Franklin Avenue,** Linscott Law & Greenspan Engineers, October 20, 2016. Approved by Los Angeles Department of Transportation (LADOT) January 26, 2017, incorporated herein by reference and included as **Appendix G** to this analysis.

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

Strategy	Project Consistency
Policy 4.1.2. Ensure that project level review and approval of land use development remains at the local level.	**Consistent.** The Proposed Project would be entitled and environmentally cleared at the local level.
Policy 4.2.1. Revise the City's General Plan/Community Plans to achieve a more compact, efficient urban form and to promote more transit-oriented development and mixed-use development.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.2.2. Improve accessibility for the City's residents to places of employment, shopping centers, and other establishments.	**Consistent.** The Proposed Project would be infill development that would provide residents with proximate access to jobs, shopping, and other uses.
Policy 4.2.3. Ensure that new development is compatible with pedestrians, bicycles, transit, and alternative fuel vehicles.	**Consistent.** The Proposed Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority (i.e., Routes 156, 656, 224, and 155) and the Metro Red Line stations at Universal/Studio City 0.8 miles away. In addition, the Proposed Project is providing a total of 75 on-site bicycle parking spaces of which 68 will be reserved for long-term use and seven for short-term use.
Policy 4.2.4. Require that air quality impacts be a consideration in the review and approval of all discretionary projects.	**Consistent.** The proposed Project's air quality impacts will be analyzed and minimized through the environmental review process.
Policy 4.2.5. Emphasize trip reduction, alternative transit, and congestion management measures for discretionary projects.	**Consistent.** The Proposed Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan Transportation Authority (i.e., Routes 237 and 656 on Highland Avenue, 212, 217, 222, and 312 on Hollywood Boulevard) and LADOT DASH Hollywood.
Policy 4.3.1. Revise the City's General Plan/Community Plans to ensure that new or relocated sensitive receptors are located to minimize significant health risks posed by air pollution sources.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 4.3.2. Revise the City's General Plan/Community Plans to ensure that new or relocated major air pollution sources are located to minimize significant health risks to sensitive receptors.	**Not Applicable.** This policy calls for City updates to its General Plan.
Policy 5.1.1. Make improvements in Harbor and airport operations and facilities in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's water port and airport facilities.
Policy 5.1.2. Effect a reduction in energy consumption and shift to non-polluting sources of energy in its buildings and operations.	**Not Applicable.** This policy calls for cleaner operations of the City's buildings and operations.
Policy 5.1.3. Have the Department of Water and Power make improvements at its in-basin power plants in order to reduce air emissions.	**Not Applicable.** This policy calls for cleaner operations of the City's Water and Power energy plants.

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

Strategy	Project Consistency
Policy 5.1.4. Reduce energy consumption and associated air emissions by encouraging waste reduction and recycling.	**Not Applicable.** This policy calls for City facilities to reduce solid waste production and energy consumption.
Policy 5.2.1. Reduce emissions from its own vehicles by continuing scheduled maintenance, inspection, and vehicle replacement programs; by adhering to the State of California's emissions testing and monitoring programs; by using alternative fuel vehicles wherever feasible, in accordance with regulatory agencies and City Council policies.	**Not Applicable.** This policy calls for the City to gradually reduce the fleet emissions inventory from its vehicles through use of alternative fuels, improved maintenance practices, and related operational improvements.
Policy 5.3.1. Support the development and use of equipment powered by electric or low-emitting fuels.	**Consistent.** The Project would be designed to meet the applicable requirements of the State's Green Building Standards Code and the City of Los Angeles' Green Building Code. Specific measures would be incorporated into the Proposed Project to the extent feasible including, but are not limited to electric vehicle charging stations in the parking structure; five (5) percent of total spaces would be designated for low emitting, fuel efficient and carpool/van pool vehicles; and 15 percent of the roof area set aside for future solar panels.
Policy 6.1.1. Raise awareness through public-information and education programs of the actions that individuals can take to reduce air emissions.	**Not Applicable.** This policy calls for the City to promote clean air awareness through its public awareness programs.
Source: DKA Planning, 2016.	

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

Less Than Significant Impact.

Construction

Construction-related emissions were estimated using the South Coast Air Quality Management District's (SCAQMD's) CalEEMod 2016.3.1 model using assumptions from the Project's developer, including the Project's construction schedule of 20 months. **Table V-5, Proposed Construction Schedule** summarizes the proposed construction schedule that was modeled for air quality impacts.

Table V-5
Proposed Construction Schedule

Phase	Duration	Notes
Site Preparation	7/3/18-7/31/18	Shoring activities using drilled solider beam installation
Grading	8/1/18-8/31/18	Up to 10,000 cubic yards of soil export
Building Construction	9/1/18-2/28/20	
Architectural Coatings	12/1/19-2/28/20	
Source: DKA Planning, 2016		

As shown in **Table V-6, Estimated Daily Construction Emissions - Unmitigated** the construction of the Proposed Project will produce VOC, NO_X, CO, SO_X, PM_{10} and $PM_{2.5}$ emissions that do not exceed the SCAQMD's regional thresholds. As a result, construction of the Proposed Project would not contribute substantially to an existing violation of air quality standards for regional pollutants (e.g., ozone). This impact is considered less than significant.

Table V-6
Estimated Daily Construction Emissions - Unmitigated

Construction Phase Year	Pounds Per Day					
	VOC	NO_X	CO	SO_X	PM10	PM2.5
2018	3	33	18	<1	3	4
2019	7	21	20	<1	2	1
2020	6	19	19	<1	2	1
Maximum Regional Total	6	33	20	<1	7	4
Regional Significance Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No
Maximum Localized Total	3	22	14	<1	3	2
Localized Significance Threshold	--	74	680	--	5	3
Exceed Threshold?	N/A	No	No	N/A	No	No
Source: DKA Planning, 2016 based on CalEEMod 2016.3.1 model runs. LST analyses based on 1 acre site with 25 meter distances to receptors in Central LA source receptor area.						

In terms of local air quality, the Proposed Project would produce significant emissions that do not exceed the SCAQMD's recommended localized standards of significance for NO_2 and CO during the construction phase. Similarly, construction activities would not produce PM10 and PM2.5 emissions that exceed localized thresholds recommended by the SCAQMD. This assessment assumes enforcement of **Regulatory Compliance**

Measure AQ-RCM-1, which addresses fugitive dust emissions of PM10 and PM2.5 that would be regulated by SCAQMD Rule 403. This rule calls for Best Available Control Measures (BACM) that include watering portions of the site that are disturbed during grading activities and minimizing tracking of dirt onto local streets. As a result, construction impacts on localized air quality are considered less than significant.

However, the close proximity of the Canyon Co-Op School and Las Palmas Senior Citizen Center at 1820 North Las Palmas Avenue 20 feet west of the Project Site could result in nuisance complaints during the construction process. As such, Project Design Features (PDFs) **AQ-PDF-1** through **AQ-PDF-4** will be implemented as part of the Project Construction Management Plan (CMP) which will be employed voluntarily to pre-empt any sensitivities to construction emissions.

Operation

The Project will also produce long-term air quality impacts to the region primarily from motor vehicles that access the Project site. The Project could add up to 234 net vehicle trips to and from the Project Site on a peak weekday at the start of operations in 2020.[9] Operational emissions would not exceed SCAQMD's regional significance thresholds for VOC, NOX, CO, PM10 and PM2.5 emissions (**Table V-7, Estimated Daily Operations Emissions - Unmitigated**). As a result, the Project's operational impacts on regional air quality are considered less than significant.

Table V-7
Estimated Daily Operations Emissions - Unmitigated

Emission Source	Pounds per Day					
	VOC	NOX	CO	SOX	PM10	PM2.5
Area Sources	1	<1	6	<1	<1	<1
Energy Sources	<1	<1	<1	<1	<1	<1
Mobile Sources	1	2	7	<1	2	<1
Net Regional Total	**1**	**3**	**13**	**<1**	**2**	**1**
Regional Significance Threshold	**55**	**55**	**550**	**150**	**150**	**55**
Exceed Threshold?	No	No	No	No	No	No
Net Localized Total	**1**	**<1**	**6**	**<1**	**<1**	**<1**
Localized Significance Threshold	**-**	**80**	**498**	**-**	**2**	**1**
Exceed Threshold?	N/A	No	No	N/A	No	No

Source: DKA Planning 2016 based on CalEEMod 2016.3.1 model runs. LST analysis based on 1 acre site with 25 meter distances to receptors in Central LA source receptor area.

9 Linscott Law & Greenspan, "Technical Memorandum-Montecito Senior Housing Project", October 2016.

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

Less Than Significant Impact.

Construction

A project's construction impacts could be considered cumulative considerable if it substantially contributes to cumulative air quality violations when considering other projects that may undertake concurrent construction activities.

Construction of the Proposed Project would not contribute significantly to cumulative emissions of any non-attainment regional pollutants. For regional ozone precursors, the Project would not exceed SCAQMD mass emission thresholds for ozone precursors during construction. Similarly, regional emissions of PM10 and PM2.5 would not exceed mass thresholds established by the SCAQMD. Therefore, construction emissions impacts on regional criteria pollutant emissions would be considered less than significant.

When considering local impacts, cumulative construction emissions are considered when projects are within close proximity of each other that could result in larger impacts on local sensitive receptors. Construction of the Project itself would not produce cumulative considerable emissions of localized nonattainment pollutants PM10 and PM2.5, as the anticipated emissions would not exceed LST thresholds set by the SCAQMD. This is considered a less than significant impact.

If any other proposed projects were to undertake construction concurrently with the proposed Project, localized CO, PM2.5, PM10, and NO2 concentrations would be further increased. However, the application of LST thresholds to each cumulative project in the local area would help ensure that each project does not produce localized hotspots of CO, PM2.5, PM10, and NO2. Any projects that would exceed LST thresholds (after mitigation) would perform dispersion modeling to confirm whether health-based air quality standards would be violated. The SCAQMD's LST thresholds recognize the influence of a receptor's proximity, setting mass emissions thresholds for PM10 and PM2.5 that generally double with every doubling of distance.

Operation

As for cumulative operational impacts, the proposed land use will not produce cumulatively considerable emissions of nonattainment pollutants at the regional or local level. Because the Project's air quality impacts would not exceed the SCAQMD's operational thresholds of significance as noted in **Table V-7,** the Project's impacts on cumulative emissions of non-attainment pollutants is considered less than significant. The Project is a residential development that would not include major sources of combustion or fugitive dust. As a result, its localized emissions of PM10 and PM2.5 would be minimal. Likewise, existing land uses in the area include land uses that do not produce substantial emissions of localized nonattainment pollutants.

d) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Construction

Construction of the Proposed Project could produce air emissions that impact several existing sensitive receptors near the Project Site, including:

- Montecito Apartments, 6650 Franklin Avenue, directly adjacent on-site.
- Canyon Co-Op School, 1820 North Las Palmas Avenue, 20 feet west of the Project Site
- Las Palmas Senior Citizen Center, 1820 North Las Palmas Avenue, 20 feet west of the Project Site
- Multi-family residences, 1847 North Cherokee Avenue; 5 feet south of the Project site
- Chateau Des Fleurs Apartments, 6626 Franklin Avenue; 185 feet east of the Project Site
- Multi-family residences, 6643 Franklin Avenue; 80 feet north of the Project Site
- Yucca Park, 6671 Yucca Street, 450 feet south of the Project Site.

As illustrated in **Table V-7,** these nearby receptors would not be exposed to substantial concentrations of localized pollutants CO, NO2, PM10, and PM2.5 from construction of the proposed Project. Specifically, construction activities would not exceed SCAQMD LST thresholds for CO, NO2, PM10, and PM2.5 and represent a less than significant impact. LST thresholds represent the maximum emissions from a project that will not cause or contribute to an exceedance of the most stringent applicable ambient air quality standard.

Operation

The Proposed Project would generate long-term emissions on-site from area and energy sources that would generate negligible pollutant concentrations of CO, NO2, PM2.5, or PM10 at nearby sensitive receptors. While long-term operations of the Project would generate traffic that produces off-site emissions, these would not result in exceedances of CO air quality standards at roadways in the area due to three key factors. First, CO hotspots are extremely rare and only occur in the presence of unusual atmospheric conditions and extremely cold conditions, neither of which applies to this Project area. Second, auto-related emissions of CO continue to decline because of advances in fuel combustion technology in the vehicle fleet. Finally, the Project would not contribute to the levels of congestion that would be needed to produce the amount of emissions needed to trigger a potential CO hotspot.[10] Specifically, traffic levels of service at three intersections studied in the vicinity of the Project would not be significantly impacted by traffic volumes from the development under existing or 2019 horizon scenarios.[11]

Finally, the Project would not result in any substantial emissions of TACs during the construction or operations phase. During the construction phase, the primary air quality impacts would be associated with the combustion of diesel fuels, which produce exhaust-related particulate matter that is considered a toxic air contaminant by CARB based on chronic exposure to these emissions.[12] However, construction activities would not produce chronic, long-term exposure to diesel particulate matter. During long-term project operations, the Project does not include typical sources of acutely and chronically hazardous TACs such as industrial manufacturing processes and automotive repair facilities. As a result, the Project would not create substantial concentrations of TACs. In addition, the SCAQMD recommends that health risk assessments be conducted for substantial sources of diesel particulate emissions (e.g., truck stops and warehouse distribution facilities) and has provided guidance for analyzing mobile source diesel emissions.[13] The Project would not generate a substantial number of truck trips. Based on the limited activity of TAC sources, the Project would not warrant the need for a health risk assessment associated with on-site activities. Therefore, Project impacts related to TACs would be less than significant.

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10 Caltrans, Transportation Project-Level Carbon Monoxide Protocol, updated October 13, 2010.

11 Linscott Law & Greenspan, "Technical Memorandum-Montecito Senior Housing Project", October 2016.

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

13 SCAQMD, Health Risk Assessment Guidance for Analyzing Cancer Risks from Mobile Source Diesel Emissions, December 2002.

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

Less Than Significant Impact. Potential sources that may emit odors during the construction activities include equipment exhaust and architectural coatings. Odors from these sources would be localized and generally confined to the Project Site. Development of the Proposed Project would utilize typical construction techniques, and the odors would be typical of most construction sites. Additionally, the odors would be temporary, and construction activity would be required to comply with SCAQMD Rule 402.[14] A less than significant impact relative to an odor nuisance would occur during construction associated with the Proposed Project.

According to the SCAQMD *California Environmental Quality Act (CEQA) Air Quality Handbook*, land uses that are associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, landfills, dairies, and fiberglass molding.[15] The Proposed Project would not include any of these odor-producing uses; odors associated with project operation would be limited to on-site waste generation and disposal and occasional minor odors generated during food preparation activities for the residents. Furthermore, all trash receptacles would be covered and properly maintained in a manner as to minimize odors, as required by City and Los Angeles County Health Department regulations, and be emptied on a regular basis. Therefore, the implementations of the Proposed Project would not generate objectionable odors affecting a substantial number of people. Impacts related to odors would be less than significant.

Project Design Features

The following optional Project Design Features will be implemented to ensure construction impacts related to air quality are further reduced.

AQ-PDF-1 The Project Applicant shall ensure that construction vehicles avoid, to the extent feasible, travel on Las Palmas Avenue adjacent to the Canyon Co-Op School and Las Palmas Senior Citizen Center.

AQ-PDF-2 The Project Applicant shall provide advance notification to the Canyon Co-Op School and Las Palmas Senior Citizen Center of the Project's anticipated general

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[14] *SCAQMD Rule 402 states the following "A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.*

[15] *South Coast Air Quality Management District, CEQA Air Quality Handbook; http://www.aqmd.gov/ceqa/hdbk.html, December 06, 2016.*

construction schedule and a specific schedule for site grading and preparation activities. Any earth moving activities shall be scheduled to avoid or minimize overlap with school activities, particularly outdoor play periods.

AQ-PDF-3 The Project Applicant shall coordinate with administrative staff at Canyon Co-Op School and Las Palmas Senior Citizen Center to seal any building leaks adjacent to the construction site.

AQ-PDF-4 The Project Applicant shall provide dense windscreens on chain link fences and gates at Canyon Co-Op School and Las Palmas Senior Citizen Center facing the Project Site to reduce dispersion of any dust plumes from earth moving activities.

Regulatory Compliance Measures

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

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

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

4. BIOLOGICAL RESOURCES

Would the project:

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

No Impact. The Project Site is currently developed with a surface parking lot and an open courtyard, located in an urban portion of the City and is not located near any vacant land with natural vegetation supportive of sensitive species.[16] Therefore, no special status/sensitive species are expected to occur on the Project Site. Because of the nature of the urbanized Project Site and project vicinity, redevelopment of the Project Site would not have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service. No impacts would occur, and no further analysis is required.

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

No Impact. The site is currently developed with a surface parking lot and an open courtyard, located in an urban area. No riparian habitat or other sensitive natural community exists within the project area or in the surrounding area.[17] Implementation of the Proposed Project would not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or United States Fish and Wildlife Service. Therefore, no impacts would occur, and no further analysis is required.

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16 *City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed December 11, 2015, and City of Los Angeles General Plan Draft EIR, Biological Resources section, Figure BR-1D, Biological Resources Areas (Coastal and Southern Geographical Area), Page 2.18-6, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf, accessed April 25, 2016.*

17 *City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed December 11, 2015, and City of Los Angeles General Plan Draft EIR, Biological Resources section, Figure BR-1D, Biological Resources Areas (Coastal and Southern Geographical Area), Page 2.18-6, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf, accessed April 25, 2016.*

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. The site is currently developed with a surface parking lot and an open courtyard and located in an urban area. There are no wetlands within the project area or in the surrounding area.[18] Buildout of the Proposed Project would not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, no impacts would occur, and no further analysis is required.

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

Less Than Significant Impact. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area. However, a number of mature trees are scattered along the parkways and within the Project Site. Although the trees are all ornamental and nonnative, they may provide suitable habitat, including nesting habitat, for migratory birds. A tree survey report was conducted by Tree Case Management in May 2017. Of the 27 identified trees on the Project site, 22 would be removed, with the remaining five trees either preserved in place, or removed, depending on construction methods. The tree survey found there are no protected species trees as defined under the Los Angeles Municipal Code Ordinance 177404. No trees to be removed are within the public right-of-way.

The Migratory Bird Treaty Act of 1918 (MBTA) implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. The US Fish and Wildlife Service administers permits to take migratory birds in accordance with the MBTA. The City requires that all projects comply with the MBTA by either avoiding grading activities during the nesting season (February 15 to August 15) or conducting a site survey for nesting birds prior to commencing grading activities. The Proposed

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18 *US Fish and Wildlife Service, National Wetlands Inventory, http://www.fws.gov/wetlands/Data/Mapper.html, accessed December 11, 2015, and City of Los Angeles General Plan Draft EIR, Biological Resources section, Figure BR-1D, Biological Resources Areas (Coastal and Southern Geographical Area), Page 2.18-6, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf, accessed April 25, 2016.*

Project will be required to comply with the provisions of the MBTA. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding season, appropriate measures would be taken to avoid impacts to any nesting birds if found. With adherence to the MBTA requirements, less than significant impacts would occur and no further analysis is required.

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

Less Than Significant Impact. The City's Protected Tree Ordinance No. 177,404 (Chapter IV, Article 6 of the Los Angeles Municipal Code), defines protected trees as:

> Any of the following Southern California native tree species, which measures four inches or more in cumulative diameter, four and one-half feet above the ground level at the base of the tree*:*
>
> *Oak trees including Valley Oak (Quercus lobata) and California Live Oak (Quercus agrifolia), or any other tree of the oak genus 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 (Umbellularia californica).*

As previously discussed, there are 27 trees within the public right-of-way and on the Project Site. All of these trees are of common ornamental species; none of the trees is of a protected species as defined above.[19] Project construction proposes to remove all of these existing trees, five of which would be relocated on the Project Site. Further, it is the City's Street Tree policies to require the replacement any street trees removed during project construction. Specifically, the City's policy is to replace all significant, non-protected trees (defined as eight inches (8") in diameter at breast height (DBH)) at a 1:1 ratio with a minimum 24-inch box size tree. In addition, per the City's Street Tree Policies, the City Department of Public Works, Urban Forestry Division's policy is to replace street trees removed during a construction project. Therefore, prior to the issuance of a grading permit, during plan check review, in compliance with the LAMC and policies, a landscape plan shall be submitted for approval by the Department of City Planning and the Urban Forestry Division of the Bureau of Street Services, Department of Public Works. The landscape plan shall demonstrate the minimum replacement ratio

[19] ***Tree Case Management Tree Report, dated May 17, 2017*** *and included as* ***Appendix B*** *to this SCEA.*

of 1:1 for the existing, significant street trees and meet the requirements of the City of Los Angeles Landscape Ordinance No. 170,978. Further, removal or planting of any tree in the public right-of-way requires approval of the Board of Public Works. A Tree Removal Permit and a subsequent Tree Planting Permit would be required prior to the issuance of a Certificate of Occupancy, to certify that all new trees in the public right-of-way are provided per the current standards of the Urban Forestry Division of the Bureau of Street Services, Department of Public Works.

Following the implementation of the City's standard policies and procedures, impacts would be less than significant and no further analysis is required.

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

No Impact. The site is located in a developed urbanized area and does not provide habitat for sensitive Biological resources. There are no SEAs within the vicinity of the Project Site.[20] Accordingly, no Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan applies to the Proposed Project. Therefore, implementation of the Proposed Project would not conflict with the provisions of an adopted habitat conservation plan. No impacts would occur, and no further analysis is required.

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[20] *City of Los Angeles General Plan, Conservation Element, Exhibit B2 SEAs and Other Resources, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf, accessed September 8, 2017, and City of Los Angeles General Plan Draft EIR, Biological Resources section, Figure BR-1D, Biological Resources Areas (Coastal and Southern Geographical Area), Page 2.18-6, http://cityplanning.lacity.org/HousingInitiatives/HousingElement/FrameworkEIR/GPF_DraftEIR/GPF_FEIR_DEIR2.18.pdf, accessed September 8, 2017.*

5. CULTURAL RESOURCES

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

Less Than Significant Impact with Mitigation. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[21] Section 15064.5 of the *State CEQA Guidelines* defines a historical resource as (1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or (3) an object, building, structure, site, area, place, record or manuscript that a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

The following analysis is based on the *Montecito II Historic Resources Technical Report* (Historic Resources Report), prepared by Historic Resources Group, dated July 2017, incorporated herein by reference and included as **Appendix C** to this SCEA.

SITE DEVELOPMENT HISTORY

Existing Conditions

The Project Site is located on the southwest corner of Franklin Avenue and N. Cherokee Avenue in Hollywood. The hillside site slopes down to the south and west. The Project Site contains a ten-story, reinforced concrete apartment building located on the northeast portion of the Project Site. Known as the "Montecito Apartments" since its original construction in 1931, the building was listed in the National Register of Historic Places in 1985.

A landscaped garden area sits directly west of the Montecito Apartments building providing private park space for the residents. The garden is surrounded by a metal

[21] *California Public Resources Code Section 21084.1*

fence covered in climbing vines. Gated access from the garden opens onto Franklin Avenue.

A rectangular surface parking lot occupies the southern portion of the Project Site flanking the Montecito Apartments building and adjacent garden. The parking lot is accessed by a gated drive off N. Cherokee Avenue.

The area immediately surrounding the Project Site is largely residential and characterized by multi-family residential buildings dating from the 1920s to the present day.

The Las Palmas Senior Center is located on a large parcel west of the Project Site. The Senior Center property contains the Canyon Co-op Pre-School.

Commercial development in the area is concentrated on Highland Avenue to the west and Hollywood Boulevard to the south.

Site Development

The Project Site and immediate surrounding area was originally subdivided as the "Hollywood Ocean View Tract" in 1901. Hollywood incorporated as a city in 1903 and in 1904 a streetcar line was established between Hollywood and Downtown Los Angeles. The city of Hollywood was consolidated with Los Angeles in 1910.

Skyrocketing population growth in the Los Angeles region, along with the success of the motion picture industry then concentrated in and around Hollywood, spurred continuous development in Hollywood over the next two decades. A 1919 Sanborn map shows that the Project Site and surrounding area had by that time been largely developed as a low-density residential area characterized by single-family homes. The current location of the Montecito Apartments building was occupied by a single-family home (1861 Cherokee). The location of the current garden west and adjacent to the Montecito Apartments was in 1919 developed with two single-family homes (6674 and 6672 Franklin Avenue) and a duplex (6668 and 6668-1/2 Franklin Avenue). The site of the current surface parking lot south of the Montecito Apartments and adjacent garden was undeveloped in 1919 but would soon be developed with a single-family home as well (1855 Cherokee).

During the 1920s, Hollywood dramatically increased in density to meet burgeoning demand for housing. Bungalow courts, duplexes, and multistory apartment buildings replaced many of the single-family homes that had originally characterized the area. In

the latter half of the 1920s, luxury apartment buildings rising four stories and higher were constructed. Many of these operated as "apartment hotels" offering fully furnished suites, laundry, housekeeping, and in some cases food service. These properties catered to a more transient population in need of temporary housing and proved to be a useful option for creative talent imported west for work in the film industry.

In 1930, the single-family residence at 1861 Cherokee Avenue was demolished. The Montecito Apartments were constructed in its place in 1931. The building was constructed with two levels of integrated subterranean parking; a portion of the parking area was converted for use as a residence commissary in 1934.

In 1953 the single-family home at 1855 Cherokee Avenue, located directly south of the Montecito Apartments, was relocated. The vacant parcel was paved and used as surface parking for the Montecito Apartments. In 1956 a "semi-public" swimming pool was constructed on the western half of the 1855 Cherokee parcel.

In 1960, the Las Palmas Senior Center was developed at the southeast corner of Franklin and Las Palmas avenues. The residential duplex at 6668 Franklin Avenue (west of the Montecito Apartments) was demolished in 1962. Permits for the demolition or relocation of the other two residential buildings located west of the Montecito Apartments were not located for this study, but according to Sanborn maps, both were removed between 1955 and 1966. The area left vacant by the removal of the residential buildings was paved and used for surface parking.

The Montecito Apartments successfully operated as a popular apartment hotel over several decades and proved to be particularly popular with actors. James Cagney, Mickey Rooney, Ronald Regan, Julie Harris, Montgomery Clift, George C. Scott, Lee Grant, and Gene Hackman all made the Montecito Apartments their home at one time. Former manager Gene Hinson was quoted as saying that actors liked the Montecito for the homey atmosphere the staff provided but also because, "we gave them credit."

Like much of Hollywood, the Montecito Apartments went into decline during the 1970s. It was listed in the National Register of Historic Places in 1985 and rehabilitated as affordable senior housing that same year. The parking lot to the immediate west of the building was most likely converted to a garden space during or soon after the 1985 conversion. The swimming pool, constructed in 1956, is no longer extant and it is not clear exactly when the swimming pool was removed. The pool was mentioned as extant in the 1985 National Register nomination but "unmaintained" and "in poor condition." No demolition permit for the pool was located for this study but aerial photographs

indicate that it had been removed by the mid-1990s. Removal of the pool likely happened at the same time as the building's conversion to low-income housing.

REGULATORY REVIEW

Historic Resources under CEQA

CEQA requires that environmental protection be given significant consideration in the decision making process. Historic resources are included under environmental protection. Thus, any project or action which may cause a substantial adverse change in the significance of an historic resource is a project that also has a significant effect on the environment.

When the California Register of Historical Resources was established in 1992, the Legislature amended CEQA to clarify which historic resources may be significant, as well as which project impacts are considered to cause a substantial adverse change in the significance of an historic resource. A "substantial adverse change" means "demolition, destruction, relocation, or alteration such that the significance of a historical resource would be impaired."

CEQA includes in its definition of historic resources a resource listed in, or determined eligible for listing, in the California Register of Historical Resources. All properties on the California Register are to be considered under CEQA. However, because a property does not appear on the California Register does not mean it is not significant and therefore exempt from CEQA consideration. All resources determined eligible for the California Register are also to be considered under CEQA.

The CEQA statute provides that an historic resource is a resource that is:

- Listed in the California Register of Historical Resources (California Register);
- Determined eligible for the California Register by the State Historical Resources Commission; or
- Included in a local register of historic resources.

The appellate court has affirmed the three categories of historic resources:

- ***Mandatory historical resources*** are resources "listed in, or determined to be eligible for listing in, the California Register of Historical Resources."

- ***Presumptive historical resources*** are resources "included in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1" of the Public Resources Code, unless the preponderance of the evidence demonstrates that the resource is not historically or culturally significant.

- ***Discretionary historical resources*** are those resources that are not listed but determined to be eligible under the criteria for the California Register of Historical Resources.

Section 15064.5 of the CEQA Guidelines (California Code of Regulations, Title 14, Chapter 3) supplements the statute by providing two additional definitions of historical resources, which may be simplified in the following manner. An historic resource is a resource that is:

- Identified as significant in an historical resource survey meeting the requirements of Public Resources Code 5024.1 (g);

- Determined by a Lead Agency to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. Generally, this category includes resources that meet the criteria for listing on the California Register (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852).

The fact that a resource is not listed in, or determined eligible for listing in, the California Register, not included in a local register of historic resources, or not deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1, does not preclude a lead agency from determining that the resource may be an "historic resource" for purposes of CEQA.

Properties formally determined eligible for listing in the National Register of Historic Places are automatically listed in the California Register. Properties designated by local municipalities can also be considered historic resources. A review of properties that are potentially affected by a project for historic eligibility is also required under CEQA.

Historic Designations

A property may be designated as historic by National, State, and local authorities. In order for a building to qualify for listing in the National Register or the California Register, it must meet one or more identified criteria of significance. The property must

also retain sufficient architectural integrity to continue to evoke the sense of place and time with which it is historically associated.

National Register of Historic Places

The National Register of Historic Places 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. The National Park Service administers the National Register program. Listing in the National Register assists in preservation of historic properties in several ways including: recognition that a property is of significance to the nation, the state, or the community; consideration in the planning for federal or federally assisted projects; eligibility for federal tax benefits; and qualification for Federal assistance for historic preservation, when funds are available.

To be eligible for listing and/or listed in the National Register, a resource must possess significance in American history and culture, architecture, or archaeology. Listing in the National Register is primarily honorary and does not in and of itself provide protection of an historic resource. The primary effect of listing in the National Register on private owners of historic buildings is the availability of financial and tax incentives. In addition, for projects that receive Federal funding, a clearance process must be completed in accordance with Section 106 of the National Historic Preservation Act. Furthermore, state and local regulations may apply to properties listed in the National Register.

The criteria for listing in the National Register follow established guidelines for determining the significance of properties. The quality of significance in American history, architecture, archeology, engineering, and culture is present in districts, sites, buildings, structures, and objects:

A. That are associated with events that have made a significant contribution to the broad patterns of our history; or

B. That are associated with the lives of persons significant in our past; or

C. That 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. That have yielded, or may be likely to yield, information important in prehistory or history.

In addition to meeting any or all of the criteria listed above, properties nominated must also possess integrity of location, design, setting, materials, workmanship, feeling, and association.

California Register of Historical Resources

The California Register is an authoritative guide in California used by State and local agencies, private groups, and citizens to identify the State's historic resources and to indicate what properties are to be protected, to the extent prudent and feasible, from substantial adverse change.

The criteria for eligibility for listing in the California Register are based upon National Register criteria. These criteria are:

1. 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.

2. Associated with the lives of persons important to local, California, or national history.

3. Embodies the distinctive characteristics of a type, period, region, or method of construction or represents the work of a master or possesses high artistic values.

4. Has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California or the nation.

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 includes the following:

- California properties formally determined eligible for (Category 2 in the State Inventory of Historical Resources), or listed in (Category 1 in the State Inventory), the National Register of Historic Places.

- State Historical Landmarks No. 770 and all consecutively numbered state historical landmarks following No. 770. For state historical landmarks preceding No. 770, the Office of Historic Preservation (OHP) shall review their eligibility for the California

Register in accordance with procedures to be adopted by the State Historical Resources Commission (commission).

- Points of historical interest which have been reviewed by the OHP and recommended for listing by the commission for inclusion in the California Register in accordance with criteria adopted by the commission.

Other resources which may be nominated for listing in the California Register include:

- Individual historic resources.
- Historic resources contributing to the significance of an historic district.
- Historic resources identified as significant in historic resources surveys, if the survey meets the criteria listed in subdivision (g).
- Historic resources and historic districts designated or listed as city or county landmarks or historic properties or districts pursuant to any city or county ordinance, if the criteria for designation or listing under the ordinance have been determined by the office to be consistent with California Register criteria.
- Local landmarks or historic properties designated under any municipal or county ordinance.

Local Designation Programs

The Los Angeles City Council designates Historic-Cultural Monuments on recommendation of the City's Cultural Heritage Commission.

Chapter 9, Section 22.171.7 of the City of Los Angeles Administrative Code defines an historical or cultural monument as:

> "… a Historic-Cultural Monument (Monument) is any site (including significant trees or other plant life located on the site), building or structure of particular historic or cultural significance to the City of Los Angeles, including historic structures or sites in which the broad cultural, economic or social history of the nation, State or community is reflected or exemplified; or which is identified with historic personages or with important events in the main currents of national, State or local history; or which embodies the distinguishing characteristics of an architectural type specimen, inherently valuable for a study of a period, style or

> method of construction; or a notable work of a master builder, designer, or architect whose individual genius influenced his or her age."

Designation recognizes the unique architectural value of certain structures and helps to protect their distinctive qualities. Any interested individual or group may submit nominations for Historic-Cultural Monument status. Buildings may be eligible for historical cultural monument status if they retain their historic design and materials. Those that are intact examples of past architectural styles or that have historical associations may meet the criteria in the Cultural Heritage ordinance.

Hollywood Community Plan

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

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

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

Hollywood Redevelopment Project

The Project Site is contained within the Hollywood Redevelopment Project area generally bounded by Franklin Avenue on the north, Serrano Avenue on the east, Santa Monica Boulevard and Fountain Avenue on the south, and La Brea Avenue on the west. The Hollywood Project area was established in 1984 by the Community Redevelopment Agency (CRA). The CRA was dissolved on February 6, 2012, and administration of the Hollywood Redevelopment Project area has been transferred to the CRA/LA, a

Designated Local Authority (DLA) and successor to the CRA, and may transfer to the City Planning Department.

The Hollywood Redevelopment Project's goals include "the retention, restoration and appropriate reuse of existing buildings, groupings of buildings, and other physical features especially those having significant historic and/or architectural value and ensure that new development is sensitive to these features through land use and development criteria." Policies and guidelines for the preservation, rehabilitation, and retention of historic properties are discussed in Section 5.11 of the Redevelopment Plan.

As part of its responsibilities in implementing the Hollywood Redevelopment Plan, the CRA compiled historic survey data on properties within the Hollywood Redevelopment Project Area. Property evaluations from historic surveys in 1986, 1997, and 2003 were compiled in a data table that was made available on the CRA website. A more recent intensive-level survey of the Hollywood Redevelopment Project Area was conducted in 2010. It provides relevant information regarding the status of properties within the redevelopment area and is used by agencies and the community to identity potential historic resources. The results of this survey have been compiled in a data table that includes information previously listed in the CRA data table.

Historic Significance and Integrity

Historic Significance

The definition of historic significance used by the California Office of Historic Preservation (OHP) in its administration of the California Register is based upon the definition used by the National Park Service for the National Register.

Historic significance is defined as the importance of a property to the history, architecture, archaeology, engineering, or culture of a community, state, or the nation. It is achieved in several ways:

- Association with important events, activities or patterns,
- Association with important persons,
- Distinctive physical characteristics of design, construction, or form, or
- Potential to yield important information.

A property may be significant individually or as part of a grouping of properties.

Historic Integrity

Historic integrity is the ability of a property to convey its significance and is defined as the "authenticity of a property's historic identity, evidenced by the survival of physical characteristics that existed during the property's historic period." The National Park Service defines seven aspects of integrity: location, design, setting, materials, workmanship, feeling, and association. These qualities are defined as follows:

- ***Location*** is the place where the historic property was constructed or the place where the historic event took place.
- ***Design*** is the combination of elements that create the form, plan, space, structure, and style of a property.
- ***Setting*** is the physical environment of a historic property.
- ***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.
- ***Workmanship*** is the physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- ***Feeling*** is a property's expression of the aesthetic or historic sense of a particular period of time.
- ***Association*** is the direct link between an important historic event or person and a historic property.

Age Threshold

The fifty-year age threshold has become standard in historic preservation as a way to delineate potential historic resources. The National Park Service, which provides guidance for the practice of historic preservation, has established that a resource fifty years of age or older may be considered for listing on the National Register of Historic Places.

In the City of Los Angeles there is no requirement that a resource be a certain age before it can be designated as a Los Angeles Historic-Cultural Monument. The City's Office of Historic Resources does qualify, however that "enough time needs to have passed since

the resource's completion to provide sufficient perspective that would allow an evaluation of its significance within a historical context."

IDENTIFICATION OF HISTORICAL RESOURCES

The Project Site contains one building that has been designated as a historic resource. No other historic resources are located on the Project Site.

The Montecito Apartments - 6650 Franklin Avenue

The Montecito Apartments, located at 6650 Franklin Avenue, was listed in the National Register of Historic Places in 1985. Because the Montecito Apartments has been listed in the National Register, it is also listed in the California Register of Historical Resources. By virtue of its listing in the National Register and California Register, the Montecito Apartments is considered a historical resource for the purposes of CEQA.[22]

Architectural Description

The Montecito Apartments is a ten story, reinforced concrete building with a two-level basement. The building is square in plan with two shallow light courts on the east and west facades and designed in an Art Deco style with Zig-Zag Moderne and Mayan influences.

The building's primary (northern) facade faces Franklin Avenue. The recessed main entrance is distinguished by a double inset bronze doorway with a decorative cast iron, rusticated concrete and marble and black glass surround. A highly decorated cast iron canopy with lamps is sits directly above the main entrance. Neon letters spelling "MONTECITO" adorn the north, east and west faces of the canopy.

The Franklin Street façade is characterized by a symmetrical and relatively austere arrangement of rusticated concrete panels set between vertical piers and metal-frame casement windows. Details include decorative cast spandrel panels and cast concrete Mayan pendants.

The east-facing façade continues the decorative detailing of the north facade. The eastern façade also features a centrally located light well flanked by four window bays on each side. The south elevation is similar to the north but dispenses with the decorative Mayan

22 A copy of the National Register Nomination for the Montecito Apartments is included in the Montecito II Historic Resources Technical Report, included as Appendix C to this SCEA.

detailing after the easternmost window bay. Due to the downward slope of the site, the two basement levels are fully exposed on this façade.

The west elevation includes a central light well similar to that of the east elevation. In this case there are only three window bays located in the principal wall segments. Fenestration is metal-frame casement throughout.

A neon roof sign spelling "MONTECITO" is located on the south-facing roof parapet. A centrally located mechanical penthouse of concrete construction tops the building. The penthouse is rectangular in plan with a hipped standing seam copper roof. There are four window openings on the east and west elevations and two window bays on the north and south.

Decorative cast panels are located above the window openings on all facades. A neon "MONTECITO" sign, similar to that on the south parapet, is located on the east façade of the machinery penthouse directly below the roofline.

Art Deco Architecture

The Montecito Apartments was designed an Art Deco style incorporating Zig-Zag Moderne and Mayan influences. Art Deco originated in France in the 1910s as an experimental movement in architecture and the decorative arts. It developed into a major style when it was first exhibited in Paris at the 1925 *Exposition Internationale des Arts Decoratifs et Industriels Modernes*, from which it takes its name. The Exposition's organizers had insisted on the creation of a new, contemporary aesthetic that dispensed with traditional historicist styles and responded more directly with the industrial and technical innovations of the 20th century. The architecture of the Art Deco movement rejected the rigid organizational methods and classical ornamentation of the Beaux Arts style. It emphasized a soaring verticality through the use of stepped towers, spires, and fluted or reeded piers, and embraced highly stylized geometric, floral, and figurative motifs as decorative elements on both the exterior and interior. Decorative motifs often referenced ancient Egyptian, Asian, or Pre-Columbian origins considered "exotic" to a western audience. Abstracted, purely geometric decoration was also often used. Ornate metalwork, glazed terra cotta tiles, and bright colors were hallmarks of the style.

Character-defining features include an emphasis on vertical lines; smooth wall surfaces, usually of plaster; flat roofs with decorative parapets or towers; stylized decorative floral and figurative elements in cast stone, glazed terra cotta tiles, or aluminum; metal-frame

windows, usually fixed or casement; and geometric decorative motifs such as zigzags and chevrons.

Art Deco was the first popular style in the United States that consciously rejected historical precedents. It was instead a product of the Machine Age and took its inspiration from industry and transportation. It was only briefly popular, from the late 1920s until the late 1930s, and was employed primarily in commercial and institutional buildings, and occasionally in multifamily residential buildings. It was rarely used for single-family residences. By the mid-1930s, in the depths of the Great Depression, the highly-decorated style came to be viewed as garish and overwrought, and it was soon abandoned in favor of the cleaner, simpler Streamline Moderne style.

Significance

The Montecito Apartments is significant under National Register Criterion C and California Register Criterion 3 as an excellent example of Art Deco architecture as applied to an apartment building; and as an excellent example of the apartment hotel property type from the pre-World War II era in Hollywood. It maintains an unusually high level of physical integrity among similar buildings from the same period.

Constructed in 1931, the Montecito Apartments was designed by noted Los Angeles architect Marcus P. Miller. Other buildings designed by Miller include the Streamline Moderne Chandler's Shoe Store at the northwest corner of Wilshire Boulevard and Cloverdale Avenue; and the programmatic Darkroom Camera Shop storefront at 5370 Wilshire Boulevard. Construction was provided by the H.M. Baruch Corporation, one of Los Angeles' most prominent builders in the late 1920's and early 1930's.

The Montecito Apartments had a long history of providing temporary housing in Hollywood and was particularly popular with artists and craftspeople associated with the motion picture industry. The building's distinctive design and illuminated roof-top signage have been a prominent component of the Hollywood skyline since its construction.

POTENTIAL IMPACTS

Significance Threshold

The City of Los Angeles CEQA Thresholds Guide (2006, p. D.3-2) states that a project would normally have a significant impact on historic resources if it would result in a

substantial adverse change in the significance of a historic resource. A substantial adverse change in significance occurs if the project involves:

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

In addition to this guidance provided by the City of Los Angeles, the State Legislature, in enacting the California Register, also amended CEQA to clarify which properties are significant, as well as which project impacts are considered to be significantly adverse.

A project with an effect 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. A substantial adverse change in the significance of a historic resource means demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of a historical resource would be materially impaired.

The Guidelines go on to state that "[t]he significance of an historic resource is materially impaired when a project… [d]emolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources… local register of historic resources… or its identification in a historic resources survey."

Additional Guidance

Secretary of the Interior's Standards

The Secretary of the Interior's Standards for the Treatment of Historic Properties (the "Standards") provide guidance for reviewing proposed projects that may affect historic resources.

The intent of the Standards is to assist the long-term preservation of a property's significance through the preservation, rehabilitation, and maintenance of historic materials and features. The Standards pertain to historic buildings of all materials, construction types, sizes, and occupancy and encompass the exterior and interior of the buildings. The Standards also encompass related landscape features and the building's site and environment, as well as attached, adjacent, or related new construction.

From a practical perspective, the Standards have guided agencies in carrying out their historic preservation responsibilities including State and local officials when reviewing projects that may impact historic resources. The Standards have also been adopted by state and local jurisdictions across the country.

In addition, the Standards are a useful analytic tool for understanding and describing the potential impacts of substantial changes to historic resources. However, these Guidelines and Regulations are not part of the CEQA process. CEQA requires analysis of physical impacts to the environment and the only relationship of the Secretary of the Interior Standards to the CEQA process are discussed under CEQA Guidelines Section 15064.5(b)(3):

"Generally, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings" (1995), Weeks and Grimmer, shall be considered as mitigated to a level of less than a significant impact on the historical resource."

The statutory language above references the Secretary of the Interior's Standards and Guidelines for four distinct historic "treatments," including: (1) preservation; (2) rehabilitation; (3) restoration; and (4) reconstruction. The specific standards and guidelines associated with each of these possible treatments are provided on the National Park Service's website regarding the treatment of historic resources.

For analytical purposes, a threshold decision must be made regarding which "treatment" standards should be used to analyze a project's potential effect on historic resources. "Preservation" refers to the straightforward stabilization and maintenance of a historic property. "Restoration" addresses the return of a property to a specific time period and includes reconstruction of features missing from that time period. "Reconstruction" addresses the depiction of a no longer extant historic property through new construction.

The use of the Secretary of the Interior's "rehabilitation" standards (the Rehabilitation Standards) addresses the most prevalent and widely used treatment. "Rehabilitation" is defined as "the process of returning a property to a state of utility, through repair or alteration, which makes possible an efficient contemporary use while preserving those portions and features of the property which are significant to its historic, architectural, and cultural values." "Rehabilitation" recognizes necessary alteration for contemporary use and therefore provides a more appropriate impact analysis than the other treatment standards, and accounts for the fact that the adjacent properties will likely require some form of protection during construction activities and ongoing maintenance over the term of the construction.

Rehabilitation Standards

The National Park Service encourages maintaining the integrity of a historic resource through the appropriate design of infill buildings at sites adjacent to historic resources. The Standards are intended as general guidance for work on any historic building. The Rehabilitation Standards expand the discussion to sites and neighborhoods.

As written in the Rehabilitation Standards, there is a distinction, but not a fundamental difference, between the concerns for additions to historic buildings and new construction, or "infill" adjacent to historic buildings on a property or within a historic district. As with most matters of design and planning, the differences are defined by the scale, site, setting, and project.

National Park Service: Preservation Brief 14

In addition to the Standards and Guidelines for Rehabilitation, the National Park Service publishes a series of briefs that includes "Preservation Brief 14, New Exterior Additions to Historic Buildings: Preservation Concerns," as revised and republished in 2010. Among the concepts presented are a balance between differentiation and compatibility, and subordination of the new to the old.

Preservation Brief 14 states:

1. There is no formula or prescription for designing a new addition that meets the Standards. A new addition to a historic building that meets the Standards can be any architectural style -- traditional, contemporary or a simplified version of the historic building. However, there must be a balance between differentiation and compatibility in order to maintain the historic character and the identity of the

building being enlarged. New additions that too closely resemble the historic building or are in extreme contrast to it fall short of this balance. Inherent in all of the guidance is the concept that an addition needs to be subordinate to the historic building.

2. The intent of the Preservation Briefs is to provide guidance to owners, architects, and developers on how to design a compatible new addition…. A new addition to a historic building should preserve the building's historic character. To accomplish this and meet the Secretary of the Interior's Standards for Rehabilitation, a new addition should:

   - Preserve significant historic materials, features and form;
   - Be compatible; and
   - Be differentiated from the historic building.

Impact Analysis Using Los Angeles CEQA Thresholds

The following analysis uses the thresholds provided in the City of Los Angeles CEQA Thresholds Guide.

1. Would the Project involve the demolition of a significant resource?

The Project will not demolish any historically significant resource. The Project will require demolition of the garden space located west of the Montecito Apartments building. The Project will also require demolition of the western portion of the surface parking lot located immediately south of the Montecito Apartments building for use as a landscaped patio space. Both the garden space and the parking lot were separate parcels containing residential buildings when the Montecito Apartments was originally constructed in 1931. This condition continued until at least 1953 when the residential building located on the parcel immediately south of the Montecito Apartments (1855 Cherokee) was relocated and the parcel was incorporated for use by the Montecito Apartments soon after. The three residential buildings located on the parcels immediately west of the Montecito Apartments were removed by the mid-1960s and those parcels were also paved for use as surface parking for the Montecito Apartments.

Neither the southern parcel nor the western parcels were part of the Montecito Apartments property during the first two decades of its existence and are not considered character-defining features of the Montecito Apartments. Moreover, both areas have

been substantially altered since their incorporation with the Montecito Apartments property. A swimming pool was constructed on the western portion of the southern parking lot in 1956 and was subsequently removed during or soon after the 1985 conversion of the Montecito Apartments for affordable senior housing. The western parking lot was converted as a garden space during or soon after the 1985 conversion.

No other buildings, structures, objects, or sites – located on the Project Site or in its vicinity – will be demolished for the Project. The Project will not involve demolition of a significant resource.

2. Would the Project involve relocation that does not maintain the integrity of a significant resource?

No buildings, structures, objects, or sites will be relocated for the purposes of the Project. Therefore, the Project does not involve the relocation of any historically significant resources.

3. Would the Project involve conversion, rehabilitation or alteration of a significant resource which does not conform to the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings?

The Project will construct a new residential building immediately west of the Montecito Apartments building on a portion of the Project Site currently used as a landscaped garden space. A one-story hyphen[23] would connect the proposed new building to the Montecito Apartments building on the first floor. Preservation Brief 14 states that a successful way to reduce material loss when attaching a new exterior addition "is to link the addition to the historic building by means of a hyphen or connector. A connector provides a physical link while visually separating the old and new, and the connecting passageway penetrates and removes only a small portion of the historic wall."

The hyphen connection of the proposed new building to the Montecito Apartments would require the removal of a small portion of historic fabric from the west-facing façade of the Montecito Apartments. Removal of historic fabric from its west facing façade would not result in a substantial loss of integrity to the Montecito Apartments because it would alter only a small portion of west-facing façade and the majority of the original fabric and character-defining features of the Montecito Apartments, including all of the existing original fabric and character-defining features of the north, east, and

23 In this context a 'hyphen' is a connecting link between two larger building elements.

south facades, will remain intact. With mitigation to ensure that the proposed connection is executed with minimal impact to the important character-defining features of the Montecito Apartments building, alteration by the proposed Project would not result in a significant impact to the Montecito Apartments.

4. Would the Project involve construction that reduces the integrity or significance of important resources on the site or in the vicinity?

The Project will construct a new residential building immediately west of the Montecito Apartments building on a portion of the Project Site currently used as a landscaped garden space. The new building will be six stories in height with two subterranean parking levels.

The proposed Project will insert a new building in an area currently used as landscaped garden space. In order for this alteration to be considered a substantial adverse change, however, it must be shown that the integrity and/or significance of the Montecito Apartments would be materially impaired by the proposed adjacent new construction.

New construction that is adjacent to or related to an existing historic resource is addressed in Standards 9 and 10 of the of the Secretary of the Interior's Standards for Rehabilitation. Standard 9 states in part: "New additions, exterior alterations, or related new construction will not destroy historic materials, features, and spatial relationships that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment." Standard 10 states that "new additions and adjacent or related new construction shall be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic property and its environment would be unimpaired."

Preservation Brief 14 provides additional guidance, stating that "the first place to consider placing a new addition is in a location where the least amount of historic material and character-defining features will be lost. In most cases, this will be on a secondary side or rear elevation." Preservation Brief 14 goes on to state that "a new addition should always be subordinate to the historic building; it should not compete in size, scale or design with the historic building. An addition that bears no relationship to the proportions and massing of the historic building—in other words, one that overpowers the historic form and changes the scale—will usually compromise the historic character as well."

The proposed new building will be located to the west of the Montecito Apartments, partially obscuring the Montecito Apartment's secondary west-facing façade. The parcels immediately west of the Montecito Apartments building were not originally part of the Montecito Apartments property when the building was originally constructed in 1931. As such, the Montecito Apartments building was designed with the understanding that the parcels to the west might be developed with new construction at a later date. The west-facing façade was left largely devoid of the decorative detail present on the other three facades, and was also designed with fewer windows and a larger light well than the east façade in anticipation of potential new development to the west. Compared to the north-, east- and south-facing facades, the west façade is the least important façade in terms of architectural detail.

The proposed new building will be subordinate to the Montecito Apartments in scale and massing. The new building would be six stories in height, considerably lower than the ten-story Montecito Apartments. It will also be set back over nine feet behind the Montecito Apartment's Franklin Avenue street wall to preserve the dominant profile of the Montecito when viewed from Franklin Avenue.

The design of the new building will also be deferential to that of the Montecito Apartments. The new building will be simple in design, with little of the decorative detail found on the Montecito Apartments. The primary facade will be articulated in a manner that echoes the rhythm of vertical piers and window bays found on the Montecito Apartments with a regular, symmetrical arrangement of windows and balconies.

In accordance with Standard 9, construction of the proposed new residential building would not destroy historic materials or features that characterize the Montecito Apartments property. In accordance with Standard 10, the essential form and integrity of the Montecito Apartments would be unimpaired if the proposed new building were removed in the future. After implementation of the Project, the distinctive form and design of the Montecito Apartments will remain intact and its architectural features will remain viewable and understandable by the public. The proposed new construction also adheres to the important principles identified in Preservation Brief 14, including the preservation of the significant historic materials, features and form of the Montecito Apartments, subordination to the Montecito Apartments and compatibility in design. Construction of the proposed new residential building would not result in a significant impact to the Montecito Apartments.

Finally, the proposed new construction would require substantial foundation work and the construction of subterranean parking. Without mitigation to ensure the protection of historic resources from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil, new construction associated with the Project may result in additional impacts to historic resources.

Summary of Potential Impacts on Historic Resources

Analysis of potential impacts using the Los Angeles CEQA thresholds, the Secretary of the Interior's Standards and National Park Service guidance reveals the following:

1. The Project would construct a new building that connects to the Montecito Apartments building. This connection has the potential to reduce the historic integrity of the Montecito Apartments without mitigation.

2. The Project would require substantial foundation work and the construction of subterranean parking. Without mitigation to ensure the protection of historic resources from damage due to underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil, new construction associated with the Project may result in additional impacts to adjacent historic resources.

Mitigation Measures

The following mitigation measures would protect historic resources from potential impacts associated with the Project:

CUL-MM-1 The applicant will engage a historic preservation consultant that meets the Secretary of the Interior's Professional Qualifications Standards to ensure that the connection from the proposed new building to the Montecito Apartments is done with a minimum loss of historic fabric in compliance with the Secretary of the Interior's Standards for Rehabilitation. The historic preservation consultant will review drawings and conduct on-site construction monitoring throughout the construction phase.

CUL-MM-2 The Project shall include a shoring plan to ensure the protection of the Montecito Apartments during construction from damage due to

underground excavation and general construction procedures and to reduce the possibility of settlement due to the removal of adjacent soil.

Following implementation of Mitigation Measures **CUL-MM-1** and **CUL-MM-2**, potential impacts to historic resources would be less than significant and no further analysis is required.

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

Less Than Significant Impact With Mitigation. Section 15064.5 of the *State CEQA Guidelines* defines significant archaeological resources as resources which meet the criteria for historical resources, or resources which constitute unique archaeological resources.

The Project Site is located in a highly urbanized area of the City and has been previously disturbed and developed. However, construction of the Proposed Project will include a two level subterranean parking garage that could involve grading and excavation to greater depths than previously undertaken. Project-related grading and excavation activities could disturb unknown archaeological resources buried in site soils. In the event of an unexpected disturbance, significant impacts to archaeological resources could occur.

All development would be subject to the numerous laws and regulations, cited below that require State, and local agencies to consider the effects of a proposed project on potentially buried cultural resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. They provide guidance concerning analytical techniques and approaches to defining compliance measures where potentially significant impacts may occur. Compliance with Mitigation Measure **CUL-MM-3** would reduce impacts to archaeological resources to a less than significant level. If the find is determined not to be a unique archeological resource, no further action is necessary and construction may continue. The Applicant shall bear the cost of implementing this mitigation measure.

Mitigation Measures

The following mitigation measures would protect archeological resources from potential impacts associated with the Project:

CUL-MM-3 In the event that archaeological resources are uncovered on the Project Site during grading or other construction activities, the Applicant must notify the City of Los Angeles Planning Department immediately and work must stop within a 100-foot radius until a qualified archeologist to be approved by the City, has evaluated the find. Construction activity may continue unimpeded on other portions of the Project Site. If the find is determined by the qualified archeologist to be a unique archeological resource, as defined by Section 21083.2 of the Public Resources Code, the site shall be treated in accordance with the provisions of Section 21083.2 of the Public Resources Code.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact With Mitigation. Paleontological resources include fossil remains or traces of past life forms, including both vertebrate and invertebrate species, as well as plants. Paleontological resources are generally found within sedimentary rock formations.

As discussed above in **Section 5(b),** the Project Site is in a highly urbanized area of the City that has been previously disturbed and developed. However, buildout of the Proposed Project could, specifically the construction of the subterranean parking garage, could involve grading and excavation to greater depths than previously undertaken. Project-related grading and excavation activities could disturb unknown paleontological resources buried in site soils. In the event of an unexpected disturbance, significant impacts to archaeological resources could occur.

All development would be subject to the numerous laws and regulations, cited below that require State, and local agencies to consider the effects of a proposed project on potentially buried paleontological resources. These laws and regulations stipulate a process for compliance, define the responsibilities of the various agencies proposing the action, and prescribe the relationship among other involved agencies. Compliance with Mitigation Measure **CUL-MM-4** would reduce impacts to paleontological resources to a less than significant level. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

Mitigation Measures

The following mitigation measures would protect paleontological resources from potential impacts associated with the Project:

CUL-MM-4 If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety shall be notified immediately, and all work shall cease in the area of the find until a qualified paleontologist evaluates the find. A qualified paleontologist shall be retained to perform periodic inspections of excavation and grading activities of the Project Site. The frequency of inspections shall be based on consultation with the paleontologist and shall depend on the rate of excavation and grading activities, the materials being excavated, and if found, the abundance and type of fossils encountered. If paleontological materials are encountered, the paleontologist shall be allowed to temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if appropriate, salvage. The paleontologist shall assess the discovered material(s) and prepare a survey, study, or report evaluating the impact. The Applicant shall comply with the recommendations of the evaluating paleontologist, as contained in the survey, study or report, and a copy of the paleontological survey, study or report shall be submitted to the Los Angeles County Natural History Museum. Ground-disturbing activities may resume once the paleontologist's recommendations have been implemented to the satisfaction of the paleontologist.

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

Less Than Significant Impact. There are no known human remains on or near the project area. Additionally, the Project Site is located in a highly urbanized portion of the City. Because the project area has already been previously disturbed and developed, it has been subject to construction and ground-disturbing activities. However, ground-disturbing activities have the potential to disturb previously undiscovered subsurface human remains.

In the event that human remains are uncovered during ground-disturbing activities, there are regulatory provisions to address the handling of human remains in California Health and Safety Code Section 7050.5, Public Resource Code 5097.98, and CEQA Guidelines Section 15064.5(e). Pursuant to these codes, in the event that human remain

are discovered, it requires that disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner is required to make a determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall consult with the Native American Heritage Commission (NAHC) by telephone within 24 hours, to designate a Most Likely Descendant (MLD) who shall recommend appropriate measures to the landowner regarding the treatment of the remains. If the owner does not accept the MLD's recommendations, the owner or the MLD may request mediation by the NAHC. Compliance with these protocols would reduce impacts to a less than significant level. No further analysis of this topic is necessary and no mitigation measures are required.

6. GEOLOGY AND SOILS

In 2015, the California Supreme Court in CBIA v. BAAQMD 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 the project. The City's revised thresholds are intended to comply with this decision. Specifically, the decision held that an impact from the existing environment to the project, including future users and/or residents, is not an impact for purposes of CEQA. However, if the project physically exacerbates existing conditions that already exist, that impact must be assessed, including how it might affect future users and/or residents of the project. Thus, in accordance with Appendix G of the State CEQA Guidelines and the CBIA v. BAAQMD decision, the Project would have a significant impact related to geology and soils if it would result in any of the following impacts to future residents or users in the Hollywood Community Plan Area.

The following analysis is based on the following reports and documentation:

- ***Evaluation of Potential Faulting,*** *New Development at Southwest Corner of Cherokee and Franklin, Montecito Apartments 6650 and 6668 Franklin Avenue and 1850 Cherokee Court, Hollywood, CA 90028*, conducted by Feffer Geological Consulting, dated March 23, 2016;
- ***Response to City of LA Correction Letter,*** *Correction Letter Dated May 4, 2016 Log #92628,* conducted by Feffer Geological Consulting, dated September 8, 2016; and
- ***Geology Report Approval Letter,*** City of Los Angeles Department of Building and Safety, dated October 3, 2016.

These documents are incorporated herein by reference and included as **Appendix D** to this SCEA.

Would the project:

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

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

Less Than Significant Impact. Fault rupture is the displacement that occurs along the surface of a fault during an earthquake. The California Geological

Survey (CGS) designates Alquist-Priolo Earthquake Fault Zones, which are regulatory zones around active faults.

The property is located within an Official Alquist-Priolo Earthquake Fault Zone that was established (November 6, 2014) by the California Geological Survey (CGS) for the Hollywood fault.

The fault investigation by Feffer Geological Consulting (Geology Report) included four test pits (TP-1 to TP-4), eight bucket auger borings (B-1, B-2, BA-1 through BA-6), two continuous core borings (BI and B2), four cone penetration tests (C1 to C4) and three trenches (ST-I , ST-2 and ST-3). The exploration identified artificial fill and several alluvial and colluvial units of various age on the site. Bedrock was identified at the northerly part of the site. Feffer Geological Consulting identified two faults crossing the subject site, which they interpret as inactive.

Regulatory Compliance Measures

The City of Los Angeles Department of Building and Safety (LADBS) has determined that the referenced reports prepared by Feffer Geological Consulting are acceptable, and that the risk of loss, injury, or death involving the rupture of a known earthquake fault would be less than significant, provided the following **Regulatory Compliance Measures** are complied with during site development:

(Note: Numbers in parenthesis () refer to applicable sections of the 2014 City of LA Building Code. P/BC numbers refer the applicable Information Bulletin. Information Bulletins can be accessed on the internet at LADBS.ORG.)

GEO-RCM-1 Prior to issuance of any permit, a geology/soils report shall be submitted to the Grading Division to provide design recommendations for the proposed grading/construction along with an evaluation by the project geologist to confirm that the proposed habitable structures are located within the shadow zone of the fault study exploration.

GEO-RCM-2 During construction, the project engineering geologist shall observe all excavations that expose the natural alluvial soils and bedrock to verify the conclusions of the fault investigation, and confirm that no Holocene faults or ground deformation are exposed. The project engineering geologist shall post a notice on the job site for the City Inspector and the Contractor stating that the

excavation (or portion thereof) has been observed, documented and meets the conditions of the report. No fill or lagging shall be placed until the LADBS Inspector has verified the documentation.

GEO-RCM-3 A supplemental report that summarizes the geologist's observations (including photographs and simple logs of excavations) shall be submitted to the Grading Division of the Department upon completion of the excavations. If evidence of active faulting is observed, the Grading Division shall be notified immediately. (7009)

No further analysis is required.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The Project Site is located within seismically active Southern California and therefore could be subject to moderate and possibly strong ground motion due to earthquakes on the Hollywood, Santa Monica, Newport-Inglewood, Malibu Coast, or Anacapa-Dume Faults, as discussed in the Geotechnical Report.

However, this impact will be reduced to a less than significant level by following all relevant California Building Code (CBC) and the City of Los Angeles Uniform Building Code (UBC) seismic standards; as well as the recommendations of the Geology Report, and the conditions contained in the Geology Report Approval Letter, dated October 3, 2016, LOG #92628-01, as required by the City of Los Angeles Department of Building and Safety (LADBS).

Compliance with existing laws regarding the risk of loss, injury, or death, from strong seismic ground shaking would reduce potential impacts to less than significant levels. No further analysis is required.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Soil liquefaction occurs when loose, saturated, granular soils lose their inherent shear strength due to excess water pressure that builds up during repeated movement from seismic activity. Factors that contribute to the potential for liquefaction include a low relative density of granular materials, a shallow groundwater table, and a long duration and high acceleration of seismic shaking. Liquefaction usually results in horizontal and vertical movements from lateral spreading of liquefied materials and post-earthquake settlement of liquefied materials. Liquefaction potential is greatest

where the groundwater level is shallow, and submerged loose, fine sands occur within a depth of approximately 50 feet or less.

As shown in the Parcel Profile Report prepared by the City of Los Angeles Department of City Planning[24], the Project Site is susceptible to liquefaction and thus may be susceptible to seismic-related ground failure, such as lateral spreading, subsidence, or settlement.

Groundwater was encountered during subsurface exploration at the Project Site at the base of trenches ST-1 and 2 in the northern and central portions of the site and in the northern most BA borings (BA-1, BA-2, and BA-3). Depths to groundwater in the Project Site area step downward over 25 feet to the south. Groundwater was observed at a depth of 20 feet below the ground surface in the northern portion of the site in trench ST-1, and groundwater was observed at a depth of 30 feet below the ground surface in the northern most BA borings (BA-1, BA-2, and BA-3).

The site is located in a designated liquefaction hazard zone as shown on the "Seismic Hazard Zones" map issued by the CGS; however, the potential liquefaction hazard would be addressed during the final construction development phase and design of the building foundations by the structural engineer in concert with the geotechnical engineer. Further, compliance with all relevant CBC and the City of Los Angeles UBC seismic standards, as well as the recommendations of the Geology Report, and the conditions contained in the Geology Report Approval Letter, dated October 3, 2016, LOG #92628-01, as required by the LADBS would ensure that potential impacts would be reduced to less than significant levels. No further analysis is required.

iv) Landslides?

No Impact. Landslides are movements of large masses of rock and/or soil. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. The Project Site and surrounding areas are generally flat with gradual changes in elevation, and there are no major slopes or bluffs.

24 *City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS), http://zimas.lacity.org/, accessed April 25, 2016.*

As shown in the Parcel Profile Report prepared by the City of Los Angeles Department of City Planning[25], the Project Site is not located in an area susceptible to landslides. Further, the site is not located within a City-designated landslide area, and thus is not subject to the City's Hillside Ordinance.[26] Therefore, no impacts resulting from landslides would occur and no further analysis is required.

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

Less Than Significant Impact. Erosion is the movement of rock and soil from place to place and is a natural process. Common agents of erosion in the vicinity of the project area include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used.

The Project Site is located in a highly urbanized area of the City and is relatively level, with minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the Project Site. The Proposed Project is a senior housing development with a subterranean parking garage, with landscaped and hardscaped areas, and would not contain large amounts of exposed soil. Following the completion of construction of the Proposed Project, the potential for soil erosion or the loss of topsoil is expected to be extremely low.

Construction of the Proposed Project would involve soil disturbance activities including excavation and grading that would leave soil on the Project Site exposed. Common means of soil erosion include water, wind, and being tracked off-site by vehicles. These activities could result in soil erosion. However, the Proposed Project will be subject to local and state codes and requirements for erosion control and grading during construction. Including, but not limited to, grading permits and haul route approval from the LADBS, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, on-site grading and site preparation must comply with all applicable provisions of Chapter IX, Division 70 of the Los Angeles Municipal Code, which addresses grading, excavations, and fills. Further, the Proposed Project will be required to comply with standard regulations, including South Coast Air Quality Management District Rule 402, which will reduce construction erosion impacts.

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25 *City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS), http://zimas.lacity.org/, accessed April 25, 2016.*

26 *City of Los Angeles General Plan, Safety Element, Exhibit C: Landslide Inventory and Hillside Areas, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf, accessed April 25, 2016.*

Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance off-site.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective July 1, 2010, regulates construction activities to minimize water pollution, including sediment. The Proposed Project will be subject to National Pollution Discharge Elimination System permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP). Construction contractors will be required to prepare and implement a SWPPP and associated best management practices (BMPs) in compliance with the CGP, along with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities during grading and construction. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities.

Therefore, soil erosion impacts from grading and construction activities associated with construction and operation of the Proposed Project will not occur and soil erosion impacts will be less than significant. No further analysis is required.

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

Less Than Significant Impact. As previously discussed, the Proposed Project site is not in a landslide zone; however, the underlying soils would potentially be subject to liquefaction. The project would comply with all the recommendations of the Geology Report, and the conditions contained in the Geology Report Approval Letter, as required by the LADBS. Additionally, the Proposed Project will be designed and constructed in conformance with the CBC, as well as Los Angeles UBC requirements and other laws designed to protect site occupants from risks related to unstable soil. Compliance with existing laws regarding the risk of loss, injury, or death, from lateral spreading, subsidence, liquefaction or collapse would reduce potential impacts to less than significant levels. No further analysis is required.

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

Less Than Significant Impact. As described above, the Proposed Project would be designed and constructed in conformance with the Los Angles UBC, and would be subject to the requirements of the CBC. Compliance with existing laws, the

recommendations of the Geology Report, and the conditions contained in the Geology Report Approval Letter, as required by the LADBS regarding expansive soils, would reduce potential impacts to less than significant levels. No further analysis is required.

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

No Impact. The Project Site is currently served by the City of Los Angeles wastewater (sewer) system. The Proposed Project would require connection to existing sewers mainlines and service lines, which are currently available in the surrounding roadways. The Proposed Project would not require the use of septic systems. Therefore, no impact would occur and no further analysis is required.

7. GREENHOUSE GAS EMISSIONS

The global nature of climate change creates unique challenges for assessing the Project's climate change impact under CEQA, which focuses on cause and effect. When compared to the cumulative inventory of GHG across the globe, a single Project's impact will be negligible. To further complicate this, there is debate about whether a Project's emissions are adding to the net emissions worldwide, or simply redistributing emissions that would have occurred anyway somewhere in the world.

Climate change analyses are also unique because emitting carbon dioxide (CO2) into the atmosphere is not itself an adverse environmental effect. It is the increased concentration of CO2 in the atmosphere resulting in global climate change and the associated consequences of climate change that results in adverse environmental affects (e.g., sea level rise, loss of snowpack, severe weather events). Although it is possible to estimate a Project's incremental contribution of CO2 into the atmosphere, it is typically not possible to determine whether or how an individual Project's relatively small incremental contribution might translate into physical effects on the environment.

Pollutants and Effects

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

GHGs that contribute to the greenhouse effect include:

- Carbon Dioxide (CO_2) is released to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), and wood and wood products are burned. CO_2 emissions from motor vehicles occur during operation of vehicles and operation of air conditioning systems. CO_2 comprises over 80 percent of GHG emissions in California.[27]

27 California Environmental Protection Agency, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 11.

- Methane (CH_4) is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from the decomposition of organic waste in solid waste landfills, raising livestock, natural gas, and petroleum systems, stationary and mobile combustion, and wastewater treatment. Mobile sources represent 0.5 percent of overall methane emissions.[28]

- Nitrous Oxide (N_2O) is emitted during agricultural and industrial activities, as well as during combustion of solid waste and fossil fuels. Mobile sources represent about 14 percent of N_2O emissions.[29] N_2O emissions from motor vehicles generally occur directly from operation of vehicles.

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

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

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

For most non-industrial development projects, motor vehicles make up the bulk of GHG emissions, particularly carbon dioxide, methane, nitrous oxide, and HFCs.[30] To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent mass of CO2, denoted as CO2e. Expressing GHG emissions in carbon dioxide equivalents takes the contribution of all GHG emissions to the greenhouse effect and converts them to a single unit equivalent to the effect that would occur if only CO2 were being emitted. High GWP gases such as HFCs, PFCs, and SF_6 are the most heat-absorbent.

28 United States Environmental Protection Agency, Inventory of U.S. Greenhouse Gas Emissions and Sinks, 1990-2003, April 2005 (EPA 430-R-05-003).

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

30 California Air Resources Board, Climate Change Emission Control Regulations, 2004

Table V-8
Global Warming Potential For Greenhouse Gases

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

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

The effects of increasing global temperature are far-reaching and difficult to quantify. If the temperature of the ocean warms, it is anticipated that the winter snow season would be shortened. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state. According to a California Energy Commission (CEC) report, the snowpack portion of the supply could potentially decline by 70 to 90 percent by the end of the 21st century. This phenomenon could lead to significant challenges securing an adequate water supply for a growing state population. Further, the increased ocean temperature could result in increased moisture flux into the state; however, since this would likely increasingly come in the form of rain rather than snow in the high elevations, increased precipitation could lead to increased potential and severity of flood events, placing more pressure on California's levee/flood control system. Sea level has risen approximately seven inches during the last century and, according to the CEC report, it is predicted to rise an additional 22 to 35 inches by 2100, depending on the future GHG emissions levels. If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion, and disruption of wetlands. As the existing climate throughout California changes over time, mass migration of species, or worse, failure of species to migrate in time to adapt to the perturbations in climate, could also result.

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

this to understand how the systems may respond to the additional impact of climate change. The Strategy's key preliminary adaptation recommendations included:

- Appointment of a Climate Adaption Advisory Panel;
- Improved water management in anticipation of reduced water supplies, including a 20 percent reduction in per capita water use by 2020 from 2011 levels;
- Consideration of project alternatives that avoid significant new development in areas that cannot be adequately protected from flooding due to climate change;
- Preparation of agency-specific adaptation plans, guidance or criteria by September 2010;
- Consideration of climate change impacts for all significant State projects;
- Assessment of climate change impacts on emergency preparedness;
- Identification of key habitats and development of plans to minimize adverse effects from climate change;
- Development of guidance by the California Department of Public Health by September 2010 for use by local health departments to assess adaptation strategies;
- Amendment of General Plans and Local Coastal Plans to address climate change impacts and to develop local risk reduction strategies; and
- Inclusion of climate change impact information into fire program planning by State firefighting agencies.

Regulatory Setting

International

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

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

The Protocol's major feature is that it sets binding targets for 37 industrialized countries and the European community for reducing GHG emissions. The targets amount to an average of five percent reduction levels against 1990 levels over the five-year period 2008-2012. The major distinction between the Protocol and the UNFCCC is that while the UNFCCC encouraged industrialized countries to stabilize GHG emissions, the Protocol commits them to do so. Recognizing that developed countries are principally responsible for the current high levels of GHG emissions in the atmosphere as a result of more than 150 years of industrial activity, the Protocol places a heavier burden on developed nations under the principle of "common but differentiated responsibilities."

On December 12, 2015, a Conference of the Parties to the UNFCCC and the 11th session of the Kyoto Protocol negotiated an agreement in Paris that would keep the rise of temperature below 2 degrees Celsius. While 186 countries published their action plans detailing how they plan to reduce their GHG emissions, these reductions would still result in up to three degrees Celsius of global warming. The Paris agreement asks all countries to review their plans every five years from 2020, acknowledges that $100 billion is needed each year to enable countries to adapt to climate change. The agreement was signed into law on April 22, 2016.

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

Federal

The U.S. Environmental Protection Agency (USEPA) has historically not regulated GHG emissions because it determined the Clean Air Act did not authorize it to regulate emissions that addressed climate change. In 2007, the U.S Supreme Court found that GHG emissions could be considered within the Clean Air Act's definition of a pollutant.[31] In December 2009, USEPA issued an endangerment finding for GHG emissions under the Clean Air Act, setting the stage for future regulation. In September 2009, the National Highway Traffic Safety Administration and USEPA announced a joint rule that would tie fuel economy to GHG emission reduction requirements. This could equate to an overall light-duty vehicle fleet average fuel economy of 35.5 miles per gallon in 2016.

In June 2013, President Obama announced a Climate Action Plan that calls for a number of initiatives, including funding $8 billion in advanced fossil energy efficiency projects, calls for federal agencies to develop new emission standards for power plants, investments in renewable energy sources, adaptation programs, and leading international efforts to address climate change. In September 2013, USEPA announced its first steps to implement a portion of the Obama Climate Action Plan by proposing carbon pollution standards for new power plants.

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

- On March 30, 2009, the NHTSA issued a final rule for model year 2011.[32]
- On May 7, 2010, the USEPA and the NHTSA issued a final rule regulating fuel efficiency and GHG emissions pollution from motor vehicles for cars and light-duty trucks for model years 2012–2016.[33]
- On August 9, 2011, USEPA and NHTSA issued a Supplemental Notice of Intent announcing plans to propose stringent, coordinated federal GHG emissions and fuel economy standards for model year 2017-2025 light-duty vehicles.[34]

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

32 NHSTA. 2009. Average Fuel Economy Standards Passenger Cars and Light Trucks Model Year 2011, Final Rule. 75 Fed. Reg. 25324.

33 USEPA. 2010. Light Duty Vehicle Greenhouse Gas Emission Standards and Corporate Average Fuel Economy Standards, Final Rule. 75 Fed. Reg. 25324.

34 Available http://www.gpo.gov/fdsys/pkg/FR-2011-08-09/pdf/2011-19905.pdf. Accessed August 1, 2016.

- NHSTA intends to set standards for model years 2022-2025 in a future rulemaking.[35]

- In addition to the regulations applicable to cars and light-duty trucks, on August 9, 2011, the USEPA and the NHTSA announced fuel economy and GHG emissions standards for medium- and heavy-duty trucks that applies to vehicles from model year 2014–2018.[36]

Energy Independence and Security Act (the "EISA"). The EISA is intended to aid in the reduction of national GHG emissions, both mobile and non-mobile through several strategies:

- 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.

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

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

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

State

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

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

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35 NHSTA. 2012. 2017 and Later Model Year Light-Duty Vehicle Greenhouse Gas Emissions and Corporate Average Fuel Economy Standards. 77 Fed. Reg. 62624.

36 USEPA Office of Transportation and Air Quality. 2011. EPA and NHTSA Adopt First-Ever Program to Reduce Greenhouse Gas Emissions and Improve Fuel Efficiency of Medium-and Heavy-Duty Vehicles. Available: http://www.epa.gov/otaq/climate/documents/420f11031.pdf. Accessed August 1, 2016.

2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels. The California Environmental Protection Agency (Cal EPA) formed a Climate Action Team ("CAT") that recommended strategies that can be implemented by state agencies to meet GHG emissions targets. The Team reported several recommendations and strategies for reducing GHG emissions and reaching the targets established in the Executive Order.[37] Furthermore, the report provided to Governor Schwarzenegger in 2006, referenced above, indicated that smart land use and increased transit availability should be a priority in the State of California.[38] According to the California Climate Action Team, smart land use is an umbrella term for strategies that integrate transportation and land-use decisions. Such strategies generally encourage jobs/housing proximity, promote transit-oriented development (TOD), and encourage high-density residential/commercial development along transit corridors. These strategies develop more efficient land-use patterns within each jurisdiction or region to match population increases, workforce, and socioeconomic needs for the full spectrum of the population.

Executive Order B-30-15: On April 29, 2015, Governor Brown issued an executive order setting a Statewide GHG reduction target of 40 percent below 1990 levels by 2030. This action aligns the State's GHG targets with those set in October 2014 by the European Union and is intended to help the State meets its target of reducing GHG emissions 80 percent below 1990 levels by 2050. The measure calls on State agencies to implement measures accordingly and directs CARB to update the Climate Change Scoping Plan.

A recent study shows that the State's existing and proposed regulatory framework will allow the State to reduce its GHG emissions level to 40 percent below 1990 levels by 2030 (consistent with Executive Order B-30-15), and to 60 percent below 1990 levels by 2050. Even though this study did not provide an exact regulatory and technological roadmap to achieve the 2030 and 2050 goals, it demonstrated that various combinations of policies could allow the statewide emissions level to remain very low through 2050, suggesting that the combination of new technologies and other regulations not analyzed in the study could allow the State to meet the 2030 and 2050 targets.[39]

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37 California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006.

38 California Climate Action Team, Climate Action Team Report to Governor Schwarzenegger and the Legislature, March 2006, p. 57.

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

Assembly Bill 32: In September 2006, AB 32 was signed into law by Governor Arnold Schwarzenegger, focusing on achieving GHG emissions equivalent to statewide levels in 1990 by 2020. It mandates that CARB establish a quantified emissions cap, institute a schedule to meet the cap, implement regulations to reduce statewide GHG emissions from stationary sources, and develop tracking, reporting, and enforcement mechanisms to ensure that reductions are achieved.

AB 32 charges CARB with the responsibility to monitor and regulate sources of GHG emissions. On June 1, 2007, CARB adopted three early action measures: setting a low carbon fuel standard, reducing refrigerant loss from motor vehicle air conditioning maintenance, and increasing methane capture from landfills.[40] On October 25, 2007, CARB approved measures improving truck efficiency (i.e., reducing aerodynamic drag), electrifying port equipment, reducing PFCs from the semiconductor industry, reducing propellants in consumer products, promoting proper tire inflation in vehicles, and reducing sulfur hexaflouride emissions from the non-electricity sector. CARB also developed a mandatory reporting program on January 1, 2008 for large stationary combustion sources that emit more than 25,000 metric tons of CO_2 per year and make up 94 percent of the point source CO_2 emissions in California.

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

An important component of the plan is a cap-and-trade program covering 85 percent of the state's emissions. Additional key recommendations of the 2008 Scoping Plan include strategies to enhance and expand proven cost-saving energy efficiency programs; implementation of California's clean cars standards and increasing the amount of clean and renewable energy used to power the state. Furthermore, the 2008 Scoping Plan proposes full deployment of the California Solar Initiative, high-speed rail, water-related energy efficiency measures, and a range of regulations to reduce emissions from trucks and from ships docked in California ports.

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40 California Air Resources Board, Proposed Early Action Measures to Mitigate Climate Change in California, April 20, 2007.

As required by AB 32, CARB must update its Scoping Plan every five years to ensure that California remains on the path toward a low carbon future.

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

On August 19, 2011, following legal action in opposition to the Scoping Plan, CARB updated the Scoping Plan through a Final Supplement to the AB 32 Scoping Plan Functional Equivalent Document (FED or 2011 Scoping Plan).[41] CARB updated their 2020 BAU emissions estimate to account for the effect of the 2007–2009 economic recession, new estimates for future fuel and energy demand, and the reductions achieved through implementation of regulations recently adopted for motor vehicles, building energy efficiency standards, and renewable energy.[42] Under that scenario, the State would have had to reduce its BAU GHG emissions by approximately 21.7 percent by 2020 (down from 28.4 percent).

On May 22, 2014, CARB approved its first update to the AB 32 Scoping Plan, recalculating 1990 GHG emissions using IPCC Fourth Assessment Report (AR4) released in 2007. It states that based on the AR4 global warming potentials, the 427 million metric tons of CO_2e ($MMTCO_2e$) 1990 emissions level and 2020 GHG emissions limit would be slightly higher than identified in the Scoping Plan, at 431 $MMTCO_2e$. Based on the revised estimates of expected 2020 emissions identified in the 2011 supplement to the FED and updated 1990 emissions levels identified in the draft first update to the Scoping Plan, achieving the 1990 emission level would require a reduction of 76 $MMTCO_2e$ (down from 507 $MMTCO_2e$) or a reduction by approximately 15.3 percent (down from 28.4 percent) to achieve in 2020 emissions levels in the BAU condition. CARB's First Update "lays the foundation for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," and many of the emission reduction strategies recommended by CARB would serve to reduce the

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

42 California Air Resources Board, *Greenhouse Gas Inventory – 2020 Emissions Forecast,* http://www.arb.ca.gov/cc/inventory/data/forecast.htm. Accessed August 1, 2016.

Project's post-2020 emissions level to the extent applicable by law by focusing on reductions from several sectors.[43,44]

As shown in **Table V-9**, **Emission Reductions Needed to Meet AB 32 Objectives in 2020,** these reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program.

Table V-9
Emission Reductions Needed to Meet AB 32 Objectives in 2020

Sector	Million Metric Tons of CO_2e Reduction	Percent of Statewide CO_2e Inventory	Summary of Recommended Actions
Energy	-25	-4.9%	Reduce State's electric and energy utility emissions, reduce emissions from large industrial facilities, control fugitive emissions from oil and gas production, reduce leaks from industrial facilities
Transportation	-23	-4.5%	Phase 2 heavy-duty truck GHG standards, ZEV action plan for trucks, construct High Speed rail system from SF to LA, coordinated land use planning, Sustainable Freight Strategy
High Global Warming Potential	-5	-1.0%	Reduce use of high-GWP compounds from refrigeration, air conditioning, aerosols
Waste	-2	-0.4%	Eliminate disposal of organic materials at landfills, in-State infrastructure development, address challenges with composting and anaerobic digestion, additional methane control and landfills
Cap and Trade Reductions	-23	-4.5%	Statewide program that reduces emissions from regulated entities through performance-based targets
Total	-78	-15.3%	

Source: California Environmental Protection Agency, "First Update to the Climate Change Scoping Plan." May 2014.

Nearly all reductions are to come from sources that are controlled at the statewide level by State agencies, including the Air Resources Board, Public Utilities Commission, High Speed Rail Authority, and California Energy Commission. The few actions that are directly or indirectly associated with local government control are in the Transportation sector, which is charged

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

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

with reducing 4.5% of baseline 2020 emissions. Of these actions, only one (GHG reductions through coordinated planning) specifically identifies local governments as the responsible agency.

Cap And Trade. CARB adopted a California Cap-and-Trade Program pursuant to its authority under AB 32. The Cap-and-Trade Program is designed to reduce GHG emissions from major sources (deemed "covered entities") by setting a firm cap on statewide GHG emissions and employing market mechanisms to achieve AB 32's emission-reduction mandate of returning to 1990 levels of emissions by 2020. The statewide cap for GHG emissions from the capped sectors (e.g., electricity generation, petroleum refining, and cement production) commenced in 2013 and will decline over time, achieving GHG emission reductions throughout the program's duration.

- Under the Cap-and-Trade Program, covered entities that emit more than 25,000 metric tons CO_2e per year must comply with the Cap-and-Trade Program. Triggering of the 25,000 metric tons CO_2e per year "inclusion threshold" is measured against a subset of emissions reported and verified under the California Regulation for the Mandatory Reporting of Greenhouse Gas Emissions. CARB issues allowances equal to the total amount of allowable emissions over a given compliance period and distributes these to regulated entities. Covered entities are allocated free allowances in whole or part (if eligible), and may buy allowances at auction, purchase allowances from others, or purchase offset credits.

- The Cap-and-Trade Program works with other direct regulatory measures and provides an economic incentive to reduce emissions. If California's direct regulatory measures reduce GHG emissions more than expected, then the Cap-and-Trade Program will be responsible for relatively fewer emissions reductions. If California's direct regulatory measures reduce GHG emissions less than expected, then the Cap-and-Trade Program will be responsible for relatively more emissions reductions. Thus, the Cap-and-Trade Program assures that California will meet its 2020 GHG emissions reduction mandate.

- In sum, the Cap-and-Trade Program will achieve aggregate, rather than site-specific or project-level, GHG emissions reductions. Also, due to the regulatory framework adopted by CARB in AB 32, the reductions attributed to the Cap-and-Trade Program can change over time depending on the State's emissions forecasts and the effectiveness of direct regulatory measures.

- As of January 1, 2015, the Cap-and-Trade Program covered approximately 85 percent of California's GHG emissions. The Cap-and-Trade Program covers the GHG emissions associated with electricity consumed in California, whether generated in-state or imported. Accordingly, GHG emissions associated with CEQA projects' electricity usage are covered by the Cap-and-Trade Program.

In July 2017, the California State Legislature voted to extend the Cap and Trade Program through 2030.

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

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

- Lead agencies should quantify all relevant GHG emissions and consider the full range of project features that may increase or decrease GHG emissions as compared to the existing setting;
- Consistency with the CARB Scoping Plan is not a sufficient basis to determine that a project's GHG emissions would not be cumulatively considerable;
- A lead agency may appropriately look to thresholds developed by other public agencies, including the CARB's recommended CEQA thresholds;
- To qualify as mitigation, specific measures from an existing plan must be identified and incorporated into the project. General compliance with a plan, by itself, is not mitigation;
- The effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis; and
- Given that impacts resulting from GHG emissions are cumulative, significant advantages may result from analyzing such impacts on a programmatic level. If

analyzed properly, later projects may tier, incorporate by reference, or otherwise rely on the programmatic analysis.

State Bill 375: SB 375 aligns three policy areas of importance to local government: (1) regional long-range transportation plans and investments; (2) regional allocation of the obligation for cities and counties to zone for housing; and (3) a process to achieve GHG emissions reductions targets for the transportation sector. It establishes a process for CARB to develop GHG emissions reductions targets for each region (as opposed to individual local governments or households). SB 375 also requires Metropolitan Planning Organizations to prepare a Sustainable Communities Strategy (SCS) within the Regional Transportation Plan (RTP) that guides growth while taking into account the transportation, housing, environmental, and economic needs of the region. SB 375 uses CEQA streamlining as an incentive to encourage residential projects, which help achieve AB 32 goals to reduce GHG emissions. While SB 375 does not prevent CARB from adopting additional regulations, such actions are not anticipated in the foreseeable future.[45]

On October 24, 2008, CARB published draft guidance for setting interim GHG emissions significance thresholds. This was the first step toward developing the recommended statewide interim thresholds of significance for GHG emissions that may be adopted by local agencies for their own use. The guidance does not attempt to address every type of project that may be subject to CEQA, but instead focuses on common project types that are responsible for substantial GHG emissions (i.e., industrial, residential, and commercial projects). CARB's preliminary proposal consisted of a quantitative threshold of 7,000 metric tons (MT) of CO2e per year for operational emissions (excluding transportation), and performance standards for construction and transportation emissions. Further, CARB's proposal sets forth draft thresholds for industrial projects that have high operational stationary GHG emissions, such as manufacturing plants, or uses that utilize combustion engines.[46] There is currently no timetable for finalized thresholds.

Senate Bill 32: In September 2016, Governor Brown signaled his intent to sign into law a measure that extends AB 32 another ten years to 2030 and increases the State's objectives. SB 32 calls on statewide reductions in GHG 40 percent below 1990 levels by 2030. Further regulatory actions by the State are forthcoming that will further challenge communities to reduce GHG emissions in the future.

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

46 California Air Resources Board. http://www.arb.ca.gov/cc/localgov/ceqa/meetings/102708/prelimdraftproposal102408.pdf

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

California Green Building Standards. The California Green Building Standards Code, which is Part 11 of the California Code of Regulations (the "CCR"), is commonly referred to as the CALGreen Code. CALGreen was added to Title 24 to represent base standards for reducing water use, recycling construction waste, and reducing polluting materials in new buildings. In contrast, Title 24 focuses on promoting more energy-efficient buildings and considers the building envelope, heating and cooling, water heating, and lighting restrictions. The first edition of the CALGreen Code in 2008 contained only voluntary standards. The 2010 edition included mandatory requirements for state-regulated buildings and structures throughout California, including requirements for construction site selection, storm water control during construction, construction waste reduction, indoor water use reduction, material selection, natural resource conservation, site irrigation conservation and more. The CALGreen Code provides for design options allowing the designer to determine how best to achieve compliance for a given site or building condition. The CALGreen Code also requires building commissioning which is a process for the verification that all building systems, like heating and cooling equipment and lighting systems are functioning at their maximum efficiency. The current 2013 CALGreen Code became effective January 1, 2014 and includes new requirements for additions to existing residential and non-residential development. The 2016 CALGreen Code standard became effective January 1, 2017.

Regional

South Coast Air Quality Management District Recommendations for Significance Thresholds:

The SCAQMD convened a GHG CEQA Significance Threshold Working Group to provide guidance to local lead agencies on determining significance for GHG emissions in their CEQA documents. Members included government agencies implementing CEQA and representatives from stakeholder groups that will provide input to the SCAQMD staff on developing GHG CEQA significance thresholds. On December 5, 2008, the SCAQMD Governing Board adopted interim GHG significance threshold for projects where the SCAQMD is lead agency. This threshold uses a tiered approach to determine a project's significance, with 10,000 metric tons of CO2 equivalent (MTCO2e) as a screening numerical threshold for stationary sources.

The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. In September 2010, the Working Group released additional revisions that recommended a screening threshold of 3,500 MTCO2e for residential projects, 1,400 MTCO2e for commercial projects, and 3,000 MTCO2e for mixed use projects. Additionally, the Working Group identified project-level efficiency target of 4.8 MTCO2e per service population as a 2020 target and 3.0 MTCO2e per service population as a 2035 target. The recommended area wide or plan-level target for 2020 was 6.6 MTCO2e and the plan-level target for 2035 was 4.1 MTCO2e. The SCAQMD has not established a timeline for formal consideration of these thresholds.[47] In the meantime, the project level thresholds are used as a non-binding guide.

The SCAQMD has also adopted Rules 2700, 2701, and 2702 that address GHG emissions reductions. However, these rules address boilers and process heaters, forestry, and manure management projects, none of which are proposed or required by the project.

SCAG Regional Transportation Plan/Sustainable Communities Strategy:

On April 7, 2016, SCAG adopted its 2016-2040 Regional Transportation Plan Sustainable Communities Strategy (the "RTP/SCS") update, calling for a continuation of integrated planning for land use and transportation that will help achieve the State's goal of reducing per capita GHG emissions by eight percent by 2020 compared to 2005 levels, by 18 percent by 2035, and 21 percent by 2040. The Plan calls for public transportation improvements that will reduce GHG emissions per household by up to 30 percent, one percent reduction in GHG from having zero emission vehicles, neighborhood vehicles, and carsharing/ridesourcing make up two percent of the vehicle fleet by 2040.

The RTP/SCS also includes a number of mitigation measures designed to reduce the potential of development to conflict with AB 32 or any other plan designed to reduce GHG.[48] These mitigation measures are particularly important where streamlining mechanisms under SB 375 are utilized. Examples of GHG emissions reduction mitigation measures include the following:

MM-GHG-3(a)(4): SCAG shall work with utilities, sub-regions, and other stakeholders to promote accelerated penetration of zero- (and/or near zero) emission vehicles in the region, including developing a strategy for the deployment of public *charging* infrastructure.

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

48 Southern California Association of Governments, Final PEIR, 2016-2040 RTP/SCS, Chapter 3.8

MM-GHG-3(a)(5): SCAG shall in its capacity as a Clean Cities Coalition establish coordinated, creative public outreach activities, including publicizing the importance of reducing *GHG* emissions and steps community members may take to reduce their individual impacts.

MM-GHG-3(a)(6): SCAG *shall* in its capacity as a Clean Cities Coalition establish coordinated, creative public outreach activities, including publicizing the importance of reducing GHG emissions and steps community members may take to reduce their individual impacts.

MM-GHG-3(a)(6): SCAG shall work with local community groups and business associations to organize and publicize walking tours and bicycle events, and to encourage pedestrian *and* bicycle modes of transportation such as the "Go Human" Campaign.

MM-GHG-3(a)(7): SCAG shall support and/or sponsor workshops on water conservation activities, such as selecting and planting drought tolerant, native plants in landscaping, *and* installing advanced irrigation systems.

MM-GHG-3(a)(8): SCAG shall in coordination with local jurisdictions (as practicable) support and/or sponsor a periodic Climate Protection Summits or Fairs, to educate the public on current climate science, projected local impacts, and local efforts and opportunities to reduce GHG emissions, including exhibits of the latest technology and products for conservation and efficiency.

MM-GHG-3(a)(9): Schools Programs: SCAG shall develop and implement a program in coordination with school districts to present information to students about climate change and ways to reduce GHG emissions, and will support school-based programs for GHG reduction, such as school-based trip reduction and the importance of recycling.

MM-GHG-3(a)(11): *SCAG* shall encourage local jurisdictions to support the following transportation-related strategies to reduce emissions:

Support the planning and development of HQTAs, jobs and housing balance, transit oriented development, and infill development through transportation investments and other funding decisions.

Offer incentives such as free or low-cost monthly transit passes to employees or free ride areas to residents and customers

Coordinate the funding of low carbon transportation with smart growth development.

Promote parking management measures that encourage walking and transit use in smart growth areas.

Develop comprehensive parking policies that encourages the use of alternative transportation

Incorporate bicycle lanes, routes and facilities into street systems, new subdivisions, and large developments, and create transit, bicycle, and pedestrian connections.

Require amenities for non-motorized transportation, such as secure and convenient bicycle parking.

MM-GHG-3(a)(10): As part of SCAG's Sustainability Program, SCAG shall assist local jurisdictions in developing Climate Action Plans (CAPs, also known as Plans for the Reduction of Greenhouse Gas Emissions), as appropriate and feasible.

The SCAG RTP/SCS also identifies a number of recommended project-level mitigation measures in its EIR's Mitigation Measure MM-GHG-3(b), including:

- Measures in an adopted plan or mitigation program for the reduction of emissions that are required as part of the Lead Agency's decision.
- Reduction in emissions resulting from a project through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
- Off-site measures to mitigate a project's emissions.
- Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
    - Use energy and fuel efficient vehicles and equipment;
    - Deployment of zero- and/or near zero emission technologies;
    - Use lighting systems that are energy efficient, such as LED technology;
    - Use the minimum feasible amount of GHG-emitting construction materials that is feasible;

- Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
- Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
- Incorporate design measures to reduce energy consumption and increase use of renewable energy;
- Incorporate design measures to reduce water consumption;
- Use lighter-colored pavement where feasible;
- Recycle construction debris to maximum extent feasible;
- Plant shade trees in or near construction projects where feasible; and
- Solicit bids that include concepts listed above.

- Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to:
  - Transit-active transportation coordinated strategies, increased bicycle carrying capacity on transit and rail vehicles;
  - Incorporating bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; providing adequate bicycle parking and planning for and building local bicycle projects that connect with the regional network;
  - Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations;
  - Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs; and
  - Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles.

- Land use siting and design measures that reduce GHG emissions, including:
  - Developing on infill and brownfields sites;
  - Building high density and mixed use developments near transit; and
  - Retaining on-site mature trees and vegetation, and planting new canopy trees.
- Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles.
- Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.

Local

City of Los Angeles: The City adopted a Green Building Ordinance in April 2008 that calls for reduction of the use of natural resources for new development.[49] Larger projects must be certified at the Leadership in Energy and Environmental Design (LEED) certified level. LEED certification generally ensures that projects exceed Title 24 (2013) standards by at least 10 percent.[50] The City's ordinance affects the following types of development:[51]

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

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

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

51 Projects that voluntarily commit to LEED certification at the Silver level or higher received expedited processing from the City.

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

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

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

Section 99.04.106.2. Storm Water Drainage and Retention During Construction. Projects which disturb less than one acre of soil and are not part of a larger common plan of development which in total disturbs one acre or more, shall manage storm water drainage during construction. In order to manage storm water drainage during construction, one or more of the following measures shall be implemented to prevent flooding of adjacent property, prevent erosion, and retain soil runoff on the site:

1. Retention basins of sufficient size shall be utilized to retain storm water on the site.

2. Where storm water is conveyed to a public drainage system, collection point, gutter, or similar disposal method, water shall be filtered by use of a barrier system, wattle or other method approved by the Department, or

3. Compliance with the City of Los Angeles' storm water management ordinance(s).

Section 99.04.204. Energy Reduction. Prescriptive Approach. Equipment and fixtures shall comply with the following where applicable:

1. Installed gas-fired space heating equipment shall have an Annual Fuel Utilization Ratio (AFUE) of .90 or higher.

2. Installed electric heat pumps shall have a Heating Seasonal Performance Factor (HSPF) of 8.0 or higher.

3. Installed cooling equipment shall have a Seasonal Energy Efficiency Ratio (SEER) higher than 13.0 and an Energy Efficiency Ratio (EER) of at least 11.5.

4. Installed tank type water heaters shall have an Energy Factor (EF) higher than .6.

5. Installed tankless water heaters shall have an Energy Factor (EF) higher than .80.

6. Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.

7. Building lighting in the kitchen and bathrooms within the dwelling units shall consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).

8. Installed swimming pool circulating pump motors shall be multi-speed or variable-speed. The pump motor controls shall have the capability of operating the pump at a minimum of three speeds; low speed, medium speed, and high speed. The daily low speed shall not exceed 300 watts. The daily medium speed shall be adjustable.

Section 99.04.210. Appliances. Appliance Rating. Each appliance provided and installed shall meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

Section 99.04.211. Renewable Energy. Future Access for Electrical Solar System. An electrical conduit shall be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system. Exception: Buildings designed and constructed with a solar photovoltaic system or an alternate system with means of generating electricity at time of final inspection.

Section 99.04.211.4.1. Space for Future Electrical Solar System Installation. A minimum of 250 square feet of contiguous unobstructed roof area shall be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.

Section 99.04.303.1. Twenty Percent Savings. A schedule of plumbing fixtures and fixture fittings that will reduce the overall use of potable water within the building by at least 20 percent shall be provided. The reduction shall be based on the maximum allowable water use per plumbing fixture and fitting as required by the California Building Standards Code. The 20 percent reduction in potable water use shall be demonstrated by one of the following methods:

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

2. A calculation demonstrating a 20 percent reduction in the building "water use" baseline as established on Table 4.303.1 shall be provided. For low-rise residential occupancies, the calculation shall be limited to the following plumbing fixture and fitting types: water closets, urinals, lavatory faucets, kitchen faucets, and showerheads.

Section 99.04.303.2. Multiple Showerheads Serving One Shower. When single shower fixtures are served by more than one showerhead, the combined flow rate of all the showerheads shall not exceed the maximum flow rates specified in the 20 percent reduction column contained on Table 4.303.2 or the shower shall be designed to only allow one showerhead to be in operation at a time. Exception: The maximum flow rate for showerheads when using the calculation method specified in Section 99.04.303.1, Item 2, is 2.5 gpm @ 80 psi.

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

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

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

Section 99.04.406. Enhanced Durability and Reduced Maintenance. Joints and Openings. Openings in the building envelope separating conditioned space from unconditioned space needed to accommodate gas, plumbing, electrical lines and other necessary penetrations must be sealed in compliance with the California Energy Code.

Section 99.05.407.3. Water Resistance and Moisture Management. Flashing Details. Provide flashing details on the building plans which comply with accepted industry standards or manufacturer's instructions around windows and doors, roof valley, and chimneys to roof intersections.

Section 99.04.407.4. Material Protection. Protect building materials delivered to the construction site from rain and other sources of moisture.

Section 99.4.408. Construction Waste Reduction, Disposal And Recycling. Construction Waste Reduction of at Least 50 Percent. Pursuant to Section 66.32 et seq. of the LAMC.

Section 99.04.504.1. Covering of Duct Openings and Protection of Mechanical Equipment During Construction. At the time of rough installation or during storage of the construction site and until final startup of the heating and cooling equipment, all duct and other related air distribution component openings shall be covered with tape, plastic, sheetmetal or other methods acceptable to the Department to reduce the amount of dust or debris which may collect in the system.

Section 99.04.505.2. Interior Moisture Control. Concrete Slab Foundations. Concrete slab foundations required to have a vapor retarder by Los Angeles Building Code, Chapter 19, shall also comply with this section.

Section 99.04.505.2.1. Interior Moisture Control. Capillary Break. A capillary break shall be installed in compliance with at least one of the following:

1. A 4-inch (101.6 mm) thick base of ½ inch (12.7 mm) or larger clean aggregate shall be provided with a vapor barrier in direct contact with concrete and a concrete mix design, which will address bleeding, shrinkage, and curling, shall be used.

2. Other equivalent methods approved by the Department, or

3. A slab design specified by a licensed design professional.

Section 99.04.505.3. Interior Moisture Control. Moisture Content of Building Materials. Building materials with visible signs of water damage shall not be installed. Wall and floor framing shall not be enclosed until it is inspected and found to be satisfactory by the building inspector. Insulation materials which are visibly wet or have high moisture content shall be replaced or allowed to dry prior to enclosure in wall or floor cavities. Wet-applied insulation materials shall follow the manufacturers' drying recommendations prior to enclosure.

On January 20, 2016, the City of Los Angeles adopted its Mobility Plan 2035, a transportation element of its General Plan. The Plan calls for strategies that advance five goals: 1) Safety First, 2) World Class Infrastructure, 3) Access for All Angelenos, 4) Collaboration, Communication, and Informed Choices, and 5) Clean Environments and Healthy Communities.

While the Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and

targeting GHG through a more sustainable transportation system. As such, the Plan's call for integrated land use planning, clean fuel vehicles are consistent with State and regional plans calling for more compact growth in areas with transportation infrastructure.

Existing Emissions

The Project Site includes is currently the site of an outdoor courtyard that supports the adjacent Montecito Apartments. As such, it does not generate anthropogenic emissions and is assumed to have de minimis GHG emissions.

Methodology

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

The California Climate Action Registry (Climate Registry) General Reporting Protocol provides basic procedures and guidelines for calculating and reporting GHG emissions from a number of general and industry-specific activities.[52] 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."[53] The General Reporting Protocol provides a basic framework for calculating and reporting GHG emissions from the project. The information provided in this analysis is consistent with the General Reporting Protocol's reporting requirements.

52 California Climate Action Registry, General Reporting Protocol Version 3.1, January 2009, www.sfenvironment.org/sites/default/files/fliers/files/ccar_grp_3-1_january2009_sfe-web.pdf, accessed August 1, 2016.

53 Ibid.

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).[54]

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

CARB recommends consideration of indirect emissions to provide a more complete picture of the GHG footprint of a facility. Annually reported indirect energy usage aids the conservation awareness of a facility and provides information to CARB to be considered for future strategies.[55] 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."[56] Therefore, direct and indirect emissions have been calculated for the Project.

GHG emissions were quantified from construction and operation of the Project using SCAQMD's California Emissions Estimator Model (CalEEMod). Operational emissions include

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54 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.

55 California Air Resources Board, Initial Statement of Reasons for Rulemaking, Proposed Regulation for Mandatory Reporting of Greenhouse Gas Emissions Pursuant to the California Global Warming Solutions Act of 2006 (AB 32), Planning and Technical Support Division Emission Inventory Branch, October 19, 2007, www.arb.ca.gov/regact/2007/ghg2007/isor.pdf, accessed August 1, 2016.

56 OPR Technical Advisory, p. 5.

both direct and indirect sources including mobile sources, water use, solid waste, area sources, natural gas, and electricity use emissions. CalEEMod is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant and GHG emissions associated with both construction and operations from a variety of land use projects. The model is considered by the SCAQMD to be an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California.[57]

Significance Criteria

CARB, SCAQMD, and the City of Los Angeles have yet to adopt project-level significance thresholds for GHG emissions that would be applicable to the Project.[58] As a result, this analysis relies on primary direction from the CEQA Guidelines. OPR's amendments to the CEQA Guidelines for GHGs were adopted by the Resources Agency on December 30, 2009, indicating that a project could have a significant impact if it would:

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

2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.[59]

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

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57 See www.caleemod.com.

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

59 A recent opinion by the California Supreme Court on November 30, 2015 (Center for Biological Diversity v. California Department of Fish and Wildlife) has suggested that environmental analyses need to support its assumptions and provide evidentiary support to find consistency with a "Business as Usual" approach with the AB 32 Scoping Plan.

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

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

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

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

Lead agencies are to establish thresholds in which a lead agency may appropriately look to thresholds developed by other public agencies, or suggested by other experts, such as CAPCOA, so long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7(c)). The CEQA Guidelines amendments also clarify that the effects of GHG emissions are cumulative. The CEQA Guidelines were amended in response to Senate Bill 97 to specify that compliance with a GHG emissions reduction plan renders a cumulative impact insignificant.

To qualify, such a plan or program must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency.[60] 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."[61] Put another way, CEQA Guidelines Section 15064(h)(3) allows a lead agency to make a finding

60 Id.

61 Id. (emphasis added).

of non-significance for GHG emissions if a project compiles with the California Cap-and-Trade Program and/or other regulatory schemes to reduce GHG emissions.[62]

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area of the project.[63]

To evaluate a project's potential greenhouse gas emissions under CEQA, a lead agency may adopt a significance criterion of whether the project will be consistent with statewide greenhouse gas emission reduction goals, as set forth in the California Global Warming Solutions Act of 2006 (or "AB 32") and the California Air Resources Board 2008 Climate Change Scoping Plan ("Scoping Plan") that implements A.B. 32. (*Center for Biological Diversity v. Cal. Dept. of Fish and Game* (2015) 62 Cal.4th 204, 220; see also CEQA Guidelines § 15064.4.) The City of Los Angeles has not adopted a significance criterion in line with statewide greenhouse gas emission reduction goals.

The statewide greenhouse gas reduction goals include cutting greenhouse gas emissions by approximately 30 percent from the BAU emission levels projected for 2020. The Scoping Plan sets forth the BAU projection, which assumes no conservation or regulatory efforts beyond what was in place when the forecast was made. A lead agency may use the BAU projection as the baseline to compare a project's expected greenhouse gas emissions rather than using a baseline of emissions in the existing physical environment. However, the lead agency must provide substantial evidence to show that a project's specific *project-level* reduction in

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62 See San Joaquin Valley Air Pollution Control District, CEQA Determinations of Significance tor Projects Subject to ARB's GHG Cap-and-Trade Regulation, APR—2030 (June 25, 2014), where the SJVAPCD "determined that GHG emissions increases that are covered under ARB's Cap-and-Trade regulation cannot constitute significant increases under CEQA…" Further, SCAQMD has taken this position as a lead agency, preparing three Negative Declarations and one Draft EIR that applied its 10,000 $MTCO_2e$/yr. significance threshold in such a way that GHG emissions covered by the Cap-and-Trade Program do not constitute emissions that must be measured against the threshold. See SCAQMD, Final Negative Declaration for Ultramar Inc. Wilmington Refinery Cogeneration Project, SCH #2012041014 (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/ultramar_neg_dec.pdf?sfvrsn=2) (October 2014); SCAQMD, Final Negative Declaration tor Phillips 66 Los Angeles Refinery Carson Plant—Crude Oil Storage Capacity Project, SCH No. 2013091029 (December 2014) (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/phillips-66-fnd.pdf?sfvrsn=2); Final Mitigated Negative Declaration for Toxic Air Contaminant Reduction for Compliance with SCAQMD Rules 1420.1 and 1402 at the Exide Technologies Facility in Vernon, CA, SCH No. 2014101040 (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2014/exide-mnd_final.pdf?sfvrsn=2) (December 2014); and Draft Environmental Impact Report for the Breitburn Santa Fe Springs Blocks 400/700 Upgrade Project, SCH No. 2014121014 (www.aqmd.gov/docs/default-source/ceqa/documents/permit-projects/2015/deir-breitburn-chapters-1-3.pdf?sfvrsn=2) (April 2014).

63 14 CCR § 15064(h)(3).

greenhouse gas emissions as compared to the BAU projection will actually meet the *statewide* goals of greenhouse gas reductions.

There are three ways a lead agency could make that showing. First, a lead agency may evaluate the data behind the Scoping Plan's BAU model to determine how a specific project in a proposed location would contribute to the statewide greenhouse gas reduction goals. Second, a lead agency may assess a project's consistency with AB 32's goals in whole or in part by considering a project's compliance with regulatory programs designed to reduce greenhouse gas emissions from particular activities, such as building efficiency and conservation standards. Third, a lead agency may rely on existing numerical thresholds of significance for greenhouse gas emissions reductions.

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

- Executive Orders S-3-05 and B-30-15;
- AB 32 Scoping Plan;
- SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles Mobility 2035 Plan;
- City of Los Angeles ClimateLA implementation plan; and
- City of Los Angeles Green Building Ordinance

The following section provides an extensive analysis of the Proposed Project's consistency with these State, regional, and local climate action-related policies. This section focuses on disclosing potential GHG emissions.

Would the project:

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

Construction

Construction of the Proposed Project would emit GHG emissions through the combustion of fossil fuels by heavy-duty construction equipment and through vehicle

trips generated by construction workers and vendors traveling to and from the Project site. These impacts would vary day to day over the 20-month duration of construction activities. As illustrated in **Table V-10, Estimated Construction Emissions - Mitigated** construction emissions of CO_2 would peak in 2017, when up to 5,362 pounds of CO_2e per day are anticipated. These emissions are further incorporated in the assessment of long-term operational impacts by amortizing them over a 30-year period, pursuant to guidance from the State and SCAQMD.

Table V-10
Estimated Construction Emissions - Mitigated

Construction Year	CO_2	CH_4	N_2O	CO_2e
2018	5,344	1	0	5,362
2019	3,512	<1	0	3,524
2020	3,467	<1	0	3,479
Source: DKA Planning 2016, based on CalEEMod 2016.3.1				

Operation

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

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

The analysis in this section includes potential emissions under NAT scenarios and from the Project at build-out based on actions and mandates expected to be in force in 2020. Early-action measures identified in the Climate Change Scoping Plan that have not been

approved were not credited in this analysis. By not speculating on potential regulatory conditions, the analysis takes a conservative approach that likely overestimates the Project's GHG emissions at build-out.

The analysis below establishes NAT as complying with the minimum performance level required under Title 24. The NAT scenario also considers State mandates that were already in place when CARB prepared the Supplemental FED (e.g., Pavley I Standards, full implementation of California's Statewide Renewables Portfolio Standard beyond current levels of renewable energy, and the California Low Carbon Fuel Standard).

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

As shown in **Table V-11, Estimated Annual CO2e Greenhouse Gas Emissions (Metric Tons per Year),** the emissions for the Project and its associated CARB 2020 NAT scenario are estimated to be 736 and 1,099 MTCO2e per year, respectively, which shows the Project will reduce emissions by 33 percent from the CARB 2020 NAT scenario. Based on these results, the Project is consistent with the reduction target as a numeric threshold (15.3 percent) set forth in the 2014 Revised AB 32 Scoping Plan.

Table V-11
Estimated Annual CO2e Greenhouse Gas Emissions (Metric Tons per Year)

Scenario and Source	NAT Scenario*	As Proposed Scenario	Reduction from NAT Scenario	Change from NAT Scenario
Area Sources	1	1	-	0%
Energy Sources	494	286	-207	-42%
Mobile Sources	520	365	-155	-30%
Waste Sources	16	16	-	0%
Water Sources	56	56	-	0%
Construction	12	12	-	0%
Total Emissions	**1,099**	**736**	**-362**	**-33%**

Daily construction emissions amortized over 30-year period pursuant to SCAQMD guidance. Annual construction emissions derived by taking total emissions over duration of activities and dividing by construction period.

** NAT scenario does not assume 30% reduction in in mobile source emissions from Pavley emission standards (19.8%), low carbon fuel standards (7.2%), vehicle efficiency measures 2.8%); does not assume 42% reduction in energy production emissions from the State's renewables portfolio standard (33%), natural gas extraction efficiency measures (1.6%), and natural gas transmission and distribution efficiency measures (7.4%).*

Source: DKA Planning, 2016.

While the AB 32 Scoping Plan's cumulative statewide objectives were not intended to serve as the basis for project-level assessments, this analysis finds that its NAT comparison based on the Scoping Plan is appropriate because the Proposed Project would not hinder attainment of statewide GHG reduction goals. Specifically, the Proposed Project's location in an existing urban setting provide opportunities to reduce transportation-related emissions, as it would eliminate many vehicle trips because travel to and from the Project Site could be captured by public transit and pedestrian travel instead. As such, this analysis concludes that the Proposed Project would meet and exceed its contribution to statewide climate change obligations that are under the control of local governments in their decision-making.

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

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

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

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

- Building structures. Operational efficiencies will be built into the project that reduce energy use and waste, as mandated by CALGreen building codes. For example, these measures include regulations on maximum lighting power, mechanical and natural ventilation, and insulation requirements.

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

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

- Solid waste management. The Project would be subject to solid waste diversion policies administered by CalRecycle and the regulations required by the City of Los Angeles to reduce GHG emissions. These regulations include details on the removal of refuse from the premises and mandatory recycling regulations for multi-family residences.

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

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

As described throughout this analysis, the Project contains numerous regulatory compliance measures and project design features that would reduce the Project's GHG emissions profile and would represent improvements vis-à-vis the NAT scenario. As a result of this and the analysis of net emissions, the Project's contribution to global climate change is not "cumulatively considerable" and is considered less than significant.

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

- **Less than significant impact.** The Project will contribute to cumulative increases in GHG emissions over time in the absence of policy intervention. As noted earlier, the Proposed Project would be consistent with a number of relevant plans and policies that govern climate change.

  - Executive Orders S-3-05 and B-30-15;
  - AB 32 Scoping Plan;
  - SCAG's 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy;
  - City of Los Angeles Mobility 2035 Plan;
  - City of Los Angeles ClimateLA implementation plan; and
  - City of Los Angeles Green Building Ordinance

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

The Project is consistent with the State's Executive Orders S-3-05 and B-30-15, which are orders from the State's Executive Branch for the purpose of reducing GHG emissions.

These strategies call for developing more efficient land-use patterns to match population increases, workforce, and socioeconomic needs for the full spectrum of the population. The Project includes elements of smart land use as it is located in an urban infill area well-served by transportation infrastructure that includes robust public transit provided by Metro.

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the Project's emissions profile to decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. Stated differently, the Project's emissions total at build-out presented in this analysis represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. As such, given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project is consistent with the Executive Order's horizon-year goal.

Many of the emission reduction strategies recommended by CARB would serve to reduce the Project's post-2020 emissions level to the extent applicable by law and help lay the foundation "…for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in CARB's First Update to the AB 32 Scoping Plan.[64,65]

As such, the Project's post-2020 emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

Consistency with the AB 32 Scoping Plan

The AB 32 Scoping Plan provides the basis for policies that will reduce cumulative GHG emissions within California to 1990 levels by 2020. **Table V-12, Project Consistency with AB 32 Scoping Plan** evaluates the Proposed Project's consistency with the AB 32 Scoping Plan to determine whether it will result in adverse cumulative impacts to global

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

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

climate change. The Proposed Project is consistent with the AB 32 Scoping Plan's focus on emission reductions from several key sectors:

- **Energy Sector:** Continued improvements in California's appliance and building energy efficiency programs and initiatives, such as the State's zero net energy building goals, would serve to reduce the Project's emissions level.[66] Additionally, further additions to California's renewable resource portfolio would favorably influence the Project's emissions level.[67] The project would indirectly benefit from these improvements.

- **Transportation Sector:** Anticipated deployment of improved vehicle efficiency, zero emission technologies, lower carbon fuels, and improvement of existing transportation systems all will serve to reduce the Project's emissions level.[68] The project would indirectly benefit from these improvements.

- **Water Sector:** The Project's emissions level will be reduced as a result of further desired enhancements to water conservation technologies. Such improvements include new conservation measures and efficiency stands, water-energy nexus rulemaking, incentives for resource-recovering wastewater treatment projects, and implementation of green infrastructure permits to treat and capture urban runoff for local use.[69]

- **Waste Management Sector:** Plans to further improve recycling, reuse and reduction of solid waste will beneficially reduce the Project's emissions level.[70] The project would indirectly benefit from these improvements.

Table V-12
Project Consistency with AB 32 Scoping

Strategy	Project Consistency
California Cap-and-Trade Program. Implement a broad-based California cap-and-trade program to provide a firm limit on emissions.	**Not Applicable.** The statewide program is not relevant to the proposed Project.
California Light-Duty Vehicle Greenhouse Gas Standards. Implement adopted Pavley standards and planned second phase of the system. Align zero-emission vehicle, alternative and renewable fuel and vehicle technology programs with long-term climate change goals.	**Not Applicable.** The development of standards is not relevant to the proposed Project.
Energy Efficiency. Maximize energy efficiency building and appliance standards and pursue additional efficiency	**Consistent.** The Project is designed to meet CALGreen building standards by

66 CARB, First Update, pp. 37-39, 85, May 2014.

67 CARB, First Update, pp. 40-41, May 2014.

68 CARB, First Update, pp. 55-56, May 2014.

69 CARB, First Update, p. 65, May 2014.

70 CARB, First Update, p. 69, May 2014.

Strategy	Project Consistency
efforts including new technologies, and new policy and mechanisms. Pursue comparable investment in energy efficiency from all retail providers of electricity in California.	including several measures designed to reduce energy consumption.
Renewables Portfolio Standard. Achieve 33 percent renewable energy mix statewide.	**Consistent.** The Project will utilize energy from the Los Angeles Department of Water and Power, which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.
Low-Carbon Fuel Standard. Develop and adopt the Low Carbon Fuel Standard.	**Not Applicable.** The statewide program is not relevant to the proposed Project.
Regional Transportation-Related Greenhouse Gases. Develop regional greenhouse gas emissions reduction targets for passenger vehicles.	**Not Applicable.** The development of regional planning goals is not relevant to the proposed Project.
Vehicle Efficiency Measures. Implement light-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures.
Goods Movement. Implement adopted regulations for the use of shore power for ships at berth. Improve efficiency in goods movement activities.	**Not Applicable.** State agencies are responsible for implementing regulations and promoting efficiency in goods movement.
Million Solar Roofs Program. Install 3,000 MW of solar-electric capacity under California's existing solar programs.	**Consistent.** The Proposed Project includes 15 percent of the roof area set aside for future solar roofs.
Medium/Heavy-Duty Vehicles. Adopt medium and heavy-duty vehicle efficiency measures.	**Not Applicable.** State agencies are responsible for implementing efficiency measures.
Industrial Emissions. Require assessment of large industrial sources to determine whether individual sources within a facility can cost-effectively reduce greenhouse gas emissions. Reduce greenhouse gas emissions from fugitive emissions from oil and gas extraction and gas transmission.	**Not Applicable.** This measure addresses industrial facilities.
High Speed Rail. Support implementation of a high speed rail system.	**Not Applicable.** This calls for the California High Speed Rail Authority and stakeholders to develop a statewide rail transportation system.
Green Building Strategy. Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	**Consistent.** The Project is designed to meet CALGreen building standards and will include several measures designed to reduce energy consumption. A list of such measures can be found in the Project Description on page II-8 and II-9.
High Global Warming Potential Gases. Adopt measures to reduce high global warming potential gases.	**Not Applicable**. State agencies are responsible for implementing these measures.
Recycling and Waste. Reduce methane emissions at landfills. Increase waste diversion, composting and other beneficial uses of organic materials and mandate commercial recycling. Move toward zero waste.	**Consistent.** The Project is expected to have minimal impact on solid waste facilities. Specific measures to be incorporated into the Proposed Project to the extent feasible would include, but are not limited to: recycling of asphalt, concrete, metal, wood and cardboard waste generate during demolition and construction.
Sustainable Forests. Preserve forest sequestration and encourage the use of forest biomass for sustainable energy generation.	**Not Applicable**. Resource Agency departments are responsible for implementing this measure.
Water. Continue efficiency programs and use cleaner	**Consistent.** The Project would use water-efficient landscaping and irrigation

Strategy	Project Consistency
energy sources to move and treat water.	systems. The Project would comply with CALGreen requirements of the California Building Code and the LAGBC, the Water Management Ordinance (Ordinance No. 170,978), and the LID Ordinance, which are designed to reduce the Project's energy and water use.
Agriculture. In the near-term, encourage investment in manure digester and at the five-year Scoping Plan update determine if the program should be made mandatory by 2020.	**Not Applicable.** The Proposed Project does not include agricultural facilities.
Source: DKA Planning, 2016.	

Based on this evaluation, this analysis finds the Project would be consistent with all feasible and applicable strategies recommended in the AB 32 Scoping Plan.

Consistency with SCAG's 2012-2035 RTP/SCS

At the regional level, the 2012-2035 RTP and Sustainable Communities Strategy represent the region's Climate Action Plan that defines strategies for reducing GHGs. In order to assess the Project's potential to conflict with the RTP/SCS, this section analyzes the Project's land use profiled for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

Table V-13
Project Consistency with SCAG 2012-2035 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Land Use Actions and Strategies		
Coordinate ongoing visioning efforts to build consensus on growth issues among local governments and stakeholders.	SCAG	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. Nonetheless, the City, which is the lead agency for the Project, regularly coordinates with SCAG on regional growth issues.
Provide incentives and technical assistance to local governments to encourage projects and programs that balance the needs of the region.	SCAG	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. Nonetheless, the City, which is the lead agency for the Project, regularly coordinates with SCAG on its advancement of projects and programs that meet regional needs. Furthermore, the Project would support this measure by providing needed housing.
Collaborate with local jurisdictions and agencies to acquire a regional fair share housing allocation that reflects	SCAG Local Jurisdictions HCD	**Consistent.** The Project would accommodate regional growth projected by SCAG in the Los Angeles Planning Area by providing needed housing in an infill site that is adjacent to existing, approved, and planned infrastructure, urban services, transportation corridors, transit facilities, and major

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
existing and future needs.		employment centers, in furtherance of SB 375 policies.
Expand Compass Blueprint program to support member cities in the development of bicycle, pedestrian, Safe Routes to Schools, Safe Routes to Transit, and ADA Transition plans.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. The Project would not impair SCAG or the State's expansion of the Compass Blueprint program. The network of streets surrounding the Project Site provide sidewalks connected to transit stops to promote alternative transportation.
Continue to support, through Compass Blueprint, local jurisdictions and sub-regional COGs adopting neighborhood-oriented development, suburban villages, and revitalized main streets as livability strategies in areas not served by high-quality transit.	SCAG State Local Jurisdictions COGs	**Consistent.** The Project contains multi-family senior residential uses in close proximity to jobs, destinations, and other neighborhood services.
Encourage the use of range-limited battery electric and other alternative fueled vehicles through policies and programs, such as, but not limited to, neighborhood oriented development, complete streets, and Electric (and other alternative fuel) Vehicle Supply Equipment in public parking lots.	Local Jurisdictions COGs SCAG CTCs	**Consistent.** While the use of alternatively-fueled vehicles by the Project's future residents is market driven and beyond the direct control or influence of the Project Applicant, the Project would not impair the City's or SCAG's ability to encourage the use of alternatively-fueled vehicles through various policies and programs.
Continue to support, through Compass Blueprint, planning for new mobility modes such as range- limited Neighborhood Electric Vehicles (NEVs) and other alternative fueled vehicles.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. However, as noted above, the Project would not impair any jurisdiction's ability to encourage the use of alternative-fueled vehicles.
Collaborate with the region's public health professionals to enhance how SCAG addresses public health issues in its regional planning, programming, and project development activities.	SCAG State Local Jurisdictions	**Consistent.** The Project would not impair the City's, SCAG's, or the State's ability to collaborate with the region's public health professionals regarding the integration of public health issues in regional planning. Additionally, the Project would encourage healthy lifestyles through the provision of ample bicycle parking spaces on-site. The Project would also incorporate measures to reduce air emissions and greenhouse gases, minimize hazards, and ensure water quality.
Support projects, programs, and policies that support active and healthy community environments that encourage safe walking, bicycling, and physical activity by children, including, but not limited to development of complete streets, school siting policies, joint use agreements, and bicycle and pedestrian safety education.	Local Jurisdictions SCAG	**Consistent.** The Project would encourage healthy lifestyles through the provision of bicycle parking spaces.
Seek partnerships with state, regional, and local agencies to acquire funding sources for	Local Jurisdictions SCAG	**Consistent.** The Project would not impair the City's, SCAG's or the State's ability to seek partnerships in furtherance of funding acquisition. Additionally, the Project would support

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
innovative planning projects.	State	this measure by providing needed housing that would serve not just Project residents but the community at large.
Update local zoning codes, General Plans, and other regulatory policies to accelerate adoption of land use strategies included in the 2012–2035 RTP/SCS Plan Alternative, or that have been formally adopted by any subregional COG that is consistent with regional goals.	Local Jurisdictions	**Consistent.** While not necessarily applicable on a project-specific basis, the Project would support this action/strategy via consistency with SCAG's 2012–2035 RTP/SCS Plan.
Update local zoning codes, General Plans, and other regulatory policies to promote a more balanced mix of residential, commercial, industrial, recreational, and institutional uses located to provide options and to contribute to the resiliency and vitality of neighborhoods and districts.	Local Jurisdictions	**Consistent.** While not necessarily applicable on a project-specific basis, the Project would support this action/strategy by creating a residential development near transit services.
Support projects, programs, policies and regulations that encourage the development of complete communities, which includes a diversity of housing choices and educational opportunities, jobs 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.	Local Jurisdictions SCAG	**Consistent.** The Project would create multi-family senior residential uses in close proximity to jobs, destinations, and other neighborhood services.
Pursue joint development opportunities to encourage the development of housing and mixed-use projects around existing and planned rail stations or along high-frequency bus corridors, in transit-oriented development areas, and in neighborhood-serving commercial areas.	Local Jurisdictions CTCs	**Consistent.** The Project would accommodate regional growth projected by SCAG in the Los Angeles Planning Area within an infill site that is adjacent to existing, approved, and planned infrastructure, urban services, transportation corridors, transit facilities, and major employment centers in furtherance of SB 375 policies.
Working with local jurisdictions, identify resources that can be used for employing strategies to maintain and assist in the development of affordable housing.	SCAG Local Jurisdictions	**Consistent.** The Project includes residential housing to serve the needs of a growing and increasingly diverse population within the City.
Consider developing healthy community or active design guidelines that promote physical activity and improved health.	Local Jurisdictions	**Consistent.** As discussed above, the Project would encourage healthy lifestyles through the provision of bicycle parking.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Support projects, programs, policies, and regulations to protect resources areas, such as natural habitats and farmland, from future development.	Local Jurisdictions SCAG	**Not Applicable.** The Project neither protects nor threatens resource areas from urbanization.
Create incentives for local jurisdictions and agencies that support land use policies and housing options that achieve the goals of SB 375.	State SCAG	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. In any event, the Project would be consistent with the overarching goal of SB 375 to reduce vehicle miles traveled and the corresponding emission of GHGs.
Continue partnership with regional agencies to increase availability of state funding for integrated land use and transportation projects in the region.	State SCAG	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. The Project would not impair the ability of SCAG and the State to increase the availability of funding for certain types of projects.
Engage in a strategic planning process to determine the critical components and implementation steps for identifying and addressing open space resources, including increasing and preserving park space, specifically in park-poor communities.	Local Jurisdictions SCAG	**Consistent.** The Project would not impair the ability of the City and SCAG to engage in strategic planning processes to address recreational/park shortages in existing communities. As previously discussed, the Project is a senior residential community in close proximity to public transit.
Identify and map regional priority conservation areas for potential inclusion in future plans.	SCAG	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG. The Project would not impair SCAG's ability to implement this action/strategy.
Engage with various partners, including CTCs and local agencies, to determine priority conservation areas and develop an implementable plan.	SCAG CTCs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to engage with various partners on issues pertaining to conservation areas.
Develop regional mitigation policies or approaches for the 2016 RTP.	SCAG CTCs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to develop regional mitigation policies or approaches for the future 2016 RTP.
Transportation Network Actions and Strategies		
Perform and support studies with the goal of identifying innovative transportation strategies that enhance mobility and air quality, and determine practical steps to pursue such strategies, while engaging local communities in planning efforts.	SCAG CTCs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to perform and support various studies.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Cooperate with stakeholders, particularly county transportation commissions, and Caltrans, to identify new funding sources and/or increased funding levels for the preservation and maintenance of the existing transportation network.	SCAG CTCs Local Jurisdictions	**Consistent.** While not necessarily applicable on a project-specific basis, the Project would support this action/strategy improving local access, with appropriate design considerations to ensure travel safety and reliability.
Expand the use of transit modes in our subregions such as BRT, rail, limited-stop service, and point-to-point express services utilizing the HOV and HOT lane networks.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project would not impair the ability of SCAG, the CTCs, or the City to expand and extend the use of other transit modes to the Project Site.
Encourage transit providers to increase frequency and span of service in TOD/HQTA and along targeted corridors where cost-effective and where there is latent demand for transit usage.	SCAG CTCs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. The Project would not impair the ability of SCAG and CTCs to encourage transit provided to increase the frequency and span of service.
Encourage regional and local transit providers to develop rail interface services at Metrolink, Amtrak, and high-speed rail stations.	SCAG CTCs Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would not impair the ability of SCAG, CTCs, or the City to encourage rail interface services.
Expand the Toolbox Tuesdays program to include bicycle safety design, pedestrian safety design, ADA design, training on how to use available resources that expand understanding of where collisions are happening, and information on available grant opportunities to improve bicycle and pedestrian safety.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. However, the Project would neither support nor adversely impact the expansion of Toolbox Tuesday opportunities.
Prioritize transportation investments to support compact infill development that includes a mix of land uses, housing options, and open/park space, where appropriate, to maximize the benefits for existing communities, especially vulnerable populations, and to minimize any negative impacts.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project represents infill development offering senior housing in close proximity to jobs, destinations, and other neighborhood services.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Explore and implement innovative strategies and projects that enhance mobility and air quality, including those that increase the walkability of communities and accessibility to transit via non-auto modes, including walking, bicycling, and neighborhood electric vehicles (NEVs) or other alternative fueled vehicles.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project is a bicycle-friendly development and would provide opportunities for residents to walk to nearby community-serving businesses. The Project would also provide bicycle parking spaces in accordance with LAMC requirements for Project residents and visitors.
Collaborate with local jurisdictions to plan and develop residential and employment development around current and planned transit stations and neighborhood commercial centers.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project's residential units would be located within walking distance of existing and proposed neighborhood commercial centers, both on- and off-site, thus reducing the number and length of vehicle trips.
Collaborate with local jurisdictions to provide a network of local community circulators that serve new TOD, HQTAs, and neighborhood commercial centers providing an incentive for residents and employees to make trips on transit.	SCAG CTCs Local Jurisdictions	**Consistent.** As discussed above, the Project's residential units would be located within walking distance of existing and proposed neighborhood commercial centers.
Similar to SCAG's partnership with the City of Los Angeles and LACMTA, offer to all County Transportation Commissions a mutually funded, joint first mile/last mile study for each region.	SCAG CTCs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. In any event, the Project would not impair SCAG's or the CTCs' ability to offer the mutually-funded study.
Develop first-mile/last-mile strategies on a local level to provide an incentive for making trips by transit, bicycling, walking, or neighborhood electric vehicle or other ZEV options.	CTCs Local Jurisdictions	**Consistent.** The Project would not impair the CTCs' or the City's ability to develop first-mile/last-mile strategies. In support of this action/strategy, the Project's residential units would be located within walking distance of existing and proposed neighborhood commercial centers, both on- and off-site.
Encourage transit fare discounts and local vendor product and service discounts for residents and employees of TOD/HQTAs or for a jurisdiction's local residents in general who have fare media.	Local Jurisdictions	**Consistent.** The Project would not impair the City's ability to encourage transit fare and other discounts.
Work with transit properties and local jurisdictions to identify and remove barriers to maintaining on-time performance.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project would not impair the SCAG's, CTCs', or the City's ability to work with transit properties to remove barriers to on-time performance.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Develop policies and prioritize funding for strategies and projects that enhance mobility and air quality.	State	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is the State of California.
Work with the California High-Speed Rail Authority and local jurisdictions to plan and develop optimal levels of retail, residential, and employment development that fully take advantage of new travel markets and rail travelers.	State	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is the State of California.
Work with state lenders to provide funding for increased transit service in TOD/HQTA in support of reaching SB 375 goals.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California.
Continue to work with neighboring Metropolitan Planning Organizations to provide alternative modes for interregional travel, including Amtrak and other passenger rail services and an enhanced bikeway network, such as on river trails.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California.
Encourage the development of new, short haul, cost-effective transit services such as DASH and demand responsive transit (DRT) in order to both serve and encourage development of compact neighborhood centers.	CTCs Municipal Transit Operators	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are CTCs and Municipal Transit Operators.
Work with the state legislature to seek funding for Complete Streets planning and implementation in support of reaching SB 375 goals.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California.
Continue to support the California Interregional Blueprint as a plan that links statewide transportation goals and regional transportation and land use goals to produce a unified transportation strategy.	SCAG State	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and the State of California. Nonetheless, the Project would provide needed senior housing in close proximity to the regional roadway network.
Transportation Demand Management (TDM) Actions and Strategies		
Examine major projects and strategies that reduce congestion and emissions and optimize the productivity and overall performance of the transportation system.	SCAG	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Develop comprehensive regional active transportation network along with supportive tools and resources that can help jurisdictions plan and prioritize new active transportation projects in their cities.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project would promote the development of a comprehensive regional active transportation network by locating more potential bicycle and pedestrians that would travel using non-motorized transportation modes.
Encourage 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, neighborhood electric vehicle (NEVs) users, movers of commercial goods, pedestrians, users of public transportation and seniors—for safe and convenient travel in a manner that is suitable to the suburban and urban contexts within the region.	Local Jurisdictions COGs SCAG CTCs	**Not Applicable.** While the City would be the implementing agency for any Complete Streets project, the Proposed Project would neither benefit nor adversely affect the implementation of infrastructure that benefits alternative transportation modes.
Support work-based programs that encourage emission reduction strategies and incentivize active transportation commuting or ride-share modes.	SCAG Local Jurisdictions	**Not Applicable.** Future tenants of the residential units could be encouraged to utilize alternative transportation modes. The inclusion of bicycle parking for future residents will help promote active transportation modes. In addition to bicycles, the Proposed Project is located in a transit-priority area where various LADOT and Metro buses serve the immediate area for easy access. Bus service specifically for seniors is provided through various local programs such as LADOT's CityRide assistance program which is for individuals age 65 or older and qualified disabled persons.
Develop infrastructure plans and educational programs to promote active transportation options and other alternative fueled vehicles, such as neighborhood electric vehicles (NEVs), and consider collaboration with local public health departments, walking/biking coalitions, and/or Safe Routes to School initiatives, which may already have components of such educational programs in place.	Local Jurisdictions	**Not Applicable.** While local governments are responsible for implementing this, the Proposed Project would neither benefit nor adversely impact the City's development of infrastructure and education programs that promote alternative fueled vehicles or other initiatives that reduce congestion and air pollution.
Encourage the development of telecommuting programs by employers through review and revision of policies that may discourage alternative work options.	Local Jurisdictions CTCs	**Not Applicable.** While local governments are responsible for implementing this, the Proposed Project would neither benefit nor adversely impact the City's development of telecommuting programs by employers that reduce congestion and air pollution.
Emphasize active transportation and alternative fueled vehicle projects as part of complying with the Complete Streets Act (AB 1358).	State SCAG Local Jurisdictions	**Not Applicable.** While local governments are responsible for implementing this, the Proposed Project would neither benefit nor adversely impact the City's development of active transportation and alternative fuel vehicle programs that promote alternative fueled vehicles or other initiatives that reduce congestion and air pollution.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Transportation System Management (TSM) Actions and Strategies		
Work with relevant state and local transportation authorities to increase the efficiency of the existing transportation system.	SCAG Local Jurisdictions State	**Consistent.** The Project would not impair the ability of SCAG, the City, or the State to work with transportation authorities to increase the efficiency of the existing transportation system. All improvements would be constructed in accordance with LADOT requirements, as appropriate. Further, the Project would mitigate any significant impacts to local and regional roadways to the extent feasible, as required by CEQA.
Collaborate with local jurisdictions and subregional COGs to develop regional policies regarding TSM.	SCAG COGs Local Jurisdictions	**Consistent.** The Project would not impair the ability of SCAG, the COGs, or the City to collaborate on the development of regional TSM policies. All Project transportation-related improvements would be developed in consultation with LADOT and/or transit service providers, as appropriate, and constructed in compliance with their respective standards.
Contribute to and utilize regional data sources to ensure efficient integration of the transportation system.	SCAG CTCs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG and CTCs. However, the Project traffic analysis is based on a traffic model developed by LADOT as the primary tool for forecasting traffic volumes within the City of Los Angeles. In addition, SCAG's regional data, including population, housing, and employment forecasts are used where appropriate throughout this analysis.
Provide training opportunities for local jurisdictions on TSM strategies, such as Intelligent Transportation Systems (ITS).	SCAG Local Jurisdictions	**Consistent.** While not necessarily applicable on a project-specific basis, the Project would not impair the ability of SCAG or the City to provide TSM strategy training. However, the Project would support transportation system management strategies via the provision of appropriate roadway improvements that meet LADOT requirements, as appropriate.
Collaborate with local jurisdictions and subregional COGs to continually update the ITS inventory.	SCAG COGS Local Jurisdictions	**Consistent.** The Project would not impair the ability of SCAG, the COGs, or the City to collaborate on updates to the ITS inventory. See the discussion above regarding the Project's support of transportation system management strategies.
Collaborate with CTCs to regularly update the county and regional ITS architecture.	SCAG CTCs Local Jurisdictions	**Consistent.** The Project does not impair the ability of SCAG, the CTCs, or the City to collaborate on updates to the ITS architecture.
Collaborate with the state and federal Government and subregional COGs to examine potential innovative TDM/TSM strategies.	SCAG State COGs	**Not Applicable.** The responsible parties identified in the 2012–2035 RTP/SCS for implementation of this action/strategy are SCAG, the State of California, and the COGs.
Clean Vehicle Technology Actions and Strategies		
Develop a Regional PEV Readiness Plan with a focus on charge port infrastructure plans to support and promote the introduction of electric and other alternative fuel vehicles in Southern California.	SCAG	**Not Applicable.** The responsible party identified in the 2012–2035 RTP/SCS for implementation of this action/strategy is SCAG.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Support subregional strategies to develop infrastructure and supportive land uses to accelerate fleet conversion to electric or other near zero-emission technologies. The activities committed in the two subregions are put forward as best practices that others can adopt in the future.	SCAG Local Jurisdictions	**Consistent.** While the acceleration of fleet conversion by the Project's future residents is market driven and beyond the direct control or influence of the Project applicant, the Project would not impair the City's or SCAG's ability to support subregional strategies in furtherance of that conversion.

SCAG = Southern California Association of Governments
HCD = California Department of Housing and Community Development
COG = subregional council of governments
CTCs = county transportation commissions
TOD = transit-oriented development
HQTA = High Quality Transit Area
[a] *"Not Applicable" actions/strategies are those that are not identified for implementation by Local Jurisdictions. The Project's consistency with any actions/strategies identified for implementation by the Local Jurisdictions (i.e., the City of Los Angeles) is assessed above.*
Source: SCAG 2012–2035 RTP/SCS, Chapter 4: Sustainable Communities Strategy, Tables 4.3 through 4.7; April 2012.

Table V-13, Project Consistency with SCAG 2016-2040 RTP/SCS demonstrates the Project's consistency with the Actions and Strategies set forth in the 2012–2035 RTP/SCS. The Project would also be consistent with the applicable goals and principles set forth in the 2012–2035 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2012–2035 RTP/SCS.

Consistency with SCAG's 2016-2040 RTP/SCS

At the regional level, the 2016-2040 RTP and Sustainable Communities Strategy represent the region's Climate Action Plan that defines strategies for reducing GHGs. In order to assess the Project's potential to conflict with the RTP/SCS, this section analyzes the Project's land use profile for consistency with those in the Sustainable Communities Strategy. Generally, projects are considered consistent with the provisions and general policies of applicable City and regional land use plans and regulations, such as SCAG's Sustainable Communities Strategy, if they are compatible with the general intent of the plans and would not preclude the attainment of their primary goals.

The Proposed Project is an infill development that is also consistent with the 2016 RTP/SCS and its focus on integrated land use planning. Specifically, the site's location near substantial local transit bus services will help the region accommodate growth and promote public transit ridership that minimizes GHG emission increases and reduces per capita emissions consistent with the RTP/SCS. Further, the inclusion of electric

vehicle charging infrastructure will support the penetration of electric zero-emission vehicles into the vehicle fleet.

Table V-14
Project Consistency with SCAG 2016-2040 RTP/SCS

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Land Use Strategies		
Reflect the changing population and demands, including combating gentrification and displacement, by increasing housing supply at a variety of affordability levels.	Local jurisdictions	**Consistent.** The Project would include residences that would add to the supply of housing in metropolitan Los Angeles County.
Focus new growth around transit.	Local Jurisdictions	**Consistent.** The Proposed Project is an infill development that would be consistent with the 2016 RTP/SCS focus on growing near transit facilities.
Plan for growth around livable corridors, including growth on the Livable Corridors network.	SCAG, Local Jurisdictions	**Consistent.** The Proposed Project is an infill development that would be consistent with the 2016 RTP/SCS focus on focusing growth along the 2,980 miles of Livable Corridors in the region.
Provide more options for short trips through Neighborhood Mobility Areas and Complete Communities.	SCAG, Local Jurisdictions	**Consistent.** The Proposed Project would help further jobs/housing balance objectives that can improve the use of Neighborhood Electric Vehicles for short trips. The project is also generally consistent with the Complete Communities initiative that focuses on creation of mixed-use districts in growth areas.
Support local sustainability planning, including developing sustainable planning and design policies, sustainable zoning codes, and Climate Action Plans.	Local Jurisdictions	**Not Applicable.** While this strategy calls on local governments to adopt General Plan updates, zoning codes, and Climate Action Plans to further sustainable communities, the Proposed Project would not interfere with such policymaking and would be consistent with those policy objectives.
Protect natural and farm lands, including developing conservation strategies.	SCAG Local Jurisdictions	**Consistent.** The Proposed Project is an infill development that would help reduce demand for growth in urbanizing areas that threaten greenfields and open spaces.
Transportation Strategies		
Preserve our existing transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy calls on investing in the maintenance of our existing transportation system, the Proposed Project would not interfere with such policymaking.
Manage congestion through programs like the Congestion Management Program, Transportation Demand Management, and Transportation Systems Management strategies.	County Transportation Commissions Local Jurisdictions	**Not Applicable.** The Proposed Project is an infill development that will minimize congestion impacts on the region because of its proximity to public transit, Complete Communities, and general density of population and jobs.

Actions and Strategies	Responsible Party(ies)	Consistency Analysis[a]
Promote safety and security in the transportation system.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** While this strategy aims to improve the safety of the transportation system and protect users from security threats, the Proposed Project would not interfere with such policymaking.
Complete our transit, passenger rail, active transportation, highways and arterials, regional express lanes, goods movement, and airport ground transportation systems.	SCAG County Transportation Commissions Local Jurisdictions	**Not Applicable.** This strategy calls for transportation planning partners to implement major capital and operational projects that are designed to address regional growth. The Proposed Project would not interfere with this larger goal of investing in the transportation system.
Technological Innovation and 21st Century Transportation		
Promote zero-emissions vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure in the proposed parking structure where 5-percent of total spaces would be designated for low emitting, fuel efficient and carpool/van pool vehicles.
Promote neighborhood electric vehicles.	SCAG Local Jurisdictions	**Consistent.** While this action/strategy is not necessarily applicable on a project-specific basis, the Project would include pre-wiring for electric vehicle charging infrastructure.
Implement shared mobility programs.	SCAG Local Jurisdictions	**Not Applicable.** While this strategy is designed to integrate new technologies for last-mile and alternative transportation programs, the Proposed Project would not interfere with these emerging programs.

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

Table V-14, Project Consistency with SCAG 2016-2040 RTP/SCS demonstrates the Project's consistency with the Actions and Strategies set forth in the 2016-2040 RTP/SCS. The Project would also be consistent with the applicable goals and principles set forth in the 2016-2040 RTP/SCS and the Compass Growth Vision Report. Therefore, the Project would be consistent with the GHG reduction related actions and strategies contained in the 2016-2040 RTP/SCS.

Consistency with the City of Los Angeles Mobility 2035 Plan

While the Mobility 2035 Plan focuses on developing a multi-modal transportation system, its key policy initiatives include considering the strong link between land use and transportation and targeting GHG through a more sustainable transportation system. The Proposed Project is fully consistent with these general objectives, including the most relevant strategy, Program No. D7, which calls for the development of GHG

tracking program that would quantify reductions in GHG from reductions in vehicle miles traveled.

Consistency with the City of Los Angeles ClimateLA Plan

Construction of the Proposed Project is consistent with Mayor Eric Garcetti's 2014 initiative, Sustainable City "pLAn".The pLAn is a comprehensive and actionable policy roadmap that prepares the City for an environmentally healthy, economically prosperous, and equitable future for all. Mayor Garcetti released the pLAn in April 2015 along with a corresponding Executive Directive (ED-#5) that incorporates that pLAn into city-wide management. The framework of pLAn sets forth a vision of things to be accomplished in the next 20 years and highlighted near- and long-term outcomes. The pLAn focuses on local water, local solar, energy-efficient buildings, carbon and climate leadership, and waste and landfills. The pLAn sets targets of reducing greenhouse gas emissions below 1990 levels by a least 45 percent by 2025, 60 percent by 2035, and 80 percent by 2050. With regard to transportation, the Project is consistent with the Plan's focus on reducing emissions from private vehicle use. Specifically, the site's infill location with immediate access to significant public transit, pedestrian, and bicycle facilities results in a transit-oriented development that will reduce auto dependence. Further, the Project is consistent with the Plan's land use policies that promote high density near transportation, transit-oriented development, and making underutilized land available for housing development, especially when near transit.

To reduce emissions from energy usage, the Proposed Project would be consistent with "pLAn" and its focus on increasing the amount of renewable energy provided by the Los Angeles Department of Water and Power; presenting a comprehensive set of green building policies to guide and support private sector development; and helping citizens to use less energy. Both construction and operational activities from the Project site would generate energy-related emissions that are reduced by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers come from renewable energy sources by December 31, 2030. A list of specific energy efficiency and renewable energy features can be found in the Project Description on page II-8 and II-9.

With regard to water, the Proposed Project would be consistent with reducing water from growth through water conservation and recycling; reducing per capita water consumption by 20 percent; and implementing the City's water and wastewater integrated resources plan that will increase conservation, and maximize the capture and

reuse of storm water. Specifically, the Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions, as well as CALGreen and City Green Building Code that call for water-conserving fixtures and processes. These elements of the Project would be consistent with goals set forth in the "pLAn".

With regard to waste, the Proposed Project would be consistent with the "pLAn" goal of increasing landfill diversion rate to at least 90 percent by 2025 and 95 percent by 2035. Operational efficiencies will be built into the Project that reduce energy use and waste, as mandated by the City's Green Building Code and CALGreen building code. With regard to ongoing operations, the Project would be subject to solid waste diversion policies administered by CalRecycle that reduce GHG emissions.

With regard to open space and greening, the Proposed Project would not interfere with "pLAn" and its focus on ensuring proportion of Angelenos living within 0.5 mile of a park or open space is at least 65 percent by 2025; revitalizing the Los Angeles River to create open space opportunities; and identifying promising locations for stormwater infiltration to recharge groundwater aquifers.

Consistency with the City of Los Angeles Green Building Ordinance

The Los Angeles Green Building Ordinance requires that all Projects filed on or after January 1, 2014 comply with the Los Angeles Green Building Code as amended to comply with the 2013 CALGreen Code. Mandatory measures under the Green Building Ordinance that would help reduce GHG emissions include short and long term bicycle parking measures; designated parking measure; and electric vehicle supply wiring. The Project would comply with these mandatory measures, as the Project would provide on-site bicycle parking spaces. Furthermore, the Green Building Ordinance includes measures that would increase energy efficiency on the Project Site, including installing ENERGY STAR rated appliances and installation of water-conserving fixtures. Therefore, the Project is consistent with the Los Angeles Green Building Ordinance.

The Proposed Project will comply with the City of Los Angeles' Green Building Ordinance standards that compel LEED certification, reduce emissions beyond a NAT scenario, and are consistent with the AB 32 Scoping Plan's recommendation for communities to adopt building codes that go beyond the State's codes. Under the City's Los Angeles Green Building Code, the Project must incorporate several measures and design elements that reduce the carbon footprint of the development:

The Proposed Project would include design, construction, maintenance, and operation at the Leadership in Energy & Environmental Design (LEED) certified level. Projects that are LEED certified generally exceed Title 24 (2013) standards by at least 10 percent.71 As such, it would incorporate several design elements and programs that will reduce the carbon footprint of the development, including:

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

    - Reduced parking based on compliance with the City's bicycle parking ordinance.

    - Access to several public transportation lines. This includes Los Angeles County Metropolitan Transportation Authority (i.e., Routes 237 and 656 on Highland Avenue, 212, 217, 222, and 312 on Hollywood Boulevard) and LADOT DASH Hollywood routes that provide opportunities to reduce GHG emissions from passenger vehicles.

    - Located near residential neighborhoods. The Project site's proximity to medium- and high-density residential neighborhoods increases the likelihood that more travel to and from the development will be made by non-motorized modes that will reduce potential GHG emissions.

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

    - Use of low-emitting paints, adhesives, carpets, coating, and other materials.

    - Equipment and fixtures will comply with the following where applicable:

        - Installed gas-fired space heating equipment will have an Annual Fuel Utilization Ratio of .90 or higher.

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

- Installed electric heat pumps will have a Heating Seasonal Performance Factor of 8.0 or higher.
- Installed cooling equipment will have a Seasonal Energy Efficiency Ratio higher than 13.0 and an Energy Efficiency Ratio of at least 11.5.
- Installed tank type water heaters will have an Energy Factor higher than .6.
- Installed tankless water heaters will have an Energy Factor higher than .80.
- Perform duct leakage testing to verify a total leakage rate of less than 6 percent of the total fan flow.
- Building lighting in the kitchen and bathrooms within the dwelling units will consist of at least 90 percent ENERGY STAR qualified hard-wired fixtures (luminaires).

- An electrical conduit will be provided from the electrical service equipment to an accessible location in the attic or other location suitable for future connection to a solar system. The conduit shall be adequately sized by the designer but shall not be less than one inch. The conduit shall be labeled as per the Los Angeles Fire Department requirements. The electrical panel shall be sized to accommodate the installation of a future electrical solar system.
- A minimum of 250 square feet of contiguous unobstructed roof area will be provided for the installation of future photovoltaic or other electrical solar panels. The location shall be suitable for installing future solar panels as determined by the designer.
- Appliances will meet ENERGY STAR if an ENERGY STAR designation is applicable for that appliance.

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

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

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

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

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

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

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

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

4. **GHG Emissions Associated with Solid Waste Generation.** The Project is subject to construction waste reduction of at least 50 percent. In addition, Project Site operations are subject to AB 939 requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. The Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials.

5. **GHG Emissions Associated with Environmental Quality.** The Project must meet strict standards for any fireplaces and woodstoves, covering of duct openings and protection of mechanical equipment during constructions, and meet other

requirements for reducing emissions from flooring systems, any CFC and halon use, and other project amenities. This would include:

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

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

Taken together, these strategies encourage providing recreational, cultural, and a range of shopping, entertainment and services all within a relatively short distance; providing employment near current and planned transit stations and neighborhood commercial centers; and supporting alternative fueled and electric vehicles. As a result, the Project would be consistent with applicable State, regional and local GHG reduction strategies. Given that the Project would generate GHG emissions that are less than significant, and given that GHG emission impacts are cumulative in nature, the Project's incremental contribution to cumulatively significant GHG emissions would be less than cumulatively considerable, and impacts would be less than significant.

Cumulative Impacts

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

Currently, there are no applicable CARB, SCAQMD, or City of Los Angeles significance thresholds or specific reduction targets, and no approved policy or guidance to assist in determining significance at the project or cumulative levels. Additionally, there is currently no generally accepted methodology to determine whether GHG emissions associated with a specific project represent new emissions or existing, displaced emissions. Therefore, consistent with CEQA Guideline Section 15064h(3), the City as Lead Agency has determined that the Project's contribution to cumulative GHG emissions and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and policies to reduce Greenhouse Gas Emissions: Executive Orders S-3-05 and B-30-15; AB 32, the 2016-2040 RTP/SCS and the City of Los Angeles Green Building Ordinance and Mobility 2035 Plan.

Implementation of the Project's regulatory compliance measures and project design features, including State mandates, would contribute to GHG reductions. These reductions represent a reduction from NAT and support State goals for GHG emissions reduction. The methods used to establish this relative reduction are consistent with the approach used in the CARB's *Climate Change Scoping Plan* for the implementation of AB 32.

The Project is consistent with the approach outlined in CARB's *Climate Change Scoping Plan*, particularly its emphasis on the identification of emission reduction opportunities that promote economic growth while achieving greater energy efficiency and accelerating the transition to a low-carbon economy. In addition, as recommended by CARB's *Climate Change Scoping Plan*, the Project would use "green building" features as a framework for achieving cross-cutting emissions reductions as new buildings and infrastructure would be designed to achieve the standards of CALGreen.

As part of SCAG's 2012–2035 SCS/RTP, a reduction in VMT within the region is a key component to achieve the 2020 and 2035 GHG emission reduction targets established by CARB. The Project results in significant VMT reduction in comparison to NAT and would be consistent with the SCS/RTP.

The Project also would comply with the City of Los Angeles Green Building Code, which emphasizes improving energy conservation and energy efficiency, increasing renewable energy generation, and changing transportation and land use patterns to reduce auto dependence. The Project's regulatory compliance measures and project design features provided above and throughout this analysis would advance these objectives. Further, the related projects would also be anticipated to comply with many

of these same emissions reduction goals and objectives (e.g., City of Los Angeles Green Building Code).

Additionally, the Project has incorporated sustainability design features in accordance with regulatory requirements as provided in the regulatory compliance measures throughout this analysis and project design features to reduce VMT and to reduce the Project's potential impact with respect to GHG emissions. With implementation of these features, the Project results in a 33 percent reduction in GHG emissions from NAT. The Project's GHG reduction measures make the Project consistent with AB 32.

As discussed above, the Project is consistent with the applicable GHG reduction plans and policies. The NAT comparison demonstrates the efficacy of the measures contained in these policies. Moreover, while the Project is not directly subject to the Cap and Program, that Program will indirectly reduce the Project's GHG emissions by regulating "covered entities" that affect the Project's GHG emissions, including energy, mobile, and construction emissions. More importantly, the Cap-and-Trade Program will backstop the GHG reduction plans and policies applicable to the Project in that the Cap-and-Trade Program will be responsible for relatively more emissions reductions should California's direct regulatory measures reduce GHG emissions less than expected. This will ensure that the GHG reduction targets of AB 32 are met.

Thus, given the Project's consistency with State, regional, and City of Los Angeles GHG emission reduction goals and objectives, the Project would not conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. In the absence of adopted standards and established significance thresholds, and given this consistency, it is concluded that the Project's impacts would be cumulatively less than significant.

8. HAZARDS AND HAZARDOUS MATERIALS

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project would create a significant hazard though the routine transfer, use, or disposal of hazardous materials. Construction of the Proposed Project would involve the use of those hazardous materials that are typically necessary for construction of senior housing development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the Proposed Project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. However, the transport, use, and disposal of construction-related hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. For example, the Proposed Project would be required to implement standard best management practices (BMPs) set forth by the City and the Los Angeles Regional Water Quality Control Board (RWQCB) which would ensure that wastes generated during the construction process are disposed of properly. Therefore, the Proposed Project would not create a significant impact related to routine transport, use, or disposal of hazardous materials during construction and impacts would be less than significant.

The Proposed Project consists of the development of residential units, and a subterranean parking garage with landscaping. The types of potentially hazardous materials associated with operation of the Proposed Project include solvents, paints, petroleum products, and pesticides that are packaged and stored for consumer sales. However, materials would be used for facility upkeep that could be considered hazardous if used inappropriately. Such materials include cleaning solvents used for janitorial purposes, materials used for landscaping, and materials used for maintenance. Examples of such materials could include but are not limited to cleaning solvents, pesticides and herbicides for landscaping, and painting supplies. All potentially hazardous materials transported, stored, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Compliance with existing local, state, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment. Project impacts related to this issue would be less than significant. No further analysis is required.

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

Less Than Significant Impact. As noted in the preceding section, compliance with federal, state, and local laws and regulations relating to transport, storage, disposal and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials. A Phase I Environmental Site Assessment (ESA) completed for the Proposed Project Site, and included as **Appendix E** to this SCEA, found no evidence of Recognized Environmental Conditions (RECs), Historical RECs, Controlled RECs, or de minimis conditions in connection with the Project.[72] Neither is the site a Hazardous Waste / Border Zone Property, nor is it within a Methane Hazard zone.[73]

As previously discussed, no structures are located on the Project Site. Thus, exposure to asbestos containing materials and/or lead-based paints would not occur during demolition of the existing paving on the Project Site. Any alterations to the existing structure (Building A) during construction would be minor and adherence to all regulatory measures regarding the handling of lead-based paint would minimize the potential for exposure. Accordingly, any threat of upset or accidental release would be less than significant. No further analysis is required.

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

Less Than Significant Impact. Canyon Co-Op Pre-School, located at 1820 North Las Palmas Avenue, is 20 feet west of the Project Site. There are no other schools within 0.25 miles of the Project Site. Other schools in the area include the Larchmont Charter School located at 6611 Selma Avenue, approximately 0.36 miles south of the Project Site, and Hollywood High School located at 1521 N. Highland Avenue, approximately 0.5 miles southwest of the Project Site.

As previously discussed, construction of the Proposed Project would involve the use of those hazardous materials that are typically necessary for construction of senior housing development (i.e., paints, building materials, cleaners, fuel for construction equipment, etc.). Therefore, construction of the Proposed Project would involve routine transport, use, and disposal of these types of hazardous materials throughout the duration of construction activities. However, the transport, use, and disposal of construction-related

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72 ***HUD Phase I Environmental Site Assessment of Montecito Apartments,*** *6650 Franklin Avenue, and 6668 Franklin Avenue, Los Angeles (Hollywood), California 90028, completed by EMG, dated October 29, 2014.*

73 *City of Los Angeles Department Of City Planning, Zoning/Property Info (ZIMAS), http://zimas.lacity.org/, accessed April 25, 2016.*

hazardous materials would occur in conformance with all applicable local, state, and federal regulations governing such activities. For example, the Proposed Project would be required to implement standard BMPs set forth by the City and the RWQCB which would ensure that wastes generated during the construction process are disposed of properly.

The types of potentially hazardous materials associated with operation of the Proposed Project include solvents, paints, petroleum products, fertilizers, and pesticides that are packaged and stored for consumer sales. However, materials would be used for facility upkeep that could be considered hazardous if used inappropriately. Such materials include cleaning solvents used for janitorial purposes, materials used for landscaping, and materials used for maintenance. Examples of such materials could include but are not limited to cleaning solvents, pesticides and herbicides for landscaping, and painting supplies. All potentially hazardous materials transported, stored, or used on site for daily upkeep would be contained, stored, and used in accordance with manufacturers' instructions and handled in compliance with applicable standards and regulations. Compliance with existing local, state, and federal regulations would ensure the transport, storage, and use of these materials would not pose a significant hazard to the public or the environment

As the Proposed Project will comply with all federal, state, and local standards and regulations, it is not anticipated to emit any hazardous emissions during construction or operation. Therefore, the Proposed Project is not expected to adversely affect Canyon Co-Op Pre-School, Larchmont Charter School or Hollywood High School facilities. Therefore, impacts would be less than significant and no further analysis is required.

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

No Impact. California Government Code Section 65962.5 requires various State agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and the SWRCB, 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.[74]

74 *These lists include, but are not limited to, the 'EnviroStor' (http://www.envirostor.dtsc.ca.gov/public/) and 'GeoTracker' (http://geotracker.waterboards.ca.gov/) lists maintained by the DTSC and the SWRCB, respectively.*

A significant impact may occur if a project site is included on any of the above lists and poses an environmental hazard to surrounding sensitive uses.

During the preparation of the Phase I ESA, EMG obtained a regulatory database report from Environmental Data Resources, Inc. (EDR) to determine if the Project is a listed regulatory site.

The following are some of the databases which were reviewed for the Phase I ESA:

- **NPL Listing:** The National Priorities (Superfund) List (NPL) is United States Environmental Protection Agency (USEPA's) database of uncontrolled or abandoned hazardous waste sites identified for priority remedial actions under the Superfund Program.
- **Delisted NPL Listing:** The Delisted NPL database is a listing of sites which have been deleted from the NPL list by the USEPA.
- **RCRA-TSD Facilities Listing:** The USEPA's Resource Conservation and Recovery Act (RCRA) Program identifies and tracks hazardous waste from the point of generation to the point of disposal. The RCRA-TSD database is a compilation by the USEPA of reporting facilities that transport, treat, store, or dispose of hazardous waste.
- **RCRA-Corracts Facilities Listing:** The USEPA's Resource Conservation and Recovery Act (RCRA) Corrective Action Sites Listing contains information pertaining to hazardous waste treatment, storage, and disposal facilities (RCRA TSD) which have conducted, or are currently conducting, a corrective action(s) as regulated under RCRA.
- **CERCLIS Listing:** This database is a compilation of sites which the USEPA has investigated or is currently investigating for a release or threatened release of hazardous substances.
- **NFRAP Listing:** This database contains information regarding sites which have been removed from the USEPA CERCLIS database.
- **RCRIS-Generator Listing:** The USEPA identifies and tracks hazardous waste from the point of generation to the point of disposal through the Resource Conservation and Recovery Information System (RCRIS). The RCRIS-Generators database is a compilation by the USEPA of facilities that report hazardous waste generation.

- **Emergency Response Notification System (ERNS):** The ERNS is a national database used to collect information on reported releases of oil or hazardous substances.
- **Federal institutional control registry:** This database contains information on sites with federal institutional controls.
- **Federal engineering control registry:** This database contains information on sites with federal engineering controls.
- **EnviroStor (SHWS):** The Department of Toxic Substances Control (DTSC) Site Mitigation and Brownfield Reuse Program (SMBRP) EnviroStor database identifies sites that have known contamination or sites for which there may be reasons to investigate further. The database includes the following site types: Federal Superfund sites (NPL); State Response, including Military Facilities and State Superfund; Voluntary Cleanup; and School sites. EnviroStor provides similar information to the information that was available in CalSites, and provides additional site information, including, but not limited to, identification of formerly-contaminated properties that have been released for reuse, properties where environmental deed restrictions have been recorded to prevent inappropriate land uses, and risk characterization information that is used to assess potential impacts to public health and the environment at contaminated sites. The CalSites listing is no longer updated by the state agency. It has been replaced by EnviroStor.
- **SLIC:** The California Spill, Leak, Investigation, and Cleanup (SLIC) database is maintained by the individual California Regional California Water Quality Control Boards (RWQCB) to track sites where releases have been reported outside of the Leaking Underground Storage Tank program. These sites typically include miscellaneous releases, not necessarily related to underground storage tanks.
- **SWF Listing:** This database is a comprehensive listing of all State Permitted Solid Waste Landfills.
- **Leaking Underground Storage Tanks:** This database contains a summary of information pertaining to leaking underground storage tank (LUST) sites identified by the state.
- **Underground Storage Tanks:** This database contains a summary of information pertaining to registered underground storage tanks (USTs) identified by the state.
- **State Voluntary Cleanup Sites**: This database contains a listing of sites which are in the State voluntary cleanup program

- **Tribal Voluntary Cleanup Sites**: This database contains a listing of sites which are in the Tribal voluntary cleanup program
- **Tribal LUST:** This database contains information on Tribal LUST sites.
- **Tribal UST:** This database contains information on Tribal UST sites.

A complete copy of the regulatory database report is included the Appendices of the Phase I ESA, Section 9.

Based on review of the regulatory database report, and by cross-referencing name, address, and zip code, EMG was able to conclude that the Project is not 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 not create a significant hazard to the public or the environment. No further analysis is required.

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

No Impact. The Project Site is not located within an airport land use plan or within the vicinity of a public airport or private airstrip. The nearest public airport is the Bob Hope Hope/Burbank Airport, located approximately 6.5 miles north of the Project Site. Los Angeles International Airport is approximately 12 mile southwest of the Project Site. The Santa Monica Airport, a private airport is located approximately 9.1 miles southwest of the Project Site. Therefore, no impact would result in a safety hazard for people residing or working within an airport land use plan would occur. No further analysis is required.

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

No Impact. See response to **Section 8(e)**, above. No further analysis is required

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

Less Than Significant Impact. Hollywood Boulevard, Highland Avenue, and the Hollywood (US 101) Freeway are designated disaster routes in the General Plan Safety Element's Critical Facilities & Lifeline Systems Map (Exhibit H).[75] Disaster routes

75 *City of Los Angeles City Planning Department, Environmental and Public Facilities Maps, Critical Facilities & Lifeline Systems in the City of Los Angeles, September 1996,(General Plan Safety Element, Exhibit H: Critical Facilities & Lifeline Systems, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf).*

function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. The Safety Element emphasizes immediate emergency debris clearance and road/bridge repairs for short-term emergency operations along these routes.

Although the Project Site is located proximate a designated disaster route, neither the construction nor the operation of the Proposed Project would require or result in modifications to any of the roadways that would impact emergency traffic. Construction of the Proposed Project could temporarily interfere with local and on-site emergency response. However, construction traffic would conform to all traffic work plan and access standards to allow adequate emergency access. Implementation of a Construction Management Plan**,** and compliance with access standards would reduce the potential for the impacts on haul routes, emergency response and access during construction of the Proposed Project. The majority of construction activities for the Proposed Project would be confined to the site, except for infrastructure improvements, which may require some work in adjacent street rights-of-way. However, this work would be short-term and temporary, and would occur during off-peak periods.

The existing driveway along Cherokee Avenue would remain for the resident and visitor access to the parking garage; the design of the Proposed Project would not cause any alteration to the local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way. In addition, the Applicant will submit a parking and driveway plan for review by the Los Angeles Fire Department (LAFD), the Bureau of Engineering (BOE) and the Los Angeles Department of Transportation (LADOT) to ensure compliance with all applicable code-required site access and circulation requirements, as well as code-required emergency access.

Therefore, demolition, construction and operation of the Proposed Project is not anticipated to significantly impair implementation of, or physically interfere with, any adopted or on-site emergency response or evacuation plans or a local, state, or federal agency's emergency evacuation plan, and the Proposed Project would have a less than significant impact with respect to these issues. No further analysis is required.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less Than Significant Impact. The Project Site is located in an urbanized area that does not contain any wildlands or urbanized areas intermixed with wildlands. The Project

Site is not located within a City designated Fire Hazardous Area[76] Further, the project would incorporate all applicable provisions of the LAMC Fire Code, including, but not limited to, installation of an automatic sprinkler system, smoke detectors, and a fire alarm system. Therefore, potential impacts from wildland fires would be less than significant. No further analysis is required.

76 *City of Los Angeles, Department of Public Works, Bureau of Engineering, NavigateLA, http://navigatela.lacity.org/navigatela/, accessed September 8, 2017.*

9. HYDROLOGY AND WATER QUALITY

Would the project:

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

Less Than Significant Impact. As part of Section 402 of the Clean Water Act, the United States Environmental Protection Agency (EPA) has established regulations under the National Pollution Discharge Elimination System (NPDES) program to control direct storm water discharges. In California, the SWRCB administers the NPDES permitting program and is responsible for developing NPDES permitting requirements. The NPDES program regulates industrial pollutant discharges, which include construction activities. The SWRCB works in coordination with the RWQCB to preserve, protect, enhance, and restore water quality.

A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

As required under the NPDES, the Proposed Project would be responsible for the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and implementation of BMPs to mitigate the effects of erosion and the inherent potential for sedimentation and other pollutants entering the stormwater system. Implementation of SWPPP and compliance with the NPDES and City discharge requirements would ensure that the construction of the Proposed Project would not violate any water quality standards and discharge requirements, or otherwise substantially degrade water quality.

During the operation, the Proposed Project would be required to comply with the City of Los Angeles's Low Impact Development (LID) Ordinance (No. 181,899) that was adopted by the Los Angeles Board of Public Works on July 1, 2011 and by the Los Angeles City Council on September 27, 2011; it became effective on May 12, 2012.

The LID Ordinance applies to all development and redevelopment in the City of Los Angeles that requires a building permit. The Ordinance requires the preparation of a LID Plan and a Standard Urban Stormwater Mitigation Plan (SUSMP) if necessary. The LID Ordinance requires projects to capture and treat the first ¾-inch of rainfall in accordance with established stormwater treatment priorities. Full compliance with the LID Plan, SUSMP, and implementation of design-related best management practices would ensure that the operation of the Proposed Project would not violate any water quality standards and discharge requirements or otherwise substantially degrade water quality. If required, any dewatering activities during construction shall comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032 National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. The Proposed Project does not include any point-source discharge (discharge of polluted water from a single point such as a sewage-outflow pipe). Therefore, the project would result in a less than significant impact to water quality and waste discharge during its construction and operation, and no further analysis is required.

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

Less Than Significant Impact. A significant impact would occur if the Proposed Project substantially depleted groundwater or interfered with groundwater recharge.

The Los Angeles Department of Water and Power (LADWP) is the water purveyor for the City. Water is supplied to the City from three primary sources, including water supplied by the Metropolitan Water District (MWD) (53 percent; Bay Delta 45 percent, Colorado River 8 percent), snowmelt from the Eastern Sierra Nevada Mountains via the Los Angeles Aqueduct (34 percent), local groundwater (12 percent), and recycled water (1 percent).[77] Based on the City's most current Urban Water Management Plan

[77] *Los Angeles Department of Water and Power - Water: Facts and Figures, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?_adf.ctrl-state=18i8d8hpzl_21&_afrLoop=430938015435485 , access April 25, 2016.*

(UWMP)[78], in 2011-2014 the LADWP has an average a water demand of 566,990 acre-feet[79] per year. Over the last five years, groundwater, largely from the San Fernando Basin (SFB) has provided approximately 12 percent of the total water supply for Los Angeles. Groundwater levels in the City are maintained through an active process via spreading grounds and recharge basins found primarily in the San Fernando Valley.

The Project Site is currently developed with a surface parking lot and an open courtyard and thus does not afford any opportunity for groundwater recharge activities. Following site redevelopment, groundwater recharge on the Project Site would continue to be negligible, similar to existing conditions.

As reported in the Geology Report, the historically-highest groundwater level at the site was on the order of 25 feet below ground surface (bgs). The Proposed Project would excavate soils beneath the Project Site to a depth of approximately 40 feet bgs. As such, the Proposed Project may extend into the groundwater table. The project would be required to comply with the requirements of the Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties (Order No. R4-2008-0032, National Pollutant Discharge Elimination System No. CAG994004) or subsequent permit. This will include submission of a Notice of Intent for coverage under the permit to the RWQCB at least 45 days prior to the start of dewatering and compliance with all applicable provisions in the permit, including water sampling, analysis, and reporting of dewatering-related discharges. Any groundwater extracted from the Project Site would need to be treated, if warranted, prior to being discharged into the sanitary sewer. Therefore, the Proposed Project's potential impacts relating to dewatering would be less than significant.

Impacts related to groundwater supplies would be less than significant. No further analysis is required.

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

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78 *An UWMP is prepared and adopted by LADWP every five years to forecast the future water demands and water supplies under average and dry year conditions. LADWP is currently in the process of preparing the 2015 UWMP, website: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water?_adf.ctrl-state=18i8d8hpzl_21&_afrLoop=431238281039535, https://www.ladwp.com/cs/idcplg?IdcService=GET_FILE&dDocName=OPLADWPCCB456809&RevisionSelectionMethod=LatestReleased, accessed April 25, 2016.*

79 *One acre foot equals 325,851 gallons of water.*

Less Than Significant Impact. A significant impact would occur if the Proposed Project substantially altered the drainage pattern of the site or an existing stream or river, so that substantial erosion or siltation would result on- or off-site.

The Project Site is located in a highly urbanized are within the City of Los Angeles. There are no natural watercourses on the Project Site or in the vicinity of the Project Site. As stated previously, the Project Site is almost entirely covered by impervious surfaces and current stormwater runoff flows to the local stormdrain system during a storm event.

The project would be required to prepare a SWPPP and implement BMPs to reduce runoff and preserve water quality during construction the Proposed Project. Further, the project would be required to implement an LID Plan (during the project's operation), which would reduce the amount of surface water runoff leaving the Project Site after a storm event. The LID Plan would require the implementation of stormwater best management practices to retain or treat the runoff from a storm event producing ¾-inch of rainfall in a 24-hour period. Therefore, the project would result in a less than significant impact in relation to surface water hydrology and would not result in substantial erosion or siltation on- or off-site. No further analysis is required.

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

Less Than Significant Impact. As discussed above under **Section 9(c)**, implementation of the Proposed Project is not anticipated to substantially change the drainage pattern on the Project Site. As discussed above, the project would implement both a SWPPP and an LID Plan and would not substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or –off-site. Further, there are no nearby streams or rivers and the Proposed Project could not alter any watercourse. As such, impacts would be less than significant and no further analysis is required.

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

Less Than Significant Impact. A project would normally have a significant impact on surface water quality if discharges associated with a project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (CWC) or that cause regulatory standards to be violated, as defined in the applicable

NPDES stormwater permit or Water Quality Control Plan for the receiving water body. For the purpose of this specific issue, a significant impact may occur if the volume of storm water runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A project-related significant adverse effect would also occur if the project would substantially increase the probability that polluted runoff would reach the storm drain system.

Construction-Related Project Impacts

Three general sources of potential short-term construction-related stormwater pollution associated with the Proposed Project are: 1) the handling, storage, and disposal of construction materials containing pollutants; 2) the maintenance and operation of construction equipment; and 3) earth moving activities which, when not controlled, may generate soil erosion and transportation, via storm runoff or mechanical equipment. Generally, routine safety precautions for handling and storing construction materials may effectively mitigate the potential pollution of stormwater by these materials. These same types of common sense, "good housekeeping" procedures, or BMPs, can be extended to non-hazardous stormwater pollutants such as sawdust and other solid wastes.

Poorly maintained vehicles and heavy equipment leaking fuel, oil, antifreeze or other fluids on the construction site are also common sources of stormwater pollution and soil contamination.

Grading activities can greatly increase erosion processes. Two general strategies are recommended to prevent construction silt from entering local storm drains. First, erosion control procedures should be implemented for those areas that must be exposed. Secondly, the area should be secured to control off-site migration of pollutants. During construction, the Applicant shall be required to implement all applicable and mandatory BMPs in accordance with the approved LID Plan and the SWPPP. When properly designed and implemented, these "good-housekeeping" practices are expected to reduce short-term construction-related impacts to a less than significant level.

Operation-Related Project Impacts

Activities associated with operation of the Proposed Project would generate substances that could degrade the quality of water runoff. The deposition of certain chemicals by cars in the parking garage could have the potential to contribute metals, oil and grease, solvents, phosphates, hydrocarbons, and suspended solids to the storm drain system. However, impacts to water quality would be reduced since the Proposed Project must

comply with water quality standards and wastewater discharge BMPs set forth by the City of Los Angeles, the SWRCB, and the Proposed Project's approved LID Plan. Compliance with existing regulations and the approved LID Plan would reduce the potential for the Proposed Project to exceed the capacity existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff impacts to a less than significant level. No further analysis is required.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. A significant impact may occur if a project includes potential sources of water pollutants that would have the potential to substantially degrade water quality.

Other than the sources discussed above, as described in Sections 9(a) and 9(e), the project does not include other potential sources of contaminants which could potentially degrade water quality.

Further, as previously discussed, to address water quality during the project's construction phase, the Project Applicant would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City of Los Angeles Bureau of Engineering (BOE) for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, project construction impacts related to water quality would be less than significant, and no further analysis of this issue is required.

During the Project's operational phase, in accordance with the City's LID Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the project would meet the City's water quality standards. Therefore, project impacts related to operational water quality would be less than significant. No further analysis is required.

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

Less Than Significant Impact. The Federal Emergency Management Agency (FEMA) prepares and maintains Flood Insurance Rate Maps (FIRMs), which show the extent of Special Flood Hazard Areas (SFHAs) and other thematic features related to flood risk**.** The Project Site is in an area of minimal flood risk (Zone X) and is not located within a 100-year flood zone, as mapped by FEMA.[80] Therefore, the Proposed Project would not involve the development of new housing and/or structures within an identified 100-year flood hazard. Impacts would be less than significant and no further analysis is required.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Less Than Significant Impact. See response to **Section 9(g)**, above. Impacts would be less than significant and no further analysis is required.

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

No Impact. A significant impact may occur if a project exposes people or structures to a significant risk of loss or death caused by the failure of a levee or dam, including but not limited to a seismically-induced seiche, which is a surface wave created when a body of water is shaken, which could result in a water storage facility failure.

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80 As per *FEMA Flood Insurance Rate Map No. 06037C1590F, effective as of 09/26/2008, accessed April 25, 2016. The map can be accessed by following the directions provided through this portal: https://msc.fema.gov/portal.*

The Project Site is not located within a potential inundation area.[81] As such, there would be no impacts related to potential inundation from the failure of a levee or dam.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. A seiche is a periodic oscillation of a body of water resulting from seismic shaking or other causes that can cause flooding. The Project Site is not located within a coastal area, and no water bodies are on or adjacent to the project area that would impact future projects due to a seiche. Impacts would be less than significant.

A tsunami is a series of waves generated by large earthquakes that create vertical movement on the ocean floor. Tsunamis can reach more than 50 feet in height, move inland several hundred feet, and threaten life and property. Often, the first wave of a tsunami is not the largest. Tsunamis can occur on all coastal regions of the world, but are most common along margins of the Pacific Ocean. Tsunamis can travel from one side of the Pacific to the other in a day, at a velocity of 600 miles an hour in deep water. A locally generated tsunami may reach the shore within minutes. Due to its inland location, the Project Site is not susceptible to tsunamis.[82] Impacts would be less than significant in this regard.

In addition, given the developed nature of the project area, there are no features adjacent to the project area capable of inundating the site by mudflow. Thus, no impacts are anticipated with regard to the inundation by seiche, tsunami, or mudflow. No further analysis is required.

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81 As per *FEMA Flood Insurance Rate Map NO. 06037C1590F, effective as of 09/26/2008, accessed April 25, 2016. The map can be accessed by following the directions provided through this portal: https://msc.fema.gov/portal.*

82 *City of Los Angeles Safety Element, Exhibit G, Inundation and Tsunami Hazard Areas, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf.*

10. LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

Less Than Significant Impact. The Project Site is located at 6650 West Franklin Avenue[83] in the Hollywood Community Plan Area, as established by the City's General Plan. The Project Site is currently developed with a surface parking lot and an open courtyard.

The Project Site is located two blocks south of Hollywood Boulevard, and Highland Avenue is two blocks to the west. The site is approximately 0.4 miles west of U.S. Highway 101 (US 101). The land uses within the general vicinity of the Project Site are characterized by a mix of medium to high-intensity residential and commercial uses. The infill project would develop the 0.78-acre site with a senior housing project consisting of a 68 residential units.[84] The project is an infill development in an area with a mix of uses, and would not physically divide an established community. Impacts would be less than significant and no further analysis is necessary.

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

Less Than Significant Impact. The Project Site is zoned [Q]R4-2 (High Density Residential). The General Plan land use designation for the Project Site is High Density Residential. The (draft) Hollywood Community Plan includes several goals, objectives, and policies that would be applicable to the Proposed Project.

The current zoning permits by-right uses and area limitations consistent with the R4 Zone and a maximum Floor Area Ratio of 6:1. Pursuant to the Q condition established by Ordinance No. 165,656 the density and height of the underlying R4 zoning is restricted to 1 unit per 600 square feet of lot area and a maximum height of 60 feet. With a grade change of more than 20 feet, the Project is permitted an additional 12 feet in height for a maximum height of 72 feet. As such, in order to implement the Proposed Project per the current plans, the Applicant is requesting the following entitlements:

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83 Additional addresses affiliated with the Project Site include 6669 West Franklin Avenue and 1855 North Cherokee Avenue

84 There would be a total of 67 new senior housing units and one unit set aside for an on-site manager.

- A **Density Bonus** (DB) pursuant to CA Government Code Section 65915(f)(3) and LAMC Section 12.22.A.25 to permit a Senior Residential Housing Development Project with 118 existing non-conforming units and 68 new units, dedicating 99% of proposed units restricted to Low and Very Low Income Households in exchange for the following incentives:

    - An **On-Menu Incentive** for an increase in height to permit a new building with 76-feet, 8-inches in height in lieu of the otherwise permitted 72-foot height limit pursuant to Ordinance 165,656 and LAMC 12.21.1 B.2 for a site with more than 20 feet of grade change;

    - An **Off-Menu Incentive** for a decrease in yards to permit a 4-foot, 6-inch northerly side yard fronting Franklin Boulevard in lieu of the otherwise required 9-foot front yard for a 6-story building pursuant to LAMC 12.11 C.2;

    - An **Off-Menu Incentive** for a decrease in yards to permit a 10-foot rear yard in lieu of the otherwise required 18-foot rear yard for a 6-story building pursuant to LAMC 12.11 C.3;

- A **Conditional Use Permit** (CUP) to permit pursuant to 12.24 U.26, to permit a housing development project with a density increase greater than the maximum permitted in LAMC 12.22 A.25, for a total of 186 units;

- A **Site Plan Review** (SPR) pursuant to LAMC 16.05 C, to permit the construction, use, and maintenance of more than 50 new residential units;

- A **Preliminary Parcel Map** (PMLA) pursuant to LAMC 17.50, a to permit the merger and re-subdivision of five (5) ground lots into one (1) ground lot and two (2) air space lots;

- Adoption of the **Sustainable Communities Environmental Assessment** (SCEA); and

- Approval of other permits, ministerial or discretionary, may be necessary in order to execute and implement the Project. Such approvals may include, but are not limited to: landscaping approvals, exterior approvals, storm water discharge permits, grading permits, haul route permits, and installation and hookup approvals for public utilities and related permits.

As discussed below, following the granting of the above-mentioned entitlements, the Proposed Project would substantially conform with the purpose, intent and provisions of the General Plan, and the Hollywood Community Plan, there would be no conflicts with any applicable land use plan, policy, or regulation, and impacts would be less than significant.

CITY OF LOS ANGELES GENERAL PLAN

Framework Element

Policy 3.1.4: *Accommodate new development in accordance with land use and density provisions of the General Plan Framework Long-Range Land Use Diagram (Figures 3-1 to 3-4) and Table 3-1.*

According to the General Plan Framework Long-Range Land Use Diagram for the Metro Subarea (Figure 3-1), the Project site is located in or adjacent to a designated Regional Center around the intersection of Hollywood Boulevard and La Brea Avenue. Residential development in proximity of these Regional Centers will shorten and lessen the need for vehicle trips and vehicle miles traveled. Thus, the Project is consistent with Policy 3.1.4 of the General Plan Framework.

Furthermore, Chapter 4 outlines Goals, Objectives and Policies with regard to Housing in the City of Los Angeles:

Goal 4A: *An equitable distribution of housing opportunities by type and cost accessible to all residents of the City.*

Objective 4.1: *Plan the capacity for and develop incentives to encourage production of an adequate supply of housing units of various types within each City sub-region to meet the projected housing needs by income level of the future population to the year 2010.*

Policy 4.1.1: *Provide sufficient land use and density to accommodate an adequate supply of housing units by type and cost within each City sub-region to meet the twenty-year projections of housing needs.*

Policy 4.1.6*: Create incentives and give priorities in permit processing for low- and very-low income housing developments throughout the City.*

Housing Element

The Housing Element of the General Plan provides land use policies and programs that encourage development of affordable housing across the City. The Project is consistent with the following policies of the Housing Element of the General Plan:

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.*

The fastest growing age group aligns broadly with the "baby boom" generation, which is currently between about 45 and 65 years old. There are about 190,000 more people in the City within this age group, compared to 10 years ago. In fact, the number of "new seniors" (from 2000 to 2010) increased faster in the Los Angeles region than New York or any other metropolitan area[85] (p. 1-5).

According to demographers, the next decade will be marked by growth of households without children, primarily by those headed by householders aged 55 and older[86]. While the City's overall population is projected to increase by about 4.5% between 2010 and 2020, its senior population (65 and older) is expected to grow by approximately 45% percent during this time period (to approximately 562,992)[87]. By 2020, seniors are expected to account for more than 14% of the City's households, compared to 10.5% in 2010. This far exceeds the growth of any other age groups in the City. The increasing numbers of older Angelenos will have important effects on the demand for housing to come (p.1-6).

Older adults over the age of 65 own their homes at the highest rate of any age group (58%).[88] While most are likely to want to stay in their homes as long as they can, many older adults may seek out alternative housing options. When seniors move, they are most likely to move into rental apartments. Statewide projections for California indicate that, of those turning 65 in 2011, approximately 60% will have moved into apartments

85 Referenced in the Housing Element: Mcllwain, John K "Seniors: In Which Metro Region are They Living?" Urban Land Institute, February 23, 2012 http://urbanland uli org/ Articles/2012/Feb/McIlwainSeniors1

86 Referenced in the Housing Element: Nelson, Arthur C "The New California Dream: How Demographic and Economic Trends May Shape the Housing Market," Urban Land Institute, Washington DC (2011)

87 Referenced in the Housing Element: Economic Roundtable "Affordable Housing Benefit Fee Study" (2011) Underwritten by the HCIDLA and DCP

88 Referenced in the Housing Element: U S Census Bureau 2010 Census, Tenure by Age of Householder SF1

by 2029.[89] The additional demand placed on the City's rental stock by the aging population will be highly significant. (p. 1-18)

Seniors should have options allowing them to live in the most integrated setting possible. To provide for this, a full spectrum of affordable housing is needed, from conventional residences to transitional and permanent supportive housing, including group, congregate and independent housing. Independent, supported living in the most integrated setting possible is preferable, either through individual or shared single-family homes or apartments, providing each individual with his/her own bedroom and optional access to support services and auxiliary amenities. Persons who use wheelchairs need affordable, conveniently-located housing which has been specially adapted for wheelchair accessibility, along with other physical needs (p. 1-22). The Project seeks to provide these options, by expanding the number of affordable units for seniors and augmenting the existing Montecito Senior Apartments.

HOLLYWOOD COMMUNITY PLAN

The Site is designated High Density Residential by the Hollywood Community Plan. The Project advances a number of specific goals and objectives of the Community Plan:

HOUSING. *The intensity of residential land use in this Plan and the density of the population which can be accommodated thereon shall be limited in accordance with the following criteria:*

1. ***The adequacy of the existing and assured circulation and public transportation systems within the area;***

Complies. As an infill development site, the property has outstanding access to community resources, particularly public transportation. The site is serviced by the DASH Hollywood line, directly abutting the property. Additionally, there are several major bus routes running along Franklin Avenue, Highland Avenue, Hollywood Boulevard, and Cahuenga Boulevard. The Project Site is less than one-half mile from the Hollywood/Highland Station of the Metro Red Line. The Project Site's proximity to Highway 101, Hollywood Boulevard, and Highland Avenue also ensures adequate access to arterials roads and freeways for regional vehicular travel.

89 Referenced in the Housing Element: Nelson, Arthur C "The New California Dream: How Demographic and Economic Trends May Shape the Housing Market," Urban Land Institute, Washington DC (2011)

2. ***The availability of sewers, drainage facilities, fire protection services and facilities, and other public utilities;***

Complies. As an infill development site, the property has existing connections to sewer and drainage facilities, and is served by Los Angeles Fire Department, Fire Station 27 (1327 Cole Avenue – 1.0 miles from Project Site) and the Los Angeles Police Department, Hollywood Division (1358 N. Wilcox Avenue – 0.9 miles from Project Site).

3. ***The steepness of the topography of the various parts of the area, and the suitability of the geology of the area for development.***

Complies. The Project Site is located on a sloping site improved with an existing residential building and surrounding by other multi-family residential buildings and is therefore suitable for the development of multi-family residential uses. A full seismic hazard study has been conducted on the site including trenching required for a project in an Alquist-Priolo Zone and has cleared the Project Site for development by LADBS.

Additional low and moderate-income housing is needed in all parts of this Community. Density bonuses for provision of such housing through Government Code 65915 may be granted in the Low-Medium I or less restrictive residential categories.

Complies. The Proposed Project is in an area designated for High Density Residential uses and surrounding by other medium- and high-density residential development. The Proposed Project is using Government Code 65915 to achieve development waivers that will produce 67 new affordable senior housing units in the Hollywood Community Plan Area.

c) Conflict with any applicable habitat conservation plan or natural community conservation plan?

No Impact. As previously stated in **Section 4, Biological Resources**, the Project Site is not located with the confines of a Habitat Conservation Plan, Natural Community Conservation Plan, or SEA. Therefore, the Proposed Project would not conflict with the provisions of an applicable habitat conservation plan or natural community conservation plan. No impacts would occur, and no further analysis is required.

11. MINERAL RESOURCES

Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The Project Site subject to the applicable land use and zoning requirements in the LAMC, particularly Chapter 1, General Provisions and Zoning (City of Los Angeles Planning and Zoning Code), it is subject to development standards for the various districts in the City of Los Angeles. The Project Site is zoned [Q]R4-2, and thus is not zoned for oil extraction and drilling, or mining of mineral resources[90], and there are no such sites at the Project Site. Further, the Project Site is not located in an identified Mineral Resource Zone in the City of Los Angeles General Plan Conservation Element.[91]

The project would involve the development of an age-restricted residential building, and would not involve any new oil or mineral extraction activities. Therefore, development of the project would not result in the loss of availability of a mineral resource that would be of value to the residents of the state or a locally-important mineral resource, or mineral resource recovery site, as delineated on a local general plan, specific plan, or land use plan. Thus, no impact associated with mineral resources would occur.

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. See response to **Section 11(a)**, above.

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90 *Sites with known mineral resources are generally known as Mineral Resource Zones (MRZ), as classified by the California Geologic Survey (CGS).*

91 *City of Los Angeles, Conservation Element Exhibit A Mineral Resources Map, http://planning.lacity.org/cwd/gnlpln/consvelt.pdf.*

12. NOISE

Introduction to Noise

Characteristics of Sound

Sound can be described in terms of its loudness (amplitude) and frequency (pitch). The standard unit of measurement for sound is the decibel, abbreviated dB. Because the human ear is not equally sensitive to sound at all frequencies, the A-weighted scale (dBA) is used to reflect the normal hearing sensitivity range of the human ear. On this scale, the range of human hearing extends from approximately 3 to 140 dBA. **Table V-15, A-Weighted Decibel Scale** provides examples of A-weighted noise levels from common sources.

Table V-15
A-Weighted Decibel Scale

Typical A-Weighted Sound Levels	Sound Level (dBA, L_{eq})
Threshold of Pain	140
Jet Takeoff at 100 Meters	125
Jackhammer at 15 Meters	95
Heavy Diesel Truck at 15 Meters	85
Conversation at 1 Meter	60
Soft Whisper at 2 Meters	35

Source: United States Occupational Safety & Health Administration, Noise and Hearing Conservation Manual, 1999.

Noise Definitions

This noise analysis discusses sound levels in terms of Equivalent Noise Level (L_{eq}) and Community Noise Equivalent Level (CNEL).

Equivalent Noise Level

L_{eq} represents the average noise level on an energy basis for a specific time period. Average noise level is based on the energy content (acoustic energy) of sound. For example, the L_{eq} for one hour is the energy average noise level during that hour. L_{eq} can be thought of as a continuous noise level of a certain period equivalent in energy content to a fluctuating noise level of that same period. L_{eq} is expressed in units of dBA.

Community Noise Equivalent Level

CNEL is an adjusted noise measurement scale of average sound level during a 24-hour period. Due to increased noise sensitivities during evening and night hours, human reaction to sound between 7:00 PM and 10:00 PM is as if it were actually 5 dBA higher than had it occurred between 7:00 AM and 7:00 PM From 10:00 PM to 7:00 AM, humans perceive sound as if it were 10 dBA higher. To account for these sensitivities, CNEL figures are obtained by adding an additional 5 dBA to evening noise levels between 7:00 PM and 10:00 PM and 10 dBA to nighttime noise levels between 10:00 PM and 7:00 AM Because of this, 24-hour CNEL figures are always higher than their corresponding actual 24-hour averages.

Effects of Noise

The degree to which noise can impact an environment ranges from levels that interfere with speech and sleep to levels that can cause adverse health effects. Most human response to noise is subjective. Factors that influence individual responses include the intensity, frequency, and pattern of noise; the amount of background noise present; and the nature of work or human activity exposed to intruding noise.

According to the National Institute of Health (NIH), extended or repeated exposure to sounds at or above 85 dB can cause hearing loss. Sounds of 75 dBA or less, even after continuous exposure, are unlikely to cause hearing loss.[92] The World Health Organization (WHO) reports that adults should not be exposed to sudden "impulse" noise events of 140 dB or greater. For children, this limit is 120 dB.[93]

Exposure to elevated nighttime noise levels can disrupt sleep, leading to increased levels of fatigue and decreased work or school performance. For the preservation of healthy sleeping environments, the WHO recommends that continuous interior noise levels not exceed 30 dBA L_{eq}, and that individual noise events of 45 dBA or higher be limited.[94] Assuming an exterior to interior sound reduction of 15 dBA, continuous exterior noise levels should therefore not exceed 45 dBA L_{eq}. Individual exterior events of 60 dBA or higher should also be limited.

Some epidemiological studies have shown a weak association between long-term exposure to noise levels of 65-70 dBA L_{eq} and cardiovascular effects including ischaemic heart disease and hypertension. However at this time, the relationship is largely inconclusive.

92 National Institute on Deafness and Other Communication Disorders, www.nidcd.nih.gov/health/noise-induced-hearing-loss.

93 World Health Organization, Guidelines for Community Noise, 1999.

94 Ibid.

Audible Noise Changes

People with normal hearing sensitivity can recognize small perceptible changes in sound levels of approximately 3 dBA. Changes of at least 5 dBA can be readily noticeable and may cause community reactions. Sound level increases of 10 dBA or greater are perceived as a doubling in loudness and can provoke a community response.[95]

Noise levels decrease as the distance from noise sources to receivers increases. For each doubling of distance, noise from stationary sources, commonly referred to as "point sources," can decrease by approximately 6 dBA over hard surfaces (i.e., reflective surfaces such as parking lots) and 7.5 dBA over soft surfaces (i.e., absorptive surfaces such as soft dirt and grass). For example, if a point source produces a noise level of 89 dBA at a reference distance of 50 feet and over an asphalt surface, its noise level would be approximately 83 dBA at a distance of 100 feet, 77 dBA at 200 feet, etc. Noises generated by mobile sources decrease by approximately 3 dBA over hard surfaces and 4.5 dBA over soft surfaces for each doubling of distance.

Noise is most audible when traveling by direct line of sight, an unobstructed visual path between noise source and receptor. Barriers that break line of sight between sources and receivers, such as walls and buildings, can greatly reduce source noise levels allowing noise to reach receivers by diffraction only. As a result, sound barriers can reduce source noise levels by up to 20 dBA.[96] However, the effectiveness of barriers can be greatly reduced when they are not high or long enough to completely break line of sight from sources to receivers.

Regulatory Framework

Federal

Currently, no federal noise standards regulate environmental noise associated with short-term construction activities or the long-term operations of development projects. As such, temporary and long-term noise impacts produced by the Project would be largely regulated by and evaluated with respect to State and City of Los Angeles standards designed to protect public well-being and health.

95 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.

96 California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, September 2013.

Table V-16
State of California Noise/Land Use Compatibility Matrix

Land Use Category	Community Noise Exposure (dB, L_{dn} or CNEL)						
	55	60	65	70	75	80	
Residential - Low Density Single-Family, Duplex, Mobile Homes							
Residential - Multi-Family							
Transient Lodging - Motels Hotels							
Schools, Libraries, Churches, Hospitals, Nursing Homes							
Auditoriums, Concert Halls, Amphitheaters							
Sports Arena, Outdoor Spectator Sports							
Playgrounds, Neighborhood Parks							
Golf Courses, Riding Stables, Water Recreation, Cemeteries							
Office Buildings, Business Commercial and Professional							
Industrial, Manufacturing, Utilities, Agriculture							

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.

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

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.

Clearly Unacceptable - New construction or development should generally not be undertaken.

Source: California Office of Planning and Research, General Plan Guidelines - Noise Element Guidelines (Appendix C), 2003.

State

State of California 2003 General Plan

The State's 2003 General Plan Guidelines establish county and city standards for acceptable exterior noise levels based on land use. These standards are incorporated into land use planning processes to prevent or reduce noise and land use incompatibilities. **Table V-16, State of California Noise/Land Use Compatibility Matrix,** illustrates State compatibility considerations between various land uses and exterior noise levels.

City of Los Angeles

Los Angeles Municipal Code

The City of Los Angeles Municipal Code (LAMC) contains a number of regulations that would apply to the Project's temporary construction activities and long-term operations. Section 41.40(a) would prohibit Project construction activities from occurring between the hours of 9:00 PM and 7:00 AM, Monday through Friday. Subdivision (c), below, would further prohibit such activities from occurring before 8:00 AM or after 6:00 PM on any Saturday, or on any Sunday or national holiday.

SEC.41.40. NOISE DUE TO CONSTRUCTION, EXCAVATION WORK—WHEN PROHIBITED.

(a) No person shall, between the hours of 9:00 PM and 7:00 AM of the following day, perform any construction or repair work of any kind upon, or any excavating for, any building or structure, where any of the foregoing entails the use of any power drive drill, riveting machine excavator or any other machine, tool, device or equipment which makes loud noises to the disturbance of persons occupying sleeping quarters in any dwelling hotel or apartment or other place of residence. In addition, the operation, repair or servicing of construction equipment and the job-site delivering of construction materials in such areas shall be prohibited during the hours herein specified. Any person who knowingly and willfully violates the foregoing provision shall be deemed guilty of a misdemeanor punishable as elsewhere provided in this Code.

(c) No person, other than an individual homeowner engaged in the repair or construction of his single-family dwelling shall perform any construction or repair work of any kind upon, or any earth grading for, any building or structure located on land developed with residential buildings under the provisions of Chapter I of this Code, or perform such work within 500 feet of land so occupied, before 8:00 AM or after 6:00 PM on any Saturday or national holiday nor at any time on any Sunday. In addition, the operation, repair, or servicing of construction equipment and the job-site

delivering of construction materials in such areas shall be prohibited on Saturdays and on Sundays during the hours herein specific…

Section 112.05 of the LAMC establishes noise limits for powered equipment and hand tools operated within 500 feet of residential zones. Of particular importance to Project construction would be subdivision (a), which institutes a maximum noise limit of 75 dBA for the types of construction vehicles and equipment that would be necessary for Project demolition and grading, especially. However, the LAMC goes on to note that these limitations would not necessarily apply if proven that the Project's compliance therewith would be technically infeasible despite the use of noise-reducing means or methods.

SEC. 112.05. MAXIMUM NOISE LEVEL OF POWERED EQUIPMENT OR POWERED HAND TOOLS

Between the hours of 7:00 AM and 10:00 PM, in any residential zone of the City or within 500 feet thereof, no person shall operate or cause to be operated any powered equipment or powered hand tool that produces a maximum noise level exceeding the following noise limits at a distance of 50 feet therefrom:

(a) 75 dBA for construction, industrial, and agricultural machinery including crawler-tractors, dozers, rotary drills and augers, loaders, power shovels, cranes, derricks, motor graders, paving machines, off-highway trucks, ditchers, trenchers, compactors, scrapers, wagons, pavement breakers, compressors and pneumatic or other powered equipment;

(b) 75 dBA for powered equipment of 20 HP or less intended for infrequent use in residential areas, including chain saws, log chippers and powered hand tools;

(c) 65 dBA for powered equipment intended for repetitive use in residential areas, including lawn mowers, backpack blowers, small lawn and garden tools and riding tractors.

Said noise limitations shall not apply where compliance therewith is technically infeasible. The burden of proving that compliance is technically infeasible shall be upon the person or persons charged with a violation of this section. Technical infeasibility shall mean that said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment.

Section 112.01 of the LAMC would prohibit any amplified noises, especially those from outdoor sources (e.g., outdoor speakers, stereo systems, etc.) from exceeding the ambient noise levels of adjacent properties by more than 5 dBA. Amplified noises would also be prohibited from being audible at any distance greater than 150 feet from the Project's property line.

SEC.112.01. RADIOS, TELEVISION SETS, AND SIMILAR DEVICES

(a) It shall be unlawful for any person within any zone of the City to use or operate any radio, musical instrument, phonograph, television receiver, or other machine or device for the producing, reproducing or amplification of the human voice, music, or any other sound, in such a manner, as to disturb the peace, quiet, and comfort of neighbor occupants or any reasonable person residing or working in the area.

(b) Any noise level caused by such use or operation which is audible to the human ear at a distance in excess of 150 feet from the property line of the noise source, within any residential zone of the City or within 500 feet thereof, shall be a violation of the provisions of this section.

(c) Any noise level caused by such use or operation which exceeds the ambient noise level on the premises of any other occupied property, or if a condominium, apartment house, duplex, or attached business, within any adjoining unit, by more than five (5) decibels shall be a violation of the provisions of this section.

Section 112.02(a), below, would prevent Project HVAC systems and other mechanical equipment from elevating ambient noise levels at neighboring residences by more than 5 dBA.

SEC.112.02. AIR CONDITIONING, REFRIGERATION, HEATING, PLUMBING, FILTERING EQUIPMENT

(a) It shall be unlawful for any person, within any zone of the city, to operate any air conditioning, refrigeration or heating equipment for any residence or other structure or to operate any pumping, filtering or heating equipment for any pool or reservoir in such manner as to create any noise which would cause the noise level on the premises of any other occupied property … to exceed the ambient noise level by more than five decibels.

L.A. CEQA Thresholds Guide

In 2006, the City released the L.A. CEQA Thresholds Guide to provide further guidance for the determination of significant construction and operational noise impacts. According to the Guide, a Project would, under normal circumstances, have a significant impact if:

- *Construction activities lasting more than one day would exceed existing ambient exterior noise levels by 10 dBA or more at a noise sensitive use;*
- *Construction activities lasting more than 10 days in a three month period would exceed existing ambient exterior noise levels by 5 dBA or more at a noise sensitive use; or*

- *Construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or at any time on Sunday.*

For a Project's operational impacts:

- *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…*

- *Any 5 dBA or greater noise increase.*

These "normally unacceptable" and "clearly unacceptable" categories refer to those outlined by the State's noise and land-use compatibility chart, shown in **Table V-16**.

Thresholds of Significance

Would the project would result in:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact with Mitigation.

Existing Conditions

The Project site is surrounded primarily by multi-family land uses to the north, east, and south. West of the Project site is a school and senior citizen center. According to the L.A. CEQA Thresholds Guide, land uses sensitive to noise include residences, transient lodgings, schools, libraries, churches, hospitals, nursing homes, auditoriums, concert halls, amphitheaters, playgrounds, and parks. The following receptors were chosen specifically for detailed construction noise impact analysis given their potential sensitivities to noise and their proximity to the Project site:

<u>Canyon Co-Op School</u>

This school is located at 1820 N. Las Palmas Avenue, west of the Project site and near the intersection of Franklin Avenue and Las Palmas Avenue.

<u>Las Palmas Senior Citizen Center</u>

This receptor is also located at 1820 N. Las Palmas Avenue.

Franklin Avenue Residences

These multi-family residential receptors are located north of the Project site along Franklin Avenue.

Cherokee Avenue Residences

These multi-family residential receptors are located to the south and east of the Project site along Cherokee Avenue.

Short-term noise readings were taken at locations surrounding the Project site to help determine these receptors' ambient noise conditions. For all noise monitoring locations, ambient noise was primarily attributable to vehicle traffic along Franklin Avenue. Ambient noise levels for all Project receptors are shown in **Table V-17, Existing Ambient Noise Levels** for reference.

Table V-17
Existing Ambient Noise Levels

Sensitive Receptor	Existing Ambient Noise Level (dBA L_{eq})
Canyon Co-Op School	66.7
Las Palmas Senior Citizen Center	66.7
Franklin Avenue Residences	66.3
Cherokee Avenue Residences	59.5
Valle Verde Courtyard Mobile Home Park	50.0
Source: DKA Planning, 2016, Appendix F	

Construction

During all construction phases, noise-generating activities could occur at the Project site between the hours of 7:00 AM and 9:00 PM Monday through Friday, in accordance with Section 41.40(a) of the LAMC. On-site activities could include the use of heavy equipment such as excavators and loaders, as well as smaller equipment such as saws, hammers, and pneumatic tools. Off-site secondary noises could be generated by sources such as construction worker vehicles, vendor deliveries, and haul trucks.

Noises from demolition and grading activities are typically the foremost concern when evaluating a project's construction noise impacts, as these activities often require the use of heavy-duty, diesel-powered earthmoving equipment. The types of heavy equipment required for these activities may include excavators, bulldozers, front-end loaders, graders, backhoes, and scrapers.

For this Project, demolition and grading noise impacts were modeled using the noise reference levels of excavators and front-end loaders, as these vehicles would be utilized extensively to demolish and grade for the Project. Excavators can produce average peak noise levels of 81 dBA at a reference distance of 50 feet; front-end loaders, 79 dBA.97 Compounding their noise impacts is the fact that these vehicles commonly operate in tandem. Excavators remove soils and demolished materials, and front-end loaders transport this matter to on-site stockpiles or haul trucks for off-site export. As a result, excavators and front-end loaders have the greatest potential to cause sustained and significant noise impacts at nearby receptors. The impacts of other construction equipment and vehicles would be neither as loud nor as extensive over the duration of the Project's demolition, grading, and other phases. Therefore, this analysis examines a worst-case-scenario; the noise impacts of all other construction equipment and phases would not exceed the impacts analyzed here. The projected noise impact from excavators and front-end loaders are shown in **Table V-18, Construction Noise Levels - Unmitigated** and summarized below.

Table V-18
Construction Noise Levels - Unmitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, L_{eq})	New Ambient (dBA, L_{eq})	Increase
Canyon Co-Op School	50	74.1	66.7	74.9	8.2
Las Palmas Senior Citizen Center	15	74.1	66.7	74.9	8.2
Franklin Avenue Residences	80	75.1	66.3	75.6	9.3
Cherokee Avenue Residences	5	79.1	59.5	79.2	19.7

Source: DKA Planning, 2016. Appendix F

Canyon Co-Op School

This school is projected to experience exterior noise levels of up to 74.9 dBA as a result of the Project's demolition and grading activities, an increase of 8.2 dBA over existing ambient noise conditions. This would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.

97 Federal Highway Administration, Construction Noise Handbook, 2006.

Las Palmas Senior Citizen Center

This receptor is projected to experience exterior noise levels of up to 74.9 dBA as a result of the Project's demolition and grading activities, an increase of 8.2 dBA over existing ambient noise conditions. This would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.

Franklin Avenue Residences

These receptors are projected to experience exterior noise levels of up to 75.6 dBA as a result of the Project's demolition and grading activities, an increase of 9.3 dBA over existing ambient noise conditions. This would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.

Cherokee Avenue Residences

These receptors are projected to experience exterior noise levels of up to 79.2 dBA as a result of the Project's demolition and grading activities, an increase of 19.7 dBA over existing ambient noise conditions. This would exceed the 5 dBA noise increase threshold considered to be a significant impact by the L.A. CEQA Thresholds Guide for construction activities lasting more than ten days in a three month period.

As discussed above, Canyon Co-Op School, Las Palmas Senior Citizen Center, Franklin Avenue Residences, and Cherokee Avenue Residences could all experience construction-related noise increases in excess of 5 dBA. However, these noise increases could be reduced to below 5 dBA by the use of temporary noise barriers and other methods. Additionally, construction equipment source noise levels for excavators and front-end loaders would exceed LAMC Section 112.05's 75 dBA limit for powered construction equipment operating within 500 feet of residential zones. This impact could also be reduced by the use of temporary noise barriers and other methods. As a result, the Project's construction noise impact would be considered significant but mitigable. Mitigation Measures **NOI-MM-1** through **NOI-MM-3** are recommended to reduce the Project's contribution to off-site increases in noise levels and limit construction source noise levels to below 75 dBA.

With regard to off-site construction-related noise impacts, grading activities would necessitate an estimated 25 haul trips per work day to export excavated soils from the

Project site to regional landfills. While this vehicle activity would marginally increase ambient noise levels along the haul route, it would not be expected to significantly increase ambient noise levels by 5 dBA or greater at any noise sensitive land uses. According to the L.A. CEQA Thresholds Guide, a 3 dBA increase in roadway noise levels requires an approximate doubling of roadway traffic volume, assuming that travel speeds and fleet mix remain constant. Though the addition of haul trucks would alter the fleet mix of the Project haul route, their minimal addition to local roadways would not nearly double those roads' traffic volumes, let along augment their traffic to levels capable of producing 5 dBA ambient noise increases. As a result, off-site construction noise impacts related to haul trips would be considered less than significant.

Mitigation Measures **NOI-MM-1** through **NOI-MM-3** would reduce the Project's construction-related ambient noise level increases to below thresholds of significance at Canyon Co-Op School, Las Palmas Senior Citizen Center, Franklin Avenue Residences, and Cherokee Avenue Residences. These measures would also reduce the Project's on-site construction source noises to below the LAMC's 75 dBA limit for powered equipment operations within 500 feet of residential zones.

Table V-19
Construction Noise Levels - Mitigated

Sensitive Receptor	Distance from Site (feet)	Maximum Construction Noise Level (dBA)	Existing Ambient (dBA, Leq)	New Ambient (dBA, Leq)	Increase
Canyon Co-Op School	50	61.1	66.7	67.8	1.1
Las Palmas Senior Citizen Center	15	66.1	66.7	69.4	2.7
Franklin Avenue Residences	80	62.1	66.3	67.7	1.4
Cherokee Avenue Residences	5	61.1	59.5	63.4	3.9

Source: DKA Planning, 2016.Appendix F

Operation

During Project operations, the development would produce noise from both on- and off-site sources. The direct on-site sources would include the following:

Mechanical Equipment

Regulatory compliance with LAMC Sec.112.02 would ultimately ensure that noises from sources such as heating, air conditioning, and ventilation systems not increase ambient noise levels at neighboring occupied properties by more than 5 dBA. Given this

regulation, ambient noise levels, and the relatively quiet operation of modern HVAC systems, these on-site noise sources would not be capable of causing the ambient noise levels of nearby uses to increase by 3 dBA CNEL to or within their respective L.A. CEQA Thresholds Guide's "normally unacceptable" or "clearly unacceptable" noise categories, or by 5 dBA or greater overall.

Residential Land Uses

Noise from recurrent activities (e.g., conversation, consumer electronics, dog barking) and non-recurrent activities (e.g., social gatherings) would elevate ambient noise levels to differing degrees. The City's noise ordinance would provide a means to address nuisances related to residential noises.

Auto-Related Activities

Operational noises related to the proposed onsite parking would include intermittent noise events such as door slamming and vehicle engine start-ups. However, these noise events are infrequent and do not substantially increase ambient noise levels, especially considering that the Project is located along a thoroughfare in an area with many similar types of multi-family residential land uses with their own auto-related noises. Furthermore, the majority of the Project's parking would be underground. Noises from the Project's underground parking level would be inaudible, or at the very least considerably attenuated, at nearby receptors. And as the Project's ground level parking would be internal and covered, noises from this parking area would similarly be either inaudible or greatly reduced. Existing parking spaces to remain as a part of the proposed Project would not contribute to increases in ambient noise.

The impact potential of these on-site operational noise sources would be considered less than significant.

The majority of the Project's operational noise impacts would be from off-site mobile sources associated with its net new daily trips. On a typical weekday, the Project is forecast to generate an estimated 14 new AM peak hour trips and 17 new PM peak hour trips.[98] These vehicle trips would not be capable of doubling the traffic volumes of any nearby roadway, and no roadway segment would experience a noise increase of at least 3 dBA as a result. These additional trips would have a nominal impact on surrounding

98 Linscott, Law & Greenspan, Engineers; Technical Memorandum – Montecito Senior Housing Project; October 2016.

roadways. The Project's off-site operational noise impact would be considered less than significant.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less than significant impact.

Introduction to Vibration

Characteristics of Vibration

Vibration is an oscillatory motion through a solid medium in which the motion's amplitude can be described in terms of displacement, velocity, and acceleration. Unlike noise, vibration is not a common environmental problem, as it is unusual for vibration from vehicle sources to be perceptible. Common sources of vibration include trains, construction activities, and certain industrial operations.

Vibration Definitions

This noise analysis discusses vibration in terms of Peak Particle Velocity (PPV).

Peak Particle Velocity

PPV is commonly used to describe and quantify vibration impacts to buildings and other structures. PPV levels represent the maximum instantaneous peak of a vibration signal and are usually measured in inches per second.[99]

Effects of Vibration

High levels of vibration may cause physical personal injury or damage to buildings. However, ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can disrupt concentration or disturb sleep. Ground-borne vibration can also interfere with certain types of highly sensitive equipment and machines, especially imaging devices used in medical laboratories.

99 California Department of Transportation, Transportation and Construction Vibration Guidance Manual, September 2013.

Perceptible Vibration Changes

Unlike noise, ground-borne vibration is not an environmental issue that most people experience every day. Background vibration levels in residential areas are usually well below the threshold of perception for humans, approximately 0.01 inches per second.[100] Perceptible indoor vibrations are most often caused by sources within buildings themselves, such as slamming doors or heavy footsteps. Common outdoor sources of ground-borne vibration include construction equipment, trains, and traffic on rough or unpaved roads. Traffic vibration from smooth and well-maintained roads is typically not perceptible.

Regulatory Framework

Federal

For the evaluation of construction-related vibration impacts, state standards set by the California Department of Transportation (Caltrans) are used given the absence of Federal, County, and City standards specific to construction activities.

California Department of Transportation

In 2013, the California Department of Transportation (Caltrans) published the Transportation and Construction Vibration Guidance Manual to aid in the estimation and analysis of vibration impacts. Typically, potential building and structural damages are the foremost concern when evaluating the impacts of construction-related vibrations. **Table V-20, Caltrans Building Damage Vibration Guidelines** summarizes Caltran's vibration guidelines for building and structural damage.

100 Ibid.

Table V-20
Caltrans Building Damage Vibration Guidelines

Structure and Condition	Significance Thresholds (in/sec PPV)	
	Transient Sources	Continuous / Frequent/ Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Source: California Department of Transportation, 2013.

Construction

As discussed earlier, construction of the proposed Project would require equipment such as excavators and loaders. These types of heavy-duty vehicles can produce peak vibration velocities of up to 0.089 inches per second at a distance of 25 feet.[101] **Table V-21, Building Damage Vibration Levels at Off-Site Structures – Unmitigated**, shows the Project's projected construction vibration impacts at the nearest off-site structures. No receptor would experience potentially damaging levels of ground-borne vibration from the Project's construction activities. As a result, the Project's construction vibration impacts would be considered less than significant.

Table V-21
Building Damage Vibration Levels at Off-Site Structures - Unmitigated

Off-Site Structures	Distance to Project Site (ft.)	Estimated PPV (in/sec)	Structural Significance Threshold (in/sec)	Significant?
Canyon Co-Op School	50	0.045	0.5	No
Las Palmas Senior Citizen Center	15	0.148	0.5	No
Franklin Avenue Residences	80	0.028	0.5	No
1847 N Cherokee Avenue Residences	5	0.445	0.5	No

Source: DKA Planning 2016.Appendix F

Note: On-Site sensitive receptors could be as close as a similar distance to the receptors at 1847 N Cherokee. Although on-site receptors are not required to be analyzed under CEQA, the impacts at these receptors would be similar to the impacts experienced at the neighboring 1847 N Cherokee residences.

101 Federal Transit Administration, Transit Noise and Vibration Impact Assessment, 2006.

Operation

During Project operations, there would be no significant stationary sources of ground-borne vibration, such as heavy equipment or industrial operations. Operational ground-borne vibration in the Project's vicinity would be generated by its related vehicle travel on local roadways. As previously discussed, road vehicles rarely create vibration levels perceptible to humans unless road surfaces are poorly maintained and have potholes or bumps. Project-related traffic would expose nearby land uses and other sensitive receptors to vibrations far below levels associated with human annoyance or land-use disruption. As a result, the Project's long-term vibration impacts would be considered less than significant.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than significant. The majority of the Project's long-term noise impacts would come from traffic traveling to and from the Project. This, the addition of future traffic from any new developments in the Project area, and overall ambient traffic growth would elevate ambient noise levels surrounding local roadways. Though the Project's traffic would contribute to cumulative increases in ambient noise, its individual impact would be negligible. The Project's minimal amount of traffic would not considerably add to ambient noise levels along any nearby roadways. As a result, the Project's cumulative operational noise impact would be considered less than significant by the City's L.A. CEQA Thresholds Guide.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less than significant. As discussed earlier, construction activities would temporarily increase ambient noise levels at nearby receptors. Any other future developments that are built noise levels. However, given the relatively high ambient noise levels along Franklin Avenue, it is unlikely that construction noises from concurrent developments would be audible at Project receptors, let alone capable of contributing to cumulatively considerable noise increases. Persistent traffic noise would mask any distant construction sounds in a manner largely similar to the effects of white noise, and the presence of numerous multi-story structures would further obstruct these sounds' line of sight travel. The Project's construction activities would not be expected to contribute substantially to any cumulative construction noise impacts.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. As previously discussed in response **8 e)**, the Project is not located within an airport land use plan or within two miles of a public or public use airport. The Project would have no impact on people residing or working in the Project area.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. As previously discussed in response **8 f)**, the Project site is not within the vicinity of a private airstrip. It would have no impact on people residing or working in the Project Area.

Mitigation Measures

The following mitigation measures shall be implemented to reduce Project noise impacts to less than significant levels.

NOI-MM-1 All powered construction equipment shall be equipped with exhaust mufflers or other suitable noise reduction devices capable of achieving a sound attenuation of at least 3 dBA.

NOI-MM-2 Temporary sound barriers capable of achieving a sound attenuation of at least 10 dBA shall be erected along the Project's northern and western boundaries to obstruct line of sight noise travel from the Project site to Canyon Co-Op School, Las Palmas Senior Citizen Center, and Franklin Avenue Residences.

NOI-MM-3 At the Project's eastern and southern boundaries, temporary sound barriers capable of achieving a sound attenuation of at least 15 dBA shall be erected to obstruct line of sight noise travel between the Project site and Cherokee Avenue Residences.

13. POPULATION AND HOUSING

Would the project:

a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. As previously discussed, the Project Site is located within the jurisdiction of SCAG. SCAG's mandated responsibilities include development plans and policies with respect to the region's population growth transportation programs, air quality, housing, and economic development. Specifically, SCAG is responsible for preparing the Regional Comprehensive Plan (RCP), the Regional Transportation Plan (RTP) and the Regional Housing Needs Assessment (RHNA), in coordination with other population employment, and housing projections for the regions and its subdivisions. In April 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan Sustainable Communities Strategy update (2016 RTP/SCS). The 2016 RTP/SCS presents the transportation vision for the region through the year 2040. It also includes projections of population, households, and employment through the horizon year. he Proposed Project is a 6-story infill senior housing development, consisting of 68 residential units (67 senior units and one on-site manager unit), recreation/open space areas, and a two-level subterranean parking garage. As an infill development, the project would not have indirect effects on growth through such mechanisms as the extension of roads and infrastructure, since the project would utilize the existing facilities.

The Project would develop 68 residential units in the City of Los Angeles. The Proposed Project could add up to 186 residents to the Plan area, based on the City's projected household density.[102] The Project Site is classified as "Residential" in the General Plan, a zoning classification that allows residential uses.

SCAG's growth forecasts from the 2012 RTP/ SCS are largely built off local growth forecasts from local governments like the City of Los Angeles. The 2012 RTP/SCS forecasts up to 3,991,700 persons; 1,455,700 households; and 1,817,700 jobs in the City of Los Angeles by 2020. The Draft 2012 RTP/SCS, released for public review on December

[102] There would be a total of 67 new senior housing units and one unit set aside for an on-site manager. Thus the number of potential new residents presented is a worst-case scenario, given that the senior housing units will in all likelihood be occupied by a maximum of two persons, and in many cases by a sole occupant. Census statistics show that average household size decreases with age, especially after age 45, and is below two persons per household for households over age 65. National Association of Home Builders 50+ Housing Council, *Approving 55+ Housing: Facts That Matter*, https://www.winchester.us/DocumentCenter/View/1182, accessed October 16, 2017.

4, 2015, accommodates 4,609,400 persons; 1,690,300 households; and 2,169,100 jobs by 2040.

The Project Site is located in the City's Hollywood Community Plan area. The Community Plan implements land use standards of the General Plan Framework at the local level. The Project is consistent with the City's projected growth capacity for the Community Plan area, which accommodated a projected population of 219,000 persons by 2010.[103] The City has not updated projections beyond 2010 for the Community Plan area.

Table V-22
SCAG 2012 Regional Transportation Plan Growth Forecast and Proposed Project Population Figures

Forecast Year	Population in City of Los Angeles	Proposed Project	Households in City of Los Angeles	Proposed Project	Employment in City of Los Angeles	Proposed Project
2008	3,770,500	186	1,309,900	68	35,900	0
2020	3,991,700		1,455,700		37,100	
2035	4,320,600		1,626,600		38,600	

Source: DKA Planning 2016 based on SCAG 2012 Regional Transportation Plan Growth Forecast. Assumes 2.74 persons per household per 2016 RTP/SCS.

As Shown in **Table V-22, SCAG 2012 Regional Transportation Plan Growth Forecast and Proposed Project Population Figures** the Project is well within the forecast growth assumptions. Further, the Proposed Project would not cause a substantial increase in population growth in the area and impacts would be considered less than significant, and no further analysis is required.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. No housing exists on the Project Site. The site is currently developed with a surface parking lot and an open courtyard. The Proposed Project would not result in the displacement of existing housing or displace a substantial number of people resulting in the construction of replacement housing elsewhere. The project will provide 68 new residential units. No impacts would occur, and no further analysis is required.

103 City of Los Angeles, *Hollywood Community Plan*, www.cityplanning.lacity.org/complan/pdf/hwdcptxt.pdf. 2014.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. See response to **Section 13(b)**, above. No further analysis is required.

14. PUBLIC SERVICES

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

i) Fire protection?

Less Than Significant Impact. A project would normally have a significant impact on fire protection if it requires the addition of a new fire station or the expansion, consolidation or relocation of an existing facility to maintain service. The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance and has the minimum fire flow required for the land use proposed. Pursuant to Section 507.3.3, Table 507.3.3, of the 2014 City of Los Angeles Fire Code, the maximum response distance between high density residential land uses and a LAFD fire station that houses an engine company or truck company is 1.5 miles or 2 miles, respectively. Minimum fire flow requirement for high-density residential land uses is 4,000 gallons per minute (gpm) from four adjacent hydrants flowing simultaneously.[104] If either of these distances were exceeded, all structures located in the applicable residential buildings would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance.

The Project Site is assigned to LAFD Operations West Bureau, Battalion 5 and is served by Fire Station 27 located at 1327 Cole Avenue, approximately one mile from the Project Site. Other fire stations within proximity to the Project Site include LAFD Fire Station 82, located at 5769 Hollywood Boulevard approximately 1.4 miles from the Project Site, and LAFD Fire Station 41, located at 1439 N. Gardner Street, approximately 1.6 miles from the Project Site.

The Proposed Project is a 6-story infill senior housing development, consisting of 68 residential units (67 senior units and one unit for an on-site manager), recreation/open space areas, and a two-level subterranean parking garage. The

[104] 2014 City of Los Angeles Fire Code, page 92

project would incorporate all applicable provisions of the LAMC Fire Code, including, but not limited to, installation of an automatic sprinkler system, smoke detectors, and a fire alarm system. Notwithstanding the above, implementation of the Proposed Project could result in an increase in calls for fire protection and emergency medical services.

The Proposed Project would increase the intensity of development on the site by adding new residential uses. The 68 new residential units, anticipated to generate up to approximately 186 residents[105], would be expected to increase the demand on existing fire protection and emergency services. The Proposed Project would be required to comply with the 2014 LAFC and any subsequent codes prior to the issuance of any construction permits, including the requirements for 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, etc.). As specified in Table 507.3.1 of the 2014 LAFC, a fire flow of 4,000 gpm from four adjacent fire hydrants, flowing simultaneously, with 20 pounds per square inch (psi) minimum residual pressure is required for high density residential structures located in a neighborhood commercial area.[106] Construction of the Proposed Project would require the installation and/or upgrade of the existing utilities on the site, including the water supply infrastructure. Thus, the infrastructure would be designed and constructed in accordance with the specifications included in the 2014 LAFC, including the fire flow requirements outlined in Section 507.

A fire flow test would be performed during the permit review period to determine if any utility improvements are needed on the site and/or for the surrounding area to ensure adequate fire flows and infrastructure pursuant to the 2014 LAFC. Pursuant to the LAFC, all required infrastructure improvements would be operational prior to construction and/or operation of the Proposed Project.

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105 There would be a total of 67 new senior housing units and one unit set aside for an on-site manager. Thus the number of potential new residents presented is a worst-case scenario, given that the senior housing units will in all likelihood be occupied by a maximum of two persons, and in many cases by a sole occupant. Census statistics show that average household size decreases with age, especially after age 45, and is below two persons per household for households over age 65. National Association of Home Builders 50+ Housing Council, *Approving 55+ Housing: Facts That Matter*, https://www.winchester.us/DocumentCenter/View/1182, accessed October 16, 2017.

106 City of Los Angeles Fire Code, Section 507 Fire Protection Water Supplies, Table 507.3.1.

Based on the above information, implementation of the Proposed Project would not result in any substantial adverse physical impacts associated with the provision of new or physically altered fire and/or emergency facilities and/or the need for new or physically altered fire and/or emergency facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable response times or other performance objectives.

In addition, with the site plan review **Regulatory Compliance Measure PS-RCM-1,** listed below, the project would have a less-that-significant impact on fire protection services. No further analysis is required.

Regulatory Compliance Measure

PS-RCM-1: The Project Applicant shall incorporate all recommendations of the Fire Department relative to fire safety into the building plans, which includes the submittal of a plot plan for approval by the Fire Department either prior to the recordation of a final map or the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant, and entrances to any dwelling units or guest room shall not be more than 150 feet in distance in horizontal travel from the edge of the roadway of an improved street or approved fire lane.

ii) Police protection?

Less Than Significant Impact. A significant impact may occur if the City of Los Angeles Police Department (LAPD) could not adequately serve a project, necessitating a new or physically altered station. The determination of whether the project results in a significant impact on police protection shall be made considering the following factors: (a) the population increase resulting from the Proposed Project, based on the net increase of residential units or square footage of non-residential floor area; (b) the demand for police services anticipated at the time of project buildout compared to the expected level of service available; and (c) whether the project includes security and/or design features that would reduce the demand for police services.

The Project Site is located in the Hollywood Area division of the LAPD's West Bureau. The Hollywood Area spans 17.2 square miles; the approximate borders

are Normandie Avenue on the east, West Hollywood on the west, Mulholland Drive on the north and Beverly Boulevard on the south. Neighborhoods served by the Hollywood Community Police Station include: Hollywood, Mount Olympus, Fairfax District (North of Beverly Boulevard), Melrose District, Argyle Avenue, and Los Feliz Estates. Besides the approximately 300,000 residents, the Hollywood Area attracts tourists from all over the world who visit famous sites depicted in television and the movies.[107] The Proposed Project would be served by the Hollywood Community Police Station, located at 1358 N. Wilcox Avenue, approximately 0.9 miles south of the Project Site. Within the Hollywood Area, the Proposed Project is located within Reporting District (RD) 636. RD. **Table V-23, Hollywood Area Police Station Crime Statistics**, below, shows the year to date crime statistics for the Hollywood Area Police Station service area.

Table V-23
Hollywood Area Crime Statistics

Type of Crime	2017[a]	2016[a]	2015[a]
Part I Crimes[b]			
Violent Crimes			
Homicide	2	4	7
Rape	113	99	96
Robbery	350	385	291
Aggravated Assault	469	425	416
Subtotal	**934**	**913**	**810**
Property Crimes			
Burglary	318	431	336
Motor Vehicle Theft	409	415	369
Burglary – Theft from Vehicle	1,414	1,136	953
Personal / Other	1,195	1,340	1,233
Subtotal	**3,336**	**3,322**	**2,891**
Total 'Part 1' Crimes	**4,270**	**4,235**	**3,701**
Part II Crimes[b]			
Child/Spousal Abuse	417	370	316
Shots Fired	28	36	25
Shooting Victims	15	15	11

a – year-to-date (comparative for previous years)
b – crime statistics are divided into categories to comply with the FBI's 'Uniform Crime Reporting Guidelines'.
Source: Los Angeles Police Department, Hollywood Los Angeles Area Profile, http://assets.lapdonline.org/assets/pdf/hwdprof.pdf, accessed September 20, 2017.

107 *Los Angeles Police Department, About Hollywood, website: http://www.lapdonline.org/hollywood_community_police_station/content_basic_view/1665, accessed April 28, 2017.*

Response times are an additional metric used by the LAPD to measure the adequacy of police service. Response time is defined as the total time from when a call requesting assistance is made until the time the first unit responds to the scene. Calls for police assistance are prioritized based on the type of call. Currently the LAPD's response time goal is seven minutes for high-priority calls and 40 minutes for non-emergency calls. The Hollywood Area Division is currently meeting this response time goal.

Implementation of the Proposed Project would result in an increase of residents and guests to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons would be anticipated to escalate as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Proposed Project would include adequate and strategically positioned functional and thematic lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited and, where possible, security controlled to limit public access. The building and layout design of the Proposed Project would also include crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and non-visible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. As such, the project residents would be able to monitor suspicious activity at the building entry points. These preventative and proactive security measures would decrease the amount of service calls to the LAPD.

With the implementation of the **Project Design Features SEC-PDF- 1 and SEC-PDF- 2,** and adherence to the **Regulatory Compliance Measure PS-RCM-2** identified below, the Proposed Project's potential impact upon LAPD services would be considered less than significant. No further analysis is necessary.

Project Design Features

SEC-PDF-1: The Applicant shall submit site plans and building plans as necessary to the LAPD Crime Prevention Unit to ensure the design incorporates building design standards that enhance police protection and meet *Design Out Crime* Guidelines. The project includes, but is not limited to, the following features:

- Natural surveillance: Physical features, activities, and people gathering areas are placed in a way that maximizes visibility.

- Mix of uses that provide good visual connection between uses, and no ambiguous unassigned spaces.
- Natural access control: Restricting or encouraging people to come into a space through the placement of entrances, exits, fencing, landscaping, and lighting, which provide nighttime vision for pedestrians, residents, and business people to permit pedestrians to see one another.
- Clear well-lit paths from the street to the development through parking and landscape areas and within the development to building entries.
- Territorial reinforcement: The establishment of the building perimeter creates physical attributes to define ownership and separate public and private spaces.

SEC-PDF-2: During construction, security measures shall be provided including security fencing, lighting, and locked entries around the construction zones.

Regulatory Compliance Measure

PS-RCM- 2: The project plans shall incorporate the Design Guidelines (defined in the following sentence) relative to security, semi-public and private spaces, which may include but not be limited to, access control to building, secured parking facilities, walls/fences with key systems, well-illuminated public and semi-public space designed with a minimum of dead space to eliminate areas of concealment, location of toilet facilities or building entrances in high-foot traffic areas, and provision of security guard patrol throughout the Project Site if needed, as outlined in "Design Out Crime Guidelines: Crime Prevention Through Environmental Design", published by the Los Angeles Police Department. Contact the Community Relations Division, located at 100 W. 1st Street, #250, Los Angeles, CA 90012; (213) 486-6000. These measures shall be approved by the Los Angeles Police Department prior to the issuance of building permits.

iii) Schools?

Less Than Significant Impact. The Project Site is located within the boundaries of the Los Angeles Unified School District (LAUSD). Implementation of the Proposed Project would result in the construction of 68 new residential units (67 senior units and one unit for an on-site manager) on the Project Site.

Due to the nature of the Proposed Project, a senior citizen housing development, it is not expected that a substantial number of students would be generated by implementation of the Project. Any generation of new students from the Proposed Project would likely be incidental and negligible. Impacts would be less than significant.

iv) Parks?

Less Than Significant Impact. A significant impact would occur if the recreation and park services available could not accommodate the projected population increase resulting from implementation of a project or if the Proposed Project resulted in the construction of new recreation and park facilities that create significant direct or indirect impacts to the environment.

The Public Recreation Plan (PRP), a portion of the Service Systems Element of the City of Los Angeles General Plan, provides standards for the provision of recreational facilities throughout the City and includes Local Recreation Standards. The desired long-range standard for local parks is based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. The Recreation Plan notes that these long-range standards may not be reached during the life of the plan, and, therefore, includes more attainable short- and intermediate-range standards of one (1) acre per 1,000 persons for neighborhood parks and one (1) acre per 1,000 persons for community parks, or two (2) acres per 1,000 people of combined neighborhood and community parks. It is important to note that these standards are Citywide goals and are not intended to be requirements for individual development projects. The Proposed Project is located within a highly developed area within the Hollywood Community Plan Area. As shown in **Table V-24**, **Recreation and Park Facilities within the Project Area** there are seven parks that equate to over 166 acres of parkland and public recreation facilities within a 2-mile radius of the Project Site.

Table V-24
Recreation and Park Facilities within the Project Area

Facility Name	Park Size	Distance from Project Site	Amenities
Las Palmas Senior Center	1.1 acres	0.05 mile	children's play area, multi-purpose field, auditorium, community room, stage
Yucca Community Center/ Yucca Park	0.6 acres	0.12 miles	basketball courts (lighted / outdoor), children's play area, picnic tables, soccer field (unlighted), community room, synthetic field
Selma Park	0.2 acres	0.37 miles	children's play area, benches, outdoor tables
Dorothy and Benjamin Smith Park	0.4 acres	0.42 miles	benches, sitting area
De Longpre Park	1.35 acres	0.65 miles	benches, children's play area
Runyon Canyon Park	160 acres	0.81 miles	children's play area, hiking trail, dog park
Hollywood Recreation Center Hollywood Pool	3.0 acres	0.95 miles	auditorium, basketball courts (lighted / outdoor), children's play area, community room, kitchen, multipurpose sports field, swimming pool

Source: City of Los Angeles Department of Recreation and Parks website, http://www.laparks.org/maplocator?cat_id=All&geo[radius]=10&geo[latitude]=34.1049725&geo[longitude]=-118.3350754&address=6650%20Franklin%20Ave,%20Los%20Angeles,%20CA%2090028,%20USA, accessed September 7, 2017.

The LAMC requires the Proposed Project to provide 5,440 square feet of open space. The Proposed Project would provide approximately 7,000 square feet of total open space and amenities on-site available to serve project residents and their guests. The Proposed Project would include a variety of on-site amenities including, but not limited to: courtyards, gardens and landscaping containing drought tolerant plants, outdoor seating and relaxing areas, and viewing decks. Therefore, the Proposed Project would achieve the required square feet of open space required by the LAMC.

As discussed in Checklist Question 13(a), it is estimated that the development of the Proposed Project would result in an increase of 186 new residents to the area. Based on the standard parkland ratio goal of 4-acres per 1,000 residents, the Proposed Project would generate a Citywide goal of serving such residents with approximately 0.74 acres of additional public parkland. The Proposed Project

would contribute towards the achievement of such goal through a combination of (1) on-site open space proposed within the project, (2) payment of applicable taxes in accordance with LAMC Section 21.10.3(a)(1), and (3) the availability of existing park and recreation facilities within the area.

In addition to the on-site open space provided within the Proposed Project, the Proposed Project is subject to a tax of $200 per dwelling unit pursuant to LAMC Section 21.10.3(a)(1) (Dwelling Unit Construction Tax). This tax, payable to the Department of Building and Safety, shall be deposited into a "Park and Recreational Sites and Facilities Fund" to be used exclusively for the acquisition and development of park and recreational sites. In accordance with LAMC Section 21.10.3(a)(1), this tax may be offset or reduced based on the amount of on-site open space and recreational amenities provided on-site. Therefore, under the City's mandatory Dwelling Unit Construction Tax, which is collected prior to a certificate of occupancy for residential land uses, per **Regulatory Compliance Measure PS-RMC-4**, the Proposed Project's impact upon parks and recreational facilities would be reduced to a less-than-significant level. No further analysis is necessary

Regulatory Compliance Measure

PS-RCM-4: Pursuant to Section 21.10 of the Los Angeles Municipal Code, the applicant shall pay the Dwelling Unit Construction Tax for construction of apartment buildings.

v) Other Public Facilities? - Libraries

Less Than Significant Impact. A significant impact would occur if the project includes substantial employment or population growth that could generate a demand for other public facilities (such as libraries), which would exceed the capacity available to serve the Project Site and the project area. Within the City of Los Angeles, the Los Angeles Public Library (LAPL) provides services at the Central Library, eight Regional Branch Libraries and 64 Community Branch Libraries. There are a total of three library facilities within two miles of the Project Site, the Frances Howard Goldwyn Hollywood Regional Library, the Will and Ariel Durant Branch Library and the Louie B. Mayer Branch Library. The closest facility is the Frances Howard Goldwyn Hollywood Regional Library located at 1623 Ivar Avenue, approximately 0.7 miles from the Project Site.

The need for public library services is generally calculated based on permanent population in a given area. As stated in **Section 13, Population and Housing,** the

Proposed Project includes 68 residential units which would generate approximately 186 new residents in the project area.[108]

The voters of the City of Los Angeles approved ballot Measure L in 2011, which amended the City Charter "… to incrementally increase the amount the City is required to dedicate annually from its General Fund to the Library Department to an amount equal to .0300 percent of the assessed value of all property in the City, and incrementally increase the Library Department's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs, in order to provide Los Angeles neighborhood public libraries with additional funding to help restore library service hours, purchase books and support library programs, subject to audits, using existing funds with no new taxes." Under the terms of Measure L, libraries will be required to pay for their own direct and indirect costs by July 2014.

Los Angeles public libraries are currently adequately funded by Measure L to purchase books, materials, and provide extra services through the public library system.[109] Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Proposed Project, which would increase with the new development. It is also anticipated that the Project would not conflict with the goals outlined in the Los Angeles General Plan, Los Angeles Public Library Strategic Plan 2015-2020, and the Palms–Mar Vista–Del Rey Community Plan.

Based on the above information, implementation of the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered library facilities and/or the need for new or physically altered library facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable response times or other performance objectives. Impacts would be less than significant, and no mitigation would be required.

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108 There would be a total of 67 new senior housing units and one unit set aside for an on-site manager. Thus the number of potential new residents presented is a worst-case scenario, given that the senior housing units will in all likelihood be occupied by a maximum of two persons, and in many cases by a sole occupant. Census statistics show that average household size decreases with age, especially after age 45, and is below two persons per household for households over age 65. National Association of Home Builders 50+ Housing Council, *Approving 55+ Housing: Facts That Matter*, https://www.winchester.us/DocumentCenter/View/1182, accessed October 16, 2017.

109 Measure L, Los Angeles Public Library

15. RECREATION

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

Less Than Significant Impact. Similarly to the discussion provided above in **Section 14(iv),** the Proposed Project would cause a less than significant impact on parks and/or recreational facilities. A significant impact to recreation would occur if the project would increase the use of existing neighborhood and regional parks or other recreational facilities to the point of substantial physical deterioration. The Proposed Project consists of the construction and operation of a senior living facility. With new residents in the area, there may be an increase use in the surrounding parks and recreational facilities. However, as mentioned in **Section 14(iv)**, the City's General Plan outlines a desired long-range standard for local parks based on two acres per 1,000 persons for neighborhood parks and two acres per 1,000 persons for community parks or four acres per 1,000 persons of combined neighborhood and community parks. In addition, the Proposed Project would provide approximately 7,000 square feet of total open space and amenities on-site.

b) **Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

Less Than Significant Impact. See response to **Section 14(iv)**, above.

16. TRANSPORTATION AND TRAFFIC

Would the project:

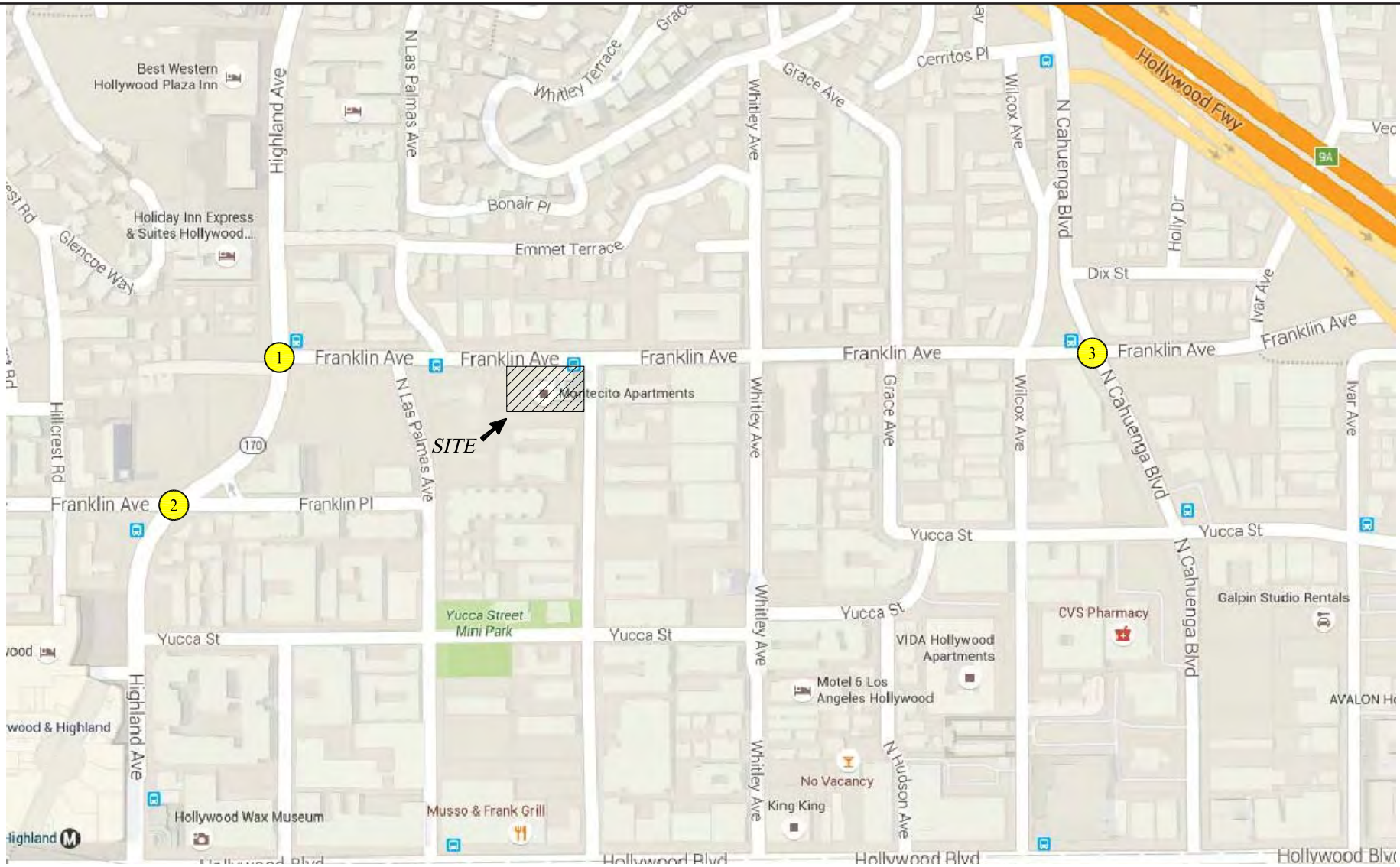
a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways, and freeways, pedestrian and bicycle paths, and mass transit??

Less Than Significant Impact The Proposed Project would provide a total of 68 new housing units (67 senior housing units and one on-site manager's unit). The following transportation and traffic analysis is based on the **Technical memorandum – Montecito Senior Housing Project (Traffic Study)** by Linscott Law and Greenspan Engineers (LLG), dated October 20, 2016. The Traffic Study was approved by the Los Angeles Department of Transportation (LADOT) in a memo dated January 26, 2017. Both documents are hereby incorporated by reference and included in the Initial Study as **Appendix G**.

The project study area, as defined through consultation with LADOT staff, includes the following study intersections:

1. Highland Avenue / N. Franklin Avenue
2. Highland Avenue / S. Franklin Avenue – Franklin Place
3. Cahuenga Boulevard / Franklin Avenue

The intersections selected for analysis were identified as they are located closest to the Project site, and therefore have the greatest potential to have adverse traffic impacts related to the project. Further away from the Project site, project-related traffic disperses, and thus, the potential for significant traffic impacts diminish. The existing lane configurations and traffic control devices at the study intersections are provided on **Figure V-1, Study Intersection Locations** and **Figure V-2, Existing Lane Configurations.**



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-1**

Study Intersection Locations

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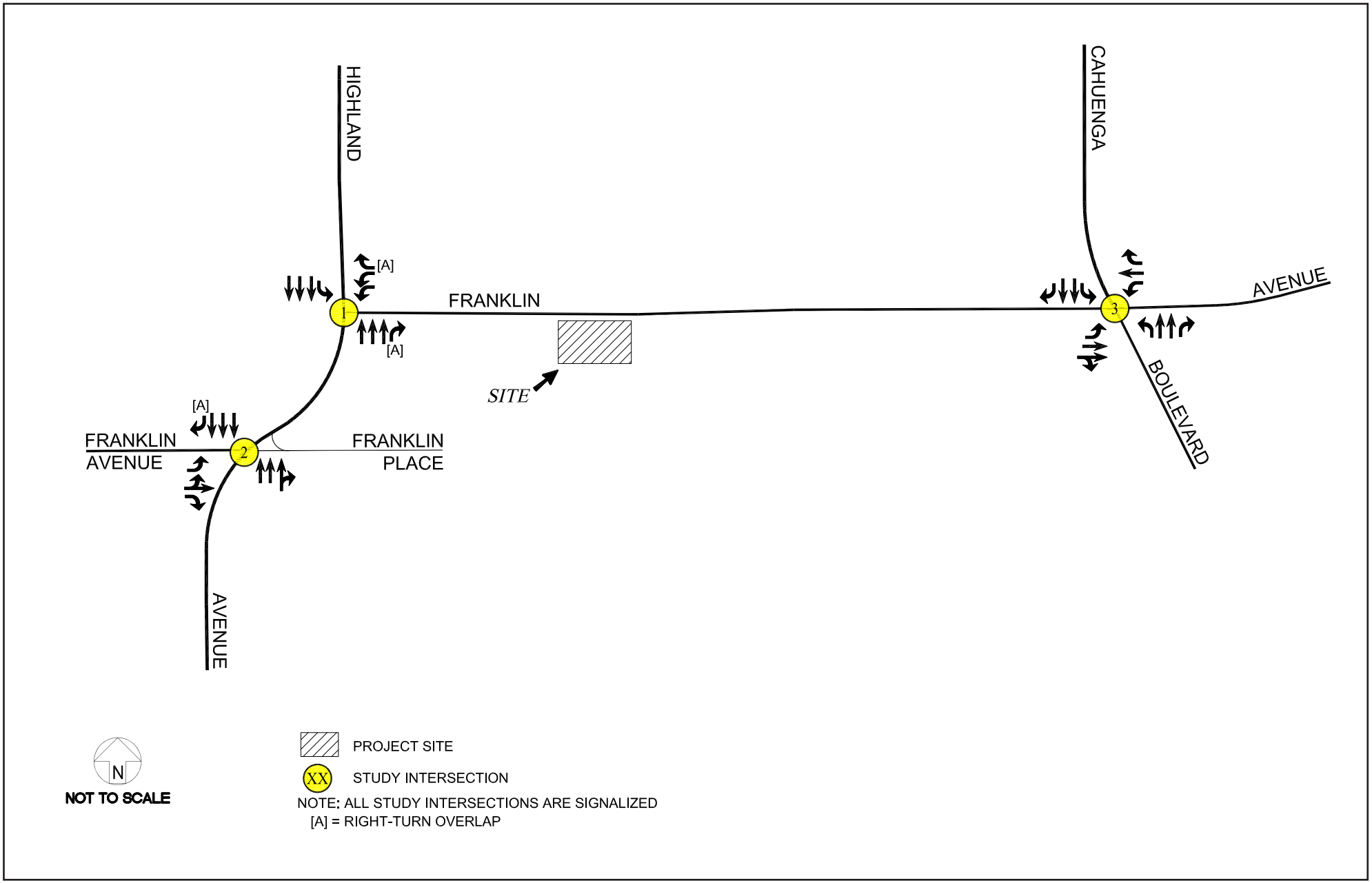

SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-2**

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Existing Lane Configurations

Project traffic impacts are analyzed for the weekday AM and PM peak-hour time periods at the study intersections. Traffic analysis in this section includes the following scenarios:

- Existing
- Existing with Project
- Future without Project
- Future with Project

LLG coordinated with Los Angeles Department of Transportation (LADOT) at the start of the traffic study to achieve consensus on assumptions such as study intersections, trip generation, and trip distribution. Manual traffic counts of vehicular turning movements were conducted during the week of May 9, 2016 at the study intersections during the weekday morning and afternoon commuter periods to determine the peak hour traffic volumes. The manual traffic counts at the study intersections were conducted from 7:00 AM to 10:00 AM to determine the AM peak commuter hour, and from 3:00 PM to 6:00 PM to determine the PM peak commuter hour. The existing peak hour volumes at each study intersection are shown on **Figure V-3, Existing Traffic Volumes, AM Peak Hour,** and **Figure V-4, Existing Traffic Volumes, PM Peak Hour**.

For analysis of Level of Service (LOS) at signalized intersections, LADOT has designated the Circular 212 Planning methodology as the desired tool. The concept of roadway level of service under the Circular 212 method is calculated as the volume of vehicles that pass through the facility divided by the capacity of that facility. A facility is "at capacity" (V/C of 1.00 or greater) when extreme congestion occurs. This volume/capacity ratio value is a function of hourly volumes, signal phasing, and approach lane configuration on each leg of the intersection.

Level of service (LOS) values range from LOS A to LOS F. LOS A indicates excellent operating conditions with little delay to motorists, whereas LOS F represents congested conditions with excessive vehicle delay. LOS E is typically defined as the operating "capacity" of a roadway. **Table V-25, Level of Service as a Function of CMA Values** defines the level of service criteria applied to the study intersections.

Table V-25
Level of Service as a Function of CMA Values

Level of Service	Description of Operating Characteristics	Range of CMA Values
A	Uncongested operations; all vehicles clear in a single cycle.	< 0.60
B	Same as above	>0.60<0.70
C	Light congestion; occasional backups on critical approaches.	>0.70<0.80
D	Congestion on critical approaches, but intersection functional. Vehicles required to wait through more than one cycle during short peaks. No long-standing lines formed.	>0.80<0.90
E	Severe congestion with some long-standing lines on critical approaches. Blockage of intersection may occur if traffic signal does not provide for protected turning movements.	>0.90<1.00
F	Forced flow with stoppages of long duration.	>1.00

Notes: CMA = Critical Movement Analysis; LOS = Level of Service
Source: LLG. 2017

Based on the existing traffic volumes and intersection geometries depicted in the Traffic Study, volume-to-capacity ratios and corresponding levels of service (LOS) were determined for the study intersections during the weekday AM and PM peak hours.

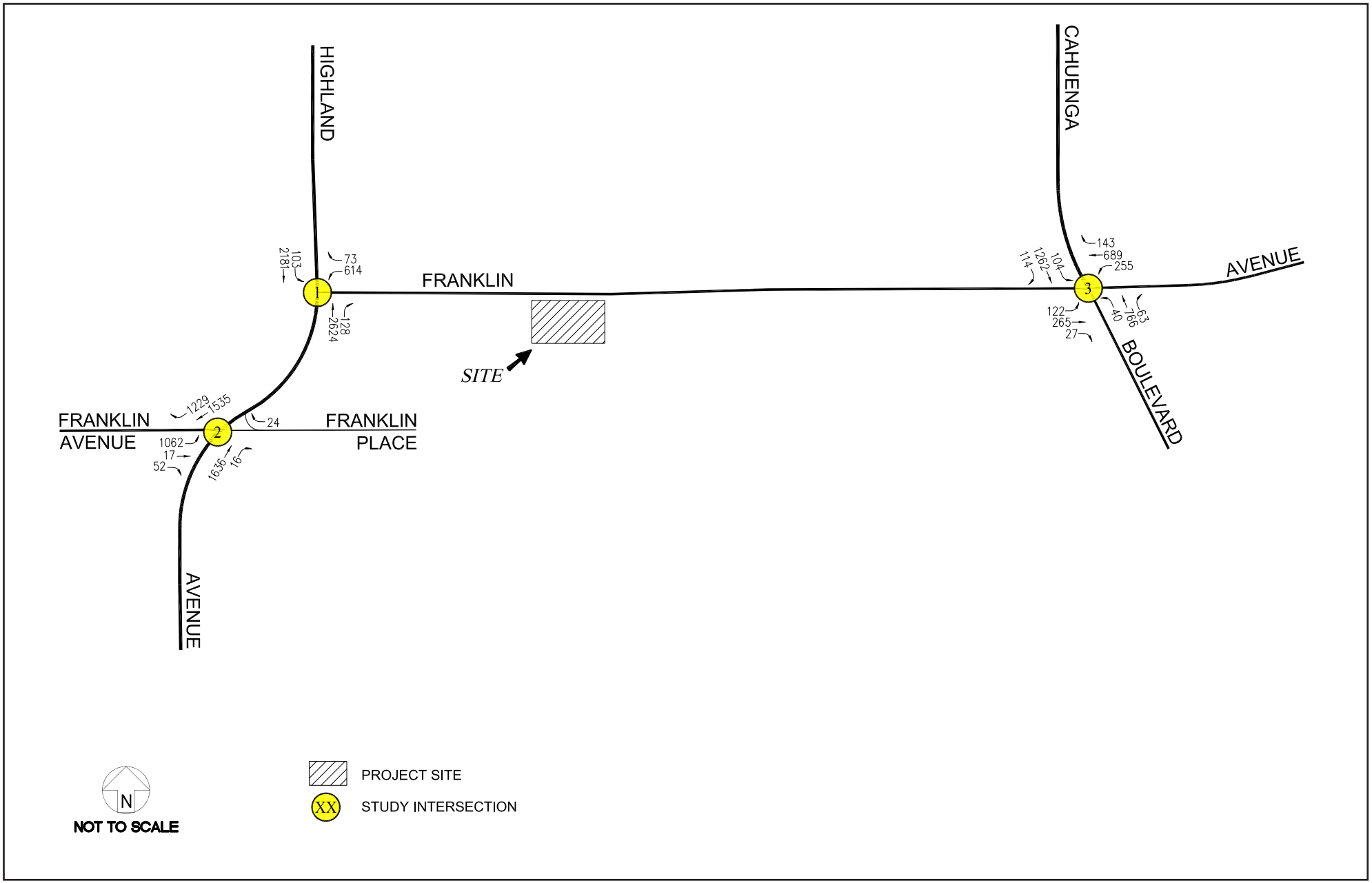
Traffic impacts are identified if a proposed development will result in a significant change in traffic conditions at a study intersection. A significant impact is typically identified if project-related traffic will cause service levels to deteriorate beyond a threshold limit specified by the overseeing agency. Impacts can also be significant if an intersection is already operating below an acceptable level of service and project related traffic will worsen conditions within the specified threshold range.

The City of Los Angeles Department of Transportation has established specific thresholds for project-related increases in the volume-to-capacity ratio (V/C) of signalized study intersections. The following increases in peak-hour V/C ratios are considered significant impacts

Table V-26
Significance Threshold

Level of Service	Final V/C	Project Related v/c increase
C	< 0.70 – 0.80	Equal to or greater than 0.040
D	< 0.80 – 0.90	Equal to or greater than 0.020
E and F	0.90 or more	Equal to or greater than 0.010

Note: Final V/C is the V/C ratio at an intersection considering impacts from the project, ambient growth, trips from area/cumulative projects, but without proposed traffic impact mitigations.



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-3**

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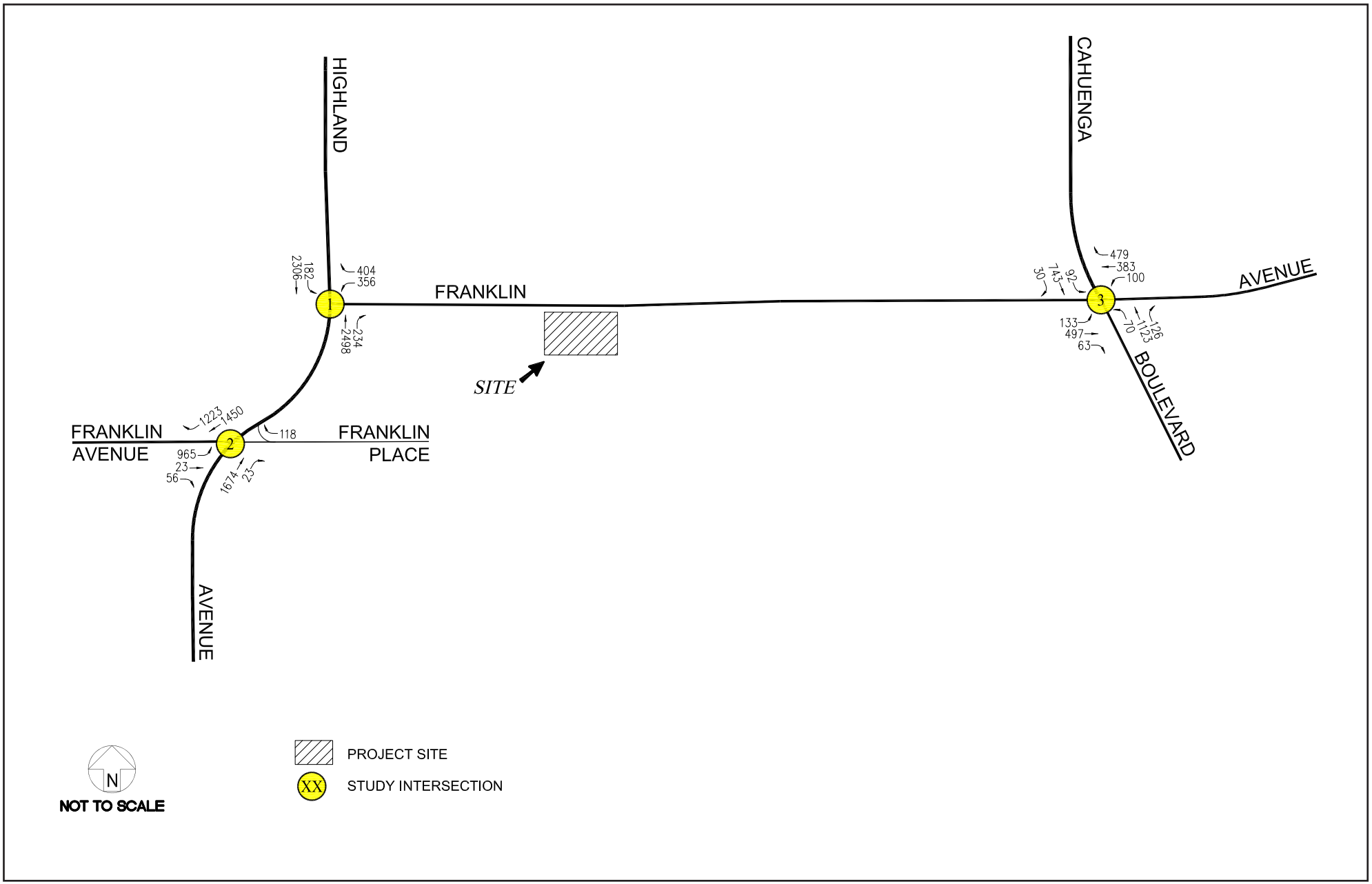
Existing Traffic Volumes AM Peak Hour



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-4**

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Existing Traffic Volumes PM Peak Hour

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Project Trip Generation

Traffic volumes expected to be generated by the proposed Project during the weekday AM and PM peak hours, as well as on a daily basis, were estimated using trip rates published in the ITE *Trip Generation* manual1. Trip generation rates for the Senior Adult Housing-Attached land use (ITE Land Use Code 252) were used to forecast the traffic volumes expected to be generated by the Project. The ITE Senior Adult Housing-Attached trip rates are based on the number of dwelling units proposed by the Project.

Table V-27, Project Trip Generation provides the trip generation forecast for the Project. As shown in **Table V-27,** the Project on a typical weekday is forecast to generate 234 net new daily trips (e.g., 117 inbound trips, 117 outbound trips), 14 net new AM peak hour trips (5 inbound trips and 9 outbound trips) and 17 net new PM peak hour trips (9 inbound trips and 8 outbound trips).

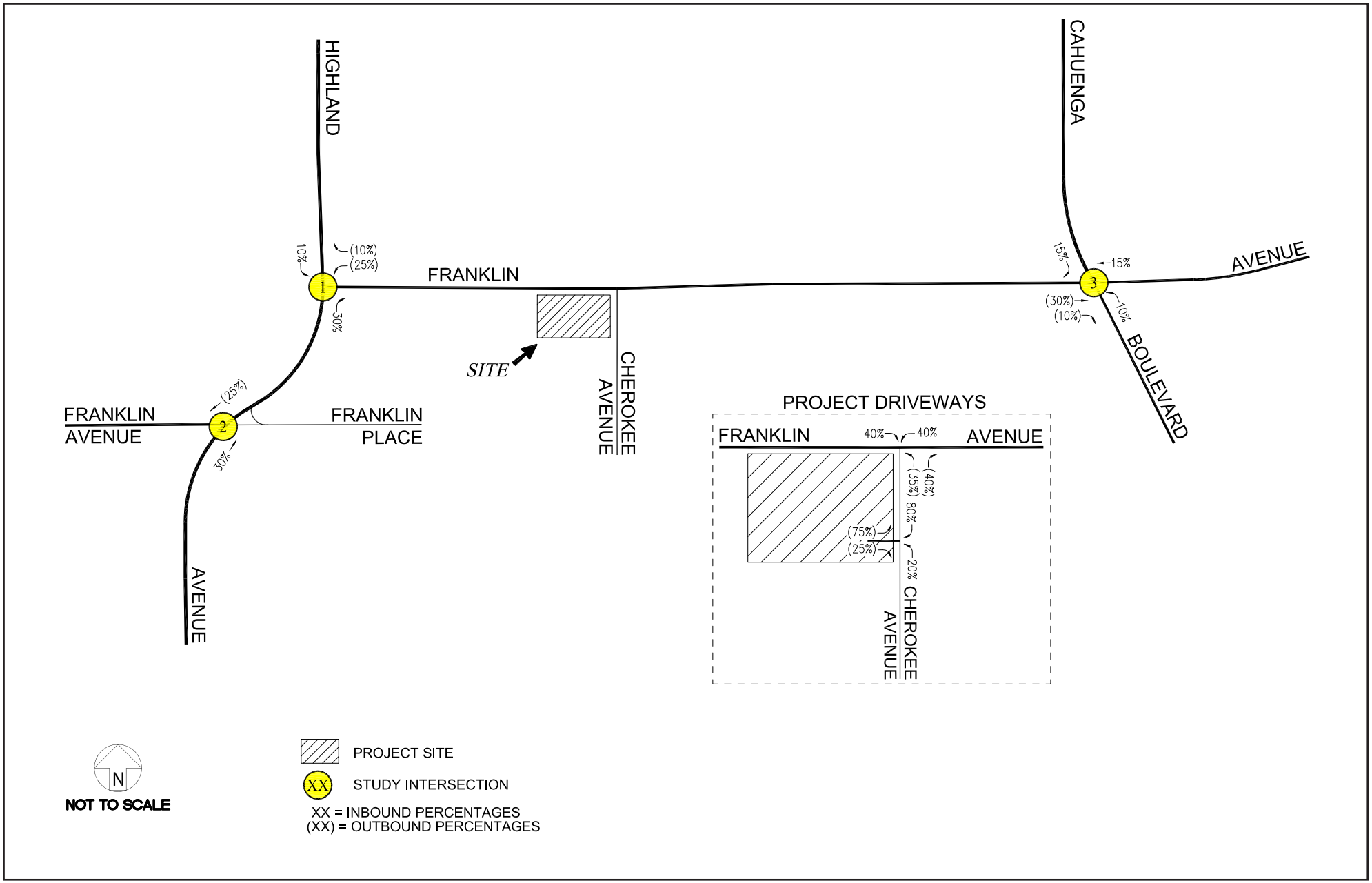
Table V-27
Project Trip Generation

Proposed Use	ITE Land Use	Size	Daily	AM Peak Hour			PM Peak Hour		
				I/B	O/B	Total	I/B	O/B	Total
Senior Apartments	252	68 du	234	5	9	14	9	8	17
Net Increase - Estimated Trips			**234**	**5**	**9**	**14**	**9**	**8**	**17**

Source: LLG. 2017

Project Trip Assignment

The weekday AM and PM commuter peak hour vehicle trips forecast to be generated by the Project were assigned to the study intersections. **Figure V-5, Project Trip Distribution** provides the vehicular trip distribution for the Project and **Figure V-6, Project Traffic Volumes, AM Peak Hour** and **Figure V-7, Project Traffic Volumes, PM Peak Hour** displays the forecast AM and PM peak hour Project-related trips at the study intersections.



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE V-5

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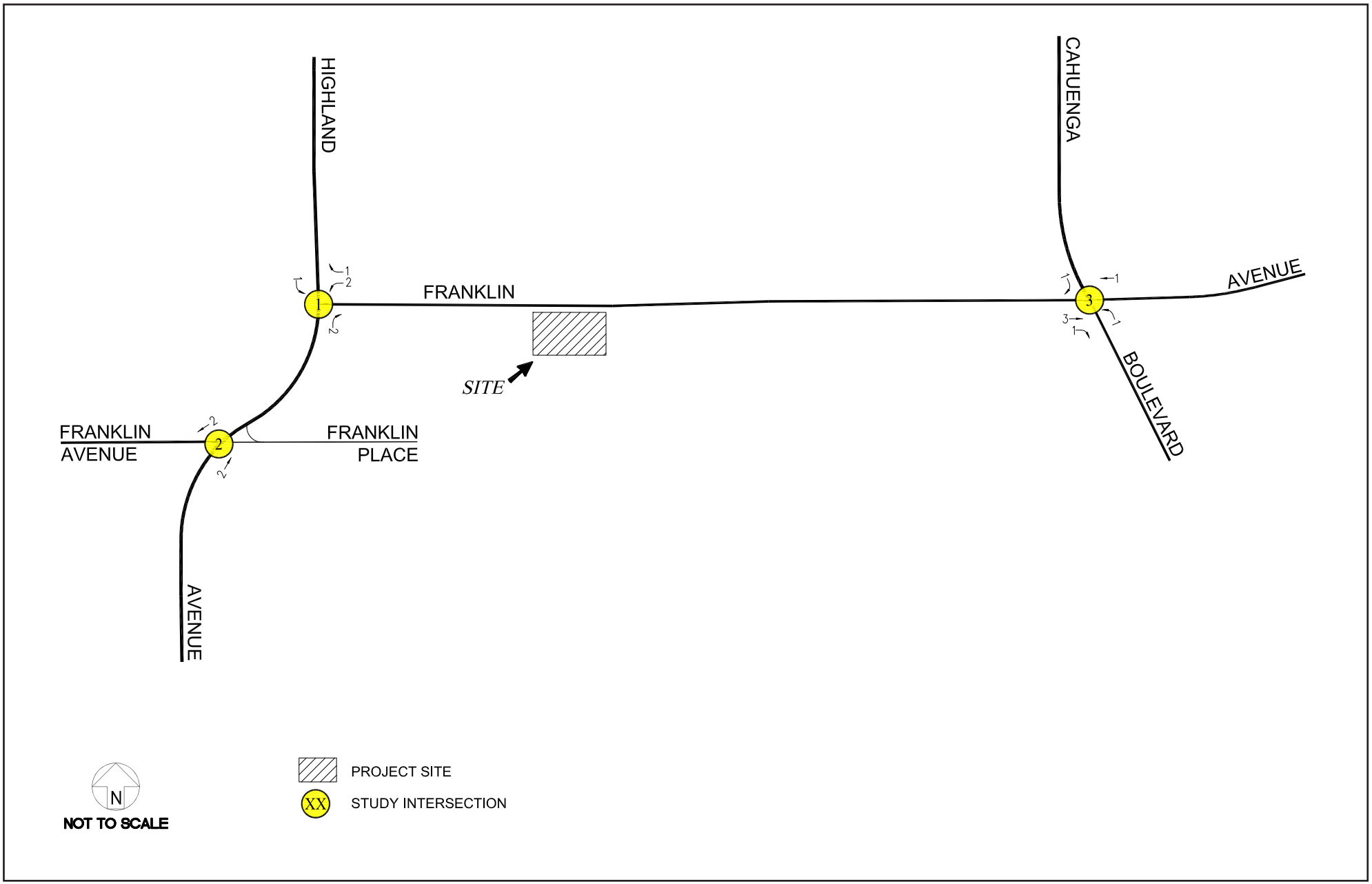
Project Trip Distribution



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-6**

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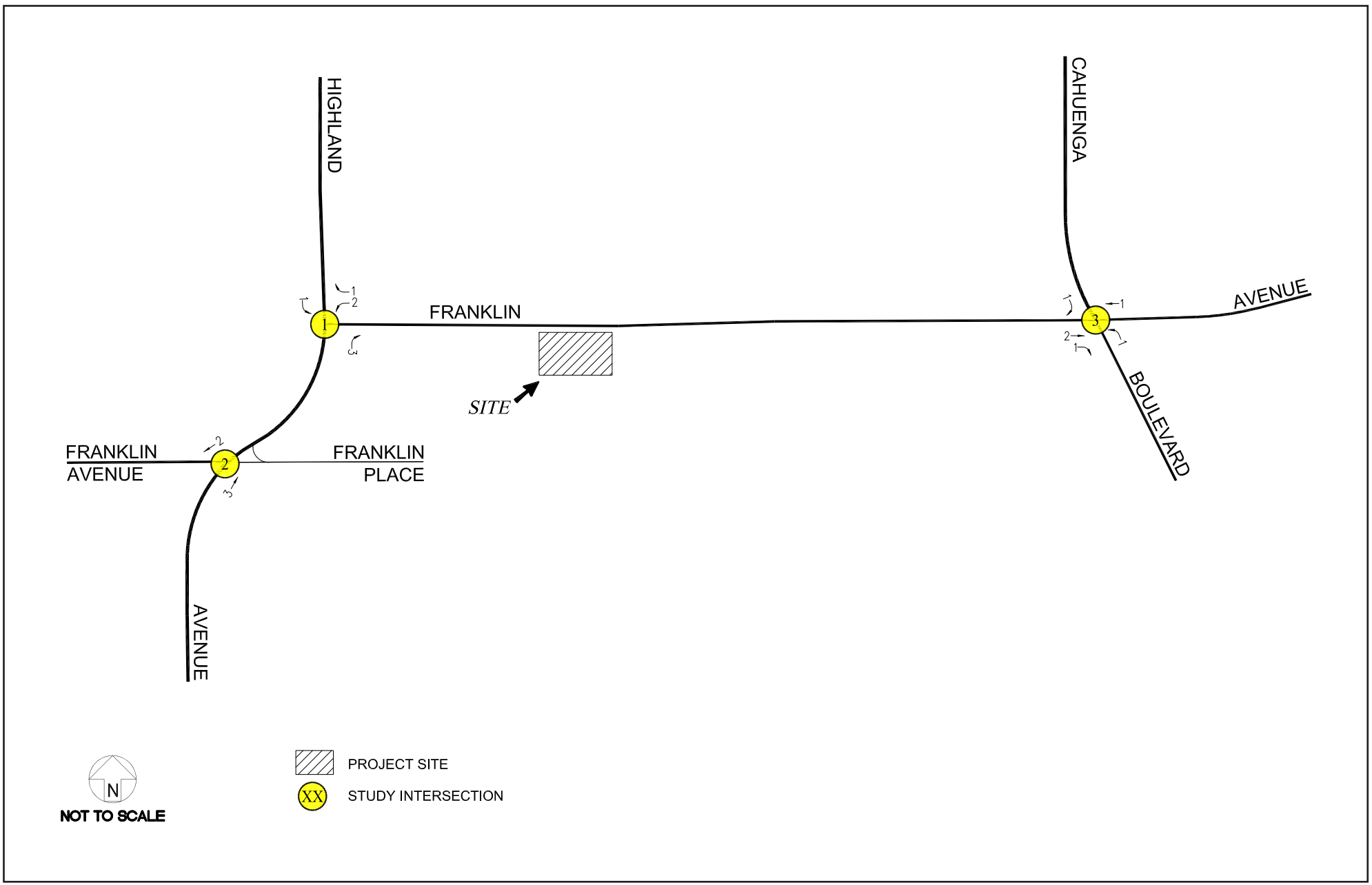
Project Traffic Volumes AM Peak Hour

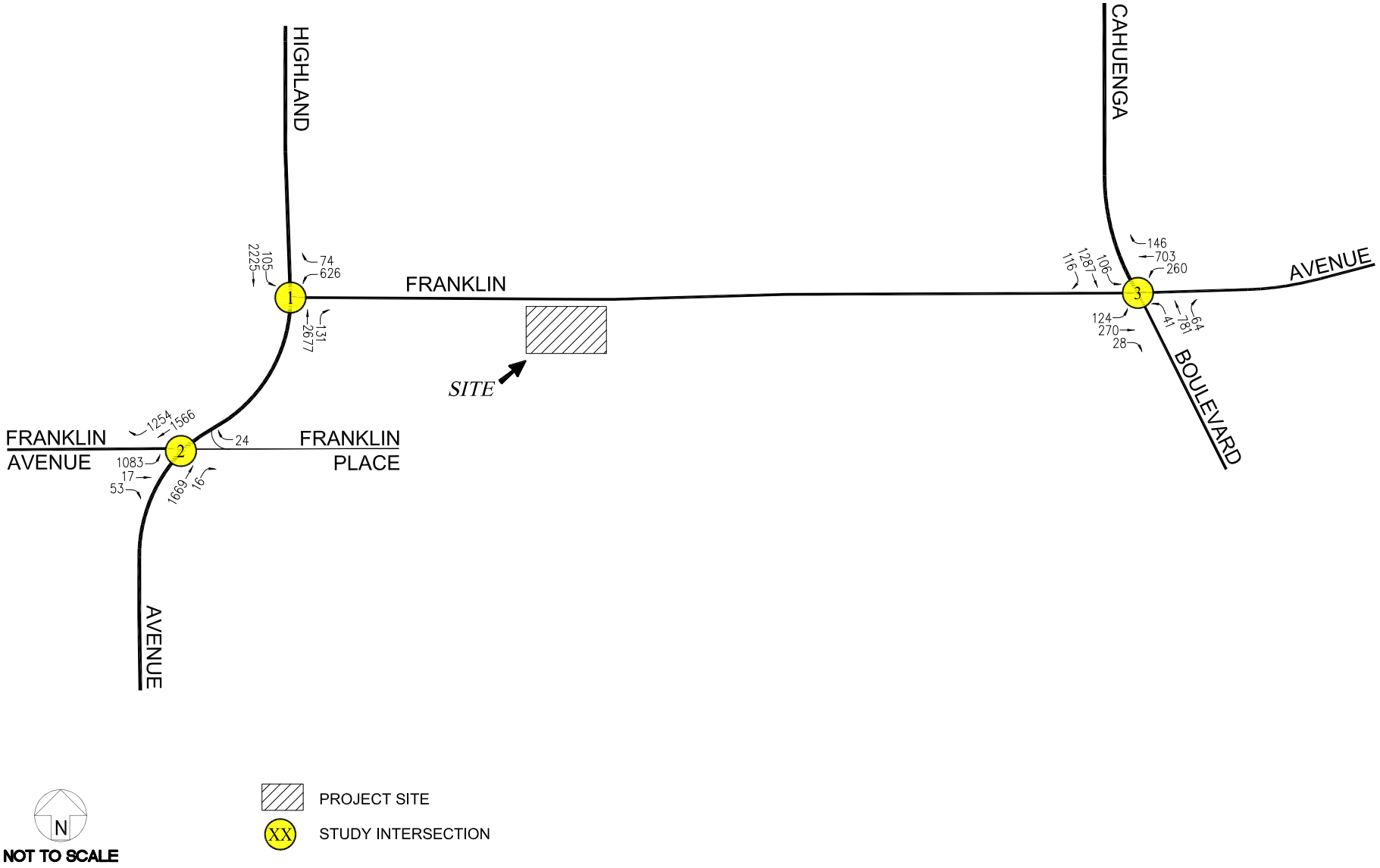


SOURCE: Linscott, Law & Greenspan, 2017

FIGURE V-7

IMPACT SCIENCES

Project Traffic Volumes PM Peak Hour



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-8**

IMPACT SCIENCES

Future without Project Traffic Volumes AM Peak Hour

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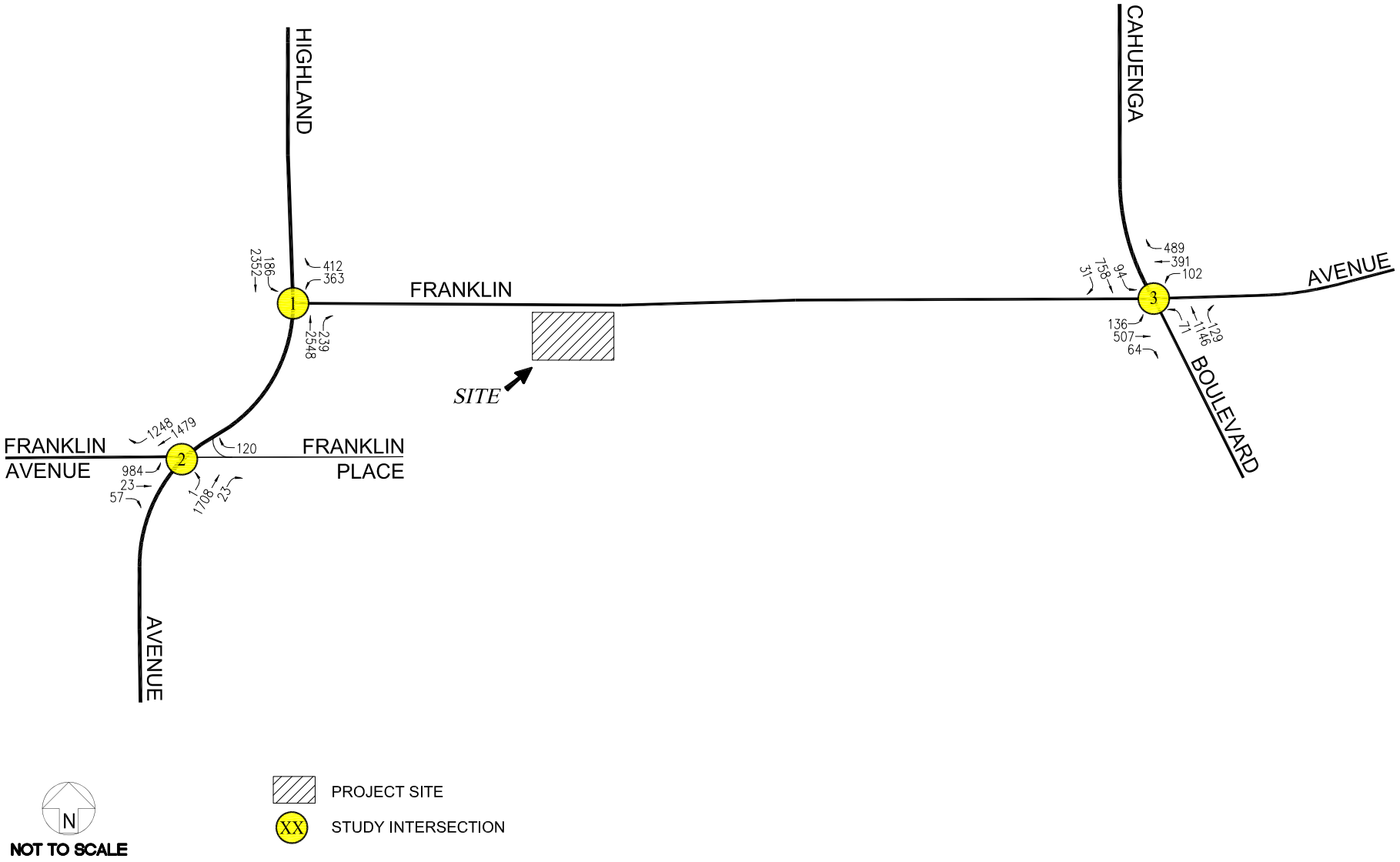


SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-9**

IMPACT SCIENCES

Future without Project Traffic Volumes PM Peak Hour

The Future without Project traffic volumes are estimated based on application of a 1.0% annual ambient growth rate applied to the existing (2016) traffic volumes through the Project build-out year of 2018, as analyzed in the Traffic Study. The Future without traffic volumes for the AM and PM peak hours are shown on **Figure V-8, Future without Project Traffic Volumes, AM Peak Hour** and **Figure V-9, Future without Project Traffic Volumes, PM Peak Hour.**

The traffic impact analysis prepared for the study intersections using the CMA methodology and application of the City of Los Angeles significant traffic impact criteria are summarized for the Project in **Table V-28, Levels of Service Summary and Volume to Capacity Ratios AM and PM Peak Hours.**

The Existing with Project condition provided in **Table V-28** includes Project-related traffic added to existing traffic at the study intersections. The forecast changes in v/c ratios at the study intersections due to Project-related traffic are calculated to be below the City's significance thresholds as shown in column [2]. Therefore, the traffic impacts of the Project in the Existing with Project condition will be less than significant for all study intersections. The Existing with Project traffic volumes are provided on **Figure V-10, Existing with Project Traffic Volumes, AM Peak Hour** and **Figure V-11, Existing with Project Traffic Volumes, PM Peak Hour**

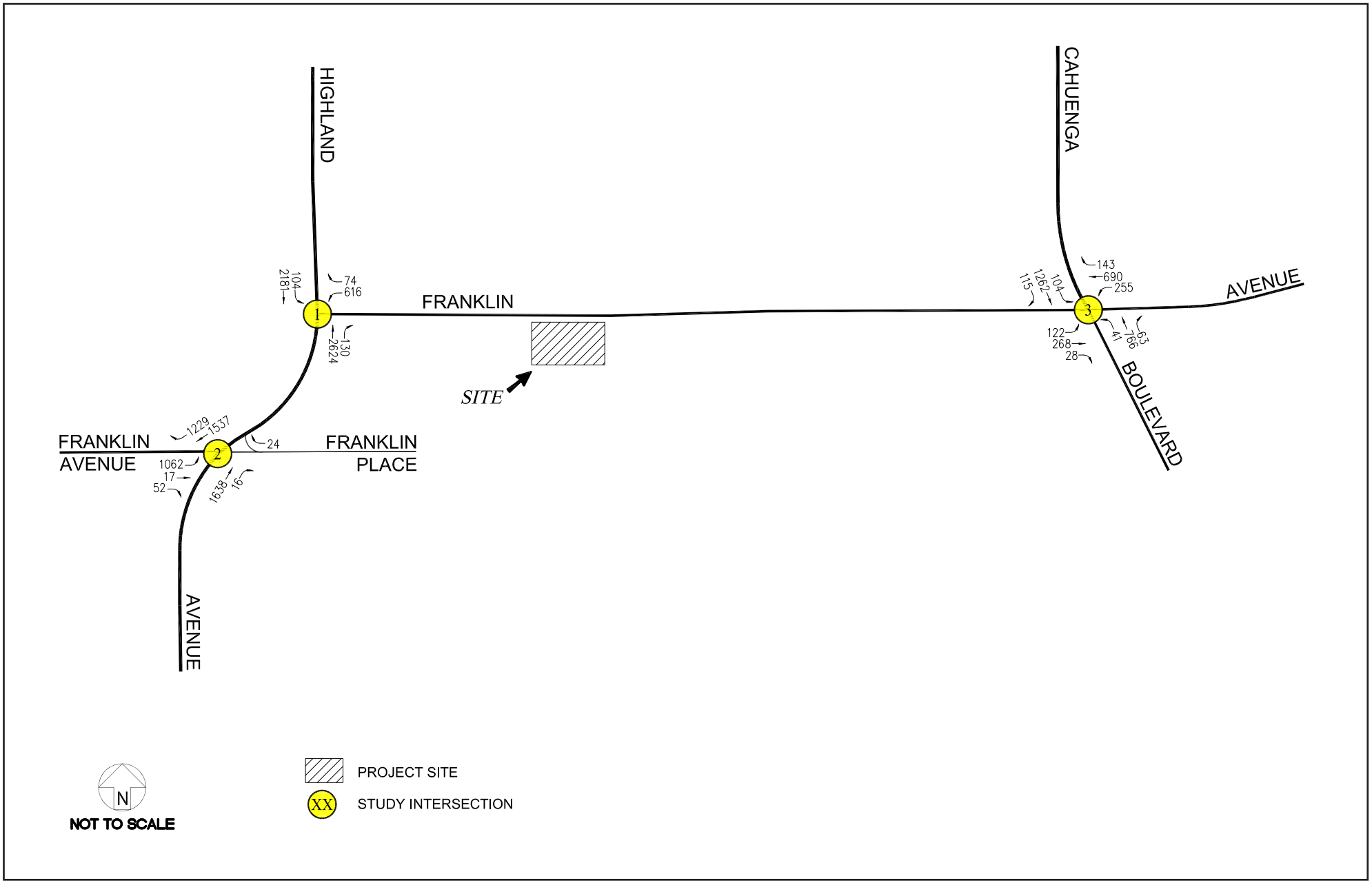
The Future with Project condition provided in **Table V-28** includes Project-related traffic added to the forecast future traffic volumes at the study intersections. As shown in column [4], the traffic impacts in the Future with Project condition will be less than significant for all study intersections with application of the City's thresholds. The Future with Project traffic volumes are provided on **Figure V-12, Future with Project Traffic Volumes, AM Peak Hour** and **Figure V-13, Future with Project Traffic Volumes, PM Peak Hour**.

In summary, the Project-related traffic impacts at the study intersections in the Existing with Project and Future with Project conditions during the weekday AM and PM peak hours are calculated to be less than significant based on the City's thresholds of significance. Therefore, no traffic mitigation measures are required or recommended for the Project.

Table V-28
Levels of Service Summary and Volume to Capacity Ratios AM and PM Peak Hours

	Intersection	Peak Hour	Existing		Existing with Project		Change	Significant	Future without Project		Future with Project		Change	Significant
			V/C	LOS	V/C	LOS	V/C	Impact?	V/C	LOS	V/C	LOS	V/C	Impact?
1	Highland Avenue/ Franklin Avenue	AM	0.824	D	0.825	D	0.001	NO	0.841	D	0.842	D	0.001	NO
		PM	0.768	C	0.769	C	0.001	NO	0.785	C	0.786	C	0.001	NO
2	Highland Avenue/ Franklin Avenue-Franklin Place	AM	0.719	C	0.719	C	0.000	NO	0.736	C	0.736	C	0.000	NO
		PM	0.175	C	0.715	C	0.000	NO	0.732	C	0.732	C	0.000	NO
3	Cahuenga Boulevard/ Franklin Avenue	AM	0.888	D	0.889	D	0.001	NO	0.908	E	0.909	E	0.001	NO
		PM	0.713	C	0.713	C	0.000	NO	0.730	C	0.730	C	0.000	NO

Source: LLG, 2016

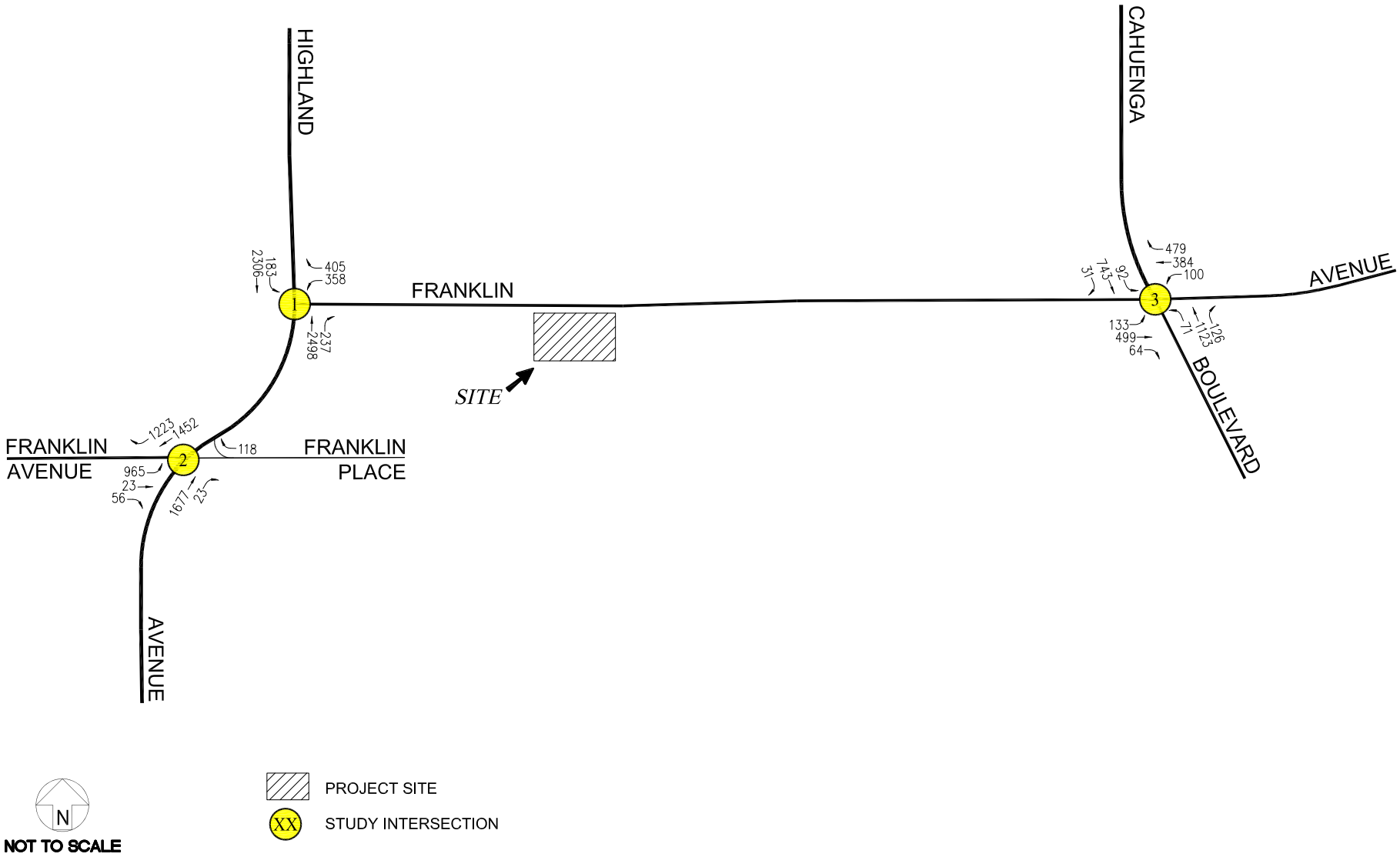


SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-10**

IMPACT SCIENCES

Existing with Project Traffic Volumes AM Peak Hour



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-11**

IMPACT SCIENCES

Existing with Project Traffic Volumes PM Peak Hour

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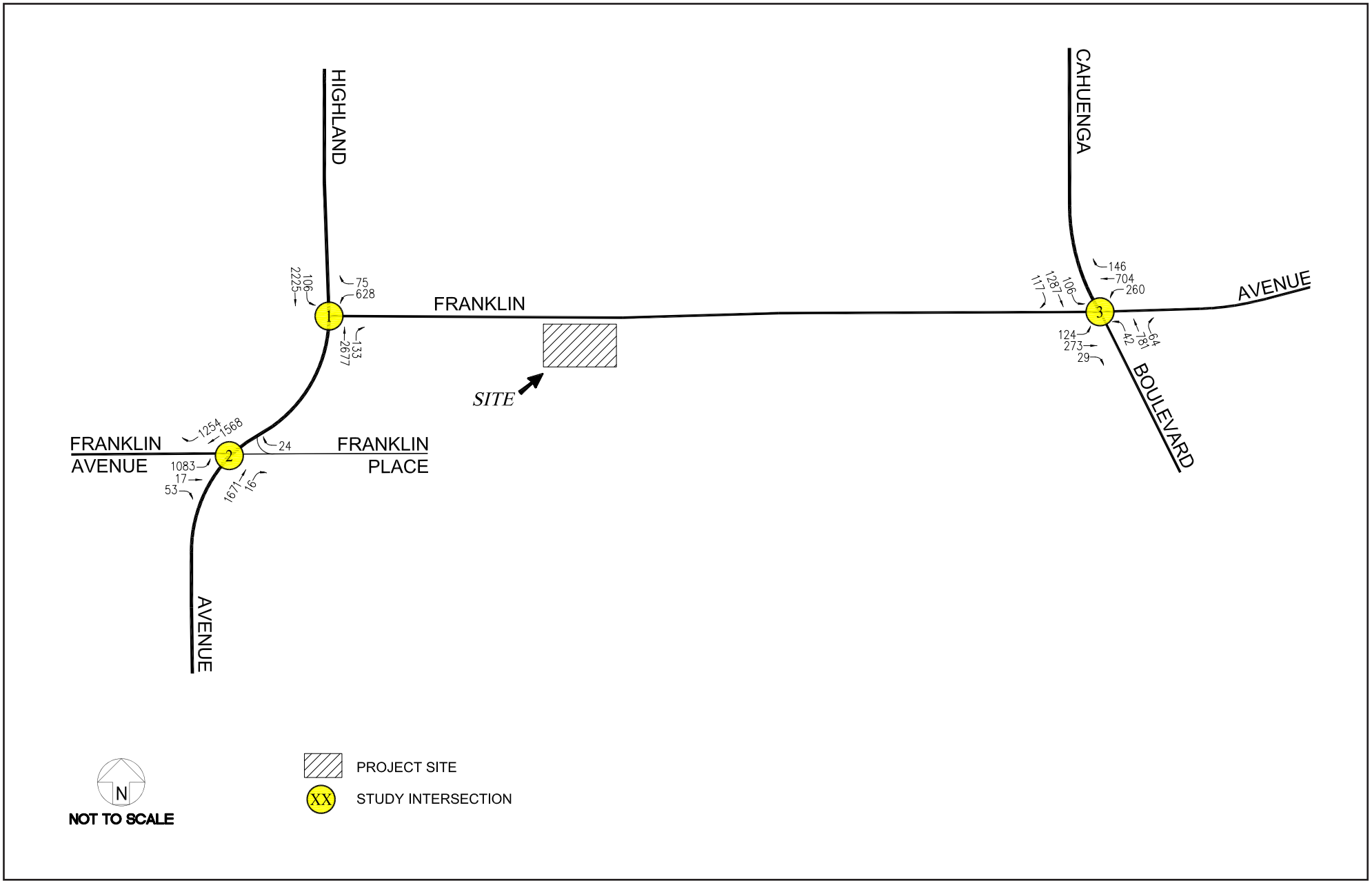
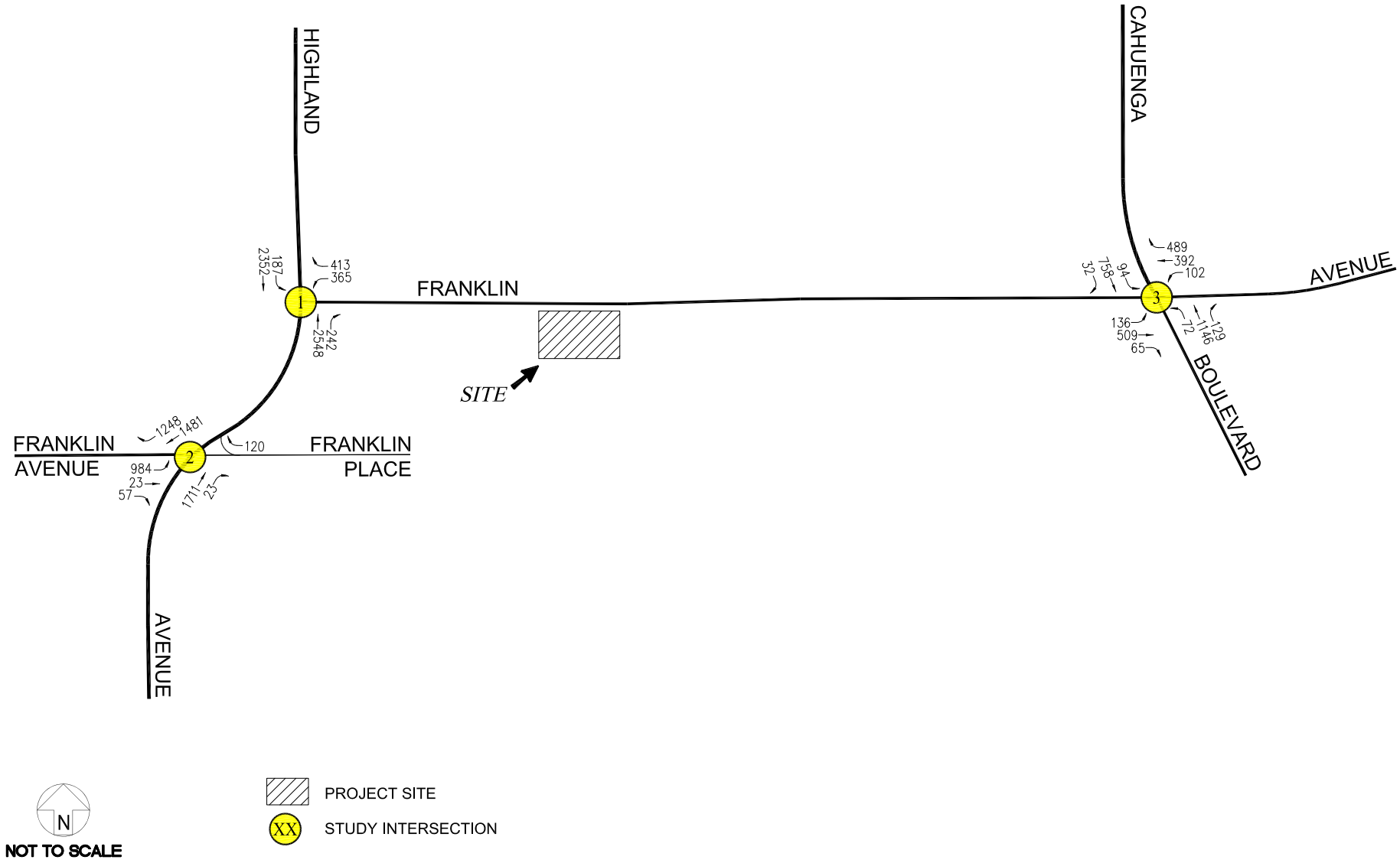


SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-12**

IMPACT SCIENCES

Future with Project Traffic Volumes AM Peak Hour



SOURCE: Linscott, Law & Greenspan, 2017

FIGURE **V-13**

IMPACT SCIENCES

Future with Project Traffic Volumes PM Peak Hour

b) Conflict with an applicable congestion management program, including but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

Less than Significant Impact. The congestion management program (CMP) in effect in Los Angeles County was issued by the Los Angeles County Metropolitan Transportation Agency in 2010.

The CMP for Los Angeles County requires that the traffic impact of individual development projects of potentially regional significance be analyzed. A specific system of arterial roadways plus all freeways comprises the CMP system. Per CMP Transportation Impact Analysis (TIA) Guidelines, a traffic impact analysis is conducted where:

- At CMP arterial monitoring intersections, including freeway on-ramps or off-ramps, where the Proposed Project will add 50 or more vehicle trips during either AM or PM weekday peak hours.
- At CMP mainline freeway-monitoring locations, where the project will add 150 or more trips, in either direction, during the either the AM or PM weekday peak hours.

Based on the project trip generation shown in **Table V-27**, it is not expected that 50 or more new trips per hour would be added at any CMP intersections, nor would the Proposed Project add 150 or more new trips per hour to any CMP mainline freeway monitoring locations. Therefore, impacts to a CMP would be less than significant and no further analysis is required.

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. As previously stated in **Section 8, Hazards and Hazardous Materials** the nearest public airport is the Bob Hope Hope/Burbank Airport, located approximately 6.5 miles north of the Project Site. Los Angeles International Airport is approximately 12 mile southwest of the Project Site. The Santa Monica Airport, a private airport is located approximately 9.1 miles southwest of the Project Site. The Project Site is not located with an airport land use plan area or within two miles of an airport, therefore no change in air traffic patterns, including either an increase in traffic levels or a change in location would occur. No impact would occur and no further analysis is required.

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact with Mitigation. As per the existing condition, vehicular access to the Project Site will be provided with one full access driveway on the west side of Cherokee Street at Franklin Avenue. As such, the design of the Proposed Project would not cause a permanent alteration to the local vehicular circulations routes and patterns, or impede public access or travel on any public rights-of-way. Further, the final design of the Proposed Project, including curb cuts, ingress, egress, and other streetscape changes, would be subject to review by the LADBS, Public Works and the Department of Transportation and would be required to comply with all requirements of those agencies.

Construction of the Proposed Project may require temporary lane or sidewalk closures. However, this impact will be reduced to a less than significant level by implementing following mitigation measure:

TRA-MM-1 Pedestrian Safety

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

Following implementation of Mitigation Measure TRA-MM-1, impacts would be less than significant and no further analysis is required.

e) Result in inadequate emergency access?

Less Than Significant Impact. Hollywood Boulevard, Highland Avenue, and the Hollywood (US 101) Freeway are designated disaster routes in the General Plan Safety Element's Critical Facilities & Lifeline Systems Map (Exhibit H).[110] Disaster routes function as primary thoroughfares for movement of emergency response traffic and access to critical facilities. The Safety Element emphasizes immediate emergency debris clearance and road/bridge repairs for short-term emergency operations along these routes.

Although the Project Site is located proximate a designated disaster route, neither the construction nor the operation of the Proposed Project would require or result in modifications to any of the roadways that would impact emergency traffic. Construction of the Proposed Project could temporarily interfere with local and on-site emergency response. However, construction traffic would conform to all traffic work plan and access standards to allow adequate emergency access. Implementation of a Construction Management Plan**,** and compliance with access standards would reduce the potential for the impacts on haul routes, emergency response, and access during construction of the Proposed Project. The majority of construction activities for the Proposed Project would be confined to the site, except for infrastructure improvements, which may require some work in adjacent street rights-of-way. However, this work would be short-term and temporary, and would occur during off-peak periods.

In addition, the Applicant will submit a parking and driveway plan for review by the LAFD, the BOE and the LADOT to ensure compliance with all applicable code-required site access and circulation requirements, as well as code-required emergency access. Impacts would be less than significant and no further analysis is required.

f) Conflict with adopted polices, plans or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

Less Than Significant Impact. The Proposed Project would be located in an urban area with significant infrastructure to facilities alternative transportation modes, including proximity to bus routes operating by the Los Angeles County Metropolitan

110 *City of Los Angeles City Planning Department, Environmental and Public Facilities Maps, Critical Facilities & Lifeline Systems in the City of Los Angeles, September 1996,(General Plan Safety Element, Exhibit H: Critical Facilities & Lifeline Systems, http://planning.lacity.org/cwd/gnlpln/saftyelt.pdf).*

Transportation Authority (i.e., Routes 237 and 656 on Highland Avenue, 212, 217, 222, and 312 on Hollywood Boulevard) and LADOT DASH Hollywood. The project would promote other alternative transportation modes, including bicycles. The project would include bicycle parking spaces per the requirements of current code. The Proposed Project is also within walking distance to a variety of shops and services for residents (e.g., personal grooming services, medical/dental offices, restaurants, etc.). For these reasons, the Proposed Project would not conflict with adopted policies, plans, or programs of transportation facilities. Impacts would be less than significant, and no further analysis is necessary.

17. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resource 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).

Less than Significant Impact. A project that may cause a substantial adverse change in the significance of a historical resource is a project that may have a significant effect on the environment.[111] Section 5020.1 of the PRC defines a historical resource as including, but is not limited to, any object, building, structure, site, area, place, record, or manuscript which is historically or archaeologically significant, or is significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California. The Project site currently contains one structure, a 118-unit, 10-story residential apartment building of affordable senior housing. The building, known as the "Montecito Apartments" since its original construction in 1931, was listed in the National Register of Historic Places in 1985. With this designation, the building is considered a historical resource defined in Public Resource Code section 5020.1(k). However, pursuant to AB 52, the Department of City Planning notified Native American tribes as to the Project with a 30-day comment period on June 19, 2017. None of the tribes responded to the request within the statutory response period. Therefore, the potential impacts to tribal cultural resources on the Project site would be less than significant, and no mitigation would be required.

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.

Less Than Significant Impact. Approved by Governor Brown on September 25, 2014, Assembly Bill 52 (AB 52) establishes a formal consultation process for California Native American Tribes to identify potential significant impacts to Tribal Cultural Resources (TCRs), as defined in PRC Section 21074, as part of CEQA. Effective July 1, 2015, AB 52 applies to projects that file a Notice of Preparation of an MND or EIR on or after July 1, 2015. PRC Section 21084.2 now establishes that a project with an effect that may cause a substantial adverse change in the significance of a

[111] *California Public Resources Code Section 21084.1*

TCR is a project that may have a significant effect on the environment. To help determine whether a project may have such an effect, PRC Section 21080.3.1 requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a Proposed Project. That consultation must take place prior to the release of a negative declaration, mitigated negative declaration, or environmental impact report for a project. As a result of AB 52, the following must take place: 1) prescribed notification and response timelines; 2) consultation on alternatives, resource identification, significance determinations, impact evaluation, and mitigation measures; and 3) documentation of all consultation efforts to support CEQA findings for the administrative record.

Under AB 52, if a lead agency determines that a project may cause a substantial adverse change to a TCR, the lead agency must consider measures to mitigate that impact. PRC Section 21074 provides a definition of a TCR. In brief, in order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a Proposed Project if the tribe has submitted a written request to be notified. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation.

As previously discussed under **Section 5.b)**, the Project Site does not contain any known archaeological sites or archaeological survey areas. In addition, the project would comply with the provisions of Sections 5097.98 and Section 21083.2 of the PRC, California Health and Safety Code Section 7050.5, and CEQA Guidelines Section 15064.5(e) which would protect any potential archaeological resources or human remains that are discovered during excavation.

Public Resources Code Section 21080.3.1 establishes a formal process for Lead Agencies to consult with California Native American Tribes to identify potential significant impacts to TCRs, as defined in PRC Section 21074.

The geographic area of the Project Site is not known to contain any TCRs. Nevertheless, the Los Angeles DCP mailed notices to Native American tribes known to be traditionally and culturally

affiliated with the project area on June 19, 2017, requesting that they respond within 30-days if they wished to open a formal consultation process with the City. None of the tribes responded to the request.

The copy of this correspondence is included in the public record as **Appendix H**, and provided to the decision makers.

With the completion of the outreach to the tribes for consultation, impacts would be less than significant, and no other mitigation is required.

18. UTILITIES AND SERVICE SYSTEMS

Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

Less than significant impact. Wastewater generated in the City is treated at the Hyperion Treatment Plant in Playa del Rey. The Regional Water Quality Control Board RWQCB) regulates the treatment of wastewater at treatment plants and the discharge of the treated wastewater into receiving waters. The Hyperion Treatment Plant is responsible for adhering to RWQCB regulations as they apply to wastewater generated by the Proposed Project. Operation of the Proposed Project could increase the amount of wastewater that would need to be treated at the Hyperion Treatment Plant.

Wastewater reclamation plants that comprise the Hyperion Service Area have a total design capacity of 580 million gallons of wastewater per day (MGD). The City of Los Angeles Integrated Resources Plan indicates by the year 2020, projected wastewater flows will increase 16 percent to total approximately 531 MGD.[112] Based on current design capacity of the Hyperion Service Area wastewater reclamation plants, the Bureau would have ample capacity in the current wastewater treatment system.

On average, the Proposed Project would generate an average daily flow of approximately 30,800 GPD, as shown in **Table V-29, Projected Wastewater Discharges for the Proposed Project.**

Table V-29
Projected Wastewater Discharges for the Proposed Project

Land Use	Size	Generation Rates (GPD)	Total Wastewater Generation (GPD)
Residential:			
Studio	32 DU	75 GPD/DU	2,400
1-Bdrm	36 DU	110 GPD/DU	3,960
Total			**6,360**

Source: LA Sanitation Wastewater Engineering Services Division
GPD – gallons per day
du = dwelling unit

112 City of Los Angeles, Department of Public Works, Bureau of Sanitation, Integrated Resources Plan Executive Summary, December 2006, https://www.lacitysan.org/cs/groups/public/documents/document/y250/mdew/~edisp/cnt010372.pdf

Currently, the Hyperion Water Plant has a capacity of 450 MGD. On average, the Hyperion Water Plant receives a flow of 275 MGD, thus resulting in available capacity of 175 MGD.[113] The net increase of 6,360 GPD from the Proposed Project would not significantly impact the Hyperion Water Plant. Impacts would be less than significant, and no mitigation would be required.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less than significant impact. The City of Los Angeles Department of Water and Power (LADWP) will provide water service to the Project Site. Water is conveyed to users in the project area along several circulating water mains of varying sizes. The Proposed Project would be required to connect to existing mains around the project area. As discussed above in **Section 17(a),** wastewater generated on the Project Site would be treated at the Hyperion Treatment Plant.

The LADWP Urban Water Management Plan provides historical and forecasted water demands for the City of Los Angeles. Total water demand varies annually and is contingent on various factors including: population growth, weather, water conservation, drought, and economic activity. **Table V-30, Historical Water Demand for LADWP's Service Area** shows the previous breakdown of average water use through 2014.

[113] County of Los Angeles Department of Public Works, LA Sanitation website, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=hy5nte6s8_4&_afrLoop=30433509942992750#!, accessed July 15, 2017

Table V-30
Historical Water Demand for LADWP's Service Area

Fiscal Year	Single Family	Multi-Family	Commercial	Industrial	Government	Non-Revenue	Total
2011-2014	209,651	165,364	98,994	17,663	42,543	32,774	566,990
2006-2010	236,154	180,277	106,964	23,196	42,956	30,617	620,165
2001-2005	239,754	190,646	109,685	21,931	41,888	52,724	656,628
1996-2000	222,748	191,819	111,051	23,560	39,421	33,696	622,295
1991-1995	197,322	177,104	110,724	21,313	38,426	39,364	584,253
24-Year Average	221,126	181,042	107,484	21,533	41,047	39,100	611,331

All units, except those in the Fiscal Year column, are in acre feet.
Source: Los Angeles Department of Water and Power, Urban Water Management Plan 2015, Exhibit ES-F

By analyzing historical demand, LADWP has forecasted water supply and demand projections in five year increments for each of the major categories of water uses. The point of forecasting water demand is to allow LADWP to better understand trends in water use, develop effective conservation programs, and invest appropriately in water supply development projects. The Urban Water Management Plan expects adequate water supplies would be able to their service area under normal, single-dry, and multi-dry year conditions through the year of 2040.

Table V-31
LADWP Forecasted Water Supply Availability Under Average Weather Conditions

Fiscal Year	Single Family	Multi-Family	Commercial/ Government	Industrial	Non-Revenue	Total
2020	222,958	184,679	148,600	18,869	36,709	611,800
2025	224,729	206,065	155,994	19,235	38,682	644,700
2030	226,770	211,454	156,788	18,701	39,173	652,900
2035	231,776	216,071	156,186	18,104	39,711	661,800
2040	231,767	216,071	156,186	18,104	39,711	675,700

All units, except those in the Fiscal Year column, are in acre feet.
Source: Los Angeles Department of Water and Power, Urban Water Management Plan 2015, Exhibit ES-S

As shown in **Table V-32, Projected Water Demand for the Proposed Project**, at buildout the Proposed Project would require approximately 7,632 gallons of water per day. The methodology to arrive at this amount is consistent with LADWP sewage generation rates established by the City of Los Angeles Bureau of Sanitation for expected wastewater demand, then extrapolating using guidance from the L.A. CEQA Thresholds

Guide 2006, Exhibit M.2-12, in which water consumption is assumed to be 120 percent of wastewater generation.

Table V-32
Project Estimated Water Demand

Land Use	Size	Generation Rates (GPD)	Water Demand (GPD)
Residential:			
Studio	32 DU	90 GPD/DU	2,880
1-Bdrm	36 DU	132 GPD/DU	4,752
		Total Water Demand	**7,632**

Source: LA Sanitation Wastewater Engineering Services Division, consistent with the City of L.A. CEQA Thresholds Guide 2006, Exhibit M.2-12, water consumption is assumed to be 120 % of wastewater generation.
GPD – gallons per day
sq. ft. – square feet
du = dwelling unit

Based on the 2015 UWMP water demand projections through 2040, projected water demand for the City would be met with adequate supply under average weather conditions through the year of 2040 and intervening years. The Project would result in an estimated net increase in water demand of approximately 8.55 acre-feet per year, which would comprise approximately 0.003 percent of the water demand for the City in 2020.

The project would not significantly affect existing on-site water and wastewater lines and/or off-site wastewater and water facilities. No mitigation is required.

c) Require or result in the construction of new stormwater drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. A significant impact may occur if the volume of stormwater runoff would increase to a level exceeding the capacity of the storm drain system serving a project site, requiring the construction of new stormwater drainage facilities.

As described in Section 9(e), the Proposed Project would not result in a significant increase in site runoff, or any changes in the local drainage patterns. Runoff from the Project Site is and would continue to be collected on the site and directed towards existing storm drains in the vicinity.

During the project's construction phase, the Project Applicant would be required to prepare and implement a SWPPP, in accordance with the NPDES General Permit for Discharges of Storm Water Associated with Construction Activity and Land Disturbance Activities. The site-specific SWPPP would be prepared prior to earthwork activities and would be implemented during project construction. The SWPPP would include BMPs and erosion control measures to prevent pollution in storm water discharge. Typical BMPs that could be used during construction include good-housekeeping practices (e.g., street sweeping, proper waste disposal, vehicle and equipment maintenance, concrete washout area, materials storage, minimization of hazardous materials, proper handling and storage of hazardous materials, etc.) and erosion/sediment control measures (e.g., silt fences, fiber rolls, gravel bags, storm water inlet protection, and soil stabilization measures, etc.). The SWPPP would be subject to review and approval by the City of Los Angeles Bureau of Engineering (BOE) for compliance with the City's Development Best Management Practices Handbook, Part A, Construction Activities. Additionally, all project construction activities would comply with the City's grading permit regulations, which require the implementation of grading and dust control measures, including a wet weather erosion control plan if construction occurs during rainy season, as well as inspections to ensure that sedimentation and erosion is minimized. Therefore, through compliance with NPDES requirements and City grading regulations, project construction impacts related to stormwater discharge would be less than significant, and no further analysis of this issue is required.

During the Project's operational phase, in accordance with the City's LID Ordinance, the Project Applicant would be required to incorporate appropriate stormwater pollution control measures into the design plans and submit these plans to the City's Department of Public Works, Bureau of Sanitation, Watershed Protection Division (WPD) for review and approval. Upon satisfaction that all stormwater requirements have been met, WPD staff would stamp the plan approved. Through compliance with the City's LID Ordinance, the project would meet the City's water quality standards. Therefore, project impacts related to operational stormwater discharges would be less than significant.

No further analysis of this issue is required.

d) Have significant water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less than Significant Impact. Water supply to the Project Site is provided by the LADWP.[114] Buildout of the Proposed Project would create an increase in demand for

[114] *Includes imported water.*

water supplies compared to existing conditions on the Project Site. But as mentioned in **17(b),** there would be sufficient capacity in water supply to be able to accommodate the Proposed Project without new or expanded entitlements. Impacts would be less than significant, and no further analysis is required.

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

Less Than Significant Impact. See **Response 17(a)** and **17(b)**, above.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less than Significant Impact. A significant impact may occur if a project were to increase solid waste generation to a degree such that the existing and projected landfill capacity would be insufficient to accommodate the additional solid waste. Based on the *L.A. CEQA Thresholds Guide,* the determination of whether a project results in a significant impact on solid waste shall be made considering the following factors: (a) amount of projected waste generation, diversion, and disposal during demolition, construction, and operation of the project, considering proposed design and operational features that could reduce typical waste generation rates; (b) need for additional solid waste collection route, or recycling or disposal facility to adequately handle project-generated waste; and (c) whether the project conflicts with solid waste policies and objectives in the City's Source Reduction and Recycling Element (SRRE) or its updates, the Storm Water Management Program Plan (SWMPP), Framework Element of the Curbside Recycling Program, including consideration of the land use-specific waste diversion goals contained in Volume 4 of the SRRE.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. While the Bureau of Sanitation provides waste collection services to single-family and some small multi-family developments, private haulers provide waste collection services for most multifamily residential and commercial developments within the City. Solid waste transported by both public and private haulers is recycled, reused, transformed at a waste-to-energy facility, or disposed of at a landfill. Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City.

Under the City's RENEW LA Plan, adopted in February 2006, the City committed to reaching Zero Waste. The goal of Zero Waste as defined by the RENEW LA Plan is to reduce, reuse, recycle, or convert the resources currently going to disposal so as to

achieve an overall diversion rate of 90 percent or more by the year 2025 and becoming a Zero Waste city by 2030. State law (AB 341) currently requires at least 50 Percent solid waste diversion and establishes a state-wide goal of not less than 75 percent of solid waste generated be source reduced, recycled, or composted by the year 2020. As of 2012 the City of Los Angeles achieved a landfill diversion rate of 76.4%, based upon the calculation methodology adopted by the State of California.[115]

Moreover, State law requires mandatory commercial recycling in all businesses and multi-family complexes and imposes additional reporting requirements on local agencies, including the City of Los Angeles. In order to meet these requirements and goals, the City has established an exclusive, competitive franchise system for the collection, transportation and processing of commercial and multifamily solid waste that will aid the City in meeting its diversion goals by, among other things: (i) requiring franchisees to meet diversion targets; (ii) increasing the capacity for partnership between the City and solid waste haulers; (iii) allowing the City to establish consistent methods for diversion of recyclables and organics; (iv) increasing the City's ability to track diversion, which will enable required reporting and monitoring of state mandated commercial and multi-family recycling; (v) increasing the City's ability to ensure diversion quality in the processing facilities handling its waste and recyclables; and (vi) increasing the City's capacity to enforce compliance with federal, state, county, and local standards.

Within the City of Los Angeles, the Sunshine Canyon Landfill and the Chiquita Canyon Landfill serve existing land uses within the City. Both landfills accept residential, commercial, and construction waste. The Sunshine Canyon Landfill is jointly operated by the City and the County, has a remaining capacity of 72.6 million tons. The Sunshine Canyon Landfill has an estimated remaining life of 22 years. An expansion of the Chiquita Canyon Landfill was recently approved by the Los Angeles County Board of Supervisors which will boost the daily disposal tonnage from 6,000 to 12,000 tons, the weekly disposal tonnage from 30,000 to 60,000 tons and the maximum amount of tonnage from 23 million to 60 million tons, extending the estimated remaining life of the landfill to 30 years.[116]

The Proposed Project would follow all applicable solid waste policies and objectives that are required by law, statute, or regulation. Under the requirements of the hauler's AB 939 Compliance Permit from the Bureau of Sanitation, all construction and demolition

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115 *City of Los Angeles, Bureau of Sanitation, Zero Waste Progress Report, March 2013.*

116 *http://www.waste360.com/design-and-construction/waste-connections-chiquita-canyon-landfill-battle-explained*

debris would be delivered to a Certified Construction and Demolition Waste Processing Facility. Debris from demolition of any asphalt surface parking located on the Project Site would be recycled/recovered and would not be deposited in area landfills. As summarized in **Table V-33**, **Estimated Construction Solid Waste Generation below**, it is estimated that approximately 119.15 tons of solid waste would be generated by the Project's construction activities. This represents a tiny fraction of the Sunshine Canyon Landfill's existing remaining disposal capacity of 72.6 million tons. Moreover, as of January 1, 2011 all contractors operating within the City of Los Angeles are required to source separate materials on site for recycling and/or use a permitted private waste hauler to deliver mixed materials to a certified processor for recycling. Thus, only a fraction of the construction and demolition debris would end up in regional landfills.

Table V-33
Estimated Construction Solid Waste Generation

Land Use	Size	Generation Rates (lbs/sf)[a]	Total Waste Generation (tons)
Multi-family units	68 du/32,560 sf	4.38	71.31
Parking	23,800 sf	4.02	47.84
Total			**119.15**
Total with 50 percent recycling			**59.58**

Notes:
a - U.S. EPA, Characterization of Building-Related Construction and Demolition Debris in the United States, Table A-4, June 1998. Construction debris is based on gross building area and thus exceeds the buildable floor area for purposes of calculating FAR.
lbs = pounds
sf – square feet
du = dwelling unit
Source: Impact Sciences, 2017.

At buildout, the Proposed Project would generate approximately 272 pounds of waste per day or approximately 49.64 tons of solid waste per year as shown in **Table V-34, Projected Daily Solid Waste Generation.** According to the 2015 Los Angeles County Integrated Waste Management Plan (IWMP), the total remaining capacity of the landfills is approximately 114 million tons.[117] The 49.64 tons per year generated during operation of the Proposed Project (not including the 50 percent diversion rate) would represent 0.00004 percent of the remaining capacity at the landfills which currently accept solid waste from the city. Therefore, the residential uses associated with the Proposed Project would not result in a significant impact towards landfill capacity. Impacts would be less than significant, and no further analysis is required.

117 *County of Los Angeles, Department of Public Works, 2015 Annual Report, Los Angeles County Wide 1ntegrated Waste Management Plan, December 2016.*

Table V-34
Projected Daily Solid Waste Generation

Land Use	Size	Generation Rates (lbs/day)	Total Waste Generation (lbs/day)	Total Waste Generation (tons/year)
Multi-family units	68 du	4 lbs/dwelling unit/day	272.0	49.64
Total			272.0	49.64
Total with 50 percent recycling			136.0	24.82

Source: CalRecycle Estimated Solid Waste Generation Rates for Commercial, Service, and Residential uses, http://www.calrecycle.ca.gov/wastechar/wastegenrates/Service.htm, accessed June 21, 2017.
Notes:
du = dwelling unit
Source: Impact Sciences, 2017.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. The California Integrated Waste Management Act of 1989 (AB 939) was the first recycling legislation in the country to mandate recycling diversion goals. AB 939 required all California cities, counties and approved regional solid waste management agencies responsible to enact plans and programs to reduce waste disposal. Jurisdictions were required to meet diversion goals of 50% by the year 2000 and a statewide goal of 75% by 2020. In 2007, the City of Los Angeles initiated a Solid Waste Integrated Resource Plan (SWIRP) with goals of moving toward zero waste by 2030. Under the City's RENEW LA Plan, the City committed to reaching Zero Waste by diverting 70% of the solid waste generated in the City by 2013, diverting 90% by 2025, and becoming a zero waste city by 2030. As reported by the Bureau of Sanitation in 2009, the City had achieved a waste diversion rate of 65%. The City is exceeding the state-mandated diversion goal of 50% by 2000 set by the California Integrated Waste Management Act (AB 939) of 1989.[118] The Proposed Project would be required to comply with applicable regulations regarding solid waste disposal. The Proposed Project's potential impacts associated with federal, state, and local statutes and regulations related to solid waste will be analyzed.

118 *City of Los Angeles Department of Public Works Bureau of Sanitation, Overview of Services for FY 2005/06, updated June, 14 2005.*

19. MANDATORY FINDINGS OF SIGNIFICANCE

a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact. As discussed in **Section 4, Biological Resources,** the project would not impact any endangered fauna or flora. Further, because of the highly urbanized nature of the Project Site and the surrounding area, construction and operation of the Proposed Project would not impact the habitat or population of the Project Site and the surrounding area, the project would not impact the habitat or population level of fish or wildlife species, nor would it threaten a plant or animal community, nor impact the range of a rare endangered plant or animal.

As discussed in **Section 5, Cultural Resources** potential impacts related historical, archaeological, and paleontological resources would be less than significant following the implementation of the regulatory compliance measures. No further analysis is required.

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

Less Than Significant Impact. Based on the proceeding discussions, no significant impacts were identified for the 18 environmental factors analyzed above. As the Proposed Project would not result in any unmitigated significant impacts, there would be no cumulative impacts. No impact would occur and no further analysis is required.

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

Less Than Significant Impact. As identified throughout the analysis, the Proposed Project would not have an environmental effect that would cause substantial adverse effects on human beings directly or indirectly. Impacts would be less than significant and no further analysis is required.

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(818) 933-0200
Fred Gaines, Esq., Partner
Kimberly Rible, Esq., Associate

VII. ACRONYMS AND ABBREVIATIONS

ATCS	Adaptive Traffic Control System
AQMP	Air Quality Management Plan
Basin	South Coast Air Basin
bgs	Below ground surface
BLS	Basic Life Support
BMPs	Best Management Practices
*CAL*Green	California Green Building Standards Code
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCTV	Closed circuit television
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CMA	Critical Movement Analysis
CMP	Congestion Management Program
CNEL	Community Noise Equivalent Level
CO	Carbon monoxide
CPA	Community Plan Area
dBA	A-weighted decibel
DOSH	California Division of Occupational Safety and Health
DCP	City of Los Angeles Department of Community Planning
DRP	City of Los Angeles Department of Recreation and Parks
DWP	Department of Water and Power (see LADWP)
EV	Electric vehicle
FAR	Floor area ratio
FRA	Federal Railway Administration

gpd	Gallons per day
gsf	Gross square feet
HRA	Health Risk Assessment
HTP	Hyperion Treatment Plant
IS	Initial Study
LADBS	City of Los Angeles Department of Building and Safety
LADOT	City of Los Angeles Department of Transportation
LADWP	City of Los Angeles Department of Water and Power
LAFCD	County of Los Angeles Flood Control District
LAFD	City of Los Angeles Fire Department
LAMC	Los Angeles Municipal Code
LAPD	City of Los Angeles Police Department
LARWQCB	Los Angeles Regional Water Quality Control Board
LAUSD	Los Angeles Unified School District
lbs	Pounds
LEL	Lower Explosive Limit
LID	Low impact development
LOS	Level of Service
MEP	Maximum Extent Practicable
Metro	Los Angeles County Metropolitan Transportation Authority
MND	Mitigated Negative Declaration
MTA	Los Angeles County Metropolitan Transit Authority
NAHC	Native American Heritage Commission
NO_x	Nitrogen oxides
NPDES	National Pollution Discharge Elimination System
PM2.5	Fine Particulate Matter
PM10	Respirable Particulate Matter
ppm	Parts per million

PSI	Pounds per square inch
RHNA	Regional Housing Needs Assessment
RCPG	Regional Comprehensive Plan and Guide
ROG	Reactive organic gas
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SCEA	Sustainable Communities Environmental Assessment
SCS	Sustainable Communities Strategy
sf	Square foot / feet
SO_x	Sulfur oxides
SPR	Site plan review
SR	State Route
SUSMP	Standard Urban Stormwater Mitigation Plan
SWPPP	Stormwater Pollution Prevention Plan
TAC	Toxic air contaminant
TDM	Transportation demand management
UBC	Uniform Building Code
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
V/C	Volume to Capacity ratio

Environmental Consultant

Impact Sciences, Inc.
28 N. Marengo Avenue
Pasadena, CA 91101
(626) 564-1500
Jessica Kirchner Flores, Managing Principal
Doug Kim, Principal
Lynn Kaufman, Associate Principal
Jared Jerome, Technical Specialist
Brandon Whelan, Staff Planner
Van Hoang, Publications Coordinator

Arborist Report

Tree Case Management
4617 Purdue Avenue
Culver City, CA 90230
(310) 902-6581
Greg J. Monfette, Certified Arborist #WE0729
ISA Tree Risk Assessor Qualified
State Contractors License #953525
Registered Consulting Arborist #481

Historic Resources Consultant

Historic Resources Group
12 S. Fair Oaks Avenue, Suite 200
Pasadena, CA 91105-1915
(626) 793-2400
Paul Travis, AICP, Principal Investigator

Geotechnical Consultant

Feffer Geological Consulting
1990 S. Bundy Drive, Suite 400
Los Angeles, CA 90025
(310) 207-5048
Joshua Feffer, Principal Geologist, C.E.G. 2138
John Helms, Project Geologist, C.E.G. 2272

Hazards Consultant

EMG
222 Schilling Circle, Suite 275
Hunt Valley, Maryland 21031
(800) 733-0660
Brian Zink, Senior Environmental Consultant

Traffic Consultant

Linscott Law & Greenspan
20931 Burbank Blvd., Suite C
Woodland Hills, CA 91367
(818) 835-8648
David Shender, Principal

RESEDA THEATER SENIOR HOUSING

COUNTY CLERK'S USE

CITY OF LOS ANGELES
OFFICE OF THE CITY CLERK
200 NORTH SPRING STREET, ROOM 360
LOS ANGELES, CALIFORNIA 90012

CITY CLERK'S USE

CALIFORNIA ENVIRONMENTAL QUALITY ACT

NOTICE OF EXEMPTION

(California Environmental Quality Act Section 15062)

Filing of this form is optional. If filed, the form shall be filed with the County Clerk, 12400 E. Imperial Highway, Norwalk, CA 90650, pursuant to Public Resources Code Section 21152 (b). Pursuant to Public Resources Code Section 21167 (d), the filing of this notice starts a 35-day statute of limitations on court challenges to the approval of the project. Failure to file this notice with the County Clerk results in the statute of limitations being extended to 180 days.

LEAD CITY AGENCY	COUNCIL DISTRICT
City of Los Angeles Department of City Planning	3

PROJECT TITLE	LOG REFERENCE
CPC-2017-5245-DB-CDO	ENV-2017-5246-CE

PROJECT LOCATION
7219 -7227 North Canby Avenue

DESCRIPTION OF NATURE, PURPOSE, AND BENEFICIARIES OF PROJECT:
Four-Story, 26 Unit Senior Independent Housing

NAME OF PERSON OR AGENCY CARRYING OUT PROJECT, IF OTHER THAN LEAD CITY AGENCY:
Thomas Safran and Associates (Tyler Monroe)

CONTACT PERSON	AREA CODE	TELEPHONE NUMBER	EXT.
Veronica Becerra	(213)	272-4784	

EXEMPT STATUS: (Check One)

		STATE CEQA GUIDELINES	CITY CEQA GUIDELINES
☐	MINISTERIAL	Sec. 15268	Art. II, Sec. 2b
☐	DECLARED EMERGENCY	Sec. 15269	Art. II, Sec. 2a (1)
☐	EMERGENCY PROJECT	Sec. 15269 (b) & (c)	Art. II, Sec. 2a (2) & (3)
☑	CATEGORICAL EXEMPTION	Sec. 15300 *et seq.*	Art. III, Sec. 1

Class 32 Category _____ (City CEQA Guidelines)

☐ OTHER (See Public Resources Code Sec. 21080 (b) and set forth state and City guideline provision.

JUSTIFICATION FOR PROJECT EXEMPTION: In-fill development meeting the conditions described in CEQA Guidelines 15332: (a) The project is consistent with the applicable general plan designation and all applicable general plan policies as well as with the applicable zoning designation and regulations. (b) The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses. (c) The project site has no value as habitat for endangered, rare or threatened species. (d) Approval of the project would not result in any significant effects relating to traffic, noise, air quality, or water quality. (e) The site can be adequately served by all required utilities and public services. See attachment for additional information.

IF FILED BY APPLICANT, ATTACH CERTIFIED DOCUMENT ISSUED BY THE CITY PLANNING DEPARTMENT STATING THAT THE DEPARTMENT HAS FOUND THE PROJECT TO BE EXEMPT.

SIGNATURE	TITLE	DATE
Tracy Williams	Planning Assistant	4/18/2018

FEE:	RECEIPT NO.	REC'D. BY	DATE
$2,280.00	0104826162	Tracy Williams	12/13/2017

DISTRIBUTION: (1) County Clerk, (2) City Clerk, (3) Agency Record
Rev. 11-1-03 Rev. 1-31-06 Word

IF FILED BY THE APPLICANT:

VERONICA BECERRA
NAME (PRINTED)

Veronica Becerra
SIGNATURE

4-13-18
DATE

KENSINGTON HOMES

1. Project title and File Number: Kensington Campus Homeless Facility
Site Plan Review No. 17-04

2. Lead agency name and address: City of Lancaster
Development Services Department
Community Development Division
44933 Fern Avenue
Lancaster, California 93534

3. Contact person and phone number: Jocelyn Swain
(661) 723-6100

4. Applicant name and address: Lancaster Housing Authority/Inside Development
44933 Fern Avenue
Lancaster, CA 93534

5. Location: ±15 gross acres located at the northeast corner of 32nd Street West and Avenue I (3107-012-905)

6. General Plan designation: MR1 (Multi-Family Residential)

7. Zoning: MDR (Moderate Density Residential, 7-15 units per acre)

8. Description of project: The proposed project consists of the construction and operation of a campus-like development to provide services and housing necessary to assist homeless individuals and families. The proposed project would consist of the following:

- 51 permanent affordable housing units;
- 100 temporary mini housing units;
- 5 shelters housing 20 people each;
- 4,000 square feet for on-site service providers;
- 4,500 square feet for on-site medical; and
- 18,000 square feet for other services for homeless individuals and families.

The 15-acre development would be designed to mimic a campus setting with a central path connecting the individual buildings. Access to the project site would be provided from three driveways along 32nd Street West. These driveways would connect to the parking areas located at the northwest portion of the project site. No trucks and cars would be allowed to drive throughout the campus. All vehicles on the site would be "golf-cart" type. The buildings would be a maximum of two stories and the facility would be landscaped with a diverse mix of landscaping types including fruit trees.

9. Surrounding land uses and setting: The area surrounding the project site is predominantly undeveloped with some multi-family residential developments and the rest is open desert. The property

to the east is developed with a State of California Veteran's Home. The property to the north is developed with the Copper Square Apartment Complex. This complex is under construction; however, the portions of the project that have been completed are currently occupied. The property at the northwest corner of 32nd Street West and Avenue I is occupied by a single family residence. The remainder of the property to the west and south (south of Avenue I) consists of undeveloped desert. Avenue I forms the southern boundary of the project site and is fully improved. A residential subdivision exists approximately a quarter mile to the south and a commercial shopping center is located approximately a half mile to the east.

10. Other public agencies whose approval is required (e.g. permits, financing approval, or participation agreement.)

Approvals from other public agencies for the proposed project include, but are not limited to, the following:

- Southern California Edison
- Antelope Valley Air Quality Management District

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, has consultation begun?

In accordance with Assembly Bill (AB) 52, consultation letters for the proposed project were sent to seven individuals associated with six different tribes (San Manuel Band of Mission Indians, Morongo Band of Mission Indians, San Fernando Band of Mission Indians, Gabrieleno Band of Mission Indians – Kizh Nation, Fernandeno Tataviam Band of Mission Indians, and the Serrano Nation of Mission Indians) identified in the cultural resources report for the project or who have previously requested to be notified. These letters were mailed via certified, return receipt mail on November 28, 2017. These letters included copies of the cultural resources report and an aerial identifying the location of the proposed project. Table 1 identifies the tribes and individuals to whom the letters were addressed and the date that the letters were received.

On December 6, 2017, the City received an email from the San Manuel Band of Mission Indians requesting specific language be included as a condition of approval with respect to the treatment of any cultural resources discovered during construction. This requested language has been included as a mitigation measure under cultural resources. No other responses have been received.

Table 1
Tribal Notifications

Tribe	Person/Title	Date Received
San Manuel Band of Mission Indians	Lee Clauss/Director of Cultural Resources	December 2, 2017
Morongo Band of Mission Indians	Robert Martin/ Chairperson	Delayed in Transit
San Fernando Band of Mission Indians	John Valenzuela/ Chairperson	Available for pickup at post office
Gabrieleno Band of Mission Indians – Kizh Nation	Andrew Salas/ Chairman	December 1, 2017
Fernandeno Tataviam Band of Mission Indians	Kimia Fatehi/Tribal Historic and Cultural Preservation Officer	December 1, 2017
Serrano Nation of Mission Indians	Goldie Walker/Chairperson	December 4, 2017
Morongo Band of Mission Indians	Denisa Torres/ Cultural Resources Manager	December 4, 2017

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION - On the basis of this initial evaluation:

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

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

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

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

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

Jocelyn Swain, Principal Planner

12/11/17
Date

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant (mitigation measures from Section XVII, "Earlier Analyses," may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation measures. For effects that are "Less than Significant with Mitigation Measures Incorporated", describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) the significance criteria or threshold, if any, used to evaluate each question; and

   b) the mitigation measure identified, if any, to reduce the impact to less than significant.

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
I. AESTHETICS -- Would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?			X	
c) Substantially degrade the existing visual character or quality of the site and its surroundings?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
II. AGRICULTURE AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and the forest carbon measurement methodology provided in the Forest Protocols adopted by the California Air Resources Board. Would the project:				

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)) or timberland (as defined in Public Resources Code Section 4526)?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?				X
III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable Air Quality Plan?				X
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X	
d) Expose sensitive receptors to substantial pollutant concentrations?			X	
e) Create objectionable odors affecting a substantial number of people?			X	
IV. BIOLOGICAL RESOURCES -- Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?			X	

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				X
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				X
V. CULTURAL RESOURCES -- Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?		X		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
d) Disturb any human remains, including those interred outside of dedicated cemeteries?				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
VI. GEOLOGY AND SOILS -- Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?		X		
iv) Landslides?				X
b) Result in substantial soil erosion or the loss of topsoil?		X		
c) 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?		X		
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for disposal of waste water?				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
VII. GREENHOUSE GAS EMISSIONS -- Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?			X	
VIII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
b) Create a significant hazard to the public or the environment through reasonably fore-seeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c) Emit hazardous emissions or handle hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				X
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			X	
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
a) Violate any water quality standards or waste discharge requirements?			X	
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in substantial erosion or siltation on- or off-site?			X	

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on-or off-site?			X	
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems?			X	
f) 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?			X	
g) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			X	
h) 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?				X
i) Inundation by seiche, tsunami, or mudflow?				X
X. LAND USE AND PLANNING -- Would the project:				
a) Physically divide an established community?				X
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
c) Conflict with any applicable habitat conservation plan or natural communities conservation plan?				X
XI. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				X
XII NOISE -- Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?		X		
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		X		
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				X
XIII. POPULATION AND HOUSING -- Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?			X	
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X
XIV. PUBLIC SERVICES				
Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?			X	
Police protection?			X	
Schools?			X	
Parks?			X	

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
Other public facilities?			X	
XV. RECREATION --				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?				X
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
XVI. TRANSPORTATION/TRAFFIC -- Would the project:				
a) Exceed the capacity of the existing circulation system, based on an applicable measure of effectiveness (as designated in a general plan policy, ordinance, etc.), taking into account all relevant components of the circulation system, including but not limited to, intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			X	
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?				X
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?				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
e) Result in inadequate emergency access?				X
f) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?				X
XVII. TRIBAL CULTURAL RESOURCES -- Would the project cause a substantial adverse change in the significance of a tribal cultural resources, 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				X
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set for 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 significant of the resource to a California Native American tribe.				X

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XVIII. UTILITIES AND SERVICE SYSTEMS -- Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			X	
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
d) Have sufficient water supplies available to serve the project from existing resources, or are new or expanded entitlements needed?			X	
e) Have a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
g) Comply with federal, state, and local statutes and regulations related to solid waste?			X	

	Potentially Significant Impact	Less Than Significant With Mitigation	Less Than Significant Impact	No Impact
XIX. MANDATORY FINDINGS OF SIGNIFICANCE --				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		X		
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

DISCUSSION OF ENVIRONMENTAL CHECKLIST

I. a. The City of Lancaster General Plan 2030 identifies five scenic vistas either within or near the City of Lancaster. These scenic vistas include the Foothill Area, Little Buttes, Quartz Hill, Piute Ponds, and Little Rock Wash. Two of these vistas (Foothill Area and Quartz Hill) are distantly available from the project site. Views of the open desert are also available from the project site.

With implementation of the proposed project, the available views of the identified scenic resources would not change and would continue to be available from the roadways and area surrounding the project site. The change in the project site would be visible; however, the development would look similar to the Veteran's Home and Copper Square apartments immediately adjacent to the project site. The height of the buildings on the project site would not exceed 2 stories or approximately 35 feet. The project site would be landscaped to create a campus-like setting with native/drought tolerant plants along with a variety of fruit trees. The proposed development would not impede views of the mountains/open

desert while traveling on any of the surrounding roadways. Therefore, impacts would be less than significant.

b. The proposed project would not remove any scenic resources such as rock outcroppings, trees, or buildings (historic or otherwise). Additionally, the project site is not located in the vicinity of any State Scenic Highways. The closest State designated scenic highway is Highway 2 which is located over 10 miles south of the project and is not visible from anywhere within the Antelope Valley. The City has designated several roadways as scenic including Avenue K from 110th Street West to 90th Street West, 90th Street West north of Avenue K to the Los Angeles/Kern County line, 60th Street West from Avenue K to Avenue L, Avenue M from 60th Street West to the Antelope Valley Freeway and the Antelope Valley Freeway from the City boundary north to the Kern County line. With the exception of the Antelope Valley Freeway, these roadways are not visible from the project site. While the project site would be distantly visible from the Antelope Valley Freeway, the proposed project would not impact the views that make the freeway scenic. Therefore, impacts would be less than significant.

c. The proposed project would change the visual character of the project site in that it would replace 15 acres of disturbed/open desert with a campus-like facility dedicated to addressing issues associated with homelessness. The 15-acre development would be designed to mimic a campus setting with a central path connecting the individual buildings. The buildings would be a maximum of two stories and the facility would be landscaped with a diverse mix of landscaping types including fruit trees. While this would change the character of the project site, the proposed project would be compatible with the Veteran's Home to the east and the Copper Square apartments currently under construction immediately to the north. Future development to the west must meet the characteristics of the mixed use zones which are compatible with the proposed development. Therefore, impacts would be less than significant.

d. The ambient lighting in the vicinity of the project site is minimal to moderate depending upon specific location. Some street lights are available on Avenue I and headlights from vehicles utilizing Avenue I and the Antelope Valley Freeway are readily available. Additionally, the glow of lights from the developed portions of Lancaster and Palmdale are visible from the project site. Brighter lights are located immediately north and east of the project site in the form of interior residential lights, site security lighting, parking lot lights, and vehicle headlights associated with the Veteran's Home and Copper Square Apartments. The proposed project would add similar types of lights as the two neighboring developments. These lights would be focused on the project site with relatively little spillage onto the neighboring properties. Additionally, street lights may be added to 32nd Street West, if deemed necessary. These street lights would be focused downward. Minimal amounts of glare would be introduced by the proposed project, primarily from vehicles. Buildings on the project site would be constructed of non-reflective materials to the extent feasible. Therefore, impacts associated with lighting and glare would be less than significant.

II. a. The California Department of Conservation, Division of Land Resource Protection, Farmland Mapping and Monitoring Program (FMMP), tracks and categorizes land with respect to agricultural resources. Land is designated as one of the following and each has a specific definition: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land, and Other Land.

The maps for each county are updated every two years. The Los Angeles County Farmland Map was last updated in 2016. Based on the 2016 map, the project site is designated as "Other Land". Other Land is defined as "land not included in any other mapping category. Common examples include low density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines, borrow pits; and water bodies smaller than 40 acres". As the project site is not designated as farmland of importance by the State nor is the site currently utilized for agricultural purposes, no impacts to agricultural resources would occur.

b. The project site is zoned as MDR which does not allow for agricultural uses. Additionally, the project site is not currently utilized for agricultural purposes; no agricultural uses are located in the vicinity of the project site; nor is the site subject to a Williamson Act contract. The proposed project involves the construction and operation of a complex to address issues associated with homelessness and would not interfere with any agricultural uses. Therefore, no impacts would occur.

c-d. According to the City of Lancaster's General Plan, there are no forests or timberlands located within the City of Lancaster. Therefore, the proposed project would not result in the rezoning of forest or timberland and would not cause the loss of forest land or the conversion of forest land to non-forest land. No impacts would occur.

e. See responses to Items IIa-d.

III. a. Development proposed under the City of Lancaster's General Plan would not create air emissions that exceed the Air Quality Management Plan (AQMP) (GPEIR pgs 5.5-21 to 5.5-22). The project site is designated as MR2 and zoned MDR. Projects such as the proposed project are allowed under this zoning. As such, any emissions associated with the proposed project have already been accounted for and the proposed project would not conflict with or obstruct with the implementation of the AQMP and no impacts would occur.

b. The AVAQMD adopted the "California Environmental Quality Act and Federal Conformity Guidelines" in August 2016. These guidelines establish daily and annual emission thresholds for proposed projects. These thresholds are identified in Table 2.

Table 2
AVAQMD Emission Thresholds

Criteria Pollutant	Annual Threshold (tons/yr)	Daily Threshold (lbs/day)
Carbon Monoxide (CO)	100	548
Oxides of Nitrogen (NO_x)	25	137
Volatile Organic Compounds (VOC)	25	137
Oxides of Sulfur (SO_x)	25	137
Particulate Matter (PM_{10})	15	82
Particulate Matter ($PM_{2.5}$)	15	65

Construction of the proposed project would generate air emissions associated with grading, use of heavy equipment, construction worker vehicles, etc. However, the emissions are not anticipated to exceed the construction emission thresholds established by the Antelope Valley Air Quality Management District (AVAQMD) due to the size of the proposed project. Therefore, construction emissions would be less than significant.

The proposed project is anticipated to generate approximately 797 daily trips with 54 a.m. peak hour trips and 80 p.m. peak hour trips. These trips would be associated with employees, deliveries, dropping off of homeless individuals, maintenance workers, etc. These vehicle trips would generate emissions; however, many of these vehicles trips are probably already occurring as the proposed project would consolidate services to address issues associated with homelessness. These emissions would not be sufficient to create or significantly contribute towards violations of air quality standards. Therefore, emissions associated with the operation of the proposed project would be less than significant.

A discussion of dust control measures during construction and operation of the proposed projects can be found under Item VI.b.

c. The proposed project, in conjunction with other development as allowed by the General Plan, would result in a cumulative increase in pollutants. However, since the emissions associated with the construction and operation of the proposed project would be less than significant; their contribution would not be cumulatively considerable.

d. The closest sensitive receptors to the project site are the residents of the Veteran's Home and Copper Square Apartment immediately adjacent to the east and north of the project site and the single family residence located at the northwest corner of Avenue I and 32nd Street West. Based on the amount of traffic expected to be generated by the operation of the proposed project, no significant traffic impacts would be anticipated. Additionally, the construction and operation of the proposed project would not exceed the thresholds established by the AVAQMD. Therefore, substantial pollutant concentrations would not occur and impacts would be less than significant.

e. Construction and operation of the proposed project is not anticipated to produce significant objectionable odors. Construction equipment may generate some odors, but these odors would be similar to those produced by vehicles traveling along Avenue I. Most objectionable odors are typically associated with industrial projects involving the use of chemicals, solvents, petroleum products and other strong smelling elements used in manufacturing processes, as well as sewage treatment facilities and landfills. These types of uses are not part of the proposed project. The proposed project is a development which would provide housing and services to address issues associated with homelessness. The proposed project would not generate any odors as a result of providing these services and no odorous chemicals would be utilized on the project site. Typical chemicals associated with the maintenance of facilities and landscaping would be utilized; however, these chemicals would not have a noticeable odor. Therefore, impacts would be less than significant.

IV. a. A biological resources survey was conducted for the project site by Mark Hagan and documented in a report entitled "Biological Resource Assessment of APN 3107-012-905, Lancaster, California" and dated October 27, 2017. The following summarizes the findings of the biological assessment.

A pedestrian survey of the project site was conducted on October 23, 2017 by walking north-south transects spaced approximately 100 feet apart. The project site is characteristic of highly disturbed halophytic saltbush scrub habitat with shadscale (*Atriplex confertifolia*), yellow pepper grass (*Lepidium flavum*) and exotic grasses (*Bromus* spp.) the dominant species. A total of 27 plant species were observed on the project site including: shadscale, allscale (*Atriplex polycarpa*), Nevada saltbush (*Atriplex torreyi*), quail bush (*Atriplex lentiformis*), rabbit brush (*Chrysothamnus nauseosis*), silverscale (*Atriplex argentea*), arrow scale (*Atriplex phyllostegia*), inkweek (*Suaeda torreyana*), alkali sea heath (*Frankenia salina*), yellow pepper grass, spotted buckwheat (*Eriogonum maculatum*), flat-topped buckwheat (*eriogonum deflexum*), fiddleneck (*Amsinckia tessellata*), Nevada blue grass (*Poa secunda*), saltgrass (*distichlis spicata*), Russian thistle (*Salsola iberica*), five-hook bassia (*Bassia hyssopifolia*), mustard sp. (Brassicaceae), tumble mustard (*Sisymbrium altisissiimum*), red stemmed filaree (*Erodium cicutarium*), schismus (*Schismus* sp.), foxtail barley (*Hordeum leporinum*), cheatgrass (*Bromus tectorum*), red brome (*Bromus rubens*), and annual burweed (*Franseria acanthicarpa*). No sensitive or special status plant species were identified during the survey. No alkali mariposa lilies (*Calochortus striatus*) were identified on the project site during the survey. The project site is located in area with suitable alkali mariposa lily habitat. It is possible that alkali mariposa lilies may occur on the project site or in the vicinity. However, due to the disturbed nature of the project site, it is not expected to support a viable population of lilies. Therefore, impacts to special status plant species would be less than significant.

A total of 10 wildlife species were observed on the project site during the surveys: rodents, desert cottontail (*Sylvilagus auduboni*), coyote (*Canis latrans*), killdeer (*Charadrius vociferus*), raven (*Corvus corax*), horned lark (*Eremophila alpestris*), butterfly (white), butterfly (small brown), painted lady, and spider. In addition to the observed wildlife species, the following species would be expected to occur: deer mouse (*Peromyscus maniculatus*), black-tailed jackrabbit (*Lepus californicus*), mourning dove (*Zenaida macroura*), side blotched lizard (*Uta stansburiana*), western whiptail (*Cnemidophorus tigris*), grasshopper, dragonfly, and fairy shrimp. No sensitive or special status wildlife species were observed on the project site. Desert tortoise (*Gopherus agassizii*), burrowing owls (*Athene cunicularia*), and Mohave ground squirrel (*Xerospermophilus mohavensis*) were not observed on the project site and no sign of these species was identified. Additionally, no birds were observed on the project site. As such, no impacts to these species would occur. However, it is possible that nesting birds and/or burrowing owls may occupy the project site prior to the start of construction. In order to ensure that any potential impacts to nesting birds or burrowing owls remain less than significant, the following mitigation measure is required. With implementation of the mitigation measure, impacts would be less than significant.

1. A nesting bird and burrowing owl preconstruction survey shall be conducted on the project site prior to the start of any construction/ground disturbing activities. If nesting birds or burrowing owls are encountered, all work in the area shall cease until either the young birds have fledged or the appropriate permits are obtained from the California Department of Fish and Wildlife.

b. The project site is located within the Amargosa Creek ephemeral wash system. Hard and soft clay pans occur within the northern portion of the project site. However, these clays do not meet the traditional definition of a streambed as they do not have an established bank, bottom, or sides. As such, the City does not anticipate the need for a Streambed Alteration Agreement and impacts would be less than significant.

c. There are no federally protected wetlands on the project site as defined by Section 404 of the Clean Water Act. Therefore, no impacts would occur.

d. The project site is not part of an established wildlife corridor. The project site is located immediately adjacent to an existing development to the north and east. The remaining property surrounding the project site is undeveloped and connected to large expanses of open space. As such, the property is not part of a wildlife corridor and development of the project site would not impact an established wildlife corridor. Therefore, no impacts would occur.

e-f. The project site is not located in an area designated under an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State Habitat Conservation Plan. Additionally, there are no local policies or ordinances protecting biological resources which are applicable to this site. Therefore, no impacts would occur.

V. a-d. A cultural resources survey was prepared for the project site by CRM Tech and documented in a report entitled "Historical/Archaeological Resources Survey Report, Assessor's Parcel No. 3107-012-905, City of Lancaster, Los Angeles County, California" and dated November 22, 2017. As part of the report the following were conducted: a historical/archaeological resources record search, historical background research, Native American representatives were contacted and an intensive pedestrian field survey.

On October 25, 2017 a records search at the South Central Coastal Information Center (SCCIC) was conducted for previously identified cultural resources on or near the project site. No cultural resources have been previously identified on the project site. Within of the project site, a total of 22 cultural resources surveys have been conducted and one archaeological site recorded. The recorded site is a lithic scatter located approximately 0.87 miles southeast of the project site. Due to the distance from the project site, the proposed project does not have the potential to impact the resource.

The Native American Heritage Commission (NAHC) was contacted for a sacred lands search and a list of tribes associated with the area. The NAHC sacred lands file search came back with negative results and five identified tribes. This contact information was utilized along with names and addresses of tribes that the City maintains to send out the AB 52 letters on November 28, 2017.

In addition, a field survey was conducted on November 1, 2017 by walking a series of parallel north-south transects spaced every 15 meters. The field survey did not identify any historical resources, tribal cultural resources, or buildings, structures, objects, sites, features, or artifact deposits of prehistoric or historical origin. Scattered domestic refuse and construction debris was observed but all items appear to be of modern origin and none of them are of any historical/archaeological interest. However, the San Manuel Tribe of Mission Indians has requested a mitigation measure to be included that outlines the process to be followed in the event that prehistoric/tribal cultural resources are encountered during construction activities. This mitigation measure has been included below in order to ensure that all impacts to cultural resources remain less than significant.

2. In the event that previously unknown cultural resources are identified during construction, the following requirements shall apply:

   - If human remains or funerary objects are encountered during any construction activities associated with the proposed project, work within a 100-foot buffer shall

cease and the County Coroner shall be contacted pursuant to State Health and /Safety Code Section 7050.5.

- In the event that Native American cultural resources are discovered during any construction activities, all work within a 60-foot buffer shall cease and a qualified archaeologist meeting the Secretary of the Interior standards shall be hired to assess the find. The San Manuel Band of Mission Indians shall be contacted and provided information and invited to perform a site visit in conjunction with the archaeologist to provide Tribal input.

- If significant Native American resources are discovered and avoidance cannot be ensured, a Secretary of the Interior qualified archaeologist shall be retained to develop a cultural resources Treatment Plan, as well as a Discovery and Monitoring Plan. A copy of the draft document shall be provided to the San Manuel Band of Mission Indians for review and comment. All in field investigation, assessment and/or data recovery pursuant to the Treatment Plan shall be monitored by a Tribal Monitor.

Development of the project site would not directly or indirectly destroy a unique paleontological resources, site, or geologic feature. No human remains, including those interred outside of formal cemeteries, were discovered on the project site. However, in the even that cultural resources are encountered during the course of construction activities, all work shall cease until a qualified archaeologist determines the proper disposition of the resource.

VI. a. The project site is not identified as being in or in proximity to a fault rupture zone (LMEA Figure 2-5). According to the Seismic Hazard Evaluation of the Lancaster East and West Quadrangles, the project site may be subject to intense seismic shaking (LMEA pg. 2-16). However, the proposed project would be constructed in accordance with the seismic requirements of the Uniform Building Code (UBC) as adopted by the City, which would render any potential impacts to a less than significant level. The project site is generally level and is not subject to landslides (SSHZ).

Liquefaction is a phenomenon in which the strength and stiffness of a soil is reduced by earthquake shaking or other events. This phenomenon occurs in saturated soils that undergo intense seismic shaking typically associated with an earthquake. There are three specific conditions that need to be in place for liquefaction to occur: loose granular soils, shallow groundwater (usually less than 50 feet below the ground surface) and intense seismic shaking. In February 2005, the California Geologic Survey updated the Seismic Hazards Zone Maps for Lancaster (SSHZ). Based on these maps, the project site is located in an area prone to liquefaction. In order to ensure that the facility is built appropriately and to determine if the specific site actually contains liquefiable soils, the following mitigation measure is required. With implementation of the mitigation measure, impacts would be less than significant.

3. Prior to the issuance of any construction related permits, the applicant shall prepare a liquefaction study and submit the study for review by the City Engineer. Upon approval of the study by the City Engineer, the developer shall follow all the recommendations identified in the report.

b. The project site is rated as having a "moderate" risk for soil erosion (USDA SCS Maps) when cultivated or cleared of vegetation. The proposed project consists of the construction and operation

of a campus like development to provide services to the homeless population. Upon completion of construction, there would be no soils exposed with the potential for wind/water erosion. The site would be covered in structures, parking lots, graded/paved paths, and landscaping.

However, there remains a potential for water and wind erosion during construction. The proposed project would be required, under the provisions of the Lancaster Municipal Code (LMC) Chapter 8.16, to adequately wet or seal the soil to prevent wind erosion. Additionally, the following mitigation measures shall be required to control dust/wind erosion.

4. The applicant shall submit a Dust Control Plan to the Antelope Valley Air Quality Management District (AVAQMD) for review and approval in accordance with Rule 403, Fugitive Dust, prior to the issuance of any grading and/or construction permits. This plan shall demonstrate adequate water or dust suppressant application equipment to mitigate all disturbed areas.

5. When water is used for dust control, watering shall occur three times per day and shall be increased to four times per day when there is evidence of visible wind driven fugitive dust.

6. Signage shall be displayed on the project site in accordance with AVAQMD Rule 403 (Appendix A).

7. All disturbed surfaces shall meet the definition of a stabilized surface upon completion of project construction.

c. Subsidence is the sinking of the soil caused by the extraction of water, petroleum, etc. Subsidence can result in geologic hazards known as fissures. Fissures are typically associated with faults or groundwater withdrawal, which result in the cracking of the ground surface. According to Figure 2-3 of the City of Lancaster's Master Environmental Assessment, the project site is located in an area with known sinkholes and fissures; however, it is unknown if any are located on the project site. In order to ensure that no impacts occur from subsidence or fissures/sinkholes in the area, the following mitigation measure is required.

8. Prior to the issuance of any construction related permits (e.g., grading, building, etc.), the applicant shall submit a detailed geotechnical report for the project site for review and approval. Upon approval of the geotechnical report, the developer shall follow all of the identified recommendations.

For a discussion of potential impacts regarding liquefaction, please refer to Item VI.a. Therefore, no impacts would occur.

d. The soil on the project site is characterized by a moderate shrink/swell potential (LMEA Figure 2-3), which may be considered an expansive soil. A soils report, as identified in Mitigation Measure 8 above, shall be submitted to the City by the project developer prior to grading of the property and the recommendations of the report shall be incorporated into the development of the property. Therefore, impacts would be less than significant.

e. The proposed project would connect to the existing sanitary sewer for ultimate disposal at the wastewater treatment plant located north of the City. The proposed project would not utilize septic tanks or alternative waste water disposal systems. Additionally, portable restroom facilities would be provided for workers during construction activities. These facilities would be maintained in accordance with all applicable rules and regulations. Therefore, no impacts would occur.

VII. a-b. The proposed project involves the construction and operation of a campus-like facility to provide services necessary to address homelessness. As discussed in Item III.b, the proposed project would generate air emissions during construction and operational activities, some of which may be greenhouse gases. These emissions are anticipated to be less than the thresholds established by the AVAQMD and would not prevent the State from reaching its greenhouse gas reduction targets. Therefore, impacts would be less than significant.

The proposed projects would be in compliance with the greenhouse gas goals and policies identified in the City of Lancaster's General Plan (pgs. 2-19 to 2-24) and with the City's Climate Action Plan. The City's Climate Action Plan was adopted in March 2017 and identifies projects in eight different categories which would help the City meet its greenhouse house gas reduction goals. These categories include: Transportation, Energy, Municipal Operations, Water, Waste, Built Environment, Community, and Land Use. The proposed development would incorporate many of the identified projects such as supporting public transportation, providing pedestrian amenities, using renewable energy, recycled water, green building, drought tolerant landscaping/community gardens and education. Therefore, impacts with respect to conflicts with an agency's plan, policies, or regulations would be less than significant.

VIII. a-b. The proposed project consists of the construction and operation of a campus-like facility to provide the necessary services to address homelessness. The proposed project would use minimal amounts of hazardous materials during construction activities. During operation, the development would utilize hazardous materials typically found in residential, office and medical settings. Use of all materials would be in accordance with all applicable rules and regulations. The proposed project is not located along a hazardous materials/waste transportation corridor (LMEA Figure 9.1-4). The project site is undeveloped and vacant with no potential for exposure to lead-based paint or asbestos.

c. The project site is not located within a quarter mile of an existing or proposed school. The closest school is Lancaster High School located at 44701 Eagle Way, approximately 0.75 miles south of the project site. Additionally, the proposed project would not emit hazardous emissions and use/disposal of any hazardous materials typically found in residential/office settings would occur in accordance with all applicable rules and regulations. Therefore, no impacts would occur.

d. A Phase I Environmental Site Assessment was prepared for the project site by Bruin Geotechnical Services, Inc. and the results documented in a report entitled "Phase I Environmental Site Assessment, Assessor Parcel Number 3107-012-905, Vicinity Avenue I, West of 30th Street West, Lancaster, California 93536" and dated October 9, 2017.

A site visit was conducted on the project site on October 2, 2017 to determine the presence of any recognized environmental concerns. The project site is undeveloped/ vacant land with vegetation and is partially fenced. During the survey it was noted that a storm drain existed along Avenue I (no sumps or clarifiers) and that electrical lines ran overhead. No hazardous materials or wastes were observed on the

project site. No surface staining or stressed vegetation was observed on the project site or adjacent to the project site.

In addition to the site visit, a regulatory database search was conducted of Federal, State, and Tribal databases for the project site and the surrounding area within specified search distances. The project site and immediately adjacent properties are not listed on any regulatory databases. Therefore, no impacts would occur.

e-f. The project site is not located within an airport land use plan or within two miles of a public airport, public use airport, or private airstrip. The closest airport is the General William Fox Airfield, which is located approximately 2 miles northwest of the project site. Therefore, no impacts would occur.

g. Access to the project site would be taken from 32nd Street West via Avenue I. Avenue I is a fully improved paved roadway, while 32nd Street West is currently a dirt road which will be improved to support the project. Avenue I has been designated as an evacuation route. However, the traffic generated by the proposed project is not sufficient to cause impacts at any of the area intersections. Therefore, the proposed project would not impact or physically block any identified evacuation routes and would not interfere with any adopted emergency response plans. Therefore, no impacts are anticipated.

h. The property surrounding the project site is predominantly undeveloped. The Veteran's Home is located immediately east of the project site and the Copper Square Apartments are located immediately north of the project site. However, the remainder of the property surrounding the project sites is vacant and undeveloped. It is possible that these lands could be subject to a grass fire. However, the project site is located within the boundaries of Fire Station 130, located at 44558 40th Street West, which would serve the project site in the event of a fire. Therefore, impacts from wildland fires would be less than significant.

IX. a. The project site is not located in an area with an open body of water or in an aquifer recharge area. The closest body of water is the lake at Apollo Park which is located approximately two miles north-northeast. According to the Lancaster Master Environmental Assessment (pg 10.1-6), the locations most suitable for groundwater recharge are: 1) Amargosa Creek (bounded by Avenue N, 10th Street West, and Division Street); 2) Little Rock Creek (near Avenue N between 60th Street West and 70th Street West); and 3) Amargosa Creek (nearest to Elizabeth Lake Road and 25th Street West). The nearest of these locations to the project site is Location 1, approximately miles east of the project site.

The proposed project would be required to comply with all applicable provisions of the National Pollutant Discharge Elimination System (NPDES) program. The NPDES program establishes a comprehensive storm water quality program to manage urban storm water and minimize pollution of the environment to the maximum extent practicable. The reduction of pollutants in urban storm water discharge through the use of structural and nonstructural Best Management Practices (BMPs) is one of the primary objectives of the water quality regulations. BMPs that are typically used to management runoff water quality include controlling roadway and parking lot contaminants by installing oil and grease separators at storm drain inlets, cleaning parking lots on a regular basis, incorporating peak-flow reduction and infiltration features (grass swales, infiltration trenches and grass filter strips) into landscaping and implementing educational programs. The proposed project would incorporate appropriate BMPs as applicable, as determined by the City of Lancaster Development Services Department. Therefore, impacts would be less than significant.

The proposed project involves the construction and operation of a campus-like development to provide necessary services to homeless populations. This facility would utilize hazardous materials typically found in residences, office settings, and medical offices. While the proposed project would be connected to the sanitary sewer system, the proposed project does not have the potential to introduce industrial discharge into a public water system and potentially violate water quality standards or waste discharge requirements. Therefore, impacts would be less than significant.

b. The proposed project would be connected to the existing potable water system and would obtain its water from Los Angeles County Waterworks District 40 and a water meter currently exists to serve the site. District 40 obtains its water from multiple sources including the State Water Project and groundwater. However, the groundwater basin has recently been adjudicated and the amount of water pumped is regulated in accordance with that adjudication. Additionally, as indicated in IX.a, the proposed project would not impact any groundwater recharge areas. Therefore, the proposed project would not deplete groundwater supplies or interfere with groundwater recharge and impacts would be less than significant.

c-e. Development of the proposed project would increase the amount of surface runoff as a result of impervious surfaces associated with the development. While the amount of impervious surfaces would increase, the proposed project is being developed to have a campus-like feel with lots of open space and landscaping. Additionally, the project site is likely to have a drainage basin to handle the flows from the project during storm events. Specifically, the proposed project would be designed to accept current flows entering the property and to handle any additional incremental runoff from the project site. Therefore, impacts from drainage and runoff would be less than significant.

f-g. The project site is designated as mix of Flood Zone AH and Flood Zone X. The northeastern portion of the project is designated as Flood Zone AH per the Flood Insurance Rate Map (FIRM) Panel No. 060672 (2008) (06037C0410F) which is within the 100-year flood zone. The remainder of the project site is designated as Flood Zone X by FIRM Panel No. 060672 (2008) (06037C0405F) which is outside of both the 100- and 500-year flood zones. The proposed project involves the construction and operation of a campus-like facility to provide necessary services to the homeless population. As result, residences/shelters and service buildings may be placed within the 100-year flood zone which could impede or redirect flood flows. However, the site would be designed to minimize the number of structures located within this area and any structures would be elevated above the flood zone in accordance with the requirements of the AH zone. Therefore, impacts would be less than significant.

h. The project site does not contain and is not downstream from a dam or levee. Therefore, no impacts would occur from flooding as a result of the failure of a dam or levee.

i. The project site is not located within a coastal zone. Therefore, tsunamis are not a potential hazard. The project site is relatively flat and does not contain any enclosed bodies of water and is not located in close proximity to any other large bodies of water. Therefore, the proposed project would not be subject to inundation by seiches or mudflows. No impacts would occur.

X. a. The proposed project is not of the scale or nature that could physically divide an established community. The proposed project consists of the construction and operation of campus-like facility providing services to address issues associated with homelessness. The area surrounding the project site is predominantly vacant with the Veteran's Home immediately to the east and the Copper Square Apartment complex immediately north. 32nd Street West will be improved along the western frontage of

the project site to allow access to the project. The proposed project would not block a public street, trail or other access route or result in a physical barrier that would divide the community. Therefore, no impacts would occur.

b. The proposed project is consistent with the City's General Plan and must be in conformance with the Lancaster Municipal Code. The proposed project will be in compliance with the City-adopted UBC (Item VI.a) and erosion-control requirements (Item VI.b). Therefore, no impacts would occur.

c. As noted under Item IV.e-f, the project site is not subject to and would not conflict with a habitat conservation plan or natural communities conservation plan. Therefore, no impacts would occur.

XI. a-b. The project site does not contain any current mining or recovery operations for mineral resources and no such activities have occurred on the project site in the past. According to the LMEA (Figure 2-4 and page 2-8), the project site is designated as Mineral Reserve Zone 3 (contains potential but presently unproven resources). However, it is considered unlikely that the Lancaster area has large, valuable mineral and aggregate deposits. Therefore, no impacts to mineral resources would occur.

XII. a, b, d Construction activities would generate short-term noise impacts. Construction activities have a short and temporary duration, lasting from a few days to a period of several months. Ground borne noise and other types of construction-related noise impacts would typically occur during the initial site preparation, which can create the highest levels of noise. High ground borne noise levels can occur during construction activities due to the use of haul trucks, backhoes, and other heavy duty construction equipment. Construction activities have the potential to expose adjacent sensitive land uses (Copper Square, Veteran's Homes, and adjacent single family residence) to noise levels between 62 and 80 dBA at 50 feet from the noise source. Table 3, Construction Reference Noise Levels, provides a summary of sixteen construction equipment reference noise level measurements. Since the reference noise levels were collected at varying distances, all construction noise level measurements presented in Table 3 have been adjusted to describe a common distance of 50 feet.

Table 3
Construction Reference Noise Levels

Noise Source	Reference Noise Levels @ 50 feet (dBA L_{max})
Truck Pass-By and Dozer Activity	63.7
Dozer Activity	72.0
Construction Vehicle Maintenance Activities	70.4
Foundation Trenching	70.5
Rough Grading Activities	80.4
Residential Framing	72.3
Water Truck Pass-By and Backup Alarm	77.9
Dozer Pass-By	85.5
Two Scrapers and Water Truck Pass-By	84.6
Two Scrapers Pass-By	82.5
Scraper, Water Truck, and Dozer Activity	83.3
Concrete Mixer Truck Movements	73.1
Concrete Paver Activities	71.3
Concrete Mixer Pour and Paving Activities	71.9
Concrete Mixer Backup Alarms and Air Brakes	78.8
Concrete Mixer Pour Activities	79.2
Source: Public Review Draft, Avanti South Specific Plan Environmental Impact Report, November 2017	

The City's General Plan (Table 3-1) establishes an outdoor maximum CNEL of 65 dBA for residential uses. The current noise levels for the area surrounding the project site are as follows: 1) Avenue I between 30th Street West and 40th Street is approximately 64.7 dBA; 2) Avenue I between 30th Street West and 27th Street West is approximately 63.9 dBA; 3) 30th Street West between Avenue H and Avenue I is approximately 59.4 dBA and 4) 30th Street West between Avenue I and Lancaster Boulevard is approximately 62.5 dBA.

The total construction time for the proposed project is estimated to be approximately 9 months, with construction starting the end of March/beginning of April and ending by the end of 2018. Construction activities associated with the construction equipment identified above would temporarily increase noise levels for adjacent land uses. Noise levels would fluctuate depending upon construction activity, equipment type and duration of use, and the distance between noise source and receiver.

The closest noise sensitive receptors are the Copper Square Apartments, the Veteran's Home and the single family residence located on the west side of 32nd Street West. Noise levels at these receptors may reach between 75 dBA and 85 dBA depending upon the location of the work and the type of equipment being utilized. These noise levels could cause interference with conversations or other normal daytime activities. However, with implementation of the mitigation measures identified below, these impacts would be reduced to a less than significant level.

9. Construction operations shall not occur between 8 p.m. and 7 a.m. on weekdays or Saturday or at any time on Sunday. The hours of any construction-related activities shall be restricted to periods and days permitted by local ordinance.

10. The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the owner shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.

11. Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible.

12. Material stockpiles and mobile equipment staging, parking and maintenance areas shall be located as far away as practicable from noise-sensitive receptors.

13. The use of noise producing signals, including horns, whistles, alarms, and bells shall be for safety warning purposes only.

14. No project-related public address of music system shall be audible at any adjacent receptor.

15. All noise producing construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specifications. Mobile or fixed "package" equipment (e.g., arc-welders, air compressors, etc.) shall be equipped with shrouds and noise control features that are readily available for the type of equipment.

With implementation of these mitigation measures, impacts from construction noise would be less than significant.

c. Operation of the proposed Kensington Campus would generate a very minimal increase in noise levels. These noise levels would be similar that that of a typical residential neighborhood. Additionally, the proposed project would generate a total of 797 daily trips. This number of trips is not sufficient to noticeably increase the noise levels in the surrounding area. It is anticipated that the noise levels in vicinity of the project site would continue to be between 59.4 dBA and 64.7 dBA. These noise levels are consistent with requirements of the City's General Plan. Therefore, noise impacts would be less than significant.

e-f. The project site is not in proximity to an airport or frequent overflight area and would not experience noise from these sources (also see Item VIII.e-f). Therefore, no impacts would occur.

XIII. a. The proposed project involves the construction and operation of a campus-like development to provide the necessary services to address homelessness. Construction of the proposed project would provide temporary construction jobs. However, these are likely to be filled by individuals currently residing in the area and would not cause individuals to relocate to the Antelope Valley. Operation of the facility would centralize services that address homelessness including food banks, job search facilities, medical/mental health care, etc. Many of these businesses currently exist and would simply operate from a new location. While the project would provide temporary and low-income housing, this would simply fill a need that currently exists and is not available elsewhere in the Antelope Valley. These facilities would not induce substantial population growth.

No new roadways or infrastructure (e.g., water lines or sewer, etc.) would be constructed as part of the proposed project. 32nd Street West would be improved (paved) and the water and sewer lines were previously installed when the Veteran's Home was constructed. Therefore, impacts would be less than significant.

b-c. The project site is currently vacant. No housing or people would be displaced necessitating the construction of replacement housing elsewhere. Therefore, no impacts would occur.

XIV. The proposed project would increase the need for fire and police services; however, the project site is within the current service area of both these agencies and the additional time and cost to service the site is minimal. The proposed project would not induce substantial population growth as it is a facility which would provide services to address issues associated with homelessness. The proposed would not induce substantial population, instead would aid existing Antelope Valley residents. These residents are currently utilizing the parks, schools and other public facilities and the proposed project would not increase this demand. Impacts would be less than significant.

XV. a-b. The proposed project involves the construction and operation of a campus-like facility to provide services to address issues associated with homelessness. Construction of the proposed project would require construction workers for approximately a 9-month period. These workers are expected to come from the local area and would not create an additional demand on recreational facilities. Once the proposed project is operational, the employees of the facility would come from the existing community as many are currently providing these services and would simply move to the new facility. Both the employees and the individuals utilizing the services are already utilizing the recreational facilities

available in the area. Therefore, no new impacts to recreational facilities would occur and no construction of new facilities would be necessary.

XVI. a. The proposed project would generate construction traffic in the form of worker vehicles and delivery trucks. These trips would only occur during construction and would most likely occur at off-peak hours of the day. Adequate access to the project sites exists from Avenue I to 32nd Street West to handle the trips that construction would generate. During operation of the facility, a total of 797 daily trips would be generated with 54 trips in the a.m. peak hour and 80 trips in the p.m. hour. The existing roadways are adequate to be handle the traffic expected to be generated by the proposed project. Additionally, a bus stop for Antelope Valley Transit Authority existing in front of the project site along Avenue I. This number of trips would not impact the surrounding street system. Therefore, impacts would be less than significant.

b. There are no county congestion management agency designated roads or highways in the vicinity of the project sites. Additionally, the proposed project would not generate a sufficient number of trips to require an analysis of the Avenue I/Highway 14 interchange. Therefore, no impacts would occur.

c. The project site does not contain any aviation related uses and the proposed project would not include the development of any aviation related uses. The proposed project is a campus-like facility which would provide the necessary services to address issues associated with homelessness. The proposed project would be constructed with materials that produce minimal amounts of glare, to the extent feasible, and therefore would not impact general aviation in the area. Therefore, the proposed project would not have an impact on air traffic patterns.

d. No new roadways are required as part of the proposed project. 32nd Street West is currently a direct road and it would be improved to provide access to the project site. No hazardous conditions would be created and no impacts would occur.

e. The proposed project would have adequate emergency access from three driveways located on 32nd Street West. Interior circulation would be provided in accordance with the requirements of the Los Angeles County Fire Department; therefore, no impacts would occur.

f. The proposed project does not conflict with or impede any of the General Plan policies or specific actions related to alternative modes of transportation (Lancaster General Plan pgs 5-18 to 5-24). An AVTA bus stop is located along the project site's Avenue I frontage providing easy access to the project site. Additionally, the proposed project would provide bike lanes and walking paths throughout the facility. Therefore, no impacts would occur.

XVII.a-b. No tribal cultural resources have been identified either through the sacred lands file search conducted by the Native American Heritage Commission or by any of the Native American Tribes with cultural affiliations to the area. A mitigation measure has been included under cultural resources outlining the process through which any cultural resources discovered during construction would be handled. Therefore, no impacts would occur.

XVIII. a. The proposed project would discharge to wastewater to the existing sewer lines located in Avenue I and 30th Street West. Project wastewater would be treated at the Lancaster Water Reclamation Plant which has adequate capacity to serve the proposed development. As the proposed project is primarily a residential development with associated services to support homeless individuals and

families, it would not exceed the wastewater treatment requirements and impacts would be less than significant.

b. Wastewater from the proposed project would be treated at the Lancaster Water Reclamation Plant, which has a design capacity of 16 million gallons per day (gpd) and has been recently upgraded to treat wastewater to tertiary standards. The proposed project is anticipated to generate wastewater on a daily basis similar to the volumes generated by the Copper Square Apartments immediately to the north. This volume of wastewater is within the available capacity of the treatment plant. The proposed project would not require the expansion of existing facilities or the construction of new facilities. Therefore, impacts would be less than significant.

c. See Items IX.c and IX.d.

d. Los Angeles County Waterworks District #40 is the water purveyor for the project site. The project site already has a water meter and the developer would need to go through the established process in order to secure the necessary water for the project site per the existing Memorandum of Understanding. No new construction of water treatment facilities or new or expanded entitlements would be required. Therefore, water impacts would be less than significant.

e. See XVII.b.

f-g. The proposed project would generate solid waste during construction and operation which would contribute to an overall impact on landfill services (GPEIR pgs 5.13-25 to 5.13-28 and 5.13-31); although this project's individual contribution is considered minimal. The proposed development would be required to have trash collection services in accordance with City contracts with waste haulers over the life of the project. These haulers are required to be in compliance with applicable regulations on solid waste transport and disposal, including waste stream reduction mandated under Assembly Bill (AB) 939, which was enacted to reduce, recycle, and reuse solid waste generated in California to the maximum extent feasible. Therefore, impacts would be less than significant

XIX.a-c. The proposed project consists of the construction and operation of a campus-like facility to provide the necessary services to address homelessness in the Antelope Valley: Kensington Campus. Cumulative impacts are the change in the environment which results from the incremental impact of the project when added to other closely related past, present and reasonably foreseeable future projects. Four other projects are located within a one-mile radius of the project site:

- SPR 05-23: Copper Square Apartment Complex located immediately north of the project site (under construction)
- TTM 70181/CUP 15-15: Residential Planned Development (RPD) for 134 lots and a park located at the northwest corner of Lancaster Boulevard and 40th Street West (under review)
- TTM 70182/CUP 15-16: RPD for 154 lots and a park located at the southwest corner of Avenue I and 40th Street West (under review)
- TTM 70892/CUP 15-17: RPD for 154 lots and a park located at the southeast corner of Avenue I and 38th Street West (under review)

The proposed project would not create any impacts with respect to: Agriculture and Forest Resources, Resources, Mineral Resources, Population/Housing, Recreation, and Tribal Cultural Resources. The project would create impacts to other resource areas and mitigation measures have identified for Biological Resources, Cultural Resources, Geology/Soils, and Noise. Many of the impacts generated by individual projects are site specific and generally do not influence the impacts on another site. All projects undergo environmental review and have required mitigation measures to reduce impacts when warranted. These mitigation measures reduce environmental impacts to less than significant levels whenever possible. All impacts associated with the proposed project are less than significant with the exception of biological resources (nesting birds), cultural resources (unknown resources), geology/soils (soil erosion/dust control) and noise. These issues would be less than significant with the incorporation of the identified mitigation measures. Therefore, the project's contribution to cumulative impacts would not be cumulatively considerable.

List of Referenced Documents and Available Locations*:

BRR:	Biological Resource Assessment of APN 3107-012-905, Lancaster, California, Mark Hagan, October 27, 2017	DSD
CLIM	City of Lancaster Climate Action Plan, March 2017	DSD
CRS:	Historical/Archaeological Resources Survey Report, Assessor's Parcel No. 3107-012-905, City of Lancaster, Los Angeles County, CRM Tech, November 22, 2017	DSD
DRAIN	Conceptual Drainage Study, APN 3107-012-905, Avenue I & 32nd Street West, Lancaster, CA, Antelope Valley Engineering, November 2017	DSD
ESA:	Phase I Environmental Site Assessment, Assessor Parcel Number 3107-012-905, Vicinity Avenue I, West of 30th Street West, Lancaster, California 93536, Bruin Geotechnical Services Inc., October 9, 2017	DSD
FIRM:	Flood Insurance Rate Map	DSD
GPEIR:	Lancaster General Plan Environmental Impact Report	DSD
LGP:	Lancaster General Plan	DSD
LMC:	Lancaster Municipal Code	DSD
LMEA:	Lancaster Master Environmental Assessment	DSD
SEWER	Sewer Area Study for Avenue I & 32nd Street West, Lancaster, CA 93534, A.P.N. 3107-012-905, Antelope Valley Engineering, September 29, 2017	DSD
SSHZ:	State Seismic Hazard Zone Maps	DSD
STAFF	Staff Report for Disposition and Development Agreement Between the Lancaster Housing Authority and InSite Development LLC for Property Located at Future 32nd Street West and West Avenue I, November 14, 2017	DSD
TRA	Traffic – CEQA Initial Study Form, December 6, 2017	DSD
USGS:	United States Geological Survey Maps	DSD
USDA SCS:	United States Department of Agriculture Soil Conservation Service Maps	DSD

* DSD: Development Services Department
Community Development Division
Lancaster City Hall
44933 Fern Avenue
Lancaster, California 93534

Mit. / Cond. No.	Mitigation Measure/ Conditions of Approval	Monitoring Milestone (Frequency)	Method of Verification	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
					Initials	Date	Remarks
BIOLOGICAL RESOURCES							
1.	A nesting bird and burrowing owl preconstruction survey shall be conducted on the project site prior to the start of any construction/ground disturbing activities. If nesting birds or burrowing owls are encountered, all work in the area shall cease until either the young birds have fledged or the appropriate permits are obtained from the California Department of Fish and Wildlife.	Prior to final approval of a grading/construction plan, issuance of a stockpile or construction permit, or any ground disturbing activities.	Prior to any rolling, vegetation removal, grubbing, grading, stockpiling, or construction activities, a copy of the report from a biologist with the results of the nesting bird and burrowing owl survey.	Development Services Department, Community Development Division			
CULTURAL RESOURCES							
2.	In the event that previously unknown cultural resources are identified during construction, the following requirements shall apply: • If human remains or funerary objects are encountered during any construction activities associated with the proposed project, work within a 100-foot buffer shall cease and the County Coroner shall be contacted pursuant to State Health and Safety Code Section 7050.5. • In the event that Native American cultural resources are discovered during any construction activities, all work within a 60-foot buffer shall cease and a qualified archaeologist meeting the Secretary of the Interior standards shall be hired to assess the find. The San Manuel Band of Mission Indians shall be contacted and provided information and invited to perform a site visit in conjunction with the archaeologist to provide Tribal input.	During construction.	Field inspections during construction.	Development Services Department, Community Development Division / San Manuel Band of Mission Indians			

Mit. / Cond. No.	Mitigation Measure/ Conditions of Approval	Monitoring Milestone (Frequency)	Method of Verification	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
					Initials	Date	Remarks
	• If significant Native American resources are discovered and avoidance cannot be ensured, a Secretary of the Interior qualified archaeologist shall be retained to develop a cultural resources Treatment Plan, as well as a Discovery and Monitoring Plan. A copy of the draft document shall be provided to the San Manuel Band of Mission Indians for review and comment. All in field investigation, assessment and/or data recovery pursuant to the Treatment Plan shall be monitored by a Tribal Monitor.						
GEOLOGY AND SOILS							
3.	Prior to the issuance of any construction related permits, the applicant shall prepare a liquefaction study and submit the study for review by the City Engineer. Upon approval of the study by the City Engineer, the developer shall follow all the recommendations identified in the report.	Prior to the issuance of any building permits.	Liquefaction study shall be received and approved by the City Engineer. All recommendations in the approved report shall be followed by the developer.	Development Services Department, City Engineer/Development Engineering			
4.	The applicant shall submit a Dust Control Plan to the Antelope Valley Air Quality Management District (AVAMQD) for review and approval in accordance with Rule 403, Fugitive Dust, prior to the issuance of any grading and/or construction permits. This plan shall demonstrate adequate water or dust suppressant applicant equipment to mitigate all disturbed areas.	Prior to vegetation removal, grubbing, grading, stockpile, or construction, the City must receive a copy of the Dust Control Plan.	A copy of the AVAQMD-approved Dust Control Plan. Field inspections.	Development Services Department, Community Development Division, Building and Safety, and the AVAQMD.			
5.	When water is used for dust control, watering shall occur three times per day and shall be increased to four times per day when there is visible wind driven fugitive dust.	During construction	Field inspection	Development Services Department, Community Development Division, Building and Safety, and the AVAQMD.			

Mit. / Cond. No.	Mitigation Measure/ Conditions of Approval	Monitoring Milestone (Frequency)	Method of Verification	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
					Initials	Date	Remarks
6.	Signage shall be displayed on the project site in accordance with AVAQMD Rule 403 (Appendix A).	During construction	Field inspection	Development Services Department, Community Development Division, Building and Safety, and the AVAQMD.			
7.	All disturbed surfaces shall meet the definition of a stabilized surface upon completion of project construction.	During construction and operation	Field inspection	Development Services Department, Community Development Division, Building and Safety, and the AVAQMD.			
8.	Prior to the issuance of any construction related permits (e.g., grading, building, etc.), the applicant shall submit a detailed geotechnical report for the project site for review and approval. Upon approval of the geotechnical report, the developer shall follow all of the identified recommendations.	Prior to the issuance of any building permits.	Geotechnical study shall be received and approved by the City Engineer. All recommendations in the approved report shall be followed by the developer.	Development Services Department, City Engineer/Development Engineering			
NOISE							
9.	Construction operations shall not occur between 8 p.m. and 7 a.m. on weekdays or Saturday or at any time on Sunday. The hours of any construction-related activities shall be restricted to periods and days permitted by local ordinance.	During construction	Field inspection	Development Services Department, Building and Safety			
10.	The on-site construction supervisor shall have the responsibility and authority to receive and resolve noise complaints. A clear appeal process to the owner shall be established prior to construction commencement that will allow for resolution of noise problems that cannot be immediately solved by the site supervisor.	During construction	Field inspection	Development Services Department, Building and Safety			

Mit. / Cond. No.	Mitigation Measure/ Conditions of Approval	Monitoring Milestone (Frequency)	Method of Verification	Party Responsible for Monitoring	VERIFICATION OF COMPLIANCE		
					Initials	Date	Remarks
11.	Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible.	During construction	Field inspection	Development Services Department, Building and Safety			
12.	Material stockpiles and mobile equipment staging, parking, and maintenance areas shall be located as far away as practicable from noise-sensitive receptors.	During construction	Field inspection	Development Services Department, Building and Safety			
13.	The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.	During construction	Field inspection	Development Services Department, Building and Safety			
14.	No project-related public address or music system shall be audible at any adjacent receptor.	During construction	Field inspection	Development Services Department, Building and Safety			
15.	All noise producing construction equipment and vehicles using internal combustion engines shall be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating conditions that meet or exceed original factory specifications. Mobile or fixed "package" equipment (e.g., arc-welders, air compressors, etc.) shall be equipped with shrouds and noise control features that are readily available for the type of equipment.	During construction	Field inspection	Development Services Department, Building and Safety			

PATH VILLAS SOUTH GATE

RESOLUTION NO. 7780

CITY OF SOUTH GATE
LOS ANGELES COUNTY, CALIFORNIA

RESOLUTION OF THE CITY COUNCIL OF THE CITY OF SOUTH GATE APPROVING DENSITY BONUS PERMIT NO. 2017-01 ALLOWING AN ADDITIONAL FIVE UNITS TO PATH VILLAS AT SOUTH GATE HOUSING DEVELOPMENT LOCATED AT 5610 IMPERIAL HIGHWAY

WHEREAS, on April 24, 2017, the Department of Community Development received an application from Path Ventures for Density Bonus Permit No. 2017-01 to allow the construction of an additional five (5) units to a proposed fifty-five (55) unit affordable housing project at 5610 Imperial Highway ("Project"); and

WHEREAS, the 2014 Housing Element calls for the City to "provide a range of housing prices, unit types, and sizes to accommodate the varied needs of all socioeconomic segments of South Gate, fostering a diverse and balanced community"; and

WHERAS, the 2014 Housing Element calls for the City to "encourage the development of housing that caters to the special needs groups, including the elderly, persons with disabilities (including developmental disabilities), students, large families, and the homeless"; and

WHEREAS, the 2009 General Plan calls for a "robust green building program"; and

WHEREAS, the 2009 General Plan calls encourages the provision of supportive services that enable households to be self-sufficient; and

WHEREAS, the approval of Density Bonus Permit No. 2017-01 increases the use of green techniques in new buildings and new building sites; and

WHEREAS, at the conclusion of the noticed public hearing held at the meeting of the Planning Commission August 1, 2017, the Planning Commission adopted Resolution No. 2017-04 recommending that the City Council approve Density Bonus Permit No. 2017-01; and

WHEREAS, a public hearing notice was duly published in the Los Angeles Wave newspaper on August 31, 2017, and mailed to property owners and properties located within 600' feet of the project site which is twice the legally require noticing area; and

WHEREAS, the City Council after conducting a duly noticed public hearing has determined that Density Bonus Permit No. 2017-01 is consistent with the goals, policies, and implementation measures set forth in the 2009 General Plan and 2014 Housing Element;

NOW, THEREFORE, THE CITY COUNCIL OF THE CITY OF SOUTH GATE, CALIFORNIA, DOES HEREBY RESOLVE AS FOLLOWS:

SECTION 1. The City Council, pursuant to the facts noted above, does hereby conditionally approve Density Bonus Permit No. 2017-01 to allow an additional five units for a proposed fifty-five unit supportive housing development at 5610 Imperial Highway subject to the conditions found in attachment "A" attached hereto and incorporated herein for reference.

SECTION 2. The adoption of Density Bonus Permit No. 2017-01 is consistent with the goals and objectives of the adopted 2014 Housing Element and 2009 General Plan.

SECTION 3. This Project is within a Class 32 "Infill" Categorical Exemption pursuant to California Environmental Quality Act Guideline Section 15332. A Class 32 Exemption exempts certain in-fill development meeting the conditions described in the section. The project qualifies for a Class 32 Exemption because of the following conditions: (a) the Project is consistent with the applicable general plan designation and all applicable general plan policies as well as with applicable zoning designation and regulations; (b) the Project occurs within city limits on a site of no more than five acres substantially surrounded by urban uses; (c) the Project's site has no value as habitat for endangered, rare or threatened species; (d) approval of the Project would not result in any significant effects relating to traffic, noise, air quality, or water quality; and (e) the site can be adequately served by all required utilities and public services. Accordingly, this Project is Categorically Exempt under California Code of Regulations (CCR) Section 15192 (Threshold Requirements of Exemptions for Affordable Housing), and CCR 15194 (Affordable Housing Exemption).

[Remainder of page left blank intentionally]

SECTION 4. If any section, sentence, clause, or phrase of this Resolution is for any reason held to be invalid or unconstitutional by a decision of any court of any competent jurisdiction, such decision shall not affect the validity of the remaining portions of this resolution. The City Council hereby declares that it would have passed this Resolution, and each and every section, subsection, sentence, clause and phrase thereof not declared invalid or unconstitutional without regard to whether any portion of the ordinance would be subsequently declared invalid or unconstitutional.

SECTION 5. The City Clerk shall certify to the adoption of this Resolution which shall be effective upon its adoption.

PASSED, APPROVED and **ADOPTED** this **12th** day of **September 2017.**

CITY OF SOUTH GATE:

Maria Davila, Mayor

ATTEST:

Carmen Avalos, City Clerk

(SEAL)

APPROVED AS TO FORM:

Raul F. Salinas, City Attorney

Exhibit A.

Planning Conditions

1. Except as set forth in conditions, development shall take place substantially as shown on the approved site plans and elevations. Any deviations (e.g. floor plan, unit square footage or unit mix) that still meet all of the City's codes and criteria will be substantially in conformance with this approval. However, any material deviations must be approved by the Community Development Department before construction.

2. Approval shall be valid for twenty-four (24) months from the date of the final determination. Time extension may be granted at the discretion of the Community Development Department.

3. No exterior structural alteration or building color change, other than those colors or building treatments originally approved by this application, shall be permitted without the prior approval of the Director of Community Development.

4. Paint and stucco colors that deviate from the approved color and material board shall be reviewed and approved by the Planning Division before purchase or application.

5. Future changes to the exterior color (either stucco or paint) shall be obtained by separate review and approval by the Planning Division of the Community Development Department.

6. The landscaping, including the parkway, shall be maintained in a clean, thriving condition, free from litter, weeds, and overgrowth in perpetuity.

7. The project shall comply with all Building & Safety and Public Works requirements.

8. At the completion of the project, final approval from the Planning Division shall be obtained prior to Building and Safety Division final approval. All conditions of approval shall be met prior to final approval by the Planning Division.

9. The applicant shall defend and hold harmless and indemnify the City and its agents, officers and employees from any claim, action, or proceeding against the City or its agents, officers or employees to attack, set aside, void or annul any approval by the City concerning the project. The City shall promptly notify the applicant of any filed claim, action or proceeding and shall cooperate fully in the defense of the actions.

10. Applicant shall agree to maintain the property and all related on-site improvements and landscaping thereon, including without limitation, buildings, parking areas, lighting, signs, and walls in a condition and repair that meets industry standards, free of rubbish, debris and other hazards to persons using the same, and in accordance with all applicable laws, rules, ordinances and regulations of all Federal, State, County and local bodies and agencies having jurisdiction, at applicants sole cost and expense. Such maintenance and repair shall include, but not be limited to the following: (i) sweeping and removal of trash and debris as soon as possible but at least within 24 hours; (ii) the care of all shrubbery, plantings and other landscaping in a healthy condition and replacement of diseased or

dead plant material with new material at an appropriate size for the health and spacing of the plant material; being replaced; (iii) maintenance of all irrigation systems in properly operating condition; (iv) the removal of graffiti within 24 hours; and (v) the repair, replacement and restriping of asphalt or concrete paving using the same type of material originally installed, to the end that such paving at all times be kept in a level and smooth condition.

11. Screening Required. Solid decorative or stucco walls and/or fences of 6' feet in height to be installed along the south, east and west boundary of the property. Decorative or stucco walls and/or fences shall be installed to provide safety and-privacy at the back of lots as shown on a Wall and Fence plan to be approved by Community Development Director.

12. All rooftop mechanical equipment shall be placed behind a permanent parapet wall and shall be completely screened from view from Imperial Highway.

13. Lighting. All lighting of the building, landscaping, parking area, and similar facilities shall be hooded and directed to reflect away from adjoining properties. A precise lighting plan shall be submitted showing the location of all exterior lighting within the driveway and parking areas. The plan shall be subject to the approval of the Community Development Director. Approval criteria will emphasize both the functional as well as the decorative nature of the proposed lighting. The plan and fixture design shall be approved separately from the design approval and from the working drawings.

14. Signs. Signage for residential uses and properties shall be subject to review and approval of the Community Development Department.

15. Treatment of Utilities. All new utilities shall be underground in accordance with Section 11.30.050 (Development Requirements) of the City's Zoning Ordinance. Prior to the release of utilities or service connections, final building, electrical, plumbing and/or mechanical approval, the owner or general contractor shall submit a list of all contractors and/or subcontractors performing work on this project or development to the Community Development Department. All contractors shall obtain a business license to work and/or do business in the City of South Gate.

16. A utility plan shall be approved by the Planning Division before a building permit is issued. All mechanical equipment and appurtenances of any type, whether located on roof top, ground level, or anywhere on the building structure or site shall be completely enclosed or screened so as not to be visible from any public street and/or adjacent property. Such enclosure of facilities or screening shall be of compatible design related to the building structure for which such facilities are intended to serve.

17. Landscaping. A precise landscaping plan shall be submitted showing the size, type and location of all plant material. The plan shall include the location of a permanent underground irrigation system, of adequate design to ensure complete coverage of all plant materials. The plan shall be subject to the approval of the Community Development Director and shall be approved separately from the design approval and working drawings. Any deviation must be approved by the Community Development Director before installation. No mature trees shall be removed without the permission of the Community Development Director.

18. Driveways. The entry drive from Imperial Highway shall be paved with permeable decorative pavers. The final paving color and design to be approved by the Community Development Department Director.

19. Trash Enclosure. Any trash enclosures located outdoors will require decorative stucco block wall enclosure with self-closing gates and decorate cover design to be approved by the Community Development Department Director.

20. A colors and materials board for all exterior colors shall be submitted to the Community Development Director for approval. All approvals must be obtained prior to installation. Colors and materials shall be approved separately from the design approval and from the working drawings.

21. A minimum of two (2) full-time dedicated staff members will provide case manager services.

22. On site bicycle facilities shall be provided with materials and designs to be approved by the Community Development Department.

23. The developer shall comply with the Arts in Public Places program requirement as stated in the Municipal code.

Density Bonus Incentive (Requirements)

Green Building Project

1. Certification shall be by the U.S. Green Building Council (USGBC), the Green Point Rated system, Build-it-Green, or compliance with another reputable independent and nationally recognized organization, deemed appropriate by the City. LEED Certified Rating, or Equivalent: 10% Maximum Density Bonus Reward
2. All additional floor area and/or dwelling units achieved through the green building incentive shall be built to the same certified green building standards as the eligible project. LEED Silver Rating, or Equivalent: 20% Maximum Density Bonus Reward
3. Intent to achieve certification shall be demonstrated at the time of permitting, and subsequent final certification shall be demonstrated to the City per the USGBC (or applicable) certification schedule. If the project does not achieve certification, penalties equivalent to the value of the bonus may apply. LEED Gold or Platinum Rating, or Equivalent: 30% Maximum Density Bonus Reward
4. Monetary contribution for green building shall not qualify for incentives.

Police Department Conditions

1. Pedestrian access by tenants would be controlled by an electronic control that would unlock secured common area entrances. Each apartment unit will have a unique lock/code that will be changed upon unit turns. All non-resident visitors must see the property manager for access.

2. Security cameras, per Condition 11 and 12 of the Standard Conditions will be mounted for 24 hour surveillance of vehicle and pedestrian ingress/egress points, parking garage, and common areas.

3. Common areas will have appropriate lighting that meets or exceeds the City security code requirements.

4. South Gate Police Department will be granted a master code to the security program thereby having access to both vehicular and pedestrian ingress/egress points.

Public Works Conditions

The Public Works Department has reviewed your request in reference to the subject property and provides the following conditions of approval:

General Design Parameters

All the streets shall be designed per APWA Standard Specifications for Public Works Construction ("Green Book") and the City of South Gate standards, in case of a conflict, the City's standards will prevail.

All the drainage design criteria shall be per the Los Angles Flood Control District and the City of South Gate standards, in case of a conflict, the City's standards will prevail.
All the grading plans shall be designed to the requirements of the City of South Gate Department of Building and Safety.

All public works improvements shall be constructed in accordance with the latest edition of the APWA Standard Specifications for Public Works Construction ("Green Book") and South Gate City Standards, and to the satisfaction of the City Engineer prior to the issuance of a Certificate of Use and Occupancy.

General Conditions

Prior to the issuance of building and public works permit, the applicant shall:
1. Prepare street, drainage, water, sewer, grading and lighting improvement plans showing all existing and proposed public works improvements and dry utilities as outlined below. Said plans shall be prepared by a registered Civil Engineer on City approved title blocks.

2. Provide an engineer's estimate for all public works improvements and pay all plan-check fees in accordance with the latest fee schedule prior to plan review.

3. Developer shall deposit $5,000 with the City to cover the City's cost for review of pre-development submittals such as preliminary plans, including traffic, civil, planning and environmental consultants, etc.

4. The developer shall pay Road Mitigation fees in accordance with the latest fee schedule, unless otherwise exempt from the Road Mitigation Ordinance or waived by the City Council. Road Mitigation Fee for New Development – Residential is $2,492 per dwelling unit. The Road Mitigation fee will be determined once site plan is approved by the Community

Development Department.

5. The developer shall pay Low Impact Development (LID) Plan Check fees. Plan check is conducted by the City's Environmental Consultant, John Hunter & Associates.

6. Pay permit and inspection fees associated with this project in accordance with the latest Public Improvement Plan Check fee schedule at the time of permit issuance and inspection.

7. Coordinate all Public Works improvements inspection with the Public Works Department at least 48 hours prior to commencing work. Contact Guillermo Petra at (323) 357-9614 to arrange for a Public Works Inspection.

8. Developer's contractor, subcontractors, and consultants working on this project must obtain and pay City Business License and permits fees, and submit relevant insurance paperwork to perform work within public right of way.

9. Prior to the City's acceptance of the public improvements, developer shall submit a refundable deposit in the amount of $1,000, which will be refunded upon receipt of "Record Drawings" for all the required improvements on approved Mylar(s) and a CD.

10. Comply with the requirements of the American Disability Act (ADA compliance) in regards to access ramps, sidewalks, driveway and any public access pathways.

11. Comply with the City's Community Development Ordinance pertaining to construction debris recycling. Contact the Building & Safety Department to obtain a Construction & Demolition Debris Waste Reduction Recycling Plan forms.

12. Developer to contact the City's Waste Hauling Company (Waste Management) at (800) 774-0222 and obtain approval for the location of waste disposal container(s), including facilities for recycling.

13. Developer must comply with all applicable South Coast Air Quality Management District (AQMD) regulations.

Streets

14. Pavement Moratorium approved by City Council under Resolution No. 2118, Section 5.04.040 will apply to the proposed development as the construction on the Imperial Highway Center Median Improvements Project is anticipated to begin in early spring of 2018. All necessary utility work, such as water service line connections, sewer later connections, including dry utilities, etc along Imperial Highway will need to be completed prior to the City commencing with the median installation and roadway resurfacing fronting the development. Developer shall coordinate and schedule this work with the City Engineer. If work is not performed prior to the City's project, the City will perform such work and back-charge the developer for all construction cost including design, construction management, staff time, and inspection.

15. Remove and reconstruct any and all damaged/or deficient existing improvements including but not limited to curb and gutter, sidewalk along the perimeter of the proposed development.

Existing sidewalks with non-compliant ADA cross slope exceeding 2% shall be replaced.

16. All existing driveways that are being replaced with new driveways on Imperial Highway will require new curb and gutter and full-width sidewalk to match the existing.

17. Construct new driveways at least 5 feet away from any above-ground obstructions in the public right-of-way. Otherwise the obstruction shall be relocated at the developer's expense. Ensure that each driveway provides proper pedestrian access across, in compliance with the Americans with Disabilities Act (ADA). The final layout and site driveway design shall be subject to the review and approval of the City Engineer.

18. Proposed new driveways will meet the classification of commercial driveways (Minimum width required is 26 feet).

19. Construct new tree wells and plant new 24-inch boxed street trees on Imperial Highway. Install decorative cast iron tree well covers with theft proof locking mechanism. Replace existing empty tree wells with PCC sidewalk in a manner in which it provides consistent spacing with new tree wells. The species of any new street trees shall be in accordance with the Citywide Tree Master Plan. All tree wells shall be irrigated with dedicated irrigation line.

20. Proposed landscape shall be designed to incorporate water conservation techniques through application of xeriscape landscaping principles. Landscape plan to include low-water demanding plants with limited turf, efficient irrigation system and use of California native plants.

21. Any damages done during construction to existing public improvements and pavement markings shall be removed and replaced to original condition per the satisfaction of the City Engineer.

22. Any cross flow drainage from the property over the sidewalks is not permitted. Construct parkway drains as required.

23. Centerline ties, property corners and benchmark monument shall be preserved in the public right of way. In the event that ties, property corners and benchmark monuments are disturbed or removed, a licensed surveyor shall re-establish and file required corner record survey with the Los Angeles County Surveyors office. All recorded copies of the documents shall be submitted to the City along with the final set of as-built plans.

24. In order to meet the City's Lighting Master Plan, developer shall verify that the frontage of the proposed development meets the Illuminating Engineering Society (IES) minimum standards for streetlight illumination for Imperial Highway. If deemed insufficient, developer shall design and construct the necessary pedestrian lighting improvements.

25. Paint property address on the curb, in front of the proposed development, to the City and Fire Departments satisfaction.

26. Coordinate all public works improvements with the Public Works Department at least 48 hours in advance of work beginning.

Right-of-Way Dedication, Easements and Lot Merger

27. Developer shall submit a legal description, Plat and boundary closure, prepared by registered land surveyor that shows the following:
    - A 13-foot right of way dedication for roadway purpose to the City of South Gate for Public Street purposes along the entire property frontage on Imperial Highway.

28. Developer shall submit the required document for the roadway dedication or any other proposed easements. Comply with all requirements of the Subdivision Map Act, the City of South Gate Municipal Code and all the applicable state and local laws.

Grading and Drainage

29. Comply with all Federal, State, and local agency requirements pertaining to the Clean Water Act, which establishes regulations, set forth in the Countywide National Pollutant Discharge Elimination System (NPDES) Permit.

30. Comply with the City's Storm Water Management Ordinance. Implement all NPDES requirements and Best Management Practices during and after construction. Provide and obtain approval of a site-specific Erosion Control Plan.

31. Submit a Grading and Drainage plans prepared by a Registered Civil Engineer to the satisfaction of the Public Works Department and Building Division. Show all existing and proposed driveways, curb & gutter, sidewalks, handicap ramps, street trees, tree wells, street lights, street signs, power poles, fire hydrants, utility boxes, meters, traffic signal poles and cabinets, parkway drains, etc. on the plans. Provide LID Plan and calculations required to address storm water discharge and NPDES requirements by City's Environmental Consultant, John Hunter and Associates (See attached requirements).

32. All catch basins and on-site storm drain inlet facilities shall be stenciled with the appropriate "No Dumping" markings.

33. Submit Geotechnical reports, including but not limited to infiltration, percolation reports.

34. The recommendation for structural section for on-site parking and circulation areas shall be included in the soils report and prepared by geotechnical engineer registered in the State of California. The soils report is subject to the review and approval by the Public Works Department and Community Development Departments.

35. Provide a final detailed drainage study (prepared by a registered/licensed civil engineer) for review and approval. The study shall include existing and proposed hydrologic conditions as well as hydraulic calculations (per Los Angeles County format) for all drainage control devices and storm drain lines.

36. Grading plan will include geotech and geologist certification, stating that grading plan has been reviewed and found to be in conformance with the recommendations as outlined in the soils and geological report.

37. Historical or existing storm water flow from adjacent lots must be received and directed by gravity to the street, a public drainage facility, or an approved drainage easement.

38. Dust control operations shall be performed by the developer at the time, location and in the amount required and as often as necessary to prevent the excavation or fill work, demolition operation, or other activities from producing dust in amounts harmful to people or causing a nuisance to persons living nearby or occupying buildings in the vicinity of the work. The developer is responsible for compliance with Fugitive Dust Regulations issued by the Air Quality Management District (AQMD).

Sewer

39. The developer shall prepare a comprehensive Sewer Capacity Study signed and stamped by a registered Civil Engineer addressing the sewer needs of the new proposed site and pay all required review fees. Initial deposit of $761 is required to initiate the plan check. Actual costs of the review will be billed to the developer as the plan check progresses. Based on the Sewer Capacity Study, the developer might be required to pay for any necessary sewer upgrades. The limits of the upgrades shall be to the downstream point of connection to where sufficient capacity exists. If in case the sewer connection is made to Los Angeles County Sanitation District sewer system, the developer may need to coordinate and get approval from Los Angeles County Sanitation District and pay any associated County fees.

40. Install adequate sewer lateral(s) to serve the proposed development, and abandon any existing sewer laterals and sewer cleanouts that will not be used, to the satisfaction of the Public Works and Building & Safety Departments. Sewer laterals will be abandoned in place with either cement slurry backfill or concrete bulkhead plug per City Standard Plans.

41. The developer shall consult the City Engineer to determine the sewer location and design requirements. Relocation of any public sewer lines shall be subject to approval by the City Engineer. Pavement moratorium applies.

Water

42. Conduct a Water System Capacity Study and provide a copy of the report to the City for review and approval. If higher water needs are determined, then the developer will pay for any water upgrade needed to meet the demand. Developer to pay for all costs incurred for the review of the capacity study.

43. All proposed improvements shall be served by adequately sized to accommodate the total domestic, landscape and fire flows. Plans shall include size, type and location of the proposed fire hydrants approved by the Los Angeles Fire Department (LAFD). Provide fire flow calculations to justify the size and the velocity in the pipe (not to exceed 10 ft/sec)

44. Coordinate with the City's Water Division regarding removal of all existing water meters that will not be used by the development.

45. Developer shall pay Water Development Impact Fees per the latest City Fee Schedule. Fee is dependent on water meter sizes. Development Water Impact fees are paid at the time of obtaining the building permit.

46. The provision of fire protection water systems, hydrants, and appropriate easements shall be in conformance with the Los Angeles County Fire Department.

47. All water facilities shall be installed outside any driveways and drive approaches, and shall be in accordance with the Los Angeles County Fire Department.

48. Developer shall be responsible to meet all water requirements and guidelines of the South Gate Water Division, the Los Angeles County Health Department and Los Angeles County Fire Department.

49. Relocation of any public water lines shall be subject to approval by the City Engineer. Pavement moratorium applies.

Traffic

50. The developer shall prepare a Traffic Impact Study signed and stamped by a registered Traffic Engineer addressing potential safety issues, trip generation, distribution and assignment, queuing analysis, Level of Service analysis, line of sight, internal circulation and overall operational impacts to nearby signalized intersections. Study should include all signalized intersections for which the proposed project will add 50 or more trips during the AM and or PM peak hour. If the study is determined insufficient by the City Engineer, the developer will be required to prepare a Traffic Impact Assessment and pay for any traffic mitigations that arise from the Traffic Impact Assessment.

51. The developer shall be responsible for installing or repairing all centerline striping, traffic legends, raised reflective pavement markers and other traffic delineation required by the City Engineer, including traffic signal loops damaged or required to be installed as part of the development. The plans shall be prepared by a Registered Traffic Engineer and submitted to the Public Works Department for review and approval. All public and private signage and markings for vehicular traffic shall conform to the provisions of the California Manual on Uniform Traffic Control Devices (CA-MUTCD).

52. The developer shall pay for a Development Traffic Report / Study Review in accordance with the latest fee schedule. The Development Traffic Report / Study Review fee is charged at actual cost with a minimum deposit of $417.

53. Internal circulation, particularly where there are deliveries or trash pick-ups should be shown accommodating the vehicles that will serve the development.

54. Clear unobstructed sight distance lines shall meet AASHTO guidelines and shall be shown on the improvement plans at intersections and/or driveways.

55. Upon completion of construction, developer shall remove temporary construction markings (USA marking).

56. Ingress and egress to the proposed development site to be restricted to right-in and right-out only movement on Imperial Highway due to future raised median island project. No left-turns to and from the development on Imperial Highway shall be allowed. Signage will be

required on-site and within the future raised Median Island to direct traffic.

57. No parking will be allowed on Imperial Highway. The entire length of the curb on Imperial Highway shall be painted red. Replace existing "No Stopping" signs with new.

Utilities

58. Developer is responsible for research on private utility lines (Gas, Edison, Telephone, Cable, Irrigation, etc.) to ensure there are no conflicts with the site.

59. All existing on-site utility lines and existing utility lines serving the proposed development, that conflict with the project, shall be relocated, removed, or abandoned at the developer's expense to the satisfaction of the City Engineer. Pavement moratorium applies.

60. For all electrical needs the developer will coordinate with the assigned SCE Planner.

61. All onsite overhead utility, except high voltage power lines, servicing the development shall be placed underground. Any significant proposed utility underground vaults or meter shall be located away from the proposed driveways.

62. Remove any abandoned above ground utilities within the parkway area including but not limited to service pedestals, pull boxes, etc.

63. All proposed on-site sewer, water, and drainage facilities shall be private system(s) maintained by the property owner.

Use and Occupancy

64. Complete Public Works improvements prior to issuance of certificate of occupancy. Should any public improvements not completed prior to issuance of certificate of occupancy the developer shall enter into a development agreement with the City prior to construction, and post the necessary securities in the amount approved by the City Engineer and in a form approved by the City Attorney. All public improvements shall be completed at the developer's cost.

65. Prior to issuance of a release of Use and Occupancy, all the above conditions shall be complied with and all the improvements are in place.

RESOLUTION CERTIFICATION PAGE

STATE OF CALIFORNIA)

COUNTY OF LOS ANGELES) SS

CITY OF SOUTH GATE)

I, Carmen Avalos, City Clerk of the City of South Gate, California, hereby certify that the whole number of Members of the City Council of said City is five; that Resolution No. 7780 was adopted by the City Council at their Regular Meeting held on September 12, 2017, by the following vote:

Ayes:	Council Members:	Davila, Bernal, Diaz, Morales and Rios
Noes:	Council Members:	None
Absent:	Council Members:	None
Abstain:	Council Members:	None

Witness my hand and the seal of said City on September 21, 2017.

Carmen Avalos, City Clerk
City of South Gate, California