FINDINGS SUPPORTING A CATEGORICAL EXEMPTION

4260 N. Arch Drive

Case Number: ENV-2023-1638-CE

Project Location: 4260 N. Arch Drive, Studio City, CA 91604

Community Plan Area: Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan

Council District: 4 – Nithya Raman

Project Description: The approximately 44,867 square foot Project Site, was previously occupied with an assisted living facility, which was recently demolished. The Project includes the construction of a new multi-family building with 129 dwelling units, including 17 units set aside for Very Low Income households. The Project includes construction of five stories of residential uses above two subterranean levels of parking with a maximum height of 75 feet and a total floor area of approximately 116,525 square feet (2.59:1 FAR). The Project includes 145 vehicle parking spaces, 166 bicycle parking spaces, and approximately 13,800 square feet of open space. The Project would include a publicly accessible path between Arch Drive and the Los Angeles River, providing public pedestrian access to the Los Angeles River path. The Project is estimated to require approximately 31,000 cubic yards of soil excavation, all of which is expected to be exported. There are 41 ornamental on-site trees within the Project Site boundaries, ten off-site trees, located along the Los Angeles River, and no City of Los Angeles street trees in adjacent right-of-way. A total of 25 trees within the Project Site boundaries are proposed to be removed, and 16 of the on-site trees and the ten off-site trees would remain. At least 19 new trees are proposed to be planted as part of the Project. In order to permit development of the Project, the City would require approval of the following discretionary actions and ministerial permits: (1) A CEQA exemption pursuant to CEQA Guidelines, Section, 15332, Class 32 (Urban Infill); (2) Density Bonus with the following (a) on-menu incentives: (i) permit a 3:1 FAR in lieu of the 1:1 FAR limitation pursuant to the Ventura/Cahuenga Boulevard Corridor Specific Plan Section 6.B.3; (ii) permit up to a 20% increase in lot coverage to allow a maximum of 72% lot coverage in lieu of 60% lot coverage limitation pursuant to the Ventura/Cahuenga Boulevard Corridor Specific Plan Section 7.B, (b) off-menu incentive: (i) permit 31-foot increase in building height to allow a maximum height of 75 feet in-lieu of the 45-foot building height limitation of the C2-1VL-RO Zone; and to allow building height to exceed the transitional height limitations pursuant to LAMC Section 12.21.1-A,10, (c) a waiver of development standards to allow up to 43 of the 132 required parking spaces to be provided as compact spaces in lieu of the compact parking limitations pursuant to LAMC 12.21-A,5(c), (d) a waiver of development standards to permit a multi-family development with deviations from Commercial Corner Development Standards pursuant to LAMC 12.22-A,23(a) including deviations for height (LAMC 12.22-A,23(a)(1)) and landscape setbacks (LAMC 12.22-A,23(a)(10)(i)); (3) Pursuant to LAMC Section 61.05, a Site Plan Review for a project with 50 or more dwelling units; (4) Pursuant to LAMC Section 11.5.7 C, a Project Permit Compliance Review for a project within the Ventura/Cahuenga Boulevard Corridor Specific Plan; (5) Pursuant to LAMC Section 12.37 I.3, a Waiver of Dedication and Improvements to the Public Right of Way along Arch Drive and Ventura Boulevard; and (6) Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, removal of on- and off-site trees, temporary street closure permits, demolition permits, grading permits, excavation/shoring permits, building permits, haul route, and sign permits in order to execute and implement the Project.

PREPARED BY:
EcoTierra Consulting, Inc.

APPLICANT:
Universal City Guest Home, L.P

July 2023

Arch Project

4260 N. Arch Drive, Studio City, CA 91604

FINDINGS SUPPORTING A CATEGORICAL EXEMPTION

APPLICANT:
Universal City Guest Home, L.P

PREPARED BY:
EcoTierra Consulting, Inc.
633 W. 5th Street, 26th Floor
Los Angeles, CA 90071

July 2023

TABLE OF CONTENTS

APPENDICES

LIST OF FIGURES

LIST OF TABLES

I. INTRODUCTION

1. INTRODUCTION

The subject of this document is the proposed Arch Project, a development of a five-story multi-family residential building with 129 residential units (the "Project") at 4260 N. Arch Drive (the "Project Site") in the Studio City community of the City of Los Angeles (the "City").[1] The Project is discussed in further detail in Section II, Project Description. The Project Site is located within the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan Area of the City of Los Angeles. The City of Los Angeles Department of City Planning is the Lead Agency under the California Environmental Quality Act (CEQA).

2. PROJECT INFORMATION

Project Title: Arch Project

Project Applicant: Universal City Guest Home, L.P

Project Location: 4260 N. Arch Drive, Studio City, CA 91604

Lead Agency: City of Los Angeles Department of City Planning
200 N. Spring Street, Room 621
Los Angeles, CA 90012

3. ORGANIZATION OF THIS DOCUMENT

This document is organized as follows:

Introduction: This section provides introductory information such as the Project title, the Project Applicant, and the designated Lead Agency for the proposed Project.

Project Description: This section provides a detailed description of the proposed Project including the environmental setting, Project characteristics, and environmental clearance requirements.

Categorical Exemption Analysis: This section contains a consistency analysis of the Project with the appropriate Categorical Exemption class and demonstrates that exclusions to a Categorical Exemption are not applicable to this Project.

[1] Los Angeles County Assessor Parcel Number 2366-025-017.

II. PROJECT DESCRIPTION

1. PROJECT SUMMARY

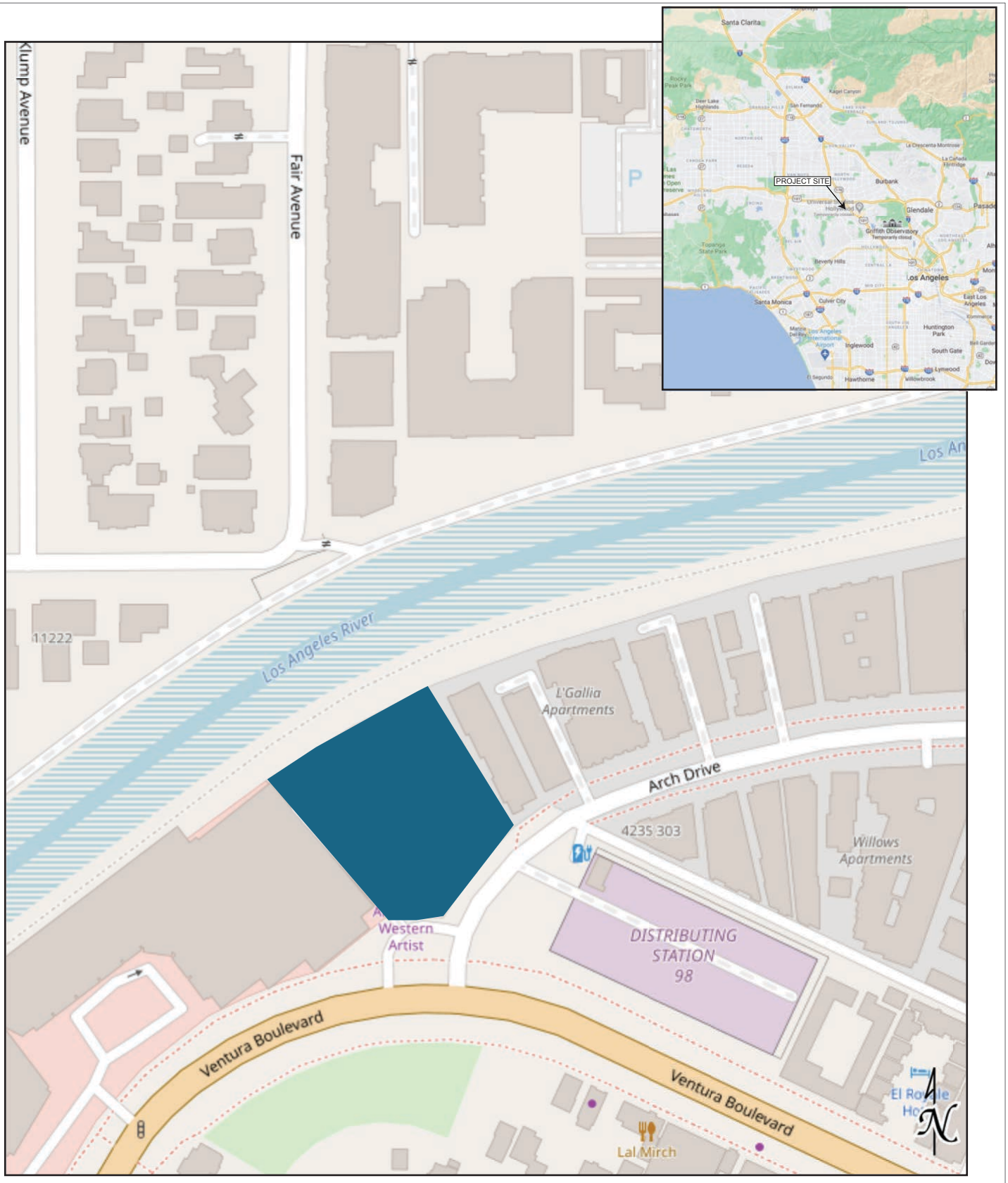
The approximately 44,867 square foot Project Site, was previously occupied with an assisted living facility, which was recently demolished. The Project includes the construction of a new multi-family building with 129 dwelling units, including 17 units set aside for Very Low Income households. The Project includes construction of five stories of residential uses above two subterranean levels of parking with a maximum height of 75 feet and a total floor area of approximately 116,525 square feet (2.59:1 FAR). The Project includes 145 vehicle parking spaces, 166 bicycle parking spaces, and approximately 13,800 square feet of open space. The Project would include a publicly accessible path between Arch Drive and the Los Angeles River, providing public pedestrian access to the Los Angeles River path. The Project is estimated to require approximately 31,000 cubic yards of soil excavation, all of which is expected to be exported. There are 41 ornamental on-site trees within the Project Site boundaries, ten off-site trees, located along the Los Angeles River, and no City of Los Angeles street trees in adjacent right-of-way. A total of 25 trees within the Project Site boundaries are proposed to be removed, and 16 of the on-site trees and the ten off-site trees would remain. At least 19 new trees are proposed to be planted as part of the Project.

2. ENVIRONMENTAL SETTING

a) Project Location

The Project is located at 4260 N. Arch Drive in the Studio City community of the City of Los Angeles and is comprised of two contiguous lots. The Project Site is an irregular-shaped parcel of land that contains approximately 44,867 square-feet (1.03 acres) of gross (pre-dedicated) lot area. The Project Site fronts the northwest corner of N. Arch Drive and Ventura Boulevard and the Los Angeles River borders the Project Site directly north (see **Figures II-1**, **Vicinity and Regional Map** and **II-2, Aerial Photograph of Project Site**).

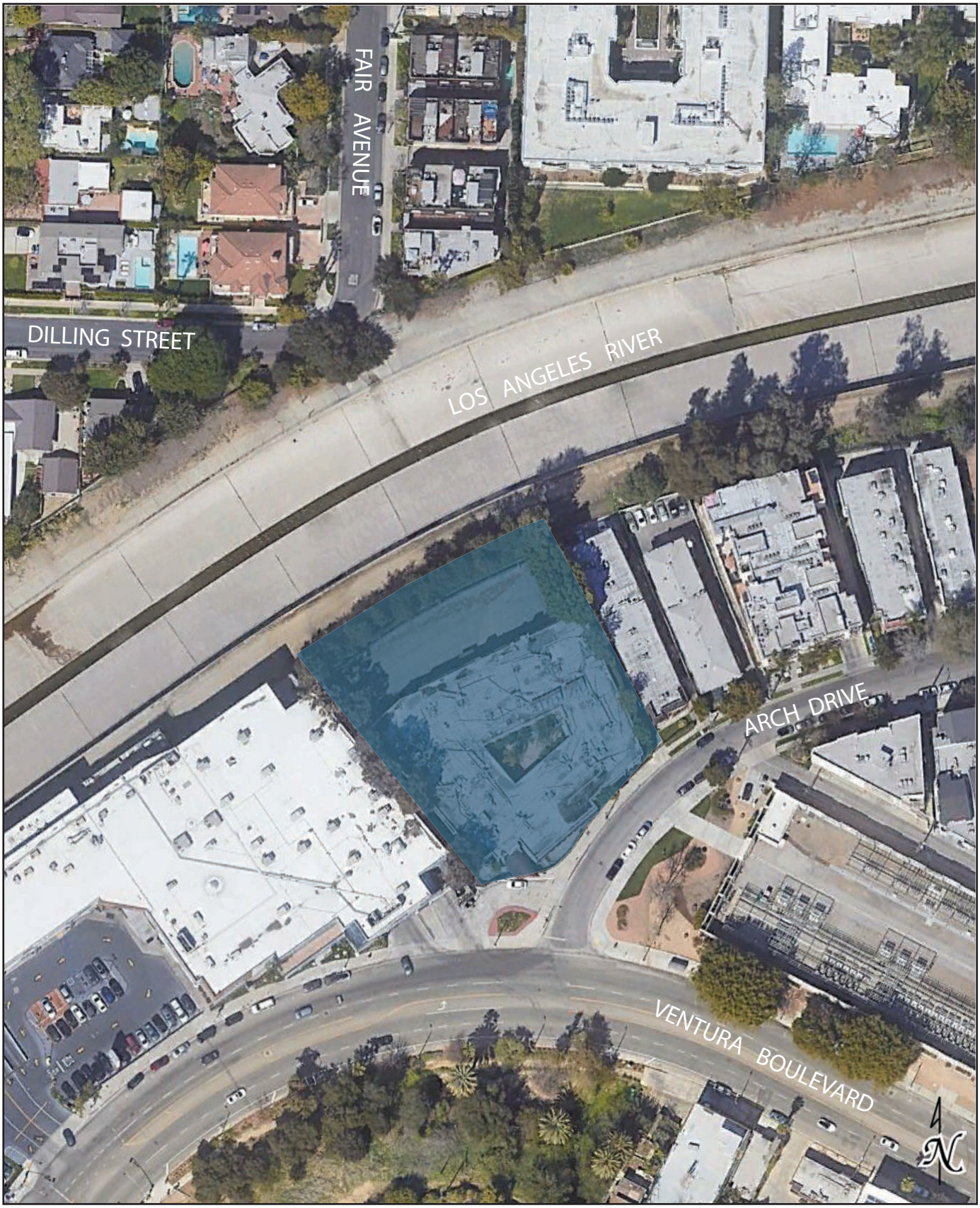
Regional access to the Project Site is provided by the Hollywood Freeway (“US 101”) approximately 0.7 driving mile to the east. Local access to the Project Site is provided by Ventura Boulevard, which is a Major Highway (Class II), and Vineland Avenue.



Project Site

Source: OpenStreetMaps, June 2023.

Figure II-1
Vicinity and Regional Map



Source: Google Earth, March 2021.

Figure II-2
Aerial Photograph of the Project Site

Regional rail service is provided from the Los Angeles County Metropolitan Transportation Authority ("Metro") Red Line which is a heavy rail subway line running between Downtown Los Angeles and North Hollywood via the districts of Hollywood and Mid - Wilshire. In North Hollywood it connects with the Orange Line Bus rapid transit line to Warner Center in Woodland Hills and Chatsworth in the northwest San Fernando Valley. The Universal City/Studio City Metro Red Line Station is located at Lankershim Boulevard and Campo de Cahuenga, approximately 0.75-mile west from the Project Site.

Metro local transit service with Routes 155 and 240, is provided along Ventura Boulevard adjacent to the Project Site. Bus stops are located at the intersections of Ventura Boulevard and Arch Drive and at Ventura Boulevard and Eureka Drive.

b) Existing Conditions

As shown on **Figure II-3**, **Views of the Project Site**, the Project Site is currently vacant and was previously occupied by an assisted living building, which has since been demolished.

The Project Site is located in the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan boundaries, and is zoned C2-1VL-RIO (Commercial Zone –Very Limited Height District No. 1 – River Improvement Overlay Project) with a corresponding General Plan land use designation of "General Commercial." In regards to the River Improvement Overlay District (RIO), projects located within the RIO District, such as the Project, require an Administrative Clearance from the Department of City Planning prior to issuance of a building permit, to ensure that projects meet certain standards for screening, lighting, river access, and landscaping. The Project Site is also located within the Vermont/Cahuenga Boulevard Corridor Specific Plan.[2]

Within the Project Site area, the City's Mobility Plan 2035 classifies Arch Drive as a Local Street (Standard) and Ventura Boulevard as a Major Highway (Class II).[3] Ventura Boulevard in the Project vicinity is designated as part of the Bicycle Lane Network, Tier 3 Bicycle Lane.[4]

There are 41 ornamental on-site trees within the Project Site boundaries, ten off-site trees, located along the Los Angeles River, and no City of Los Angeles street trees in adjacent right-of-way. A total of 23 trees within the Project Site boundaries are proposed to be removed, and 16 of the on-site trees and the ten off-site trees would remain. At least 19 new trees are proposed to be planted as part of the Project. None of the existing trees are species protected by the City's tree protection ordinance.[5]

[2] City of Los Angeles Department of City Planning, Zone Information & Map Access System.
[3] City of Los Angeles, Bureau of Engineering, Public Works Department, NavigateLA.
[4] City of Los Angeles, Department of City Planning, General Plan 2035 Mobility Plan, Map D1, June 23, 2016.
[5] Carlberg Associates, Tree Inventory and Report – 4260 N Arch Drive, Los Angeles, California 91604, July 14, 2023. Refer to **Appendix A**.

View 1: View looking north from Ventura Boulevard towards the Project Site.

View 2: View looking north from Arch Drive towards the Project Site.

View 3: View looking southwest from Arch Drive towards the Project Site.

PHOTO LOCATION MAP

Source: GoogleEarth, 2023.

Figure II-3
Views of the Project Site
Views 1, 2, and 3

c) Surrounding Land Uses

The Project Site is located in the Studio City community of the City. Parcels to the east are also zoned C2-1VL-RIO and are improved with a commercial complex that include various retail uses. South of the Project Site, across Ventura Boulevard, parcels are zoned C2-1VL-RIO and are comprised of an undeveloped hillside. Just beyond those parcels is single-family residential neighborhood. Also south of the Project Site, across Arch Drive, parcels are zoned PF-1XL-RIO and are improved with a Los Angeles Department of Water and Power (LADWP) power facility. The parcel to the immediate east of the Project Site is zoned [Q]R4-1-RIO and is improved with a multi-family residential building and the Los Angeles River abuts the Project Site to the immediate north. Views of the surrounding land uses are shown on **Figures II-4** and **II-5**.

3. PROJECT CHARACTERISTICS

a) Project Overview

The Project includes the construction of a new five-story multi-family residential building including 129 dwelling units. The Project's 129 multi-family residential units would include 17 dwelling units set aside for Very Low Income households. The Project would include five stories of residential uses above two subterranean levels of parking. A total of 145 vehicle parking spaces would be provided. The Project would also provide a total of 166 bicycle parking spaces. The Project includes approximately 13,800 square feet of open space including a recreation room, two fitness centers, a common open space with pool area, and private balconies. The Project would be approximately 75 feet in height, plus rooftop appurtenances, in five stories above grade. The total floor area of the Project would be approximately 116,525 square feet, resulting in an FAR of 2.59:1. **Table II-1, Project Development Summary**, summarizes the proposed land uses. The Project's site plan and rendering are shown in **Figures II-6** and **II-7**.

Table II-1
Project Development Summary

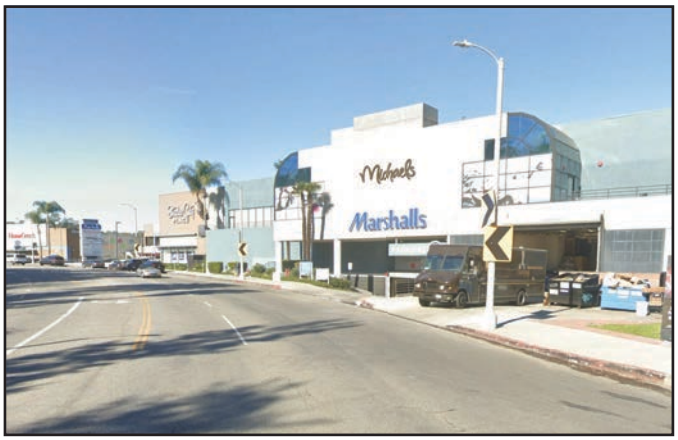
Land Use	Amount
Residential Units (du)	
Studio	20
One-bedroom	73
Two-Bedroom	36
Total Units (du)	**129**
Parking Spaces	
P1 Parking Level	62
P2 Parking Level	83
Total Automobile Parking Spaces	**145**
Long-Term Basement (Bicycle)	150
Short-Term Street (Bicycle)	16
Total Bicycle Parking Spaces	**166**

Table II-1
Project Development Summary

Land Use	Amount
Open Space (sf)	
Common Open Space	8,956
Private Open Space	2,800
Indoor Common Space	2,044
Total Common Open Space (sf)	**13,800**
Landscaped Area (sf)	
Total Landscaped Area (sf)	**6,391**[1]

du = dwelling units; sf = square feet
1 Lahmon Architects, 80% Construction Documents, June 2023.
Source: Lahmon Architects, February 2023.

Per LAMC code section 12.22.A.25 (Affordable Housing Incentives – Density Bonus), the Project is requesting a Density Bonus with the following: (a) on-menu incentives: (i) permit a 3:1 FAR in lieu of the 1:1 FAR limitation pursuant to the Ventura/Cahuenga Boulevard Corridor Specific Plan Section 6.B.3; (ii) permit up to a 20% increase in lot coverage to allow a maximum of 72% lot coverage in lieu of 60% lot coverage limitation pursuant to the Ventura/Cahuenga Boulevard Corridor Specific Plan Section 7.B, (b) off-menu incentive: (i) permit 31-foot increase in building height to allow a maximum height of 75 feet in-lieu of the 45-foot building height limitation of the C2-1VL-RO Zone; and to allow building height to exceed the transitional height limitations pursuant to LAMC Section 12.21.1-A,10, (c) a waiver of development standards to allow up to 43 of the 132 required parking spaces to be provided as compact spaces in lieu of the compact parking limitations pursuant to LAMC 12.21-A,5(c), (d) a waiver of development standards to permit a multi-family development with deviations from Commercial Corner Development Standards pursuant to LAMC 12.22-A,23(a) including deviations for height (LAMC 12.22-A,23(a)(1)) and landscape setbacks (LAMC 12.22-A,23(a)(10)(i)).



View 1: View looking northwest from Ventura Boulevard towards adjacent commercial uses.

View 2: View looking south from Arch Drive towards greenscape.

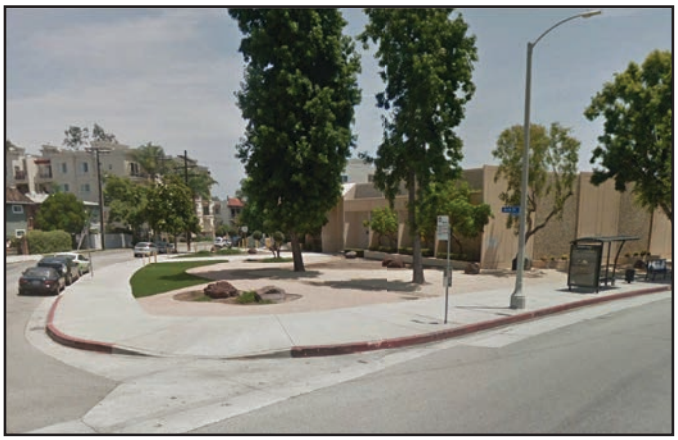
View 3: View looking southeast along Ventura Boulevard.

PROJECT SITE

PHOTO LOCATION MAP

Source: GoogleEarth, 2023.

Figure II-4
Views of Surrounding Uses
Views 1, 2, and 3



View 4: View looking northeast from Ventura Boulevard towards a Los Angeles Department of Water and Power power facility.

View 5: View looking southwest from Arch Drive towards adjacent multi-family uses.

View 6: View looking northeast from Arch Drive towards multi-family uses.

PHOTO LOCATION MAP

Source: GoogleEarth, 2023.

Figure II-5
Views of Surrounding Uses
Views 4, 5, and 6

Source: Lahmon Architects, 2023.

Figure II-6
Site Plan

Source: Lahmon Architects, 2023.

Figure II-7
Project Rendering

b) Design and Architecture

In accordance with the Citywide Design Guidelines,[6] the proposed building provides a variety of complementary architectural materials on the exterior façades, including plaster, board formed concrete, decorative metal, porcelain tile, and wood slats on the balcony fronts. The proposed building façade oriented toward Ventura Boulevard and fronting Arch Drive are articulated by separating the building into two separate masses and five distinct vertical sections with alternating styles of residential balconies. The Project's use of different textures, colors, setbacks, materials, and distinctive architectural treatments is designed to create visual interest, avoid repetitive facades, and break up the building's mass.

c) Open Space and Landscaping

The Project's required open space was calculated pursuant to LAMC Section 12.21.G, based on the size and number of dwelling units. As described above, the Project proposes 129 residential units. For each unit with less than three habitable rooms, 100 square feet of open space is required and for each unit with three habitable rooms, 125 square feet of open space is required. Thus, a total of 13,800 square feet of open space is required for this Project. The Project would provide 13,800 square feet of open space consisting of 2,800 square feet of private balconies and 11,000 square feet of common space. In conformance with LAMC Section 12.21.G, 25 percent of the provided common open space is required to be landscaped, or a minimum of 3,250 square feet. The Project would include 6,391 square feet of landscaped outdoor common open space.

The Project's open space and amenities would include a first-floor open-to-sky common area with pool area, open space facing the Los Angeles River, a fitness center, and recreation room, and a second-floor fitness center. The dwelling units would include private balconies.

The Project would remove 23 ornamental trees located throughout the Project Site[7] and would plant at least 19 new trees on-site as part of the landscape plan.

d) Access, Circulation, and Parking

Pedestrians would access the residential units from Arch Drive, via a walkway, and there would be pedestrian access from the rear of the Project Site to the Los Angeles River. Vehicular access to the Project Site would be provided via a new two-way driveway located at the central portion of the Project Site's frontage on Arch Drive. The one existing driveway cut located at the western edge of the Project Site would be closed. All automobile parking would be provided within the subterranean parking garage.

As the Project is a Density Bonus Project, it is utilizing Parking Option 1. In accordance with the Density Bonus Parking Option 1, the Project is required to provide parking based on the number

[6] Citywide Design Guidelines, adopted October 24, 2019.
[7] Carlberg Associates, Tree Inventory and Report – 4260 N. Arch Drive, Los Angeles, California 91604, July 14, 2023. Refer to **Appendix A**.

of bedrooms, inclusive of Handicapped and Guest parking with at least one space per one-bedroom units, and one and a half parking spaces for units with two or three bedrooms. Based on the proposed unit mix, the Project would be required to provide 147 spaces for the 129 units. With a 10 percent reduction allowed per the City's bicycle parking incentives, 132 spaces are required. As shown on **Table II-1**, the Project meets and exceeds this requirement, providing a total of 145 on-site vehicle parking spaces, but would require a waiver of development standards to allow up to 43 of the 132 required parking spaces to be provided as compact spaces in lieu of the compact parking limitations pursuant to LAMC 12.21-A. ADA parking would be provided in the subterranean level 1 parking. The Project would also include Electric Vehicle (EV) charging stations for 10 percent of the total code-required parking spaces and wiring for future installation of EV charging stations for 30 percent of the total code-required parking spaces.

Per the City of Los Angeles Bicycle Parking Ordinance (Ordinance No. 182,386), the Project is required to provide 149 long-term and 16 short-term bicycle parking spaces. As shown on **Table II-1**, the Project would provide up to 166 bicycle parking spaces, including, 150 long-term bicycle parking spaces located in the first subterrain parking level and 16 short-term bicycle parking spaces located at the frontage of the Project Site on Arch Drive.

e) Lighting and Signage

New Project signage would be used for building identification, wayfinding, and security. Exterior lights would be wall- or ground-mounted and shielded away from adjacent properties. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties.

f) Site Operation and Security

The residential Project would operate 24 hours a day, seven days a week. On-site residential amenities would be available only to residents and their guests, and would not be open to the public. The Project would provide security features including, but not limited to controlled access to residential areas.

g) Sustainability Features

The Project would be compliant with the Los Angeles Green Building Code and California Energy Code/Title 24 requirements, and would include, but not be limited to, the following features:

- Thirty percent of the parking spaces would be pre-wired for electric vehicle charging. Of these, ten percent of the total number of parking spaces will have chargers for electric vehicles;
- Air tight and insulated envelope;
- Low-E windows;
- Low-water use plumbing fixtures;
- MERV 13 air filters;

- Low-water use landscaping and weather-sensor controlled drip irrigation; and
- Solar ready thermal systems.

The Project's landscape plan includes a minimum of 19 new trees planted throughout the Project Site, exceeding the requirement of 32 trees, within the Project Site boundary. Overall, the proposed landscaping plan provides a mix of ground cover and trees to complement the architecture. Plant material has been selected for temperature hardiness and low water use. Overall water consumption would be minimized with the inclusion of water efficient appliances and fixtures throughout the development.

As also required by the City Building Code, the proposed building would provide space to accommodate future rooftop solar panels and conduit for on-site electric automobile charging stalls, which would be provided in the parking garage. The roof level has been designed to accommodate solar panels above.

h) Anticipated Construction Schedule

The Project would be constructed over approximately 24 months. Construction activities would include excavation, grading, and building construction and are anticipated to start in the fourth quarter of 2023, and construction completion and occupancy is anticipated in the third quarter of 2025.

The Project is expected to export approximately 31,000 cubic yards of excavated earth. Exported materials would likely be disposed at Sunshine Canyon Landfill in Sylmar. The anticipated haul route from the Project Site would be via Ventura Boulevard to I-101 north, 170-north, and I-5 north. The Project's haul route would be considered by the City as part of its review of the Project's entitlement requests.

4. REQUESTED PERMITS AND APPROVALS

The list below includes the anticipated requests for approval of the Project. The entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

(1) A CEQA exemption pursuant to CEQA Guidelines, Section, 15332, Class 32 (Urban Infill);

(2) Pursuant to Los Angeles Municipal Code (LAMC) Section 12.22-A,25(g) a Density Bonus for a housing development project totaling 129 dwelling units, including 17 units set aside for VLI Households, and requesting the following three incentives and two waivers of development standards:

   a) With the following on-menu incentives:

i) Floor Area Ratio (FAR) of 3:1 for a project located on a Major Highway within 1,500 feet of a Transit Stop in lieu of the 1:1 FAR limitation pursuant to the Ventura/Cahuenga Boulevard Corridor Specific Plan Section 6.B.3; and

ii) Permit up to a 20 percent increase in lot coverage to allow a maximum of 72 percent lot coverage in lieu of 60 percent lot coverage limitation pursuant to the Ventura/Cahuenga Boulevard Corridor Specific Plan Section 7.B.

b) With the following off-menu incentive:

i) Permit 31-foot increase in building height to allow a maximum height of 75 feet in-lieu of the 45-foot building height limitation of the C2-1VL-RO Zone; and to allow building height to exceed of the transitional height limitations pursuant to LAMC Section 12.21.1-A,10.

c) With the following waiver of development standards:

i) A waiver of development standards to allow up to 43 of the 132 required parking spaces to be provided as compact spaces in lieu of the compact parking limitations pursuant to LAMC 12.21-A,5(c); and

ii) A waiver of development standards to permit a multi-family development with deviations from Commercial Corner Development Standards pursuant to LAMC 12.22-A,23(a) including deviations for height (LAMC 12.22-A,23(a)(1)) and landscape setbacks (LAMC 12.22-A,23(a)(10)(i)).

(3) Pursuant to LAMC Section 61.05, a Site Plan Review for a project with 50 or more dwelling units;

(4) Pursuant to LAMC Section 11.5.7 C, a Project Permit Compliance Review for a project within the Ventura/Cahuenga Boulevard Corridor Specific Plan;

(5) Pursuant to LAMC Section 12.37 I.3, a Waiver of Dedication and Improvements to the Public Right of Way along Arch Drive and Ventura Boulevard; and

(6) Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, removal of on- and off-site trees, temporary street closure permits, demolition permits, grading permits, excavation/shoring permits, building permits, and sign permits in order to execute and implement the Project.

5. ENVIRONMENTAL REVIEW

As demonstrated in the following Section III, Categorical Exemption Analysis, this Project has been determined to qualify as a Class 32 In-Fill Development Project, which is a categorical exemption under CEQA.

III. CATEGORICAL EXEMPTION ANALYSIS

1. EXEMPTION

The Project qualifies for a Class 32 – In-Fill Development Project Categorical Exemption under the California Environmental Quality Act (CEQA) (Public Resources Code, Sections 21000-21189.57) as set forth in Section 15332 of the *State CEQA Guidelines* (California Code of Regulations, Title 14, Chapter 3, Sections 15000-15387).

2. EXEMPTION RATIONALE

Article 19, Categorical Exemptions, of the *State CEQA Guidelines* (Sections 15300 – 15333) lists classes of projects which have been determined not to have a significant effect on the environment and which are exempt from the provisions of CEQA as required by Section 21084 of the Public Resources Code. This section provides an analysis demonstrating that the Project meets the conditions for a Class 32 Categorical Exemption and that none of the possible exceptions to a Categorical Exemption listed in Section 15300.2 of the *State CEQA Guidelines* is applicable to this Project. The specific language of each condition of the Class 32 Categorical Exemption and each possible exception is shown in italics below under their respective headings, which are followed by the Project analysis for each condition and exception.

3. PROJECT ANALYSIS OF CONDITIONS CONSISTENCY

a) Conditions of the Class 32 Categorical Exemption

[State CEQA Guidelines Section] 15332. In-Fill Development Projects

Class 32 consists of projects characterized as 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 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.

Condition (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.

1) City of Los Angeles General Plan

Land uses on the Project Site are guided by the General Plan. The General Plan sets forth goals, objectives, and programs to guide day-to-day land use policies and to meet the existing and future needs and desires of the community, while integrating a range of State-mandated elements including Land Use, Transportation, Noise, Safety, Housing, and Open Space/Conservation. The Land Use Element of the General Plan consists of 35 community plans that guide land use at a local level. The General Plan also includes the Framework Element, which sets forth general guidance regarding land use issues for the City and defines citywide policies regarding land use that influence the community plans and most of the City's General Plan Elements.

(a) General Plan Framework Element

The consistency of the Project with applicable objectives and policies in the General Plan Framework Element is presented in **Table III-1, Project Consistency with the Framework Element**. As shown, the Project would be consistent with the applicable objectives and policies.

Table III-1
Project Consistency with the Framework Element

Objective/Policy [a]	Project Consistency
Land Use Chapter	
Objective 3.1: Accommodate a diversity of uses that support the needs of the City's existing and future residents, businesses, and visitors.	**Consistent.** The Project would develop 129 dwelling units, including 17 deed-restricted affordable housing units for Very Low Income Households, which would help meet the anticipated growth in housing demand for the area and the City.
Policy 3.1.2: Allow for the provision of sufficient public infrastructure and services to support the projected needs of the City's population and businesses within the patterns of use established in the community plans as guided by the Framework Citywide Long- Range Land Use Diagram.	**Consistent**. As discussed in the analysis under Condition (e), the agencies that provide utilities (water, wastewater, solid waste, natural gas, and electricity) and public services (fire, police, schools, parks, and libraries) to the Project Site would have capacity to serve the Project.
Objective 3.2: Provide for the spatial distribution of development that promotes an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution.	**Consistent.** The Project includes infill multi-family residential development within an existing urbanized setting and is within an area well-served by existing transit routes, including the Metro B (Red) rail line within 0.75-mile of the Project Site and Metro bus lines 155 and 240. The Project would provide bicycle parking spaces in compliance with the LAMC's requirements. Thus, the Project would assist in the reduction of car dependency, which helps reduce vehicle miles traveled while contributing to greater quality of life and improved air quality.
Policy 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	**Consistent:** The Project would develop 129 dwelling units on a site surrounded by a variety of uses. The Project would contribute to the diversity of land uses in the area, which currently includes residential,

Table III-1
Project Consistency with the Framework Element

Objective/Policy [a]	Project Consistency
and the integration of public services and various densities of residential development within neighborhoods at appropriate locations.	commercial, retail, and restaurant land uses within walking distance of the Project Site.
Policy 3.2.3: Provide for the development of land use patterns that emphasize pedestrian/bicycle access and use in appropriate locations.	**Consistent.** The Project would include short- and long-term bicycle parking, including short-term bicycle parking spaces along Arch Drive allowing direct access to the Project's residential uses. Pedestrians would access the residential units from Arch Drive through a lobby area that is accessible from Arch Drive. The Project would move the existing driveway from the corner of Arch Drive and Ventura Boulevard, towards the center of the Project Site, thereby enhancing pedestrian/bicycle access by minimizing potential conflicts with vehicles. Accordingly, the Project would facilitate pedestrian and bicycle access between the Site, existing transit, and nearby neighborhood-serving commercial uses along Ventura Boulevard.
Housing Chapter	
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 subregion to meet the twenty-year projections of housing needs.	**Consistent.** The Project would include 129 dwelling units, including 17 deed-restricted affordable housing units for Very Low Income households, in the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan area, which would help meet the anticipated growth in housing demand for the area and the City.
Objective 4.2: Encourage the location of new multi-family housing development to occur in proximity to transit stations, along some transit corridors, and within some high activity areas with adequate transitions and buffers between higher-density developments and surrounding lower-density residential neighborhoods.	**Consistent.** The Project would include 129 dwelling units, including 17 deed-restricted affordable housing units for Very Low Income households, in an area well-served by existing transit, including the Metro B (Red) rail line within 0.75-mile of the Project Site and Metro bus lines 155 and 240. The Project would be permitted to develop the Project through the residential density increase pursuant to its provision of affordable housing for Very Low Income households. The Project would develop multi-family residential units in an area zoned and designated for multi-family residential uses.
Urban Form and Neighborhood Design Chapter	
Objective 5.2: Encourage future development in centers and in nodes along corridors that are served by transit and are already functioning as centers for the surrounding neighborhoods, the community, or the region.	**Consistent.** The Project Site is on the corner of Ventura Boulevard and Arch Drive. Ventura Boulevard is developed with a diversity of land uses, including commercial uses, that serve the surrounding neighborhoods. The Project Site is also 0.75-mile from the Universal City/Studio City Metro station which provides service on the Metro B (Red) line, and within walking distance of Metro bus lines 155 and 240.
Objective 5.5: Enhance the livability of all neighborhoods by upgrading the quality of development and improving the quality of the public realm.	**Consistent:** The Project would redevelop a site that was previously occupied with an assisted living facility, which was recently demolished, with a new, high-quality, engaging architectural design for a residential building that is constructed to the latest resource-efficient requirements of the LA Green Building Code, as well as provisions for on-site bicycle parking and proximity to transit to reduce car dependency, thereby

Table III-1
Project Consistency with the Framework Element

Objective/Policy [a]	Project Consistency
	improving the quality of life and aesthetic quality of the public realm.
Objective 5.9: Encourage proper design and effective use of the built environment to help increase personal safety at all times of the day.	**Consistent:** The Project would include adequate and strategically positioned lighting to enhance public safety. Visually obstructed and infrequently accessed "dead zones" would be limited, and security controlled to limit public access. The building and layout design of the Project would also include nighttime security lighting and secure parking facilities. Additionally, 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's residents would be able to monitor suspicious activity at the building entry points.
Objective 5.9.1: Facilitate observation and natural surveillance through improved development standards which provide for common areas, adequate lighting, clear definition of outdoor spaces, attractive fencing, use of landscaping as a natural barrier, secure storage areas, good visual connections between residential, commercial, or public environments and grouping activity functions such as child care or recreation areas.	**Consistent:** See consistency analysis for Objective 5.9 above.
Economic Development Chapter	
Objective 7.2: Establish a balance of land uses that provides for commercial and industrial development which meets the needs of local residents, sustains economic growth, and assures maximum feasible environmental quality.	**Consistent.** The Project would support this objective by providing a residential development consisting of 129 dwelling units, including 17 deed-restricted affordable housing units for Very Low Income households on land designated and zoned for multi-family residential uses. The Project Site is within walking distance of neighborhood-serving commercial uses along Ventura Boulevard, and future Project residents would patronize these businesses, thus fostering continued economic investment. Furthermore, the Project would integrate sustainable and green building techniques by incorporating various standards and guidelines to reduce resources and energy consumption.
Infrastructure and Public Services Chapter	
Policy 9.3.1: Reduce the amount of hazardous substances and the total amount of flow entering the wastewater system.	**Consistent.** Construction associated with the Project would be subject to the requirements of Los Angeles Regional Water Quality Control Board (LARWQCB) Order No. R4-2012-0175-A01, NPDES No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of Best Management Practices (BMPs),

Table III-1
Project Consistency with the Framework Element

Objective/Policy [a]	Project Consistency
	including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction. In addition, all development and redevelopment projects that create, add, or replace 500 square feet or more of impervious area must comply with the City's Low Impact Development (LID) Ordinance. This includes compliance with the City's Development Best Management Practices Handbook (BMP Handbook), which contains minimum stormwater requirements for construction activities. In addition, in accordance with National Pollutant Discharge Elimination System Municipal Permit requirements, the Project would be required to implement Standard Urban Stormwater Mitigation Plan (SUSMP) and LID requirements throughout the operational life of the Project. The SUSMP would outline stormwater treatment measures or post-construction BMPs required to control pollutants of concern. In addition, consistent with the City's LID requirement to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system as established by the LID Manual.
Objective 9.6: Pursue effective and efficient approaches to reducing stormwater runoff and protecting water quality.	**Consistent.** See the consistency analysis for Policy 9.3.1 above.
a City of Los Angeles, The Citywide General Plan Framework Element, readopted August 2001. *Source (table): EcoTierra Consulting, 2023.*	

(b) Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan

The City's community plans are intended to promote an arrangement of land uses, streets, and services, which would encourage and contribute to the economic, social, and physical health, safety, and welfare of the people who live and work in the community. The community plans are also intended to guide development in order to create a healthful and pleasing environment. The community plans coordinate development among the various communities of the City and adjacent municipalities in a fashion both beneficial and desirable to the residents of the community. The Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan guides land uses on the Project Site and in the surrounding areas within the Community Plan Area. This Community Plan sets forth planning goals and objectives to maintain the community's distinctive character.

As set forth in the Community Plan, the Project Site is designated for General Commercial land uses.[8] Zoning designations consistent with the General Commercial land use category include

[8] City of Los Angeles, Department of City Planning, General Plan Land Use Map, Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan, February 2013.

CR, C2, C4, Cr, RAS3, P, and PB. The Project would be consistent with this land use designation as the Project's multi-family residential land use is allowed in the General Commercial land use designation and the Project Site's corresponding C2-1VL-RIO zoning designation. Moreover, the Project is consistent with additional Community Plan objectives and policies. The Project's consistency with these applicable objectives and policies is presented in **Table III-2, Project Consistency with the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan**.

Table III-2
Project Consistency with the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan

Objectives and Policies[a]	Project Consistency
Residential	
Objective 1-2. To locate new housing in a manner which reduces vehicular trips and makes it accessible to services and facilities.	**Consistent**. The Project includes infill multi-family residential development within an existing urbanized setting and is within an area well-served by existing transit routes, including the Metro B (Red) rail line within 0.75-mile of the Project Site and Metro bus lines 155 and 240. The Project would provide bicycle parking spaces in compliance with the LAMC's requirements. Thus, the Project would assist in the reduction of car dependency, which helps reduce vehicle miles traveled while contributing to greater quality of life and improved air quality.
Policy 1-2.1. Locate higher residential densities near commercial centers, rail transit stations and major bus routes where public services facilities, utilities and topography will accommodate this development.	**Consistent**. The Project would develop 129 new residential units on a site that currently has no residential units, in proximity to transit and commercial centers as described above. As discussed in the analysis under Condition (e), the agencies that provide utilities (water, wastewater, solid waste, natural gas, and electricity) and public services (fire, police, schools, parks, and libraries) to the Project Site would have capacity to serve the Project.
Policy 1-2.2. Encourage multiple residential development in commercial zones.	**Consistent**. The Project would include a multi-family residential use in a site zoned C2-1VL-RIO with a General Plan Land use of General Commercial.
Objective 1-3. To preserve and enhance the varied and distinct residential character and integrity in existing single and multi- family neighborhoods.	**Consistent**. The building facades would be accented with balcony insets, and feature alternating building materials. Building massing would be broken down by facade articulations.
Policy 1-3.1. Seek a high degree of compatibility and landscaping for new infill development to protect the character and scale of existing residential neighborhoods.	**Consistent**. The Project building façade would include a mix of materials, textures, and planes to add visual interest around the entire site in a neighborhood that hosts a mix of architectural styles among both residential and commercial buildings. Further, the Project's landscape plan would include a variety of trees, shrubs, and ground cover complementing the common open space areas on the ground level.
Policy 1-3.2. Consider factors such as neighborhood character and identity, compatibility of land uses, impact on livability, impacts on services and public facilities, and impacts on traffic levels when changes in residential densities are proposed.	**Consistent**. The Project is within the vicinity of commercial and residential uses and would be consistent with the existing character and scale of the surrounding area. Additionally, the Project would provide bicycle parking spaces and is well-served by existing transit routes, including the Metro B (Red) rail

Table III-2
Project Consistency with the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan

Objectives and Policies[a]	Project Consistency
	line within 0.75-mile of the Project Site and Metro bus lines 155 and 240.
Objective 1-4. To promote and insure the provision of adequate housing for all persons regardless of income, age or ethnic background.	**Consistent**. The Project would include up to 129 multi-family dwelling units, including 17 units reserved for Very Low Income Households, within the Community Plan Area.
Policy 1-4.1. Promote greater individual choice in type, quality, price and location of housing.	**Consistent**. The proposed 129 residential units include 20 studio apartments, 73 one-bedroom apartments, 36 two-bedroom. The units range in size from 470 square feet to 1,552 square feet. Thirteen percent of the residential units would be set aside as designated affordable housing units for qualifying households (17 Very Low Income).
Urban Design	
Site Planning 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. Toward that goal, the following policies are proposed: 1. Providing a pedestrian entrance at the front of each project. 2. Requiring useable open space for outdoor activities, especially for children.	**Consistent.** The Project would include approximately 11,000 square feet of outdoor common space for the residents to utilize. The Project's open space and amenities would include a first-floor open-to-sky common area with pool area, open space facing the Los Angeles River, a fitness center, and recreation room, and a second-floor fitness center. The dwelling units would include private balconies. Further, pedestrians would access residential units from both Arch Drive and the rear of the Project Site via a walkway from the Los Angeles River.
Design The design of all buildings shall be of a quality and character that improves community appearances by avoiding excessive variety and monotonous repetition. Achievement of this can be accomplished through: 1. Requiring the use of articulations, recesses, surface perforations and/or porticoes to break up long, flat building facades. 2. Utilizing complementary building materials on building facades. 3. Incorporating varying design to provide definition for each floor. 4. Integrating building fixtures, awnings, security gates, into design of building(s). 5. Screening of all roof top equipment and building appurtenances from adjacent properties. 6. Requiring decorative, masonry walls to enclose trash.	**Consistent.** The Project building façade would include a mix of materials, textures, and planes to add visual interest around the entire site in a neighborhood that hosts a mix of architectural styles among both residential and commercial buildings. This mid-rise building would front on Arch Drive and is designed with varied massing and setbacks to articulate the building so that the façade is not a flat surface. Additionally, the Project includes windows and balconies along the street facing elevation to further orient the building to the street. The use of quality materials in combination with a clear architectural design would enhance the overall neighborhood context. Attention has been given to fenestration and material composition that is responsive to the human scale. Furthermore, all roof top equipment and appurtenances would be screened from public view.

a City of Los Angeles, Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan, May 13, 1998.
Source (table): EcoTierra Consulting, 2023.

(c) Vermont/Cahuenga Boulevard Corridor Specific Plan

The Project Site is located within the boundaries of the Vermont/Cahuenga Boulevard Corridor Specific Plan. The general purpose of the Vermont/Cahuenga Boulevard Corridor Specific Plan, adopted February 16, 1991 by Ordinance No. 166,560, and most recently amended August 18, 2001, is to promote the Vermont/Cahuenga Boulevard Corridor as a vibrant commercial area with multiple-family housing opportunities through the implementation of several improvement goals including, providing guidelines for landscape and exterior buildings and structures, creating more unified appearance in buildings and signs, and ensuring future development occurs in a manner that is environmentally sensitive.[9] Development of the Project Site is subject to the requirements of the Vermont/Cahuenga Boulevard Corridor Specific Plan guidelines including criteria regarding use, height and density, facade treatments, parking, and other standards pertaining to private property, as well as the public right-of-way. Criteria and requirements of the Vermont/Cahuenga Boulevard Corridor Specific Plan are detailed below.

(i) Specific Plan Section 6

Section 6 of the Vermont/Cahuenga Boulevard Corridor Specific Plan provides land use regulations applicable to all subareas within the Specific Plan area as follows:

Section 6A – Basic Development Rights. The Project shall comply with the applicable Development Rights. Development Rights are legal requirements that address those aspects of site development and building design for which physical specifications can be described. Design Guidelines are strong recommendations that provide direction for more subjective considerations.

Section 6B – Floor Area Ratio Limitations. FAR is limited to 1:1 by the Vermont/Cahuenga Boulevard Corridor Specific Plan for properties located within an area designated for General Commercial uses, such as the Project Site. With an FAR of only 1:1, the Project would be limited to 36,328 square feet, which is smaller than the building that was recently demolished on the Project Site (41,697 square feet). The Project would be 116,525 square feet, which would be allowed with the on-menu incentive to increase the FAR to 3:1 and would allow the Applicant to set aside 13 units for Very Low Income households.

(ii) Specific Plan Section 7

Section 7 of the Vermont/Cahuenga Boulevard Corridor Specific Plan provides land use regulations applicable to all subareas within the Specific Plan area as follows:

Section 7A – Yards and Setbacks. The Project would be consistent with the required setbacks. The Vermont/Cahuenga Boulevard Corridor Specific Plan requires a front yard 18-inch setback and maximum requirement of a 20 foot setback, a side yard setback of a maximum requirement of 10 feet, and a rear yard setback of a maximum requirement of 18 feet. The Project would be constructed with an 18-inch front yard setback along Arch Drive, an 8 foot side yard setback along the east and west sides, and an 18 foot rear yard setback along the Los Angeles River.

[9] Vermont/Cahuenga Boulevard Corridor Specific Plan, February 1995.

Section 7B – Lot Coverage. The Vermont/Cahuenga Boulevard Corridor Specific Plan limits the maximum lot coverage for buildings and structures constructed on the Project Site to 60 percent. With approval of the off-menu waiver the Applicant would be permitted up to 70 percent lot coverage. This is necessary due to the Project Site's sloping topography, which causes the first subterranean parking level (that is accessed at grade level from the front of the building at Arch Drive) to extend above the Project Site's natural grade at the rear of the building. Because the swimming pool courtyard is located just above this parking level, it is considered to be more than six-feet above natural grade, and therefore, counts toward lot coverage. Without this proposed waiver of development standards, compliance with the required lot coverage percentage would require reducing the lot area available for the building footprint and envelope and therefore physically preclude construction of the Project at the proposed density and with the proposed number of affordable units.

Section 7D – Landscape Requirements. The Vermont/Cahuenga Boulevard Corridor Specific Plan states that at least 60 percent of all front setbacks in excess of 18 inches shall be landscaped and the remainder shall be finished to City standards for sidewalks, or finished with other paving materials, including concrete pavers, brick masonry pavers. The Project, which includes 6,391 square feet of landscaped area, shall comply with the landscape requirements. Furthermore, portions of the building façade that front Arch Drive include a vehicle ingress and egress and shall be enhanced with landscape planters, windows and balconies.

Section 7E – Height Limit. With approval of the off-menu Bonus Density incentive for height increase to permit a building height of 75 feet to the tallest parapet in lieu of a maximum 45-foot building height, including rooftop equipment such as stairwells, the Project would be consistent with the height limits. Included in this request is relief from the City's transitional height requirement abutting the OS Zone, which requires a stepped back building height limit of 25 feet for portions of the property between 0 – 49 feet from the north property line, 33 feet between 50 – 99 feet and 61 feet between 100 – 199 feet.

To reflect the intent of the City's transitional height regulations, the Project would be stepped back next to the Los Angeles River with approximate building heights of between 33 and 54 feet at 18 – 49 feet, between 54 and 75 feet at 50 – 99 feet, and between 75 and 42 feet at 100 – 199 feet. The building would start at three stories along the Los Angeles River side and would be four stories at the street frontage next to the adjacent apartment building to the east to be more compatible with adjacent uses. There is also an approximate 50 foot buffer of land from the north property line to the Los Angeles River edge. As such, the building would be 68 feet from the Los Angeles River edge. Also, the maximum height would occur in the middle of the building, due to a slight downward sloping topography to the north, with a grade difference of approximately 11 feet.

Section 7F – Parking. Utilizing the City's Density Bonus regulations, Option #1, the Project would be required to provide 147 spaces for the 129 units. With a 10 percent reduction allowed per the City's bicycle parking incentives, 132 spaces are required. The Project meets and exceeds this requirement, providing a total of 145 on-site vehicle parking spaces.

(iii) Specific Plan Section 8

Section 8 of the Vermont/Cahuenga Boulevard Corridor Specific Plan provides land use regulations applicable to all subareas within the Specific Plan area as follows:

Section 8 – Sign Regulations. New Project signage would be used for building identification, wayfinding, and security. The Project shall include signage that complies with the provisions of LAMC Chapter II, Article 8, Section 28.00, et seq.; Chapter VI, Article 7, Section 67.00, et seq.; and Chapter IX, Article 1, Division 62.

2) Planning and Zoning Code

All on-site development activity is subject to the City's Planning and Zoning Code. The Planning and Zoning Code includes development standards for the various districts in the City. The Project Site is currently zoned C2-1VL-RIO (Commercial Zone –Very Limited Height District No. 1 – River Improvement Overlay Project).[10]

Land uses allowed in the C2 zone include a wide range of commercial uses (including art and pet shops, catering businesses, restaurants, and tire shops, etc.) as well as any land uses allowed in the C1.5 zone, which includes residential land uses allowed in the R4 (including multiple family dwellings with a minimum lot area of 400 square feet per dwelling unit), and land use allowed in the C1 zone, which includes residential land uses allowed in the R3 zone (including multiple family dwellings with a minimum lot area of 800 square feet per dwelling unit).[11]

The Project's proposed residential project would be consistent with the current underlying C2 zoning at the Project Site per the Planning and Zoning Code. In addition, the Project Site is located in the Vermont/Cahuenga Boulevard Corridor Specific Plan. The development standards as specified in the Vermont/Cahuenga Boulevard Corridor Specific Plan supersedes the LAMC, which includes but is not limited to height.

The Affordable Housing Incentives-Density Bonus was approved as Ordinance 179,681 on April 15, 2008. The purpose of the Affordable Housing Incentive-Density Bonus is to establish procedures for implementing State Density Bonus requirements and to increase the production of affordable housing, through establishing density increases, parking reductions, and development incentives and concessions for residential or mixed-use projects that contain affordable housing units and that are located within a half-mile of a major transit stop.[12]

Housing developments are eligible for additional incentives if a project meets certain requirements identified in the Affordable Housing Incentives-Density Bonus Guidelines. At least one incentive or concession, in addition to the density bonus, must be provided to projects that set aside affordable units. The number of incentives increases as the percentage of set-aside units increases. Since the Project would deed-restrict 13 percent (17 dwelling units) of the proposed

[10] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org. Accessed June 2023.
[11] LAMC Section 12.14.A.
[12] LAMC Section 12.22.A.25

129 dwelling units for Very Low Income Households, the Project is eligible for three Affordable Housing Incentives-Density Bonus base incentives.[13]

Density

The C2 Zone permits the R4 Zone's multiple dwelling unit density of 1 unit per 400 square feet of land area, or 113 dwelling units for the Project Site.[14] As the Project complies with all applicable provisions of LAMC Section 12.22.A.25 by providing 13 percent (or 17 dwelling units) of the proposed dwelling units for Very Low Income Households, the Project is eligible for an increase in residential density. As such, the Project would be able to construct up to 153 dwelling units on the Project Site.[15] The Project proposes 129 units.

Height

The Project Site is located in Height District 1 Very Limited.[16] Height District No. 1VL restricts building heights to not exceed three-stories, nor shall it exceed 45 feet in height. The requested off-menu incentive pursuant to LAMC Section 12.22 A.25(g)(3) is to permit a building height of 75 feet to the tallest parapet in lieu of a maximum 45-foot building height, including rooftop equipment such as stairwells, as required by the Vermont/Cahuenga Boulevard Corridor Specific Plan. Included in this request is relief from the City's transitional height requirement abutting the Open Space (OS) Zone, which requires a stepped back building height limit of 25 feet for portions of the property between 0 – 49 feet from the north property line, 33 feet between 50 – 99 feet and 61 feet between 100 – 199 feet.

To reflect the intent of the City's transitional height regulations, the Project would be stepped back next to the Los Angeles River with approximate building heights of between 33 and 54 feet at 18 – 49 feet, between 54 and 75 feet at 50 – 99 feet, and between 75 and 42 feet at 100 – 199 feet. The building would start at three stories along the Los Angeles River side and would be four stories at the street frontage next to the adjacent apartment building to the east to be more compatible with adjacent uses. There is also an approximate 50 foot buffer of land from the north property line to the Los Angeles River edge. As such, the building would be 68 feet from the Los Angeles River edge. Also, the maximum height would occur in the middle of the building, due to a slight downward sloping topography to the north, with a grade difference of approximately 11 feet. As proposed, the off-menu incentive to exceed the building height limitations would allow for the construction of a three-to five-story building with a maximum height of 75 feet.

Setbacks

The C2 zone is not required by the LAMC to provide front yard setbacks, but is required to provide side and rear yard setbacks. The width of the side yard shall be not less than 10 percent of the

[13] 17 divided by 129 equals 13.2 percent.
[14] Gross lot area of the C2 portion of the Project Site is 44,886.8 square feet, which, at the underlying residential density of 1 dwelling unit per 400 square feet, equals 113 residential dwelling units (44,886.8 / 400 = 112.2 rounded up).
[15] 153 units (113 units x 1.35 = 152.6 rounded up).
[16] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org. Accessed June 2023.

lot width, but need not exceed five feet and shall be not less than three feet. One foot shall be added to the width of such side for each story above the second story, but such side yard need not exceed 16 feet in width. The rear yard shall not less than 15 feet in depth. One foot shall be added to the depth of such rear yard for each additional story above the third story, but such rear yard need not exceed 20 feet. However, the Vermont/Cahuenga Boulevard Corridor Specific Plan, pursuant to Section 7(A)(1), requires a front yard 18-inch setback and maximum requirement of a 20 foot setback, a side yard setback of a maximum requirement of 10 feet, and a rear yard setback of a maximum requirement of 18 feet.

The Project would be constructed with an 18-inch front yard setback along Arch Drive, an 8 foot side yard setback along the east and west sides, and an 18 foot rear yard setback along the Los Angeles River. The provision of these setbacks minimizes the Project's massing, along with its potential impacts upon these adjacent properties, while remaining consistent with the intent of the Vermont/Cahuenga Boulevard Corridor Specific Plan's yard requirements.

Commercial Corner

As the Project proposes multi-family residential uses on a corner lot zoned C2-1VL that abuts the Los Angeles River, which is zoned OS, it is subject to the City's Commercial Corner standards.[17] As a result, any multi-family residential development that does not meet these standards, which include height, front yard setback, landscaping, lighting and signage requirements, among others, would require conditional use approval pursuant to LAMC Section 12.24.W.27. However, a Mixed Use Project, as defined in LAMC Section 13.09.B.3, consisting predominantly of residential uses with a certain amount of ground floor commercial space, is exempt from these requirements.

Therefore, the Project requests an off-menu waiver from the requirement to include commercial space in the building, which if otherwise included, would qualify it for an exemption from the City's Commercial Corner regulations. However, if the Project were to include commercial space, it would result in the loss of space for residential units and amenities on the building's first floor. Additional parking spaces would also be required for the commercial space, which would reduce the number of parking spaces that would feasibly be provided for the residents. Therefore, by waiving this standard, the Project would be exempt from these requirements.

Parking

As the Project is a Density Bonus Project, it is utilizing Parking Option 1. In accordance with the Density Bonus Parking Option 1, the Project is required to provide parking based on the number of bedrooms, inclusive of Handicapped and Guest parking with at least one space per one-bedroom units, and one and a half parking spaces for units with two or three bedrooms. Based on the proposed unit mix, the Project would be required to provide 147 spaces for the 129 units. With a 10 percent reduction allowed per the City's bicycle parking incentives, 132 spaces are required. The Project meets and exceeds this requirement, providing a total of 145 on-site vehicle parking spaces, but would require a waiver of development standards to allow up to 43 of the 132 required parking spaces to be provided as compact spaces in lieu of the compact parking limitations pursuant to LAMC 12.21-A. ADA parking would be provided in the subterranean level

[17] LAMC Section 12.22.A.23.

1 parking. The Project would also include Electric Vehicle (EV) charging stations for 10 percent of the total code-required parking spaces and wiring for future installation of EV charging stations for 30 percent of the total code-required parking spaces.

Per the City of Los Angeles Bicycle Parking Ordinance No. 182,386, the Project is required to provide 149 long-term and 16 short-term bicycle parking spaces. The Project would provide up to 166 bicycle parking spaces, including, 150 long-term bicycle parking spaces located in the first subterrain parking level and 16 short-term bicycle parking spaces located at the frontage of the Project Site on Arch Drive.

Open Space

The Project's required open space was calculated pursuant to LAMC Section 12.21.G, based on the size and number of dwelling units. As described above, the Project proposes 129 residential units. For each unit with less than three habitable rooms, 100 square feet of open space is required and for each unit with three habitable rooms, 125 square feet of open space is required. Thus, a total of 13,800 square feet of open space is required for this Project. The Project would provide 13,800 square feet of open space consisting of 2,800 square feet of private balconies and 11,000 square feet of common space. In conformance with LAMC Section 12.21.G, 25 percent of the provided common open space is required to be landscaped, or a minimum of 3,250 square feet. The Project would include 6,391 square feet of landscaped outdoor common open space.

Furthermore, the Project Site located within Media Sub District of the Studio City/Cahuenga Pass Streetscape Plan area and shall comply with the adopted Streetscape and Design Guidelines for this area.

In conclusion, the discretionary and ministerial entitlements, reviews, permits, and approvals required to implement the Project include, but are not necessarily limited to, the following:

(1) A CEQA exemption pursuant to CEQA Guidelines, Section, 15332, Class 32 (Urban Infill);

(2) Pursuant to Los Angeles Municipal Code (LAMC) Section 12.22-A,25(g) a Density Bonus for a housing development project totaling 129 dwelling units, including 17 units set aside for VLI Households, and requesting the following three incentives and two waivers of development standards:

   a. With the following on-menu incentives:

      i. Floor Area Ratio (FAR) of 3:1 for a project located on a Major Highway within 1,500 feet of a Transit Stop in lieu of the 1:1 FAR limitation pursuant to the Ventura/Cahuenga Boulevard Corridor Specific Plan Section 6.B.3; and

      ii. Permit up to a 20 percent increase in lot coverage to allow a maximum of 72 percent lot coverage in lieu of 60 percent lot coverage limitation pursuant to the Ventura/Cahuenga Boulevard Corridor Specific Plan Section 7.B.

   b. With the following off-menu incentive:

i. Permit 31-foot increase in building height to allow a maximum height of 75 feet in-lieu of the 45-foot building height limitation of the C2-1VL-RO Zone; and to allow building height to exceed of the transitional height limitations pursuant to LAMC Section 12.21.1-A,10.

c. With the following waiver of development standards:

i. A waiver of development standards to allow up to 43 of the 132 required parking spaces to be provided as compact spaces in lieu of the compact parking limitations pursuant to LAMC 12.21-A,5(c); and

ii. A waiver of development standards to permit a multi-family development with deviations from Commercial Corner Development Standards pursuant to LAMC 12.22-A,23(a) including deviations for height (LAMC 12.22-A,23(a)(1)) and landscape setbacks (LAMC 12.22-A,23(a)(10)(i)).

(3) Pursuant to LAMC Section 61.05, a Site Plan Review for a project with 50 or more dwelling units;

(4) Pursuant to LAMC Section 11.5.7 C, a Project Permit Compliance Review for a project within the Ventura/Cahuenga Boulevard Corridor Specific Plan;

(5) Pursuant to LAMC Section 12.37 I.3, a Waiver of Dedication and Improvements to the Public Right of Way along Arch Drive and Ventura Boulevard; and

(6) Other discretionary and ministerial permits and approvals that may be deemed necessary, including, but not limited to, removal of on- and off-site trees, temporary street closure permits, demolition permits, grading permits, excavation/shoring permits, building permits, and sign permits in order to execute and implement the Project.

Based on the above, with approval of the requested base and additional incentives, the Project would be consistent with the City's Planning and Zoning Code.

3) River Improvement Overlay District

The Project Site is located within the Los Angeles RIO, which requires new construction to meet development regulations addressing landscaping, screening, and fencing, and lighting, and orientation in association with the Los Angeles River. Pursuant to Ordinance No. 183,145, the purpose of the RIO District includes: supporting the goals of the Los Angeles River Revitalization Master Plan; contributing to the environmental and ecological health of the City's watersheds; establishing a positive interface between river adjacent property and river parks and/or greenways; promoting pedestrian, bicycle and other multi-modal connections between the river and its surrounding neighborhoods; providing native habitat and supporting local species; providing an aesthetically pleasing environment for pedestrians and bicyclists accessing the river area; providing safe, convenient access to and circulation along the river; promoting the river identity of river adjacent communities; and supporting the Low Impact Development Ordinance, the City's Irrigation Guidelines, and the Standard Urban Stormwater Maintenance Program.

The Project includes plans to specifically to meet the Los Angeles RIO District regulations, including landscaping with native trees, plants and shrubs; recreational amenities, such as a

swimming pool and spa, fitness rooms, recreation room, outside seating areas, and terraces, including Los Angeles River observation decks. Prior to issuance of a building permit, the Project Applicant would be required to consult with the Department of City Planning to obtain an Administrative Clearance for compliance with all of the applicable regulations of the Los Angeles RIO District. As such, the Project would be required to comply with the Los Angeles RIO District.

4) Los Angeles Green Building Code

The Los Angeles Green Building Code ("LA Green Building Code") is based on the California Green Building Standards Code (commonly known as CALGreen), 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 LA Green Building Code:

- All new buildings (residential and non-residential);
- Every building alteration with a building permit valuation of $200,000 or more (residential and non-residential);
- Residential alterations that increase the building's conditioned volume; and
- Every building addition (residential and non-residential).

The Project would be compliant with the LA Green Building Code and California Energy Code/Title 24 requirements, and would include, but not be limited to, the following features:

- Thirty percent of the parking spaces would be pre-wired for electric vehicle charging. Of these, ten percent of the total number of parking spaces would have chargers for electric vehicles;
- Air tight and insulated envelope;
- Low-E windows;
- Low-water use plumbing fixtures;
- MERV 13 air filters;
- Low-water use landscaping and weather-sensor controlled drip irrigation; and
- Solar ready thermal systems.

As also required by the City's Building Code, the proposed building would provide space to accommodate future rooftop solar panels and conduit for on-site electric vehicle charging stalls, which would be provided in the parking garage.

5) Citywide Design Guidelines

The City's General Plan Framework Element and each of the City's 35 Community Plans promote architectural and design excellence. The Citywide Design Guidelines provide guidance for applying policies contained within the General Plan Framework and the City's 35 Community Plans. The Citywide Design Guidelines are particularly applicable to those areas within the City that do not currently have adopted design guidelines contained in a Community Plan Urban Design chapter, specific plan, or other community planning documents. They provide guidance for new Community Plan updates. Per the Citywide Design Guidelines, in instances where the Citywide Design Guidelines conflict with a provision in a Community Plan Urban Design chapter,

a specific plan, or a community-specific guideline such as the Downtown Design Guide, the community-specific requirements prevail.[18]

The Project's consistency with the applicable objectives and guidelines of the Citywide Design Guidelines is presented in **Table III-3, Consistency with Applicable Provisions of the Citywide Design Guidelines**. As shown, the Project would be consistent with the applicable objectives and guidelines.

Table III-3
Consistency with Applicable Provisions of the Citywide Design Guidelines

Objective	Project Consistency
Guideline 1: Promote a safe, comfortable and accessible pedestrian experience for all.	**Consistent.** The Project is a residential development. Pedestrians would access the residential units from Arch Drive, via a walkway, and there would be pedestrian access from the rear of the Project Site to the Los Angeles River. Ventura Boulevard provides opportunities for residents and visitors to use public transit for work trips, and walk to other retail businesses within and near the Project Site. Furthermore, appropriate lighting and other security measures would be incorporated into the design and the residential areas of the site would be secured during nighttime hours.
Site Planning Provide direct access to the surrounding neighborhood and amenities, including transit.	**Consistent.** The residential Project is located on the corner of Ventura Boulevard and Arch Drive. Ventura Boulevard provides opportunities for residents and visitors to use public transit for work trips, and walk to other retail businesses within and near the Project Site. The Metro B (Red) rail line within 0.75-mile of the Project Site and Metro bus lines 155 and 240 run along Ventura Boulevard.
Use ornamental low-level lighting to highlight and provide security for pedestrian paths and entrances. Ensure that all parking areas and pedestrian walkways are illuminated.	**Consistent.** Project lighting would include architectural lighting, interior lighting, and exterior lighting for security and wayfinding purposes. Exterior lights would be wall mounted or ground mounted, directed downward, and shielded away from adjacent land uses. Other illuminated areas would be localized and would minimize light trespass and spill. Light fixtures that broadcast light over large areas or which are a source of direct glare would not be used. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties.
Building Design Promote pedestrian activity by placing entrances at grade level or slightly above, and unobstructed from view from the public right-of-way. Entryways below street level should be avoided.	**Consistent.** The Project's pedestrian entrances are provided at grade and unobstructed from view of the respective public rights-of-way.

[18] Citywide Design Guidelines, adopted October 24, 2019.

Table III-3
Consistency with Applicable Provisions of the Citywide Design Guidelines

Objective	Project Consistency
Guideline 2: Carefully incorporate vehicular access such that it does not discourage and/or inhibit the pedestrian experience.	**Consistent.** Automobile access to the parking garage would be via a driveway off of Arch Drive at the center of the Project Site. The vehicle access driveway would be separated from the pedestrian activity areas. Pedestrians would access the residential units from Arch Drive, via a walkway, and there would be pedestrian access from the rear of the Project Site to the Los Angeles River.
Site Planning Prioritize pedestrian access first and automobile access second. Orient parking and driveways toward the rear or side of buildings and away from the public right-of-way. On corner lots, parking should be oriented as far from the corner as possible.	**Consistent.** Vehicular access to the Project Site would be provided via a two-way driveway off of Arch Drive, providing controlled access. The Project would move the existing driveway from the corner of Arch Drive and Ventura Boulevard, towards the center of the Project Site, thereby enhancing pedestrian/bicycle access by minimizing potential conflicts with vehicles. Pedestrians would access the residential units from Arch Drive, via a walkway, and there would be pedestrian access from the rear of the Project Site to the Los Angeles River.
Minimize both the number of driveway entrances and overall driveway widths.	**Consistent.** Vehicular access to the Project Site would be provided via a two-way driveway off of Arch Drive, providing controlled access. The Project would move the existing driveway from the corner of Arch Drive and Ventura Boulevard, towards the center of the Project Site, thereby enhancing pedestrian/bicycle access by minimizing potential conflicts with vehicles. The driveway would be built to the satisfaction of the Bureau of Engineering.
Orient vehicular access as far from street intersections as possible.	**Consistent**. Vehicular access to the Project Site would be provided via a two-way driveway off of Arch Drive, providing controlled access. The Project would move the existing driveway from the corner of Arch Drive and Ventura Boulevard, towards the center of the Project Site, thereby enhancing pedestrian/bicycle access by minimizing potential conflicts with vehicles.
Guideline 5: Express a clear and coherent architectural idea.	**Consistent.** The Project is designed in a contemporary architectural style and incorporates decorative plaster, board formed concrete, decorative metal, porcelain tile, and wood slats on the balcony fronts, and a neutral color palette generally consisting of browns and natural tan tones. The Project's use of different textures, colors, setbacks, materials, and distinctive architectural treatments is designed to create visual interest, avoid repetitive facades, and break up the building's mass.
Building Design Design lighting to enhance the ground floor environment or to emphasize key architectural	**Consistent.** Illuminated areas would be localized and would minimize light trespass and spill. Exterior lights would be wall mounted or ground

Table III-3
Consistency with Applicable Provisions of the Citywide Design Guidelines

Objective	Project Consistency
features without projecting light into the night sky. Utilize adequate, uniform, and glare-free lighting, such as dark-sky compliant fixtures, to avoid uneven light distribution, harsh shadows, and light spillage.	mounted and shielded away from adjacent land uses to ensure no light spillage. Other illuminated areas would be localized and would minimize light trespass and spill. Light fixtures that broadcast light over large areas or which are a source of direct glare would not be used. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties.
Guideline 9: Configure the site layout, building massing and orientation to lower energy demand and increase the comfort and well-being of users.	**Consistent.** The Project's location near bus stops, could help reduce the energy and emission footprint of the Project and the per capita GHG emissions of the residents and visitors from private automobile travel. Furthermore, the Project would be compliant with the Los Angeles Green Building Code and California Energy/Title 24 requirements. The Project would include the provision of conduit that is appropriate for future solar thermal collectors.
Site Planning Plant trees and/or install shade structures to increase comfort and provide passive cooling opportunities. Provide canopy trees in planting areas for shade and energy efficiency, especially on south and southwest facing façades.	**Consistent.** A total of 19 new on-site trees, along with low-growing vegetation would be incorporated into the Project.
Install a publicly accessible Electric Vehicle charging station and/or space for car-share providers on the project site, if the site and context is suitable.	**Consistent.** The Project would include ten percent of its required and provided parking spaces (or 15 spaces) with chargers for electric vehicles.
Integrate solar powered lighting to increase energy efficiency.	**Consistent.** The Project would be compliant with the Los Angeles Green Building Code and California Energy/Title 24 requirements. The Project would include the provision of conduit that is appropriate for future solar thermal collectors.
Guideline 10: Enhance green features to increase opportunities to capture stormwater and promote habitat.	**Consistent.** In accordance with National Pollutant Discharge Elimination System Municipal Permit requirements, the Project would be required to implement Standard Urban Stormwater Mitigation Plan and Low Impact Development requirements throughout the operational life of the Project. The Standard Urban Stormwater Mitigation Plan would outline stormwater treatment measures or post-construction Best Management Practices required to control pollutants of concern. In addition, consistent with the City's Low Impact Development requirement to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system as established by the Low Impact Development Manual.

Table III-3
Consistency with Applicable Provisions of the Citywide Design Guidelines

Objective	Project Consistency
Site Planning Facilitate stormwater capture, retention, and infiltration, and prevent runoff by using permeable or porous paving materials in lieu of concrete or asphalt. Collect, store, and reuse stormwater for landscape irrigation.	**Consistent.** In accordance with National Pollutant Discharge Elimination System Municipal Permit requirements, the Project would be required to implement Standard Urban Stormwater Mitigation Plan and Low Impact Development requirements throughout the operational life of the Project. The Standard Urban Stormwater Mitigation Plan would outline stormwater treatment measures or post-construction Best Management Practices required to control pollutants of concern. In addition, consistent with the City's Low Impact Development requirement to reduce the quantity and improve the quality of rainfall runoff that leaves the Project Site, the Project would include the installation of an infiltration system as established by the Low Impact Development Manual.
Select plant species that are adapted and suitable for the site's specific soil conditions and microclimate.	**Consistent.** Landscaping would consist of low water use and drought tolerant landscaping that is suitable to the Project Site.
Source: Citywide Design Guidelines, adopted October 24, 2019; EcoTierra Consulting, 2023.	

6) Walkability Checklist: Guidance for Entitlement Review

In January 2007, the Department of City Planning created the *Walkability Checklist: Guidance for Entitlement Review* ("Walkability Checklist"). The purpose of the Walkability Checklist is to guide the Department of City Planning, as well as developers, architects, engineers, and all community members, in creating enhanced pedestrian movements, access, comfort, and safety contributing to overall walkability throughout the City. The Walkability Checklist provides a list of recommended strategies that projects should employ to improve the pedestrian environment in the public right-of-way and on private property. Each of the implementation strategies in the Walkability Checklist should be considered in a project, although not all strategies would be appropriate in every project. While the Walkability Checklist is neither a requirement nor part of the LAMC, it provides guidance for consistency relating to the policies contained in the General Plan Framework Element. Incorporating these guidelines into a project's design encourages pedestrian activity, higher quality urban forms, and place-making. The following is an analysis of the Project's consistency with the applicable guidelines.

a) Sidewalks

The Project generally supports the walkability guidelines discussing sidewalks, which provide that pedestrian corridors should be delineated by creating a consistent rhythm, should be wide enough to accommodate pedestrian flow, and provide pedestrian safety, specifically by creating a clear separation from the roadway and from traffic. Pedestrians would access the residential units from Arch Drive, via a walkway, and there would be pedestrian access from the rear of the Project Site to the Los Angeles River. While there is no parkway along Arch Drive that fronts the Project Site,

landscape along this frontage too would help buffer pedestrian activity on the sidewalk from the roadway.

b) Utilities

The Project generally supports the walkability guidelines discussing utilities, which provide that ideally utilities should be placed underground in order to improve and preserve the character of the street and neighborhood, increase visual appeal, and minimize obstructions in the pedestrian travel path. If new utility equipment is needed, the Project would place utility equipment underground and/or in the specified zones outlined in the Walkability Checklist.

c) Building Orientation

The Project generally supports the walkability guidelines discussing building orientation, which provide that a building's placement on a site establishes its relationship to the sidewalk and street and could enhance pedestrian activity. Pedestrians would access the residential units from Arch Drive, via a walkway, and there would be pedestrian access from the rear of the Project Site to the Los Angeles River. The Project's building orientation and ground-floor accessibility allow the building to engage the sidewalk and promote pedestrian activity.

d) Off-Street Parking and Driveways

The Project generally supports the walkability guidelines discussing off-street parking and driveways, which provide that the safety of the pedestrian is primary in an environment where pedestrians and automobiles must both be accommodated. Vehicular access to the Project Site would be provided via a two-way driveway off of Arch Drive, providing controlled access. The Project would move the existing driveway from the corner of Arch Drive and Ventura Boulevard, towards the center of the Project Site, thereby enhancing pedestrian/bicycle access by minimizing potential conflicts with vehicles. The vehicle access point would be separated from the pedestrian activity of the Project.

e) On-Site Landscaping

The Project would generally support the walkability guidelines discussing on-site landscaping. Consistent with these guidelines, the Project would incorporate on-site landscaping including new trees and landscaped planters that would be designed to complement pedestrian movement, where appropriate.

f) Building Façade

The Project generally supports the walkability guidelines discussing building façade, which provide that a building's façade could be employed to meet many objectives for a safe, accessible, and comfortable pedestrian environment, specifically by adding visual interest and emphasizing pedestrian movement and comfort. The building façade oriented toward Ventura Boulevard and fronting Arch Drive would be articulated by separating the building into two separate masses and five distinct vertical sections with alternating styles of residential balconies. The Project is designed with a strong base on Arch Drive to distinguish the ground floor level from the levels above. The Project's use of different textures, colors, setbacks, materials, and distinctive

architectural treatments is designed to create visual interest, avoid repetitive facades, and break up the building's mass.

g) Building Signage and Lighting

The Project would be designed to generally support the walkability guidelines discussing building signage and lighting, which describe signage as part of the visual urban language and contributing to neighborhood identity and "place-making." The Project would include pedestrian-scale wayfinding signage. Outdoor lighting would be used minimally to illuminate the building for safety, security, and address/building identification. Exterior lighting would be directed on-site and comply with LAMC for site lighting requirements. Building security lighting would be used at all entry/exits and would remain on from dusk to dawn, but would be designed to prevent light trespass onto adjacent properties.

7) Condition (a) Conclusion

As discussed above, the Project would be consistent with applicable objectives and policies of set forth in the City's plans and zoning including the General Plan; Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan; Vermont/Cahuenga Boulevard Corridor Specific Plan; Planning and Zoning Code; LA Green Building Code; Citywide Design Guidelines; and Walkability Checklist. Therefore, the Project would be consistent with the applicable General Plan designation and all applicable General Plan policies as well as with applicable zoning designation and regulations. As such, the Project meets Categorical Exemption Condition (a).

Condition (b): The proposed development occurs within city limits on a project site of no more than five acres substantially surrounded by urban uses.

The Project Site is located entirely within the City limits on a site that is approximately 44,867 square feet (1.03-acres) in size. Views of the regional vicinity and Project Site are shown in **Figures II-1** and **II-2** in **Section II, Project Description**; as shown therein, the Project Site is located in a highly urbanized setting characterized by a mix of commercial and residential uses. Parcels to the east are also zoned C2-1VL-RIO and are improved with a commercial complex that include various retail uses. South of the Project Site, across Ventura Boulevard, parcels are zoned C2-1VL-RIO and are comprised of an undeveloped hillside. Just beyond those parcels is single-family residential neighborhood. Also south of the Project Site, across Arch Drive, parcels are zoned PF-1XL-RIO and are improved with a Los Angeles Department of Water and Power (LADWP) power facility. The parcel to the immediate east of the Project Site is zoned [Q]R4-1-RIO and is improved with a multi-family residential building and the Los Angeles River abuts the Project Site to the immediate north. Therefore, as the proposed development occurs within City limits, the Project Site is less than five acres in size, and the Project Site is substantially surrounded by urban uses, the Project meets Categorical Exemption Condition (b).

Condition (c): The project site has no value as habitat for endangered, rare or threatened species.

The City encompasses a variety of open space and natural areas that serve as habitat for sensitive species. Much of this natural open space is found in or is adjacent to the foothill regions

of the San Gabriel, Santa Susana, Santa Monica, and Verdugo Mountains, the Simi Hills, and along the coastline between Malibu and the Palos Verdes Peninsula. Many of the outlying areas are contiguous with larger natural areas, and may be part of significant wildlife habitats or movement corridors. The metro and valley portions of the City contain fewer natural areas.[19] The Project Site and surrounding area are not identified as a biological resource area.[20] Moreover, the Project Site and immediately surrounding area are not within or near a designated Significant Ecological Area.[21]

The generally flat Project Site was previously occupied with an assisted living facility, which was recently demolished. As the Project Site was previously completely developed with structures and hardscaping within a heavily urbanized area of the City, the Project Site does not contain any habitat capable of sustaining any species identified as endangered, rare, or threatened. No such species or habitats are known to occur at the Project Site per local or regional plans by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service. Additionally, there are no known locally designated natural communities at the Project Site or in the immediate vicinity, nor is the Project Site located near undeveloped natural/undisturbed open space or a natural water source that may otherwise serve as habitat for state- or federally-listed species. Furthermore, the Project Site and its vicinity are not part of any draft or adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.[22]

The Project would remove 25 private, on-site trees. None of these trees are species protected by the City's tree protection ordinance;[23] however, they may provide temporary suitable habitat for nesting migratory birds, which are protected under the federal Migratory Bird Treaty Act (MBTA). The MBTA, which is an international treaty ratified in 1918, protects migratory nongame native bird species (as listed in 50 C.F.R. Section 10.13) and their nests. Additionally, Section 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests, including raptors and other migratory nongame birds (as listed under the MBTA). Tree removals would be undertaken pursuant to applicable City permits and requirements. The Project would be required to comply with these existing federal and state laws (i.e., MBTA and California Fish and Game Code, respectively).

Based on the above, would not result in any significant impacts regarding habitat for endangered, rare, or threatened species. As such, the Project meets Categorical Exemption Condition I.

Condition (d): Approval of the project would not result in any significant effects related to traffic, noise, air quality, greenhouse gases, or water quality.

19 City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, pages C-2 and C-5.
20 City of Los Angeles, L.A. CEQA Thresholds Guide, 2006, Exhibit C-5, Biological Resource Areas (Valley Geographical Area).
21 Los Angeles County Department of Regional Planning, Planning & Zoning Information, GIS-NET online database.
22 California Department of Fish and Wildlife, California Regional Conservation Plans, April 2019.
23 Carlberg Associates, Tree Inventory and Report – 4260 N Arch Drive, Los Angeles, California 91604, July 14, 2023. Refer to **Appendix A**.

The following provides a Project-specific analysis of the impacts to traffic, noise, air quality, greenhouse gases, and water quality.

1) Project-Specific Transportation Impacts

The following transportation impact analysis summarizes and incorporates by reference the information provided in the *Updated Transportation Assessment for Multi-Family Residential Development, Located at Ventura Boulevard and Arch Drive in the City of Los Angeles,* prepared by Overland Traffic Consultants, Inc., April 2022 (Transportation Assessment). The City of Los Angeles Department of Transportation (LADOT) issued an assessment letter for the Transportation Assessment on February 18, 2020, accepting the findings of the study. The Transportation Assessment and LADOT assessment letter are available as **Appendix B** to this document.

On July 30, 2019, the City of Los Angeles adopted the vehicle miles traveled (VMT) metric as its criterion for determining transportation impacts under the California Environmental Quality Act (CEQA). These changes requirements of the State of California Senate Bill 743 (SB 743) and the State's CEQA Guidelines. The new CEQA guidelines for evaluating transportation impacts no longer focus on measuring automobile delay and level of service (LOS). Instead, SB 743 directed lead agencies to revise transportation assessment guidelines to include a transportation performance metric that promotes: the reduction of greenhouse gas emissions, the development of multimodal networks, and access to diverse land uses.

The LADOT TAG (August 2022) is the City of Los Angele23ocumentment providing guidance for conducting CEQA transportation analyses for land development projects. The TAG identifies three CEQA threshold questions for evaluating potential significant transportation impacts in accordance with SB 743 that are applicable to the Project.

1) Does the Project conflict with Plans, Programs, Ordinances, or Policies? (Threshold T-1)

2) Does the Project cause substantial vehicle miles traveled (VMT)? (Threshold T-2.1)

3) Does the Project substantially increase hazards due to a geometric design feature or incompatible use? (Threshold T-3)

The City's adopted process also requires an additional non-CEQA traffic flow analysis and review for land development projects. The purpose of this review is to evaluate how projects affect vehicular access, circulation, and safety for all users of the transportation system.

(a) Conflicts with Plans, Programs, Ordinances or Policies (Threshold T-1)

To guide the City's Mobility Plan 2035 (Transportation Element of the General Plan), the City adopted programs, plans, ordinances, and policies that establish the transportation planning framework for all travel modes, including vehicular, transit, bicycle, and pedestrian facilities. Land development projects are evaluated for conformance with these City adopted transportation plans, programs, and policies.

The Threshold T-1 impact criteria applies if the project conflicts with a program, plan, ordinance(s), or policy addressing the transportation circulation system. Please note however, a project would not result in an impact merely based on whether a project would not implement a program, policy, or plan. Rather, it is the intention of this threshold test to ensure that proposed development does not conflict with nor preclude the City from implementing adopted programs, plans, and policies.

(b) Screening Criteria for Policy Analysis

If the development project requires a discretionary action, and the answer is yes to any of the following screening threshold questions, further analysis may be needed to assess whether the proposed project would conflict with plans, programs, ordinances, or policies.

1) Does the project require a discretionary action that requires the decision maker to find that the decision substantially conforms to the purpose, intent, and provisions of the General Plan?

Yes, the Project does require a discretionary action. The TAG provides a list of key City plans, policies, programs, and ordinances for consistency review. This review has been conducted and the Project does substantially conform to the purpose, intent, and provisions of the General Plan, as shown in Table 1 and Appendix G of the Transportation Assessment (see **Appendix B** to this document).

2) Is the Project known to directly conflict with a transportation plan, policy or program adopted to support multi-modal transportation options or public safety?

No, the Project would not conflict with these key City planning documents, and potential impacts would be less than significant, see Table 1, Consistency Check of the Transportation Assessment (see **Appendix B** to this document). The Project is near regional and local public transit services and provides bicycle parking to promote multimodal transportation options. Furthermore, the Project's vehicular and pedestrian access follows City design guidelines.

3) Is the Project proposing to, or required to, make any voluntary or required, modifications to the public right-of-way (i.e., street dedications, reconfigurations of curb lines, etc.)?

Yes, Pursuant to the following Mobility Element Street Standards for the Project's adjacent street standards, the Project has dedication or street widening requirements, see below for current and Mobility Street Standards.

- Ventura Boulevard is designated a Boulevard II which calls for an –0 - foot roadway (40-foot half) on 110 feet of right-of-way (55-foot half). Ventura Boulevard is currently developed to a 40-foot half roadway and a 50-foot half right-of- way adjacent to the Project Site. According to the Mobility Element standards for Ventura Boulevard, no roadway widening would be required, but a 5-foot dedication would be required for any Ventura Boulevard frontage adjacent to the Project Site.

- Arch Drive is designated a local street north of Ventura Boulevard, which calls for a 36-foot roadway (18-foot half) on 60 feet of right-of-way (30-foot half). Arch Drive is currently developed to a 15-foot half roadway and a 25-foot half right-of-way adjacent to the Project

Site. According to the Mobility Element standards for Arch Drive, a 3-foot street widening, and a 5-foot dedication would be required adjacent to the Project Site.

The TAG provides a list of key City plans, policies, programs, and ordinances for consistency review. As summarized below and in more detail in Appendix G of the Transportation Assessment (see **Appendix B** to this document), Projects that conform with and do not conflict with these City's development standards will be considered consistent and impacts would be less than significant.

(c) Cumulative Consistency Check

Pursuant to the TAG, each of the plans, programs, ordinances, and policies to assess potential conflicts with proposed projects are reviewed to assess cumulative impacts that may result from the Project in combination with other nearby development projects. In accordance with the TAG, the cumulative analysis must include Related Projects within 0.5 miles of the Project Site. A listing of the Related Projects considered in this analysis is provided in Appendix G of the Transportation Assessment (see **Appendix B** to this document).

A cumulative impact could occur if the Project, with other future development projects located on the same block were to cumulatively preclude the City's ability to serve transportation user needs as defined by the City's transportation policy framework. No other development projects were identified on the same block. Note that Related Projects would be individually responsible for complying with the City's transportation plans, programs ordinances and policies.

The Project does not have a significant transportation impact under CEQA Threshold T- 1 (Conflicting with Plans, Programs, Ordinances, or Policies).

(d) Criteria for Transportation Projects

A Transportation Project includes the addition of through traffic lanes on existing or new highways, including general purpose lanes, high-occupancy vehicle (HOV) lanes, peak period lanes, auxiliary lanes, and lanes through grade-separated interchanges (except managed lanes, transit lanes, and auxiliary lanes of less than one mile in length designed to improve roadway safety).

Not Applicab–e - This analysis for Transportation Projects is not applicable to land development projects and the Project is not a transportation project because the Project is a land development project. Therefore, the Transportation Project analysis is not part of the Project's CEQA review.

(e) Causing Substantial Vehicle Miles Traveled (Threshold–T - 2.1)

The intent of this threshold question is to assess whether a land development project causes a substantial VMT impact. CEQA Guidelines Section 15064.3(b) relates to use of VMT as the methodology for analyzing transportation impacts.

To address this question, LADOT's TAG identified significant VMT impact thresholds for each of seven Area Planning Commission (APC) sub-areas in the City of Los Angeles. A project's VMT

is compared against its APC threshold goal for household VMT per capita and work VMT per employee to evaluate the significance of the project's VMT.

A development project will have a potential impact if the development project would generate VMT exceeding 15 percent below the existing average VMT for the Area Planning Commission (APC) area in which the project is located per TAG's Table 2.2-1.

The Project is in the South Valley APC s–b - area which limits daily household VMT per capita to a threshold value of 9.4 and a daily work VMT per employee to a threshold value of 11.6 (15 percent below the existing VMT for the South Valley APC).

The Project's household VMT per capita is estimated at 8.2, which is below the VMT threshold for the South Valley APC. The work VMT per employee is not applicable because no commercial space is not part of the Project.

The Project would not result in a significant VMT impact based on the threshold for the South Valley APC. The Project's VMT calculation report is provided in Appendix F of the Transportation Assessment (see **Appendix B** to this document).

(i) Transportation Demand Management (TDM)

The Project's design features include TDM measures that reduce trips and VMT through TDM strategies selected in the VMT calculator. Specifically, the Project's TDM program includes reduce parking and bike parking, which are regulatory measure(s) and part of the Project, as described below by LADOT'S TAG:

- Parking Strategy – Reduced Parking Supply – This strategy changes the on-site parking supply to provide less than the amount of vehicle parking required by direct application of the LAMC without consideration of parking reduction mechanisms permitted in the code. Permitted reductions in parking supply could utilize parking reduction mechanisms such as TOC, Density Bonus, Bike Parking ordinance, or locating in an Enterprise Zone or Specific Plan area.

- Bike Parki–g - This strategy involves implementation of short and long-term bicycle parking to support safe and comfortable bicycle travel by providing parking facilities at destinations under existing LAMC regulations applicable to the Project (LAMC Section 12.21.A.16). The Project is providing 166 bicycle parking spaces on-site (150 long-term spaces and 16 short-term spaces).

The effectiveness of the TDM strategies included in the VMT Calculator is based primarily on research documented in the 2010 California Air Pollution Control Officers Association (CAPCOA) publication, Quantifying Greenhouse Gas Mitigation Measures (CAPCOA, 2010).

(ii) Cumulative VMT Consistency Check

Cumulative VMT impacts are evaluated through a consistency check with the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities

Strategy (2016-2040 RTP/SCS) plan. The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and greenhouse gas (GHG) reduction targets.

Per the City's TAG, projects that are consistent with the RTP/SCS plan in terms of development location and density are part of the regional solution for meeting air pollution and GHG goals. Projects that have less than a significant VMT impact are deemed to be consistent with the SCAG's 2016-2040 RTP/SCS and would have a less-than-significant cumulative impact on VMT.

As shown, the Project VMT impact would not exceed the City's South Valley APC VMT impact thresholds and as such, the Project's contribution to the cumulative VMT impact is adequate to demonstrate there is no cumulative VMT impact that would preclude the City's ability to provide transportation mobility in the area.

(f) Substantially Increasing Hazards Due to a Geometric Design Feature or Incompatible Use (Threshold T- 3.1)

Impacts regarding the potential increase of hazards due to a geometric design feature relate to the design of access points to and from the Project Site, and may include safety, operational, or capacity impacts. Impacts can be related to vehicle conflicts as well as to operational delays caused by vehicles slowing and/or queuing to access a project site. No deficiencies are apparent in the site access plans which would be considered significant. This determination considers the following factors:

1) Vehicle access to the parking will be from Arch Drive, the adjacent local street.

2) The Project's access is consistent with LADOT driveway width and placement per LADOT Manual of Policies and Procedures, Section 321, Driveway Design.

A review of the Project Site plan does not present any hazardous geometric design features that would result in vehicle/pedestrian, vehicle/bicycle, or vehicle/vehicle safety hazards.

Therefore, the Project does not have a significant transportation impact under CEQA Threshold T-3.1.

(i) Guidance for Freeway Safety Analysis

On May 1, 2020, LADOT issued an Interim Guidance for Freeway Safety Analysis memorandum. The purpose of this memorandum is to provide interim guidance on the preparation of freeway safety analysis for land use proposals that are required by LADOT to prepare Transportation Assessments. The guidance was further updated in an LADOT Memo dated August 26, 2021. The following evaluation is consistent with the LADOT guidance.

Caltrans District 7 requested that environmental analyses for new land use development projects include freeway off-ramp safety considerations. Specifically, it was requested that a development project study the effects on vehicle queuing on freeway off-ramps.

In response, LADOT has developed the following criteria for a project freeway safety analysis to be included in Transportation Assessments for land development projects.

The initial step is to identify the number of Project trips expected to be added to nearby freeway off-ramps serving the Project Site. If the Project adds twenty-five (25) or more trips to any off ramp in either the morning or afternoon peak hour, then that ramp should be studied for potential queuing impacts. If the Project is not expected to generate more than twenty-five (25) or more peak hour trips at any freeway off-ramps, then a freeway ramp analysis is not required.

The Project generates 46 a.m. and 46 p.m. peak hour trips total. Figure 6 of the Transportation Assessment (see **Appendix B** to this document), the Project traffic assignment graphic, shows the Project would not add 25 peak hour trips to any freeway off ramp during any peak hour. Therefore, no further freeway safety analysis is necessary for the Project using this guidance criteria.

(ii) Construction Overview

Project construction is evaluated to determine if activities substantially interfere with pedestrian, bicycle, transit, or vehicle mobility. Factors to be considered are the location of the Project Site, the functional classification of the adjacent street affected, temporary loss of bus stops or rerouting of transit lines, and the loss of vehicle, bicycle, or pedestrian access. LADOT's TAG considers three areas to be considered when evaluating project construction activities. The Project applicant may be required to submit formal Work Area Traffic Control Plans for review and approval by the City prior to the issuance of any construction permits.

Temporary Transportation Constraints

As part of the Project's construction, the City of Los Angeles may require a Construction Traffic Management Plan (Plan) to be implemented during the construction phase to minimize potential conflicts with vehicles, pedestrians, bicycle, and transit facilities associated with the Project's construction. The Plan should include a construction schedule, the location of any traffic lane or sidewalk closures, any traffic detours, haul routes, hours of operation, access plans to abutting properties, and contact information.

Construction workers are typically expected to arrive at the Project Site before 7:00 a.m. and depart before or after the weekday peak hours of 4:00 to 6:00 p.m. Deliveries of construction materials would be coordinated to non-peak travel periods, to the extent possible and occur on-site, from the parking lane along Arch Drive.

For off-site activities, Worksite Traffic Control Plans would be prepared for any temporary traffic lane or sidewalk closures in accordance with City guidelines. These worksite plans would require a formal review and approval by the City prior to the issuance of any construction permits. In addition, the City of Los Angeles would require a Truck Haul Route plan including permitted hauling hours and a haul route to and from the landfill.

No detours around the construction site are expected; however, flaggers would be used to control traffic movement during the ingress and egress of construction trucks.

Since Project construction would not substantially interfere with pedestrian, bicycle or vehicle mobility, the construction impacts would be less than significant.

Temporary Loss of Access

Vehicular access to the adjacent properties would be maintained. Safe pedestrian circulation paths adjacent to or around the work areas would be provided by covered pedestrian walkways if necessary and would be maintained as required by City-approved Work Area Traffic Control Plans.

Since Project construction would not result in complete loss of vehicular or pedestrian access, the construction impacts on loss of access would be less than significant.

Temporary Loss of Bus Stops or Rerouting of Bus Lines

No bus stops are located within the work zone adjacent to the Project Site that would need to be temporarily relocated. There would be no loss of pedestrian access to transit stops and no rerouting of bus lines are necessary.

Since Project construction would not require relocation of bus stops or bus lines, the construction impacts on transit operations would be less than significant.

(g) Transportation Impact Summary

As indicated above and in the Transportation Assessment, the Project would result in less than significant impacts to traffic.

2) Project-Specific Noise Impacts

The following noise impact analysis summarizes and incorporates by reference the information provided in the *4260 Arch Drive Multi-Family Residential – Cat32 Exemption Noise Impact Assessment – Los Angeles, CA,* prepared by MD Acoustics, October 2022 (Noise Impact Assessment). The Noise Impact Assessment is available as **Appendix C** to this document.

(a) Local Acoustical Requirements and CEQA Guidelines

The City of Los Angeles has outlined the following within the LAMC as it relates to noise regulation:

- Per Section 111.03, the minimum ambient level for all residential zones is 50 dBA from 7 a.m. to 10 p.m. and 40 dBA from 10 p.m. to 7 a.m.
- Per Section 112.02, air conditioning, refrigeration, and heating equipment cannot cause a noise level to exceed the ambient noise level on the premises of another occupied property by more than 5 dB.
- Per Section 112.05(A), construction machinery must not exceed 75 dBA at 50 feet.
- Per Section 41.40, construction must occur between the hours of 7 a.m. and 9 p.m. on Monday through Friday and 8 a.m. to 6 p.m. on Saturday. Construction may not occur on Sundays or national holidays.

According to CEQA guidelines, the Project would have a potential impact if it resulted in:a) 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) Generation of excessive groundborne vibration or groundborne noise levels?c) For a project located within the vicinity of a private airstrip or 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?

(b) Study Method and Procedure

(i) Ambient Noise Measurements

Two 15-minute measurements were performed on October 10, 2022, between 1 p.m. and 2 p.m. as shown in Appendix B of the Noise Impact Assessment (see **Appendix C** to this document). NM1 was placed near the south corner of the Project Site and NM2 was placed near the east corner of the Site. The main source of ambient noise throughout the Project Site and surrounding areas came from traffic on Ventura Boulevard. The noise level was 61 to 65 dBA Leq as shown in **Table III-4**, **Short-Term Measurement Summary**. Further notes and pictures are provided in Appendix B of the Noise Impact Assessment (see **Appendix C** to this document).

Table III-4
Short-Term Measurement Summary

Location	Start	Stop	Leq	Lmax	Lmin	L2	L8	L25	L50	L90
NM1	1:09 PM	1:24 PM	64.5	71.2	48.3	69.5	67.8	65.8	63.7	56
NM2	1:25 PM	1:40 PM	61.0	73.1	48.7	68.4	64.9	61	58.9	54.1

(ii) FHWA Traffic Noise Model

The traffic noise analysis utilizes the Federal Highway Administration (FHWA) Traffic Noise Model, together with several key construction parameters. Key input speed, site conditions, average daily traffic (ADT), and vehicle mix data. The modeling does not take into account any existing barriers, structures, and/or topographical features that may further reduce noise levels.

The traffic noise model indicated that the noise level at the eastern corner of the Project Site is 64 dBA Leq during the peak hour of the day, 62 dBA Leq during daytime hours, 59 dBA Leq during evening hours, and 54 dBA Leq during nighttime hours. The Community Noise Equivalent Level (CNEL) level is calculated to be 63 dBA. See Appendix C of the Noise Impact Assessment (see **Appendix C** to this document).

(iii) FHWA Construction Noise Model

The construction noise analysis utilizes the FHWA Roadway Construction Noise Model (RCNM) methodology, together with several key construction parameters. Key inputs include distance to

the sensitive receiver, equipment usage, percent usage factor, and baseline parameters for the Project Site. The Project was analyzed based on the different construction phases. The FHWA has compiled data regarding the noise-generated characteristics of typical construction activities and is presented in **Table III-5, RCNM Measured Noise Emission Reference Levels**.

Table III-5
RCNM Measured Noise Emission Reference Levels[1]

Type	Typical Noise Level at 50 Feet (dBA)
Concrete Saw	90
Dozer	82
Grader	85
Tractor	84
Roller	80
Crane	81
Man Lift	75
Concrete Mixer Truck	79
Air Compressor	78
Notes: *[1] Referenced Noise Levels from the FHWA RCNM.*	

(iv) Construction Vibration Model

Construction activities can produce vibration that may be felt by adjacent land uses. The construction of the Project would not require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. The primary vibration source during construction may be from a bulldozer. A large bulldozer has a vibration impact of 0.089 inches per second peak particle velocity (PPV) at 25 feet which is likely perceptible but below any risk of architectural damage.

The fundamental equation used to calculate vibration propagation through average soil conditions and distance is as follows:

$$PPV_{equipment} = PPV_{ref} (25/D_{rec})^{n}$$

Where: PPV_{ref} = reference PPV at 25 feet
D_{rec} = distance from equipment to receiver in feet
n = 1.1 (the value related to the attenuation rate through ground)

The thresholds from the Caltrans Transportation and Construction Induced Vibration Guidance Manual provide general thresholds and guidelines as to the vibration damage potential from vibratory impacts.

(c) Traffic Noise Level Projections

Traffic noise along Ventura Boulevard would be the main source of noise impacting the Project Site and the surrounding area. The Project has subterranean parking and has no above ground parking. The Project projects 593 daily trips. Per the Transportation Assessment (see **Appendix**

B to this document), Ventura Boulevard has 26,300 trips by the Project Site.

It takes a change of 3 dB or more to hear an audible difference which would occur with a doubling of traffic. The Project is anticipated to not increase the existing noise level due to an increase in traffic, and therefore the impact is less than significant.

(d) Project Operational Noise Level Projections

On-site operational noise includes a transformer and HVAC. All HVAC equipment is located on the rooftop and would be blocked by a 5 foot parapet wall. Equipment would be at least 57 feet away from adjacent residences. The maximum sound power level from a single unit is 75 dBA. At 57 feet away, the sound pressure level is estimated to be 42 dBA. For all 34 units near the residential property operating simultaneously, the sound level is 58 dBA. This is a simplification assuming all units are 57 feet away from the receiver when in reality most would be over 57 feet away. The parapet would provide a 15 dB reduction. The maximum sound level at the nearby residential receivers would be 43 dBA and would therefore not increase the overall nighttime ambient level of 54 dBA Leq. See Appendix D of the Noise Impact Assessment (see **Appendix C** to this document) for calculations

Per American National Standard Institute (ANSI) and National Environmental Protection Act (NEPA) requirements for transformer noise, transformers must be no louder than 65 dBA at 6 feet. Transformers should be placed at least 20 feet from the adjacent residential receptors or should be shielded to stay below the nighttime ambient level.

Operational noise complies with Section 122.02 of the LAMC. The impact is, therefore, less than significant.

(e) Construction Noise Level Projections

The degree of construction noise may vary for different areas of the Project Site and also vary depending on the construction activities. Noise levels associated with the construction would vary with the different phases of construction. **Table III-6, Projected Construction Noise Levels**, presents the construction noise levels at sensitive receptors with the implementation of 15 dB mufflers on all heavy equipment. See Appendix E of the Noise Impact Assessment (see **Appendix C** to this document) for calculations.

Table III-6
Projected Construction Noise Levels

Location	Phase	Construction Noise Level	Exceeds Significant Threshold?
Adjacent Residential Properties	Grade	70	No
	Build	69	No
	Pave	69	No
	Arch Coat	63	No

Assuming the implementation of 15 dB mufflers on all heavy equipment, the regulatory noise level limit of 75 dBA is never exceeded during each phase of construction at 50 feet from the source. The impact is, therefore, less than significant.

(f) Construction Vibration Level Projections

Bulldozers would get as close as 19 feet to the nearest residential buildings surrounding the Project Site. The vibration would be up to 0.120 in/sec PPV during construction. This is perceptible but below the threshold of damage of 0.2 in/sec PPV for the adjacent buildings. The impact is, therefore, less than significant. See Appendix E of the Noise Impact Assessment (see **Appendix C** to this document) for calculations.

(g) Airport Noise

The Project Site is not located with any airport's influence area nor within the vicinity of a private airstrip or an airport land use plan, or within two miles of a public use airport or public use airstrip. Therefore, the Project would have no impact with respect to airport noise.

(h) Noise Impact Summary

The Project would not result in any significant noise impacts during the construction or the operations phases. No mitigation measures are required.

3) Project-Specific Air Quality Emission Impacts

The following noise impact analysis summarizes and incorporates by reference the information provided in the *4260 Arch Drive Multi-Family Project – Cat32 Exemption – Focused Air Quality, Greenhouse Gas, and Energy Impact Evaluation – Los Angeles, CA,* prepared by MD Acoustics, October 2022 (Air Quality, Greenhouse Gas, and Energy Impact Assessment). The Air Quality, Greenhouse Gas, and Energy Impact Assessment is available as **Appendix D** to this document.

The air quality, greenhouse gas, and energy construction and operational emissions generated by the Project, calculated using the California Emissions Estimator Model (CalEEMod), have been evaluated and compared to South Coast Air Quality Management District's (SCAQMD) thresholds of significance as it relates to residential and commercial uses and consistency to the City's General Plan. The significance of these potential impacts is described below. It should be noted that the Air Quality, Greenhouse Gas, and Energy Impact Assessment evaluated an earlier construction start date and operational opening year than is currently anticipated for the Project. Because CalEEMod background assumptions account for increasing efficiency in both construction equipment and building systems, the estimated emissions of the Project presented in the Air Quality, Greenhouse Gas, and Energy Impact Assessment and evaluated in this document are considered conservative and actual emissions during construction and operation of the Project are likely to be lower. In addition, CalEEMod default assumptions for construction phase lengths were used in the model. This results in a shorter construction period of approximately 11 months as compared to the Project's proposed 24-month schedule. Therefore, as maximum daily emissions during construction are used to determine impacts and the shorter construction phase of 11 months results in higher maximum daily emissions. The shorter construction period included in modeling of the Project additionally contributes to the conservative emissions values presented in this analysis.

(a) Air Quality/Greenhouse Gas Significance Thresholds

(i) Air Quality Significance Thresholds

Project emissions were compared to both regional and localized SCAQMD's thresholds of significance for construction and operational emissions.[24,25]

(ii) Greenhouse Gas Significance Thresholds

The Project emissions were compared to the SCAQMD's 3,000 $MTCO_2e$ draft threshold for all land uses.[26]

(b) Evaluation Procedure/Methodology

The latest version of CalEEMod (2020.4.0) was utilized to calculate both the construction and operational emissions from the Project Site. Construction assumes grading, building construction, paving, and architectural coating. CalEEmod defaults were utilized. Assumptions and output calculations for winter, summer and annual are provided in Appendix C of the Quality, Greenhouse Gas, and Energy Impact Assessment (see **Appendix D** to this document).

(c) Local Ambient Conditions

The Project Site is located in South Coast Air Basin (SCAB) in the Central Los Angeles Source Receptor Area (SRA) 1.[27] The nearest air monitoring station to the Project Site is the Los Angeles – North Main Street Monitoring Station. Historical air quality data for the vicinity can be found both at CARB and SCAQMD's websites.[28,29] Temperature and historical precipitation data can be found at the Western Regional Climate Center (WRCC).[30]

(d) Findings

The following outlines the emissions for the Project:

(i) Regional Construction Emissions

The construction emissions for the Project would not exceed the SCAQMD's daily emission thresholds at the regional level as indicated in **Table III-7, Regional Significance – Construction Emissions**, and therefore the impact would be considered less than significant.

---

24 SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, revised March 2023.
25 SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Localized Significance Thresholds, revised October 2009.
26 SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Greenhouse Gas Significance Thresholds, adopted December 2008.
27 SCAQMD, https://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf?sfvrsn=6. Accessed June 2023.
28 SCAQMD, https://www.aqmd.gov/home/air-quality/historical-air-quality-data/historical-data-by-year
29 https://www.arb.ca.gov/adam/. Accessed June 2023.
30 WRCC, https://www.wrcc.dri.edu/summary/Climsmsca.html. Accessed June 2023.

Table III-7
Regional Significance – Construction Emissions

Activity	Pollutant Emissions (pounds/day)					
	VOc	NOx	CO	SO_2	PM10	PM2.5
Grading						
On-Site[2]	1.33	14.47	8.70	0.02	3.58	1.92
Off-Site[3]	0.98	54.36	11.86	0.25	8.15	2.59
Total	**2.32**	**68.82**	**20.56**	**0.27**	**11.73**	**4.51**
Building Construction						
On-Site[2]	1.52	11.71	12.61	0.02	0.51	0.50
Off-Site[3]	0.50	1.38	4.19	0.01	1.15	0.32
Total	**2.02**	**13.09**	**16.80**	**0.04**	**1.67**	**0.81**
Paving						
On-Site[2]	0.57	5.33	8.80	0.01	0.25	0.23
Off-Site[3]	0.04	0.03	0.36	0.00	0.11	0.03
Total	**0.62**	**5.35**	**9.16**	**0.01**	**0.35**	**0.26**
Architectural Coating						
On-Site[2]	33.39	1.15	1.81	0.00	0.05	0.05
Off-Site[3]	0.08	0.05	0.67	0.00	0.20	0.05
Total	**33.47**	**1.19**	**2.48**	**0.00**	**0.25**	**0.10**
Total of overlapping phases[4]	**34.09**	**6.54**	**11.63**	**0.02**	**0.60**	**0.36**
SCAQMD Thresholds	**75**	**100**	**550**	**150**	**150**	**55**
Exceeds Thresholds	No	No	No	No	No	No

Notes:
[1] CalEEMod Version 2020.4.0
[2] On-site emissions from equipment operated on-site that is not operated on public roads.
[3] Off-site emissions from equipment operated on public roads.
[4] Architectural coatings and paving phases may overlap.

(ii) Localized Construction Emissions

Utilizing the construction equipment list and associated acreages per 8-hour day provided in the SCAQMD "Fact Sheet for Applying CalEEMod to Localized Significance Thresholds,"[31] the maximum number of acres disturbed in a day would be 2.0 acres during grading (as shown in **Table III-8**, below); however, as the Project is approximately one acre, the Project emissions have been compared to the 1-acre per day localized significance threshold.

[31] SCAQMD, 2011b.

Table III-8
Maximum Number of Acres Disturbed Per Day[1]

Activity	Equipment	Number	Acres/8hr-day	Total Acres
Grading	Graders	1	0.5	0.5
	Rubber Tired Dozers	1	0.5	0.5
	Tractors/Loaders/Backhoes	2	0.5	1.0
			Total Per Phase	**2.0**

Notes:
[1] CalEEMod output and South Coast AQMD, Fact Sheet for Applying CalEEMod to Localized Significance Thresholds,http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/caleemod-guidance.pdf?sfvrsn=2. Accessed June 2023.

None of the analyzed criteria pollutants would exceed the LST emission thresholds at the nearest sensitive receptors as shown in **Table III-9, Localized Significance – Construction Emissions**. Therefore, the impact would be less than significant from construction.

Table III-9
Localized Significance – Construction Emissions

Phase	On-Site Pollutant Emissions (pounds/day)[1]			
	NOx	**CO**	**PM10**	**PM2.5**
Grading	14.47	8.70	3.58	1.92
Building Construction	11.71	12.61	0.51	0.50
Paving	5.33	8.80	0.25	0.23
Architectural Coating	1.15	1.81	0.05	0.05
Total for overlapping construction phases	18.18	23.22	0.81	0.78
SCAQMD Threshold[2]	**74**	**680**	**5**	**3**
Exceeds Threshold?	No	No	No	No

Notes:
[1] Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for one-acre (see Table 2), to be conservative, in Central Los Angeles Source Receptor Area (SRA 1).
[2] The nearest sensitive receptors are the multi-family residential uses located approximately 10 feet (~3 meters) to the northeast of the Project Site; therefore, the 25-meter threshold was utilized.

(iii) Regional Operational Emissions

The operating emissions were based on year 2023, which, as previously explained, provides a conservative estimate of operational emissions as CalEEMod background defaults include assumptions of increasing efficiency year-to-year in building systems. The CalEEMod default project trips and VMTs were used. The summer and winter emissions created by the Project's long-term operations were calculated and the highest emissions from either summer or winter are summarized in **Table III-10, Regional Significance – Operational Emissions**. The data in **Table III-10** shows that the operational emissions for the Project would not exceed the SCAQMD's regional significance thresholds.

Table III-10
Regional Significance – Operational Emission

Activity	Pollutant Emissions (pounds/day)[1]					
	VOc	NOx	CO	SO2	PM10	PM2.5
Area Sources[2]	3.12	1.30	11.15	0.01	0.15	0.15
Energy Usage[3]	0.04	0.38	0.16	0.00	0.03	0.03
Mobile Sources[4]	1.92	2.92	15.61	0.04	3.24	0.89
Total Emissions	**5.08**	**4.60**	**26.92**	**0.05**	**3.43**	**1.07**
SCAQMD Thresholds	**55**	**55**	**550**	**150**	**150**	**55**
Exceeds Threshold?	No	No	No	No	No	No

Notes:
[1] CalEEMod Version 2020.4.0
[2] Area sources consist of emissions from consumer products, architectural coatings, and landscaping equipment.
[3] Energy usage consists of emissions from on-site natural gas usage.
[4] Mobile sources consist of emissions from vehicles and road dust.

(iv) Localized Operational Emissions

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, on-site usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the State and Federal air quality standards in the Project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin.

According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes stationary sources, or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site; such as industrial warehouse/transfer facilities. The Project is a residential project and does not include such uses. Therefore, due to the lack of stationary source emissions, no long-term localized significance threshold analysis is warranted.

(v) Greenhouse Gas Emissions

Table III-11, Opening Year Project – Related Greenhouse Gas Emissions, outlines the construction and operational GHG emissions for the Project. The Project's emissions are below (996.70 $MTCO_2e$) the SCAQMD's draft screening threshold of 3,000 $MTCO_2e$ for all land uses and; therefore, the impact is less than significant.

Table III-11
Opening Year Project – Related Greenhouse Gas Emissions

Category	Greenhouse Gas Emissions (Metric Tons/Year)[1]					
	Bio-CO2	NonBio-CO2	CO2	CH4	N2O	CO2e
Area Sources[2]	0.00	57.45	57.45	0.00	0.00	57.82
Energy Usage[3]	0.00	229.74	229.74	0.01	0.00	230.99
Mobile Sources[4]	0.00	568.31	568.31	0.03	0.03	578.57
Solid Waste[6]	12.05	0.00	12.05	0.71	0.00	29.84
Water[7]	2.67	11.35	14.02	0.27	0.01	22.85
Construction[8]	0.00	29.16	29.16	0.00	0.00	29.62
Total Emissions	14.71	896.02	910.73	1.04	0.04	**949.69**
					SCAQMD Draft Screening Threshold	**3,000**
					Project Emissions Exceed Threshold?	**No**

1 CalEEMod Version 2020.4.0.
2 Area sources consist of GHG emissions from consumer products, architectural coatings, and landscape equipment.
3 Energy usage consists of GHG emissions from electricity and natural gas consumption.
4 Mobile sources consist of GHG emissions from vehicles.
5 Solid waste includes the CO2 and CH4 emissions created from the solid waste placed in landfills.
6 Water include GHG emissions from electricity used for transport of water and processing of wastewater.
7 Construction GHG emissions based on a 30-year amortization rate.

(vi) Consistency with Applicable Plans

Consistency with the City's General Plan

The Project Site is located in the City of Los Angeles. The Project Site has a current land use classification of "C2" Commercial Zone (C2-1VL-RIO) according to ZIMAS. C2 zones allow for apartment housing per Section 12.14 of the Los Angeles Planning and Zoning Code. The Project is a multi-family residential building with 129 units. Therefore, the Project is consistent with the land use and zoning designations of the City's General Plan and Community Plan.

The Project would be subject to the policies and ordinances pertaining to air quality and climate change in the City's General Plan. Although the Project would generate greenhouse gas emissions, either directly or indirectly, these emissions are short-term and not considered to have a significant impact on the environment. Furthermore, Project emissions have demonstrated that they will be below any significant thresholds as outlined by SCAQMD.

In addition, as shown below, the Project's GHG impacts have been evaluated by assessing the Project's consistency with applicable statewide, regional, and local GHG reduction plans and strategies.

Consistency with the City of Los Angeles' Sustainable City pLAn and Green New Deal

The Project could have the potential to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. The applicable plan for the Project is the L.A. Green New Deal Sustainable city pLAn 2019, which is an update to the City of Los Angeles' Sustainable City pLAn (Plan) adopted by the City in April 2015. The Green New Deal Sustainable City pLAn establishes visions for the City in thirteen topic areas including environmental justice, renewable energy, local water, clean and healthy buildings,

housing and development, mobility and public transit, zero emission vehicles, industrial emissions and air quality monitoring, waste and resource recovery, food systems, urban ecosystems and resilience, prosperity and green jobs, and lead by example.

Project consistency with all of the applicable targets within the Green New Deal Sustainable City pLAn are assessed in Table 6 of the Air Quality, Greenhouse Gas, and Energy Impact Assessment (see **Appendix D** to this document). As shown in Table 6, the Project is consistent with the applicable targets within the Green New Deal Sustainable City Plan.

Additional relevant plans and polices that govern climate change include:

- Executive Orders S-305 and B-30-15;
- AB 32 Scoping Plan;
- SCAG's Regional Transportation Plan/Sustainable Communities Strategy;
- City of Los Angeles Climate LA Implementation Plan; and
- City of Los Angeles Building Ordinance.

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

Executive Orders S-3-05 and B-30-15 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 an infill development well-served by transportation infrastructure and near public transit.

Although the Project's emissions level in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the project's emissions profile to decline as the regulatory initiatives identified by ARB in the First Update are implemented, and other technological innovations occur. 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. Therefore, the Project is consistent with Executive Orders S-3-05 and B-30-15.

Consistency with the CARB Scoping Plan

The Scoping Plan is a GHG emission reduction roadmap developed and updated by the CARB at least once every five years, as required by Assembly Bill (AB) 32. It lays out the transformations needed across various sectors to reduce GHG emissions and reach the State's climate targets. CARB published the Final 2022 Scoping Plan for Achieving Carbon Neutrality (2022 Scoping Plan Update) in November 2022, as the third update to the initial plan that was adopted in 2008. The initial 2008 Scoping Plan laid out a path to achieve the AB 32 target of returning to 1990 levels of GHG emissions by 2020, a reduction of approximately 15 percent below business-as-usual activities.[32] The 2008 Scoping Plan included a mix of incentives, regulations, and carbon pricing, laying out the portfolio approach to addressing climate change and clearly making the case for

32 CARB. 2008. Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/document/adopted_scoping_plan.pdf. Accessed June 2023.

using multiple tools to meet California's GHG targets. The 2013 Scoping Plan Update (adopted in 2014) assessed progress toward achieving the 2020 target and made the case for addressing short-lived climate pollutants (SLCPs).[33] The 2017 Scoping Plan Update,[34] shifted focus to the newer SB 32 goal of a 40 percent reduction below 1990 levels by 2030 by laying out a detailed cost-effective and technologically feasible path to this target, and also assessed progress towards achieving the AB 32 goal of returning to 1990 GHG levels by 2020. The 2020 goal was ultimately reached in 2016, four years ahead of the schedule called for under AB 32.

The 2022 Scoping Plan Update is the most comprehensive and far-reaching Scoping Plan developed to date. It identifies a technologically feasible, cost-effective, and equity-focused path to achieve new targets for carbon neutrality by 2045 and to reduce anthropogenic GHG emissions to at least 85 percent below 1990 levels, while also assessing the progress California is making toward reducing its GHG emissions by at least 40 percent below 1990 levels by 2030, as called for in SB 32 and laid out in the 2017 Scoping Plan.[35] The 2030 target is an interim but important stepping stone along the critical path to the broader goal of deep decarbonization by 2045. The relatively longer path assessed in the 2022 Scoping Plan Update incorporates, coordinates, and leverages many existing and ongoing efforts to reduce GHGs and air pollution, while identifying new clean technologies and energy. Given the focus on carbon neutrality, the 2022 Scoping Plan Update also includes discussion for the first time of the natural and working lands sectors as sources for both sequestration and carbon storage, and as sources of emissions as a result of wildfires.

Achieving the targets described in the 2022 Scoping Plan Update will require continued commitment to and successful implementation of existing policies and programs, and identification of new policy tools and technical solutions to go further, faster. Aligning local jurisdiction action with state-level priorities to tackle climate change and the outcomes called for in the 2022 Scoping Plan Update is identified as critical to achieving the statutory targets for 2030 and 2045. The State encourages local governments to adopt a CEQA-qualified CAP addressing the three priority areas (transportation electrification, VMT reduction, and building decarbonization). However, the State recognizes that almost 50 percent of jurisdictions do not have an adopted CAP and jurisdictions that wish to take meaningful climate action (such as preparing a non-CEQA-qualified CAP or as individual measures) aligned with the State's climate goals in the absence of a CEQA-qualified CAP are advised to look to the three priority areas when developing local climate plans, measures, policies, and actions: (transportation electrification, VMT reduction, and building decarbonization). To assist local jurisdictions, the 2022 Scoping Plan Update presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas). A detailed assessment of goals,

33 CARB. 2014. First Update to the Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/2013_update/first_update_climate_change_scoping_plan.pdf. Accessed June 2023.
34 CARB. 2017. California's 2017 Climate Change Scoping Plan. ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.
35 CARB, California's 2017 Climate Change Scoping Plan, 2017, ww2.arb.ca.gov/sites/default/files/classic/cc/scopingplan/scoping_plan_2017.pdf.

plans, policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below.

Transportation Electrification

The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles to be zero-emission by 2035 (see Table 2-1 of the Scoping Plan).

- Convert local government fleets to zero-emission vehicles (ZEV)

The CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030. This report would help decision-makers allocate resources to install new EV chargers where they are needed most.

The City of LA Green New Deal (Sustainable City pLAn 2019) identifies a number of measures to reduce VMT and associated GHG emissions. Such measures that would support the local reduction strategy include converting all city fleet vehicles to zero emission where technically feasible by 2028. Starting in 2021, all vehicle procurement followed a "zero emission first" policy for City fleets. The Green New Deal also establishes a target to increase the percentage of zero emission vehicles to 25 percent by 2025, 80 percent by 2035 and 100 percent by 2050. In order to achieve this goal, the City would build 20 Fast Charging Plazas throughout the City. The City would also install 28,000 publicly available chargers by 2028 to encourage adoption of ZEVs.

The City's goals of converting the municipal fleet to zero emissions and installation of EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. This measure applies to City fleets and the Project would not conflict with these goals.

- Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans)

The State has adopted AB 1236 and AB 970, which require cities to adopt streamline permitting procedures for EV charging stations. As a result, the City updated Section IX of the LAMC, which requires most new construction to include the following:

- EV Capable: 30 percent of provided parking shall include electrical panel capacity and raceways for future installation of Level 2 electric vehicle supply equipment (EVSE);
- EV Ready: 25 percent of provided parking shall include a 240-volt electrical outlet at each space capable of supporting Level 2 EVSE); and
- EV Chargers: 10 percent of provided parking spaces shall include Level 2 EVSE at each space.

These requirements exceed CALGreen 2022 requirements of 10 percent "EV Capable" and 5 percent "EV Installed" while matching the CALGreen requirement of 25 percent "EV Ready." The City has also implemented programs to increase the amount of EV charging on city streets, EV carshare, and incentive programs for apartments to be retrofitted with EV chargers. The City's goals of installing EV chargers throughout the City would be consistent with the Scoping Plan goals of transitioning to EVs. The Project would install EV Chargers in 10 percent (15 spaces) of the 145 provided parking spaces and 25 percent (44 spaces) of the 145 provided parking spaces would be EV Ready, thereby meeting the EV parking space requirements of the LAMC.

VMT Reduction

The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

- Reduce or eliminate minimum parking standards in new developments.
- Implement parking pricing or transportation demand management pricing strategies.

The City of Los Angeles Mobility Plan 2035 which is the Transportation Element of the City's General Plan contains measures and programs related to VMT reduction throughout the City. With regard to parking standards, the implementation of Mobility Plan Programs and AB 2097 reduce or eliminate parking requirements for certain types of developments near transit (within half a mile). These reduction strategies and TDM programs would serve to reduce minimum parking standards and reduce vehicle trips.

Pursuant to AB 2345, the Project is required to provide 132 residential vehicular parking spaces. The Project proposes to provide a total of 145 residential vehicular parking spaces in two levels of subterranean parking. The Project is required to provide 136 long-term residential bicycle parking spaces and 14 short-term residential bicycle parking spaces. Per the City of Los Angeles Bicycle Parking Ordinance (Ordinance No. 182,386), the Project is required to provide 16 short-term bicycle parking spaces and 149 long-term bicycle parking spaces. The Project would provide 166 bicycle parking spaces including 16 short-term and 150 long-term spaces, exceeding the long-term requirement; long term spaces would be provided in the first subterranean parking level, and short-term spaces would be provided outside along the Arch Drive frontage. Metro local transit service with Routes 155 and 240, is provided along Ventura Boulevard adjacent to the Project Site. Bus stops are located at the intersections of Ventura Boulevard and Arch Drive and at Ventura Boulevard and Eureka Drive. The Project Site is also 0.75-mile from the Universal City/Studio City Metro station which provides service on the Metro B (Red) line. Access to alternative forms of transportation will reduce VMT. Therefore, the Project would be consistent and not conflict with this reduction strategy to reduce parking standards.

- Implement Complete Streets policies and investments, consistent with general plan circulation element requirements.

The City of Los Angeles Mobility Plan 2035 established a "Complete Streets" planning framework which resulted in the City of Los Angeles Complete Streets Design Guide in 2015, consistent with

California's Complete Streets Act of 2008. A supplemental update to the Complete Streets Design Guide was adopted in 2020.

The Complete Streets Design Guide provides a number of measures to increase public access to electric shuttles, car sharing and walking. The Design Guide establishes guidelines for establishing on-street parking for car sharing. The City has also established BlueLA which is a car sharing network consisting of more than 100 electric vehicles located throughout the City. In addition, under the Green New Deal, the City would install 28,000 publicly available chargers by 2028 and introduce 135 new electric DASH buses.

This reduction strategy mainly applies to City traffic circulation. The Project is a residential project containing 129 new dwelling units, including at least 13 percent (or 17 dwelling units) set aside as Very Low Income units. As stated in the Project Description, pedestrians would access the residential units from Arch Drive, via a walkway, and there would be pedestrian access from the rear of the Project Site to the Los Angeles River. Metro local transit service with Routes 155 and 240, is provided along Ventura Boulevard adjacent to the Project Site. Bus stops are located at the intersections of Ventura Boulevard and Arch Drive and at Ventura Boulevard and Eureka Drive. The Project Site is also 0.75-mile from the Universal City/Studio City Metro station which provides service on the Metro B (Red) line. Therefore, the Project would not conflict with the implementation of Complete Streets policies:

- Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, micro transit, etc.

- Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking.

- Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing the allowable density of a neighborhood).

- Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements).

These reduction strategies are supported through implementation of SB 375 which requires integration of planning processes for transportation, land-use and housing and generally encourages jobs/housing proximity, promote transit-oriented development (TOD), and encourages high-density residential/commercial development along transit corridors. To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2020–2045 RTP/SCS, also referred to as Connect SoCal. The 2020–2045 RTP/SCS' "Core Vision" prioritizes the maintenance and management of the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. Please refer below for additional discussion of consistency with the 2020-2045 RTP/SCS.

On a local level, the city has developed the Complete Streets Design Guide which provides a number of reduction strategies to increase public access to electric shuttles, car sharing and walking, continues to build out networks in the Mobility Plan for pedestrians, bicyclists, and transit users, has implemented an EV car sharing network, and is working towards increasing publicly available chargers, and introducing new electric DASH buses.

The Project represents an infill development within an existing urbanized area that would concentrate on new development consistent with the overall growth pattern encouraged in the RTP/SCS. The Project is in close proximity to public transit, including Metro Bus Local Line 155 and 240 and the Metro B (Red) Line. These opportunities for transit use, walking, and biking would result in a reduction of vehicle trips, vehicle miles traveled (VMT), and GHG emissions. In addition, the project site is surrounded by a variety of existing commercial and residential uses which would encourage residents to walk to nearby destinations, thereby reducing VMT and GHG emissions. Therefore, the Project would be consistent with these reduction strategies.

Building Decarbonization

The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the Scoping Plan).

- Adopt all-electric new construction reach codes for residential and commercial uses.

California's transition away from fossil fuel–based energy sources will bring the project's GHG emissions associated with building energy use down to zero as our electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's Renewables Portfolio Standard (RPS) by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

The City has updated the LAMC with requirements for all new buildings, with some exceptions to be all-elective, which will reduce GHG emissions related to natural gas combustion. Space heating, water heating and cooking for non-restaurant uses would be required to be powered by electricity. In future years, the LADWP will be required to increase the amount of renewable energy in the power mix to comply with SB 100 requirements. The combination of the all-electric LAMC regulations and increasing availability of renewable energy will serve to reduce GHG emissions from sources traditionally powered by natural gas.

The Project will incorporate electrical appliances as required by LAMC. Therefore, the Project would be consistent and not conflict with the LAMC.

- Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive

appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers)

This reduction strategy would support the Scoping Plan action regarding electrification of appliances in existing residential buildings (see Table 2-1 of the Scoping Plan). The City and Los Angeles Department of Water and Power has established rebate programs to promote use of energy-efficient products and home upgrades. Under the LADWP's Consumer Rebate Program (CRP), residential customers would receive rebates for energy-efficient upgrades such as Cool Roofs, Energy Star Windows, HVAC upgrades, pool pumps and insulation upgrades. Such upgrades would serve to reduce wasteful energy and water usage and associated GHG emissions.

The Project would not involve retrofitting of existing buildings and would be completely new construction required to comply with all applicable State and local requirements for energy efficiency. Therefore, the Project would be consistent and not conflict with policies to implement energy efficiency retrofits.

Consistency with SCAG's 2020-2045 RTP/SCS

To implement SB 375 and reduce GHG emissions by correlating land use and transportation planning, SCAG adopted the 2016–2040 Regional Transportation Plan / Sustainable Communities Strategy (2016-2040 RTP/SCS) on April 7, 2016.[36, 37]

On September 3, 2020, SCAG's Regional Council adopted an updated Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS) known as the 2020 – 2045 RTP/SCS or Connect SoCal. The purpose of Connect SoCal is to meet the mobility needs of the six-county SCAG region over the subject planning period through a roadmap identifying sensible ways to expand transportation options, improve air quality and bolster Southern California long-term economic viability.[38] Applicable Goals and Guiding Principles of Connect SoCal include:

- Improve mobility, accessibility, reliability, and travel safety for people and goods.
- Enhance the preservation, security, and resilience of the regional transportation system.
- Increase person and goods movement and travel choices within the transportation system.
- Reduce greenhouse gas emissions and improve air quality.
- Support health and equitable communities.
- Adapt to a changing climate and support an integrated regional development pattern and transportation network

[36] Southern California Association of Governments, Final 2016-2040 RTP/SCS.
[37] Southern California Association of Governments, Executive Order G-16-066, SCAG 2016 SCS ARB Acceptance off GHG Quantification Determination, June 2016.
[38] SCAG, News Release: SCAG Regional Council Formally Adopts Connect SoCal, September 3, 2020.

- Leverage new transportation technologies and data-driven solutions that result in more efficient travel.
- Encourage development of diverse housing types in areas that are supported by multiple transportation options.

Consistent with Connect SoCal's alignment of transportation, land use, and housing strategies, the Project would accommodate increases in population, households, and travel demand. The Project would also be consistent with the following key GHG reduction strategies in Connect SoCal, which are based on changing the region's land use and travel patterns:

- Compact growth in areas accessible to transit;
- 129 new dwelling units, including 17 units set aside for Very Low Income households; and
- Biking and walking infrastructure to improve active transportation options and transit access.

Additionally, the inclusion of electric vehicle charging infrastructure (per LA Green Building Code) would support the penetration of electric zero-emission vehicles into the vehicle fleet.

The Project is located adjacent to Ventura Boulevard, which is within an area well-served by existing transit routes, including the Metro B (Red) rail line within 0.75-mile of the Project Site and Metro bus lines 155 and 240. The Project would include landscape along the Arch Drive frontage, which would help buffer pedestrian activity on the sidewalk from the roadway. The Project Site is located adjacent to a mature network of streets that include vehicular and pedestrian facilities. Development of the Project within this established community would promote a variety of travel choices and would create new employment and housing opportunities the area. The Project would not conflict with Connect SoCal goals to maximize mobility and accessibility for all people and goods in the region, ensure travel safety and reliability, preserve and ensure a sustainable regional transportation system, protect the environment, encourage energy efficiency and facilitate the use of alternative modes of transportation.

As demonstrated above, the Project would be consistent with the applicable goals, including those pertaining to reductions in GHG emissions, in the 2020 – 2045 RTP/SCS.

Consistency with the City of Los Angeles ClimateLA Implementation Plan

The "ClimateLA" plan focuses on transportation, energy, water use, land use, waste, open space and greening, and economic factors to achieve emissions reductions. The Project is required to comply with CALGreen and the City's Green Building Code, as well as solid waste diversion policies administered by CalRecycle, and is an infill location with immediate access to significant public transit, pedestrian, and bicycle facilities. Therefore, the Project is consistent with the "ClimateLA" plan.

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 current Los Angeles Green Building Code as amended to comply with the 2022 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 provides 16 short-term and 150 long-term bicycle parking spaces and would also include EV charging stations for 10 percent of the total code-required parking spaces and wiring for future installation of EV charging stations for 30 percent of the total code-required parking spaces as required per the City's Building Code. The Green Building Ordinance also includes measures that would increase energy efficiency on the Project Site, including installing Energy Star rated appliances and installation of water conserving fixtures, that the project is required to comply with. Therefore, the Project is consistent with the Los Angeles Green Building Ordinance.

(vii) Energy Analysis

Information from the CalEEMod 2020.4.0 Daily and Annual Outputs contained in the air quality and greenhouse gas analyses above was utilized for this analysis. The CalEEMod outputs detail project related construction equipment, transportation energy demands, and facility energy demands.

Construction Energy Demand

Construction Equipment Electricity Usage Estimates

Electrical service would be provided by the Los Angeles Department of Water and Power (LADWP). Based on the 2017 National Construction Estimator, Richard Pray (2017),[39] the typical power cost per 1,000 square feet of building construction per month is estimated to be $2.32. The Project plans to develop the Site with a 177,098 square foot building, utilizing the Los Angeles Building Code (LABC) building area calculation, including 129 multi-family residential dwelling units over the course of approximately 24 months. Based on **Table III-12, Project Construction Power Cost and Electricity Usage**, the total power cost of the on-site electricity usage during the construction of the Project is estimated to be approximately $9,855.36. As shown in **Table III-12, Project Construction Power Cost and Electricity Usage**, the total electricity usage from Project construction related activities is estimated to be approximately 164,256 kWh.[40]

[39] Pray, Richard. 2017 National Construction Estimator. Carlsbad : Craftsman Book Company, 2017.

[40] LADWP's Small Commercial & Multi-Family Service (A-1) is approximately $0.06 per kWh of electricity Southern California Edison (SCE). Rates & Pricing Choices: General Service/Industrial Rates. https://library.sce.com/content/dam/sce-doclib/public/regulatory/historical/electric/2020/schedules/general-service-&-industrial-rates/ELECTRIC_SCHEDULES_GS-1_2020.pdf. Accessed June 2023.

Table III-12
Project Construction Power Cost and Electricity Usage

Power Cost (per 1,000 square foot of building per month of construction)	Total Building Size (1,000 Square Foot)[1]	Construction Duration (months)	Total Project Construction Power Cost
$2.32	177	24	$9,855.36

Cost per kWh	Total Project Construction Electricity Usage (kWh)
$0.06	177,699

**Assumes the Project would be under the A-1 Small Commercial & Multi-Family Service rate under LADWP, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-financesandreports/a-fr-electricrates/a-fr-er-stcommindrates?_adf.ctrl-state=4uqberzct_4&_afrLoop=958662023680086. Accessed June 2023.*

Construction Equipment Fuel Estimates

Using the CalEEMod data input, the Project's construction phase would consume electricity and fossil fuels as a single energy demand, that is, once construction is completed their use would cease. CARB's 2017 Emissions Factors Tables show that on average aggregate fuel consumption (gasoline and diesel fuel) would be approximately 18.5 hp-hr-gal.[41] As presented in **Table III-13, Construction Equipment Fuel Consumption Estimates**, Project construction activities would consume an estimated 37,796 gallons of diesel fuel.

Table III-13
Construction Equipment Fuel Consumption Estimates

Phase	Number of Days	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor	HP hrs/day	Total Fuel Consumption (gal diesel fuel)[1]
Grading	9	Graders	1	8	187	0.41	613	298
	9	Rubber Tired Dozers	1	8	247	0.4	790	385
	9	Tractors/Loaders/Backhoes	2	7	97	0.37	502	244
Building Construction	446	Cranes	1	6	231	0.29	402	9,690
	446	Forklifts	1	6	89	0.2	107	2,575
	446	Generator Sets	1	8	78	0.37	231	5,566
	446	Tractors/Loaders/Backhoes	1	6	97	0.37	215	5,191
	446	Welders	3	8	46	0.45	497	11,977
Paving	22	Cement and Mortar Mixers	4	6	9	0.56	121	144
	22	Pavers	1	7	130	0.42	382	455
	22	Paving Equipment	1	8	132	0.36	380	452
	22	Rollers	1	7	80	0.38	213	253
	22	Tractors/Loaders/Backhoes	1	7	97	0.37	251	299
Architectural Coating	22	Air Compressors	1	6	78	0.48	225	267
CONSTRUCTION FUEL DEMAND (gallons of diesel fuel)								**37,796**

Notes:
[1]Using Carl Moyer Guidelines Table D-21 Fuel consumption rate factors (bhp-hr/gal) for engines less than 750 hp.
Source: ht tps://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017_gl_appendix_d.pdf). Accessed June 2023.

[41] Aggregate fuel consumption rate for all equipment was estimated at 18.5 hp-hr/day (from CARB's 2017 Emissions Factors Tables and fuel consumption rate factors as shown in Table D-21 of the Moyer Guidelines: (https://www.arb.ca.gov/msprog/moyer/guidelines/2017gl/2017_gl_appendix_d.pdf). Accessed June 2023.

Construction Worker Fuel Estimates

It is assumed that all construction worker trips are from light duty autos (LDA) along area roadways. With respect to estimated VMT, the construction worker trips would generate an estimated 793,478 VMT. Vehicle fuel efficiencies for construction workers were estimated in the air quality and greenhouse gas analysis using information generated using CARB's EMFAC model (see Appendix C for details). **Table III-14, Construction Worker Fuel Consumption Estimates**, shows that an estimated 25,637 gallons of fuel would be consumed for construction worker trips.

Table III-14
Construction Worker Fuel Consumption Estimates

Phase	Number of Days	Worker Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Grading	9	10	14.7	1,323	30.95	43
Building Construction	446	119	14.7	780,188	30.95	25,208
Paving	22	13	14.7	4,204	30.95	136
Architectural Coating	22	24	14.7	7,762	30.95	251
Total Construction Worker Fuel Consumption						**25,637**

Notes:
[1]Assumptions for the worker trip length and vehicle miles traveled are consistent with CalEEMod 2020.4.0 defaults.

Construction Vendor/Hauling Fuel Estimates

Tables III-15 and **III-16** show the estimated fuel consumption for vendor and hauling during building construction and architectural coating. With respect to estimated VMT, the vendor and hauling trips would generate an estimated 151,358 VMT. For the architectural coatings it is assumed that the contractors would be responsible for bringing coatings and equipment with them in their light duty vehicles.[42] **Tables III-15** and **III-16** show that an estimated 19,509 gallons of fuel would be consumed for vendor and hauling trips.

[42] Vendors delivering construction material or hauling debris from the site during grading would use medium to heavy duty vehicles with an average fuel consumption of 9.22 mpg for medium heavy-duty trucks and 6.74 mpg for heavy heavy-duty trucks (see Appendix C of the Air Quality, Greenhouse Gas, and Energy Impact Assessment [see **Appendix D** to this document] for details).

Table III-15
Construction Vendor Fuel Consumption Estimates (MHD Trucks)[1]

Phase	Number of Days	Vendor Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Grading	9	0	6.9	0	9.22	0
Building Construction	446	24	6.9	73,858	9.22	8,011
Paving	22	0	6.9	0	9.22	0
Architectural Coating	22	0	6.9	0	9.22	0
Total Vendor Fuel Consumption						**8,011**

Notes:
[1] Assumptions for the vendor trip length and vehicle miles traveled are consistent with CalEEMod 2020.4.0 defaults.

Table III-16
Construction Hauling Fuel Consumption Estimates (HHD Trucks)[1]

Phase	Number of Days	Hauling Trips/Day	Trip Length (miles)	Vehicle Miles Traveled	Average Vehicle Fuel Economy (mpg)	Estimated Fuel Consumption (gallons)
Grading	9	430.6	20	77,500	6.74	11,499
Building Construction	446	0	20	0	6.74	0
Paving	22	0	20	0	6.74	0
Architectural Coating	22	0	20	0	6.74	0
Total Construction Hauling Fuel Consumption						**11,499**

Notes:
[1]Assumptions for the hauling trip length and vehicle miles traveled are consistent with CalEEMod 2020.40 defaults.

Construction Energy Efficiency/Conservation Measures

Construction equipment used over the approximately 24-month construction phase would conform to CARB regulations and California emissions standards and is evidence of related fuel efficiencies. In addition, the CARB Airborne Toxic Control Measure limits idling times of construction vehicles to no more than five minutes, thereby minimizing unnecessary and wasteful consumption of fuel due to unproductive idling of construction equipment. Furthermore, the project has been designed in compliance with California's Energy Efficiency Standards and 2019 CALGreen Standards.

Construction of the proposed residential development would require the typical use of energy resources. There are no unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities; or equipment that would not conform to current emissions standards (and related fuel efficiencies). Equipment employed in construction of the Project would therefore not result in inefficient wasteful, or unnecessary consumption of fuel.

Operational Energy Demand

Energy consumption in support of or related to Project operations would include transportation energy demands (energy consumed by employee and patron vehicles accessing the project site) and facilities energy demands (energy consumed by building operations and site maintenance activities).

Transportation Fuel Consumption

The largest source of operational energy use would be vehicle operation of customers. The Site is located in an urbanized area just in close proximity to downtown Los Angeles.

Using the defaults VMT estimates from CalEEMod, it is assumed that the average vehicle miles traveled was 6.69 miles for all vehicle categories. As the Project is a residential project, it was assumed that vehicles would operate 365 days per year. **Table III-17, Estimated Vehicle Operations Fuel Consumption**, shows the worst-case estimated annual fuel consumption for all classes of vehicles from autos to heavy-heavy trucks.[43] **Table III-17, Estimated Vehicle Operations Fuel Consumption** shows that an estimated 53,784 gallons of fuel would be consumed per year for the operation of the Project. Trip generation and VMT generated by the Project are consistent with other similar residential uses of similar scale and configuration. That is, the Project does not propose uses or operations that would inherently result in excessive and wasteful vehicle trips and VMT, nor associated excess and wasteful vehicle energy consumption. Therefore, Project transportation energy consumption would not be considered inefficient, wasteful, or otherwise unnecessary.

Table III-17
Estimated Vehicle Operations Fuel Consumption

Vehicle Type	Vehicle Mix	Number of Vehicles	Average Trip (miles)[1]	Daily VMT	Average Fuel Economy (mpg)	Total Gallons per Day	Total Annual Fuel Consumption (gallons)
Light Auto	Automobile	269	6.69	1,799	31.82	56.53	20,634
Light Truck	Automobile	29	6.69	194	27.16	7.14	2,604
Light Truck	Automobile	95	6.69	636	25.6	24.83	9,064
Medium Truck	Automobile	90	6.69	603	20.81	28.96	10,572
Light Heavy Truck	2-Axle Truck	19	6.69	128	13.81	9.27	3,385
Light Heavy Truck 10,000 lbs +	2-Axle Truck	5	6.69	32	14.18	2.26	826
Medium Heavy Truck	3-Axle Truck	6	6.69	39	9.58	4.12	1,503
Heavy Heavy Truck	4-Axle Truck	15	6.69	102	7.14	14.24	5,196
Total		528	--	3,532	--	147.35	--
Total Annual Fuel Consumption							**53,784**

Notes:
[1]Based on the size of the site and relative location, trips were assumed to be local rather than regional.

[43] Average fuel economy based on aggregate mileage calculated in EMFAC 2017 for opening year (2023). See Appendix A of the Air Quality, Greenhouse Gas, and Energy Impact Assessment [see **Appendix D** to this document] for EMFAC output.

Facility Energy Demands (Electricity and Natural Gas)

The annual natural gas and electricity demands were provided per the CalEEMod output and are provided in **Table III-18, Project Mitigated Annual Operational Energy Demand Summary**. As shown in **Table III-18**, the estimated electricity demand for the Project is approximately 838,163 kWh per year. In 2020, the residential sector of the County of Los Angeles consumed approximately 22,913 million kWh of electricity.[44] In addition, the estimated natural gas consumption for the Project is approximately 1,519,680 kBTU per year. In 2020, the residential sector of the County of Los Angeles consumed approximately 1,238 million therms of gas.[45] Therefore, the increase in both electricity and natural gas demand from the Project is insignificant compared to the County's 2020 demand.

Table III-18
Project Mitigated Annual Operational Energy Demand Summary[1]

Natural Gas Demand	kBTU/year
Apartments High Rise	1,519,680
Total	1,519,680

Electricity Demand	kWh/year
Apartments High Rise	508,878
Enclosed Parking Structure	329,285
Total	838,163

Notes:
[1]Taken from the CalEEMod 2020.4.0 annual output.

Renewable Energy and Energy Efficiency Plan Consistency

Regarding federal transportation regulations, the Project Site is located in an already developed area. Access to/from the Project Site is from existing roads. These roads are already in place so the Project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the ISTEA because SCAG is not planning for intermodal facilities in the project area.

Regarding the State's Energy Plan and compliance with Title 24 CCR energy efficiency standards, the applicant is required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances as well as utility energy efficiency programs implemented by the SCE and Southern California Gas Company.

Regarding the State's Renewable Energy Portfolio Standards, the Project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part 11 (CALGreen). CalGreen Standards require 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.

[44] California Energy Commission, Electricity Consumption by County. https://ecdms.energy.ca.gov/elecbycounty.aspx. Accessed June 2023.
[45] California Energy Commission, Gas Consumption by County. http://ecdms.energy.ca.gov/gasbycounty.aspx. Accessed June 2023.

(e) AQMP Consistency Conclusion

Construction and operational Project emissions were evaluated and compared to both regional and localized SCAQMD's thresholds of significance. In addition, project GHG emissions were evaluated and compared to SCAQMD's draft threshold of 3,000 MTCO2e per year for all land uses. Project emissions are anticipated to be below SCAQMD's thresholds of significance with no mitigation. Therefore, the impact is less than significant.

Furthermore, neither construction nor operation of the Project would result in wasteful, inefficient, or unnecessary consumption of energy, or wasteful use of energy resources. The Project does not include any unusual project characteristics or construction processes that would require the use of equipment that would be more energy intensive than is used for comparable activities and is a residential project that is not proposing any additional features that would require a larger energy demand than other residential projects of similar scale and configuration. The energy demands of the Project are anticipated to be accommodated within the context of available resources and energy delivery systems. The Project would therefore not cause or result in the need for additional energy producing or transmission facilities. The Project would not engage in wasteful or inefficient uses of energy and aims to achieve energy conservations goals within the State of California. The Project has been designed in compliance with California's Energy Efficiency Standards and 2022 CALGreen Standards. The Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, impacts would be less than significant.

(f) Air Quality Impact Summary

The Project would not result in any significant effects relating to air quality.

4) Project-Specific Water Quality Impacts

(a) Groundwater

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

- Affect the rate or change the direction of movement of existing contaminants;
- Expand the area affected by contaminants;
- Result in an increased level of groundwater contamination (including that from direct percolation, injection or saltwater intrusion); or
- Cause regulatory water quality standards at an existing production well to be violated, as defined in the California Code of Regulations (CCR), Title 22, Division 4, and Chapter 15 and in the Safe Drinking Water Act.

The Project Site overlies the San Fernando Valley Groundwater Basin.[46] The historically highest groundwater level is greater than 100 feet below grade.[47] It is anticipated that the proposed basement parking level would only extend up to a depth of approximately 14 feet below the existing grade. Fluctuations in the level of groundwater may occur due to variations in rainfall, temperature, and other factors. However, due to the depth of the groundwater anticipated on the Project Site, the operation of the Project would not interfere with any groundwater recharge activities within the area. The Project Site was until recently entirely developed and the degree to which any surface water infiltration and groundwater recharge occurs on-site is negligible. Moreover, the entire site would be redeveloped by the Project. Therefore, impacts to groundwater would be less than significant.

(b) Surface Water

Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on surface water quality if discharges associated with the project would create pollution, contamination, or nuisance as defined in Section 13050 of the California Water Code (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 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 State Water Resources Control Board (SWRCB). These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

(i) Construction

Construction activities associated with the Project have the potential to degrade water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. Construction associated with the Project would be subject to the requirements of Los Angeles Regional Water Quality Control Board (LARWQCB) Order No. R4-2012-0175-A01, NPDES No. CAS004001, effective December 28, 2012, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the Coastal Watersheds of Los Angeles County (the "Los Angeles County MS4 Permit"), which controls the quality of runoff entering municipal storm drains in Los Angeles County. Section VI.D.8 of the Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of Best Management Practices (BMPs), including, but not limited to, approval of an Erosion and Sediment

[46] California Natural Resources Agency, Groundwater Basin Boundary Assessment Tool, Interactive Map, https://gis.water.ca.gov/app/bbat/. Accessed June 2023.

[47] Public Works of Los Angeles County, Well Location, Interactive Map, https://dpw.lacounty.gov/general/wells/#. Accessed June 2023.

Control Plan (ESCP) for all construction activities within their jurisdiction.[48] ESCPs are required to include the elements of a Stormwater Pollution Prevention Plan (SPPP). Accordingly, the construction contractor for the Project would be required to implement BMPs that would meet or exceed local, State, and federal mandated guidelines for stormwater treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities. Therefore, potential impacts during construction of the Project would be less than significant.

(c) Operation

With respect to water quality during operation of the Project, Los Angeles County and all incorporated cities within Los Angeles County (except the City of Long Beach) are permittees under the Los Angeles County MS4 Permit. Section VI.D.7 of the Los Angeles County MS4 Permit, Planning and Land Development Program, is applicable to, among others, land-disturbing activities that result in the creation or addition or replacement of 5,000 square feet or more of impervious surface area on an already developed site, which would apply to the Project.[49] This Program requires, among other things, that the Project runoff volume from the following be retained on-site: (a) the 0.75 inch, 24-hour rain event; or (b) the 85th percentile, 24-hour rain event, as determined from the Los Angeles County 85th percentile precipitation isohyetal map, whichever is greater. The Project would also be subject to the BMP requirements of the SUSMP adopted by LARWQCB. As a permittee, the City is responsible for implementing the requirements of the County-wide SUSMP within its boundaries. In compliance with these regulatory requirements, a Project-specific SUSMP would be implemented during the operation of the Project. In compliance with the Los Angeles County MS4 Permit and SUSMP requirements, the Project would be required to retain, treat and/or filter stormwater runoff through biofiltration before it enters the City stormwater drain system. The system incorporated into the Project must follow design requirements set forth in the MS4 permit and must be approved by the City. Adherence to the requirements of the MS4 Permit and SUSMP would ensure that potential impacts associated with water quality would be less than significant. With appropriate Project design and compliance with the applicable federal, State, local regulations, and permit provisions, impacts of the Project related to stormwater runoff quality would be less than significant.

In addition, the Project would be subject to the provisions of the City's Low Impact Development (LID) Ordinance, which is designed to mitigate the impacts of increases in runoff and stormwater

[48] California Regional Water Quality Control Board – Los Angeles Region, MS4 Discharges within the Coastal Watersheds of Los Angeles County Except those Discharges Originating from the City of Long Beach MS4, Order No. R4-2012-0175, as amended by Order WQ 2015-0075, NPDES No. CAS004001, page 116 et seq.

[49] California Regional Water Quality Control Board – Los Angeles Region, MS4 Discharges within the Coastal Watersheds of Los Angeles County Except those Discharges Originating from the City of Long Beach MS4, Order No. R4-2012-0175, as amended by Order WQ 2015-0075, NPDES No. CAS004001, page 97 et seq.

pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration and use of stormwater, as appropriate. The LID Ordinance would require the Project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff and reduce stormwater runoff such as the installation of LID BMPs for, at a minimum, the first flush or the equivalent of the greater between the 85th percentile storm and first 0.75-inch of rainfall for any storm event. In this regard, the City has established review procedures to be implemented by the Department of City Planning, Department of Building and Safety (LADBS), and Department of Public Works that parallel the review of the SUSMP discussed above. Incorporation of these features would minimize the increase in stormwater runoff from the Project Site. The SUSMP consists of structural BMPs, including a capture and reuse cistern for stormwater runoff built into the Project for ongoing water quality purposes over the life of the Project. Additionally, because the Project Site does not currently operate under a SUSMP, implementation of the Project with a SUSMP would improve water quality leaving the Project Site compared to existing conditions. Furthermore, in the existing condition, it appears stormwater discharges from the Project Site without filtration. Therefore, impacts would be less than significant.

(d) Water Quality Impact Summary

As indicated above, the Project would not violate water quality standards or discharge requirements, and would not significantly impact the water quality of either groundwater or surface water during construction or operation of the Project. Therefore, the Project would not result in any significant effects related to water quality.

5) Condition (d) Conclusion

As detailed above, the Project would not significantly impact the nearby roadways and intersections, would have a less-than-significant VMT impact, and would have adequate access and internal circulation; would comply with applicable noise standards during construction, would not substantially increase existing ambient noise levels during operation, and would not expose people to excessive noise levels related to airports; would not result in emissions that would exceed regional or local significance thresholds, would not contribute to long-term health impacts related to nonattainment of the ambient air quality standards, and would be consistent with and not obstruct implementation of the applicable AQMP; and would not violate water quality standards or discharge requirements, and would not significantly impact the water quality of either groundwater or surface water during construction or operation of the Project. Therefore, the Project would not result in any significant effects relating to traffic, noise, air quality, greenhouse gases, or water quality. As such, the Project meets Categorical Exemption Condition (d).

Condition (e): The site can be adequately served by all required utilities and public services.

The following provides an analysis of whether the Project Site can be adequately served by all required utilities and public services.

1) Utilities

(a) Water

(i) Existing and Projected Supply

The City's water supply primarily comes from the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California (MWD), which is obtained from the Colorado River Aqueduct, and to a lesser degree from local groundwater sources. MWD uses a land use-based planning tool that allocates projected demographic data from SCAG into water service areas for each of MWD's member agencies. These sources, along with recycled water, are expected to supply the City's water needs in the years to come. The LADWP *2020 Urban Water Management Plan* (UWMP) confirmed that the rate of water use in the City has remained relatively consistent over the previous five years and the City's average water usage in 2020 was lower than the City's average water usage in the 1970s. The *2020 Urban Water Management Plan* water demand projection for 2045 is approximately 746,000 acre-feet. As shown in **Table III-19, Estimated Average Daily Water Consumption**, the Project is anticipated to consume a total of approximately 17,745 gallons per day (or 19.86 af/y) of water. This projected water demand from the Project falls within the UWMP's projected water supplies through 2045, representing less than approximately 0.003 percent of the projected water supply (746,000 af/y). The City is also making efforts to increase the availability of water supplies, including increasing recycled water use and identification of alternative water supplies, such as water transfer, desalination, and stormwater runoff reuse, as well as implementing management agreements for long-term groundwater use strategies to prevent overdraft. Consideration of existing sources of supply, coupled with the combined effect of these City efforts to increase available water supplies, it is expected to assure adequate water supplies for the LADWP service area through at least 2045. Therefore, the amount of new annual demand from the Project would be insignificant relative to available supplies through 2045, projected growth in Los Angeles, and planned water resource development by LADWP.

LADWP's Water System 10-Year Capital Improvement Program for the Fiscal Years 2010-2019 details LADWP's 10-year process of capital upgrades to the water infrastructure system of the City and increasing its water resources, enhance the quality of water it distributes, and improve the security of the water supply. These goals are accomplished by replacing and/or adding to the water system infrastructure, complying with and/or exceeding all state and federal water regulations, looking for new sources of water supply as well as conserving those already in existence, and adopting new and improved security measures to ensure the safety of the city's water. Through this program, LADWP can provide reliable sources of water to the residents of the City.[50] Thus, sufficient water supplies are anticipated to be available to serve the Project from existing entitlements and resources, and new or expanded entitlements would not be necessary. Moreover, the Project's housing and population increases are consistent with the RTP/SCS and UWMP (making the addition of 69 dwelling units resulting from the Project consistent with regional

[50] City of Los Angeles Department of Water and Power, Water System Ten-Year Capital Improvement Program for the Fiscal Years 2010-2019.

growth). Thus, the Project's estimated water usage is within applicable projections and would not exceed the amount anticipated by the City's long-range land use and planning efforts.

The Project would also comply with Ordinance No. 170,978 (Landscape Ordinance), which imposes numerous water conservation measures in landscaping, installation, and maintenance (e.g., use drip irrigation and soak hoses in lieu of sprinklers to lower the amount of water lost to evaporation and overspray, set automatic sprinkler systems to irrigate during the early morning or evening hours to minimize water loss due to evaporation, and water less in the cooler months and during the rainy season), therefore helping to reduce the Project's water demand.

Water demand would be further reduced through adherence to the City's existing regulatory compliance measures including the following:

- High-efficiency toilets (maximum 1.28 gallons per flush), including dual-flush water closets, and high-efficiency urinals (maximum 0.5 gallons per flush), including no-flush or waterless urinals, in all restrooms as appropriate.
- Restroom faucets with a maximum flow rate of 1.5 gallons per minute and self-closing design.
- High-efficiency Energy Star-rated dishwashers.
- Prohibiting the use of single-pass cooling equipment (single-pass cooling refers to the use of potable water to extract heat from process equipment, e.g. vacuum pump, ice machines, by passing the water through equipment and discharging the heated water to the sanitary wastewater system).
- Demand (tankless or instantaneous) water heater system sufficient to serve the anticipated needs of the dwellings.
- No more than one showerhead per shower stall, having a flow rate no greater than 2.0 gallons per minute.
- High-efficiency clothes washers (water factor of 6.0 or less), if provided in either individual units and/or in a common laundry room(s).
- Weather-based irrigation controller with rain shutoff.
- Matched precipitation (flow) rates for sprinkler heads.
- Drip/microspray/subsurface irrigation where appropriate.
- Minimum irrigation system distribution uniformity of 75 percent.
- Proper hydro-zoning, turf minimization and use of native/drought tolerant plan materials.
- Use of landscape contouring to minimize precipitation runoff.
- A separate water meter (or submeter), flow sensor, and master valve shutoff for irrigated landscape areas totaling 5,000 square feet and greater.

Thus, it is reasonably anticipated that the Project would not create any water system capacity issues, and sufficient reliable water supplies would be available to meet Project demands. Therefore, impacts would be less than significant, and the Project Site can be adequately served by LADWP with regard to water supply.

(b) Facilities and Infrastructure

The LADWP currently supplies water to the Project Site. LADWP is responsible for ensuring that water demand within the City is met and that State and federal water quality standards are achieved. The LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,336 miles of pipes, and more than 115 storage tanks and reservoirs.[51] Much of the water flows north to south, entering Los Angeles at the Los Angeles Aqueduct Filtration Plant (LAAFP) in Sylmar, which is owned and operated by LADWP. Water entering the LAAFP undergoes treatment and disinfection before being distributed throughout the LADWP's Water Service Area. The LAAFP treats approximately 600 million gpd.[52]

The Project's estimated water consumption is presented on **Table III-19, Estimated Average Daily Water Consumption**. As shown, the Project would consume a total of approximately 17,745 gpd (or approximately 0.018 million gpd) of water.

Table III-19
Estimated Average Daily Water Consumption

Land Use	Size	Consumption Rate (gpd) [a]	Total Water Consumed (gpd)
Residential: Apt – Studio	20 du	75 / du	1,500
Residential: Apt – 1 BDR	73 du	110 / du	8,030
Residential: Apt – 2 BDR	36 du	150 / du	5,400
Recreation/Gym Room	2,044 sf	650 gpd / 1,000 sf	1,329
Auto Parking	55,168 sf[b]	20 gpd / 1,000 sf	1,103
Landscaping	6,391 sf	60 gpd / 1,000 sf	383
		Project Total	**17,745**

Notes: Apt = apartment; BDR = bedroom; sf = square feet; du = dwelling units; gpd = gallons per day. Estimated gallons per day have been rounded to nearest whole number.
a Based on 100 percent of wastewater generation rates provided in City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, April 6, 2012.
b Lahmon Architects, 80% Construction Documents, June 2023.
Source (table): EcoTierra Consulting, 2023.

51 Los Angeles Department of Water and Power Website, About Us, Water Facts & Figures, available at: https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-water/a-w-factandfigures?. Accessed: June 2023.

52 Better Buildings U.S. Department of Energy, https://betterbuildingssolutioncenter.energy.gov/showcase-projects/los-angeles-department-water-and-power-los-angeles-aqueduct-filtration-plant. Accessed June 2023.

Thus, implementation of the Project is not expected to measurably reduce LAAFP's capacity, and as such, no new or expanded water treatment facilities would be required. Therefore, with respect to water treatment facilities, impacts would be less than significant.

Moreover, as discussed below, the Project's anticipated water demand is consistent with demand projected under LADWP's UWMP, therefore, it is anticipated that LADWP would be able to meet the Project's water treatment demand.

In addition to supplying water for domestic uses, LADWP also supplies water for fire protection services, in accordance with the Los Angeles Fire Code. The City of Los Angeles Fire Department (LAFD) and LAMC Section 57.507 require a water flow ranging from 4,000 gallons per minute (gpm) flowing from four hydrants simultaneously for high-density residential and neighborhood commercial land uses to 6,000 to 9,000 gpm flowing from four to six hydrants simultaneously for industrial and commercial land uses. The existing water lines that currently serve the Project Site would serve the Project. If water main or infrastructure upgrades are required, LAMC requires the Project Applicant to pay for such upgrades, which would be constructed by either the Project Applicant or LADWP. To the extent such upgrades result in a temporary disruption in service, proper notification to LADWP customers would take place, as is standard practice. In the event that water main and other infrastructure upgrades are required, it would not be expected to create a significant impact to the physical environment because: (1) any disruption of service would be of a short-term nature, (2) replacement of the water mains would be within public rights-of-way, and (3) any foreseeable infrastructure improvements would be limited to the immediate Project vicinity. Therefore, potential impacts resulting from water infrastructure improvements, if any are to be required, would be less than significant.

Furthermore, the Project would comply with the City's mandatory water conservation measures that, relative to the City's increase in population, have reduced the rate of water demand in recent years. LADWP's growth projections are based on conservation measures and adequate treatment capacity that is, or would be, available to treat LADWP's projected water supply, as well as LADWP's expected water sources. Compliance with water conservation measures, including Title 20 and 24 of the California Administrative Code would serve to reduce the projected water demand. Chapter XII of LAMC comprises the City's Emergency Water Conservation Plan.

The Emergency Water Conservation Plan stipulates conservation measures pertaining to water closets, showers, landscaping, maintenance activities, and other uses. At the State level, Title 24 of the California Administrative Code contains the California Building Standards, including the California Plumbing Code (Part 5), which promotes water conservation. Title 20 of the California Administrative Code addresses Public Utilities and Energy and includes appliance efficiency standards that promote conservation. Various sections of the Health and Safety Code also regulate water use.

On April 7, 2017, following unprecedented water conservation averaging approximately 25 percent across the State and plentiful winter rain and snow, the governor ended the drought state of emergency in most of California (including Los Angeles County) through Executive Order B40-17. Executive Order B-40-17 builds on actions taken in Executive Order B-37-16, which remains

in effect, to continue making water conservation a way of life in California.[53] Executive Order B-37-16 (Making Water Conservation a California Way of Life) directs the California Department of Water Resources to work with the State Water Resources Control Board (SWRCB) to make some of the requirements of the emergency conservation regulation permanent so as to build upon and exceed the existing State law requirements to achieve a 20 percent reduction in urban water usage by 2020. LADWP used these water-use targets to develop a goal of saving 142 gallons per capita per day by 2020 and achieved a savings of 106 gallons per capita per day by 2020. LADWP continues to implement water saving strategies to achieve regulatory water saving requirements year over year. Overall, the Project's water demand is expected to comprise a small percentage of LADWP's existing water supplies. Moreover, as discussed below, the Project's anticipated water demand is consistent with demand projected under LADWP's UWMP. Therefore, the impact would be less than significant, and the Project Site can be adequately served by water facilities and infrastructure.

(c) Wastewater

The City's Bureau of Sanitation provides sewer service to the Project area. The sewer infrastructure in the vicinity of the Project includes an existing 8-inch line on Arch Drive. The sewage from the existing 8-inch line feeds into an 8-inch line in the ally that runs parallel to Ventura Boulevard, before discharging into an 18-inch sewer line on Ventura Boulevard.[54] Sewage from the Project Site is ultimately conveyed via existing sewer infrastructure to the Hyperion Treatment Plant (HTP), which has the capacity to treat approximately 450 million gallons per day (mgd) of wastewater to full secondary treatment level and currently receives approximately 260 mgd for treatment. Accordingly, the remaining daily capacity at the HTP is approximately 190 mgd or approximately 42 percent of its total capacity.[55]

Estimated Project wastewater generation is presented below in **Table III-20, Estimated Average Daily Wastewater Generation**. As shown, the Project would generate a total of approximately 17,745 gpd (or approximately 0.018 million gpd) of wastewater. Therefore, the HTP would have adequate capacity to serve the Project. As such, with respect to the capacities of wastewater treatment facilities, impacts would be less than significant, and the Project Site can be adequately served by wastewater treatment facilities.

[53] State Water Resources Control Board, Press Room, Announcements, State Releases Plan to Make Water Conservation a Way of Life, April 7, 2017.

[54] City of Los Angeles, Bureau of Engineering, Department of Public Works, Navigate LA, https://navigatela.lacity.org/NavigateLA/. Accessed June 2023.

[55] City of Los Angeles, One Water LA 2040 Plan, Volume 2, Wastewater Facilities Plan, page 59.

Table III-20
Estimated Average Daily Wastewater Generation

Land Use	Size	Generation Rate (gpd) [a]	Total Wastewater Generated (gpd)
Residential: Apt – Studio	20 du	75 / du	1,500
Residential: Apt – 1 BDR	73 du	110 / du	8,030
Residential: Apt – 2 BDR	36 du	150 / du	5,400
Recreation/Gym Room	2,044 sf	650 gpd / 1,000 sf	1,329
Auto Parking	55,168 sf[b]	20 gpd / 1,000 sf	1,103
Landscaping	6,391 sf	60 gpd / 1,000 sf	383
		Project Total	**17,745**

Notes: Apt = apartment; BDR = bedroom; sf = square feet; du = dwelling units; gpd = gallons per day. Estimated gallons per day have been rounded to nearest whole number.
a Based on wastewater generation rates provided in City of Los Angeles Bureau of Sanitation, Sewer Generation Rates Table, April 6, 2012.
b Lahmon Architects, 80% Construction Documents, June 2023.
Source (table): EcoTierra Consulting, 2023.

Furthermore, as part of the building permit process, the City would require detailed gauging and evaluation of the Project's wastewater connection point at the time of connection to the system. If deficiencies are identified at that time, the Project Applicant would be required, at their own cost, to build secondary sewer lines to a connection point in the sewer system with sufficient capacity, in accordance with standard City procedures. The installation of any such secondary lines, if needed, would require minimal trenching and pipeline installation in accordance with all City permitting requirements, which would be a temporary action and would not result in any adverse environmental impacts. Therefore, impacts would be less than significant, and the Project Site can be adequately served by wastewater facilities and infrastructure.

(d) Solid Waste

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 multi-family residential developments within the City. Pursuant to LAMC 66.03, owners of multi-family dwellings are required to subscribe to and pay for collection services provided by a solid waste hauler authorized to provide such services. As is typical for most solid waste haulers in the greater Los Angeles area, the hauler would be anticipated to separate and recycle all reusable material collected from the Project Site at a local materials recovery facility. The remaining solid waste would be disposed of at a variety of landfills, depending on with whom the hauler has contracts. Most commonly, the City is served by the Sunshine Canyon Landfill. This Class III landfill accepts non-hazardous solid waste including construction and demolition (C&D) waste. Moreover, as of 2020, Azusa Land Reclamation is the only permitted inert (i.e., unclassified and C&D waste which includes earth, rock, concrete rubble, asphalt paving fragments, etc.) in Los Angeles County that has a full solid waste facility permit.[56] **Table III-21,**

[56] Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2020 Annual Report, published October 2021, page 36.

Current Landfill Capacity and Intake, details the permitted daily intake and estimated remaining capacity at these landfills currently.

Table III-21
Current Landfill Capacity and Intake

Landfill Facility	Permitted Daily Intake (tpd) [a]	2019 Average Daily Intake (tpd) [a]	Estimated Total Remaining Permitting Capacity [a] (million tons)
Class III Landfill			
Sunshine Canyon	12,100	8,039	54
Inert Construction & Demolition Waste-Accepting Landfill			
Azusa Land Reclamation	8,000	1,032	65

Notes: tpd = tons per day
a Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2020 Annual Report, published October 2021, Appendix E-2, Table 4.
Source (table): EcoTierra Consulting, 2023.

(i) Construction

Implementation of the Project would generate C&D waste. C&D debris includes concrete, asphalt, wood, drywall, metals, concrete rubble, and other miscellaneous and composite materials. **Table III-22, Estimated Project Construction and Demolition Solid Waste**, presents the Project's estimated C&D waste.

Table III-22
Estimated Project Construction and Demolition Solid Waste

Construction Activity	Size	Generation Rate (lbs) [a]	Total Solid Waste Generated (lbs)
Project Construction	206,254 sf [b]	4.39 / sf	905,455 lbs
		Total	**905,455 lbs**

Notes: sf = square feet; lbs = pounds. Fractions have been rounded to nearest whole number.
a Source: U.S. Environmental Protection Agency, Estimating 2003 Building-Related Construction and Demolition Material Amounts, March 2009, Table 2-4 (Summary of Nonresidential Demolition Job Site Surveys of C&D Materials and Table 2-1 (Summary of Residential Construction Job Site C&D Materials Surveys).
b Gross building useable area square footage.
Source (table): EcoTierra Consulting, 2023.

As shown in **Table III-22**, the Project would generate approximately 905,455 pounds or 453 tons of C&D debris. This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. In order to help meet the landfill diversion goals, the City adopted the Citywide C&D Waste Recycling Ordinance (Ordinance No. 181,519). This ordinance, which became effective January 1, 2011, requires that all haulers and contractors responsible for handling C&D waste obtain a Private Solid Waste Hauler Permit from the Bureau of Sanitation prior to collecting, hauling, and transporting C&D waste. It requires that all C&D waste generated within City limits be taken to City-certified C&D waste processors, where the waste would be recycled to the extent feasible. Moreover, there are 142.67 million tons of remaining capacity available in Los Angeles County for the disposal of inert

waste.[57] Some C&D waste may also be landfilled at the Sunshine Canyon Class III landfill. Thus, Project-generated C&D waste would represent a small percentage of the waste disposal capacity in the region, and, as noted, the aggregate amount estimated in the above table would not all be landfilled since the Project would comply with City's recycling requirements. Therefore, solid waste impacts from C&D activities would be less than significant, and the Project Site can be adequately served by solid waste facilities during construction.

(e) Operation

The Project's estimated operational solid waste generation is presented in **Table III-23, Estimated Project Operational Solid Waste**.

Table III-23
Estimated Project Operational Solid Waste

Land Use	Size	Generation Rate (lbs) [a]	Total Solid Waste Generated (lbs/day)
Residential	129 units	12.23 / unit	1,578
		Project Total	**1,578**

Notes: sf = square feet; lbs = pounds
[a] L.A. CEQA Thresholds Guide, 2006, page M.3-2.
Source (table): EcoTierra Consulting, 2023.

As shown in **Table III-23**, the Project is estimated to generate approximately 1,578 pounds of solid waste per day. AB 374 mandates a 75 percent landfill diversion rate by 2020.[58] In addition, the City's Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, aims to achieve a goal of 90 percent diversion by 2025 within the City.[59] The Bureau of Sanitation's Solid Resources Citywide Recycling Division (SRCRD) develops and implements source reduction, recycling, and re-use programs in the City.[60] The SRCRD provides technical assistance to public and private recyclers, manages the collection and disposal programs for Household Hazardous Waste, and helps create markets for recycled materials.[61] At the state-mandated minimum diversion rate of 75 percent, approximately 1,184 pounds would be recycled and the remaining 394 pounds (0.20 tons) would be landfilled. At the City's goal of 90 percent diversion, approximately 1,420 pounds would be recycled and the remaining 158 pounds (0.08 tons) would be landfilled. In either scenario, there would be adequate landfill capacity for the Project's operational impact (see **Table III-23**, above). Furthermore, AB 341 requires multi-family residential developments with five units or more to provide for recycling services on site. Therefore, solid waste impacts from operation of the Project would be less than significant, and the Project Site can be adequately served by solid waste facilities during operation.

[57] County of Los Angeles Department of Public Works, Countywide Integrated Management Plan, 2020 Annual Report, published October 2021, page 35.
[58] California Department of Resources and Recycling, California's 75 Percent Initiative.
[59] City of Los Angeles, Solid Waste Integrated Resources Plan – A Zero Waste Master Plan, October 2013.
[60] Los Angeles Bureau of Sanitation, Solid Resources, Construction and Demolition Recycling Guide.
[61] Los Angeles Bureau of Sanitation, Solid Resources, Construction and Demolition Recycling Guide.

(f) Natural Gas

Pursuant to Ordinance 187,714, buildings that obtain permits after April 1, 2023 will be all-electric and will not include hookups for natural gas appliances such as heating or water heating. The following analysis of potential natural gas consumption impacts is provided in the case that this Project obtains permits prior to April 1, 2023 and includes natural gas appliances.

Southern California Gas Company (SCG) provides natural gas service to the City, including the Project Site. The *2022 California Gas Report* presents a comprehensive outlook for natural gas requirements and supplies for California through 2035. SCG expects its active meter growth to increase by an annual average of 0.6 percent from the period 2021 through 2035; however, total natural gas demand within the SCG service area is expected to decline at an annual rate of 1.5 percent during this same period, with gas demand in the residential sector expected to decrease at an annual rate of 1.9 percent. The decrease in overall gas demand results from a combination of modest economic growth, forecasted energy efficiency and fuel substitution, tighter standards created by revised Title 24 Codes and Standards, and renewable energy goals that impact gas-fire electricity. As a result, SCG projects that its total gas demand across all sectors will decrease from 243 billion cubic feet in 2021 to 168 billion cubic feet in 2035,[62] with a decrease in residential demand from 224 billion cubic feet to 170 billion cubic feet over the same time period.[63] Currently, SCG has a total capacity of 3,435 million cubic feet available per day, with an expected increase to 3,775 million cubic feet after 2029.[64]

The estimated natural gas demand of the Project was calculated by CalEEMod to be approximately 1,519,680 kBTU per year,[65] or 4,015 cubic feet per day.[66] As such, the Project's natural gas consumption would represent an extremely small percentage of SCG's total usage supplied to residential buildings and of the total capacity available. Therefore, new or expanded sources of natural gas or natural gas storage and pipeline infrastructure would not be required. Furthermore, SCG is satisfactorily meeting its obligations to its current customers and projects to meet the obligations of its future customers. As such, SCG's existing infrastructure and storage supplies are well-prepared for the long-term forecasts. Also, as the Project would be infill redevelopment, there is already a natural gas connection point; expansion for local distribution infrastructure would not be required and capacity-enhancing alterations to existing facilities would be highly unlikely. However, in the event SCG cannot provide service from the existing infrastructure, a system analysis would be conducted by SCG to determine the best method to provide service and appropriate actions such as pressure betterments may be initiated to resolve the issue. Thus, any corrective action, albeit unlikely, would be minimal and temporary, and would not result in any adverse environmental impacts. Therefore, impacts would be less than

62 California Gas and Electric Utilities, 2022 California Gas Report, page 115.
63 California Gas and Electric Utilities, 2022 California Gas Report, page 120.
64 California Gas and Electric Utilities, 2022 California Gas Report, page 186.
65 CalEEMod Data Sheets prepared for the Air Quality/Greenhouse Gas Analysis. Refer to **Appendix D** of this Categorical Exemption.
66 1 cubic foot of natural gas provides approximately 1.037 kBTU of heat. 1,519,680 kBTU per year / 1.037 = 1,465,458 cubic feet per year / 365 days = 4,015 cubic feet per day.

significant, and the Project Site can be adequately served by natural gas facilities and infrastructure.

(g) Electrical Power

LADWP provides electrical service to the City, including the Project Site. On January 13, 2017, LADWP adopted the 2017 Power Integrated Resource Plan (IRP), which provides a 20-year roadmap to guide LADWP in meeting future energy needs by forecasting demand for energy and determine how that demand will be met by executing new projects and replacement projects and programs. In April 2018, LADWP approved the expansion of the IRP into the Power Strategic Long-Term Resource Plan (SLTRP),[67] which increased the planning horizon from 20 years ending in 2037 through 2050, in order to better align with Statewide GHG emissions goals and align with the City's 100 percent clean energy initiative. The SLTRP lays out alternative strategies for meeting LADWP's regulatory requirements and environmental policy goals for increasing renewable energy and reducing GHG emissions, while maintaining power reliability. The SLTRP provides detailed analysis and results of the updated Power SLTRP resource cases, which investigated the economic and environmental impact of increased Renewable Portfolio Standard (RPS), local solar, energy storage, and various levels of transportation electrification within a 20-year horizon. LADWP generates power from a variety of different sources that include renewable energy, hydroelectric, natural gas, nuclear energy, and other fuel sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. Of the approximately 8,075 MW of net dependable generating capacity available to LADWP,[68] approximately 36.7 percent of LADWP's 2020 electricity purchases were from renewable sources, meeting the statewide RPS requirement to procure at least 33 percent of their energy portfolio from renewable sources by 2020. Furthermore, LADWP is committed to meeting the requirement of the RPS Enforcement Program to use at least 50 percent of the state's energy from renewables by 2030.[69] The current sources procured by LADWP include wind, solar, and geothermal sources. Additionally, LADWP is on track to meet 65 percent or more energy from renewable sources by 2036 through the commission of large-scale solar projects (Moapa Southern Paiute Solar, Copper Mountain 3 Solar), expansion of customer-owned rooftop and ground-mounted solar projects, and construction of a new geothermal project in Imperial County.[70]

LADWP forecasts that its total energy sales in the 2025–2026 fiscal year (the Project's buildout year) will be 23,537 GWh of electricity, 8,258 GWh of which will be to residential uses.[71] The estimated electrical demand of the Project was calculated by CalEEMod to be approximately 838,163 kilowatt-hours (kWh) per year.[72] As such, the Project would represent a negligible

[67] Los Angeles Department of Water and Power, 2017 Power Strategic Long-Term Resource Plan, December 2017.
[68] LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix F.
[69] City of Los Angeles, Department of Water and Power, Renewables Portfolio Standard.
[70] City of Los Angeles, Department of Water and Power, News Releases, LADWP Achieves 25 Percent Renewable Energy Milestone.
[71] LADWP defines its future electricity supplies in terms of sales that will be realized at the meter. LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017, Appendix A, Table A-1, p. A-6.
[72] CalEEMod Data Sheets prepared for the Air Quality/Greenhouse Gas Analysis. Refer to **Appendix D** of this Categorical Exemption.

percentage of LADWP's total and residential sector electrical demands. Therefore, new or expanded electrical generation or transmission infrastructure would not be required. Furthermore, LADWP routinely plans capacity additions and changes at existing and new facilities as needed to supply area load based on consideration of projects within the City that may affect energy demand, including residential development, such as the Project. Accordingly, the Project's electrical consumption would be part of the total load growth forecast for the LADWP service area and accounted for in the planned growth of the City's power system. In addition, as the Project would be infill redevelopment, there is already an electrical power connection point, and new or expanded local distribution and delivery infrastructure would not be required, nor would capacity-enhancing alterations to existing facilities be required from Project implementation. The installation of any on-site electrical equipment (wiring, meters, etc.) would be a temporary, localized action part of normal residential development and would not result in any adverse environmental impacts. Coordination with LADWP prior to connection to the local system would be required and would avoid service disruption to existing users in the vicinity. Therefore, impacts would be less than significant, and the Project Site can be adequately served by electrical facilities and infrastructure.

2) Public Services

(a) Fire Protection

LAFD considers fire protection services for a project to be adequate if a project is within the maximum response distance for the land use proposed. Pursuant to LAMC Section 57.507.3.3, the maximum response distances for high-density residential land uses (which is likely the most appropriate land use category for the Project) is 1.5-mile from an LAFD fire station that houses an engine company, and 2 miles from a station that houses a truck company. If these distances are exceeded, the project in question would be required to install automatic fire sprinkler systems. The Project would be served primarily by Fire Station No. 86, located at 4305 Vineland Avenue, approximately 1.5 roadway mile northeast of the Project Site.[73] Fire Station No. 86 includes Engine 86, EMS Rescue 86 (ALS), and a Foam Tender.[74] As such, the Project Site is located within the maximum response distances for an LADF engine company and would include a building sprinkler systems.

In addition to response distances, the adequacy of fire protection is also based upon the required fire flow, equipment access, and LAFD's safety requirements regarding needs and service for the area. The required fire flow necessary for fire protection varies with the type of development, life hazard, occupancy, and the degree of fire hazard. Pursuant to LAMC Section 57.507.3.1, City-established fire flow requirements vary from 2,000 gpm in low-density residential areas to 12,000 gpm in high-density commercial or industrial areas. In any instance, a minimum residual water pressure of 20 pounds per square inch (PSI) is to remain in the water system while the required gpm is flowing. LAMC Section 57.507.3.3 identifies a fire flow requirement of 4,000 gpm for high density residential projects such as the Project. The adequacy of existing water pressure and availability in the Project area with respect to required fire flow would be confirmed by LAFD during

[73] City of Los Angeles Fire Department website, Find Your Station, https://www.lafd.org/fire-stations/station-results. Accessed June 2023.

[74] California Fire and EMS, http://www.cafirefighters.com/lafd.htm. Accessed June 2023.

the plan check review process. As part of the normal building permit process, the Project would be required to upgrade water service laterals, meters, and related devices, as applicable, in order to provide required fire flow; however, no new water facilities are anticipated. Moreover, such improvements would be conducted as part of the Project either on-site or off-site within the right-of-way, and as such, the construction activities would be temporary and not result in any significant environmental impacts.

LAMC Section 57.507.3.2 addresses land use-based requirements for fire hydrant spacing and type. Land uses in the High Density Residential and Neighborhood Commercial category require one hydrant per 100,000 square feet of land with 300 to 450-foot distances between 2.5-inch by 4-inch or 4-inch by 4-inch double fire hydrants. Regardless of land use, every first story of a residential, commercial, and industrial building must be within 300 feet of an approved hydrant. The Project would implement City Building and Fire Code requirements regarding Project components including, but not limited to, structural design, building materials, site access, clearance, hydrants, fire flow, storage and management of hazardous materials, alarm and communications systems, and building sprinkler systems. Compliance with these requirements would be demonstrated as part of a plot plan that would be submitted to LAFD for review and approval prior to issuance of a building permit in accordance with City regulations. Compliance with applicable City Building Code and Fire Code requirements would be demonstrated as part of LAFD's fire/life safety plan review and LAFD's fire/life safety inspection for new construction projects, as set forth in Section 57.118 of the LAMC, prior to the issuance of a building permit. Construction activities to install any new pipes or pumping infrastructure would be temporary and of short duration and would not result in any significant environmental impacts.

Emergency vehicle access to the Project Site would continue to be provided from local roadways. All improvements proposed would comply with the Fire Code, including any additional access requirements of LAFD. Additionally, emergency access to the Project Site would be maintained at all times during both Project construction and operation pursuant to the Worksite Traffic Control Plan that would be prepared for the Project and approved by the City.

Therefore, for the reasons stated above, impacts related to fire protection services would be less than significant, and the Project Site can be adequately served by fire protection services.

(b) Police Protection

The Project Site is served by the City of Los Angeles Police Department's (LAPD) North Hollywood Community Police Station, which is located at 11640 Burbank Boulevard, approximately 2.8 roadway miles northwest of the Project Site.[75] The North Hollywood Community Police Station's boundaries include more than 220,000 people and covers 25 square miles. The North Hollywood Community Police Station is under the jurisdiction of LAPD's Valley Bureau.[76]

[75] City of Los Angeles Police Department website, Find Your Community, https://www.lapdonline.org/lapd-contact/valley-bureau/north-hollywood-community-police-station/?zip=4260%20arch%20Drive%20studio%20city%2091604. Accessed June 2023.

[76] City of Los Angeles Police Department, Valley Bureau, North Hollywood Community Police Station, https://www.lapdonline.org/lapd-contact/valley-bureau/north-hollywood-community-police-station/?zip=4260%20arch%20Drive%20studio%20city%2091604. Accessed June 2023.

(i) Construction

Construction sites, if not properly managed, have the potential to attract criminal activity (such as trespassing, theft, and vandalism) and can become a distraction for local law enforcement from more pressing matters that require their attention. However, as required by the City as a regulatory compliance measure, the Project would employ construction safety features including erecting temporary fencing along the periphery of the active construction areas to screen as much of the construction activity from view at the local street level and to deter trespassing, vandalism, short-cut attractions, potential criminal activity, and other nuisances. Therefore, potential impacts to police protection services during the construction of the Project would be less than significant, and the Project Site can be adequately served by police protection services during construction.

(c) Operation

Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons could be anticipated to increase as a result of the increased on-site activity and increased traffic on adjacent streets and arterials. The Project would include adequate and strategically positioned 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 Project would also include nighttime security lighting and secure parking facilities. Additionally, 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's 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 that LAPD would otherwise receive. In light of these features, it is anticipated that any increase in demands upon police protection services would be relatively low, and not necessitate the construction of a new police station, the construction of which could potentially cause environmental impacts. Therefore, potential impacts to police protection services during the operation of the Project would be less than significant, and the Project Site can be adequately served by police protection services during operation.

(d) Schools

The Project is in an area that is currently served by several Los Angeles Unified School District (LAUSD) public schools, as well as several private schools and after-school programs. The LAUSD jurisdiction encompasses an area of 710 square miles and serves approximately 570,000 students and operates over 1,400 schools.[77] The LAUSD is divided into four local districts and the Project Site is located within Local District North.[78]

The following LAUSD schools currently serve the Project Site:

- Rio Vista Elementary (UTKindergarten-5th grade): located 0.5 mile northeast at 4243 Satsuma Avenue,

[77] Los Angeles Unified School District Fingertip Facts, 2022-2023.
[78] Los Angeles Unified School District, LAUSD Maps, https://achieve.lausd.net/domain/34. Accessed: June 2023.

- Walter Reed Middle School Magnet (grades 6-8): located 1.1 miles northwest at 4525 Irvine Avenue, and
- North Hollywood Senior High (grades 9-12): located 1.9 miles east at 5231 Colfax Avenue.[79]

It should be noted that State-mandated open enrollment policy enables students anywhere in LAUSD to apply to any regular, grade-appropriate LAUSD school with designated "open enrollment" seats. The number of open enrollment seats is determined annually. Each individual school is assessed based on the principal's knowledge of new housing and other demographic trends in the attendance area. Open enrollment seats are granted through an application process that is completed before the school year begins. Students living in a particular school's attendance area are not displaced by a student requesting an open enrollment transfer to that school.

The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to address a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits, and subdivisions. SB 50 is deemed to fully address school facilities impacts, notwithstanding any contrary provisions in CEQA or other State or local law.

To reduce any potential population growth impacts on public schools, the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of facilities (pursuant to California Education Code Section 17620(a)(1)). The LAUSD prepares Developer Fee Justification Studies for to support the school district's levy of the fees authorized by Section 17620 of the California Education Code, with the most recent study prepared in March 2022.[80] The Project would be required to pay the appropriate fees, based on the square footage, to LAUSD. Therefore, as payment of appropriate school fees to LAUSD is required by law and considered to fully address impacts, impacts would be less than significant, and the Project Site can be adequately served by school facilities.

(e) Parks and Recreation

The City of Los Angeles Department of Recreation and Parks (LADRP) manages all municipal recreation and park facilities within the City. The following parks and recreational facilities are available to serve the Project Site:[81]

Neighborhood Parks (between 5 and 10 acres in size) within a two-mile radius

- Woodbridge Park, located at 11240 Moorpark Street
- Moorpark Park, located at 12061 Moorpark Street
- Beeman Park, located at 12621 Rye Street
- El Paseo De Cahuenga Park, located at 3300 De Cahuenga Boulevard

[79] Los Angeles Unified School District, Explore, https://explorelausd.schoolmint.net/school-finder/home. Accessed: June 2023.
[80] Los Angeles Unified School District, Developer Fee Justification Study, March 2022.
[81] *Los Angeles Department of Recreation and Parks website, Facility Map Locator.*

Community Parks (between 15 and 20 acres in size) within a two-mile radius

- North Weddington Recreation Center, located at 10844 Acama Street
- South Weddington Park, located at 10600 Valleyheart Drive
- Valley Village Park, located at 5000 Westpark Drive
- North Hollywood Recreation Center, located at 5015 Tujunga Avenue

Regional Parks (50+ acres in size) within a two-mile radius

- Wilacre Park, located at 3431 Fryman Road
- Coldwater Canyon Open Space, located at 8260 Mulholland Drive

The Project would construct 129 multi-family residential units, which is estimated to generate approximately 311 residents.[82] The Project is located in an area of the City that is below the City's recommended long-range ratio for neighborhood and community park acreage. Specifically, the City's Public Recreation Plan recommends achievement of a ratio of 2 acres of neighborhood parks per 1,000 people and 2 acres of community parks per 1,000 people. As described in the Public Recreation Plan, these guidelines are Citywide goals, and are not intended to be requirements for individual development projects.

Based on the standard minimum parkland-to-population ratio provided in the City's General Plan Framework Element (i.e., 2 acres per 1,000 residents), the Project would generate a need for approximately 0.62-acre of public parkland (neighborhood and community parks). Similarly, based on LADRP's long-range minimum parkland-to-population ratio provided in the Public Recreation Plan (i.e., 4 total acres of neighborhood and community parks per 1,000 residents), the Project would generate a need for approximately 1.24 acres of public parkland. Specifically, in the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan Area, the Project's increase in on-site population would increase the demand on park and recreational facilities.

Consistent with the LADRP's recommended strategy to help alleviate the burden on existing park and recreational facilities, the Project would provide approximately 13,800 square feet of open space including a recreation room, two fitness centers, a common open space with pool area, and private balconies. These recreational amenities would help relieve stress on the City's existing park system. Even so, the Project would result in an increase in the use of parks and recreational facilities that may not have the capacity to serve residents. However, this impact would be reduced to a less than significant level through the payment of the park fees as required by LAMC Section 12.33. LADRP would collect these park fees based on their current rate and fee schedule. The City requires park fees to reduce the park- and open space-related impacts of new residential development projects, and requires these fees to be paid before a Certificate of Occupancy can be issued. Therefore, through provision of on-site open space and payment of required park fees, impacts would be less than significant, and the Project Site can be adequately served by park facilities.

[82] *Based on a Citywide factor of 2.41 residents per dwelling unit. Jack Tsao, Data Analyst II, Los Angeles Department of City Planning.*

(f) Libraries

Los Angeles Public Library (LAPL) provides library services to the City. The nearest LAPL libraries to the Project Site include:

- Studio City Branch Library, located at 12511 Moorpark Street
- Buena Vista Branch Library, located at 300 N. Buena Vista Street

On March 8, 2011, City voters approved ballot Measure L, which amends the City Charter to incrementally increase the amount the City is required to dedicate annually from its General Fund to LAPL to an amount equal to 0.03 percent of the assessed value of all property in the City, and incrementally increase LAPL's responsibility for its direct and indirect costs until it pays for all of its direct and indirect costs. The measure was intended to provide 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.[83] Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs.[84]

LAPL's existing service level would be maintained without an additional library or alterations to the existing libraries. The demand for library materials could be accommodated by the over six million books, audiobooks, periodicals, DVDs, and CDs throughout the LAPL system. The LAPL also offers many other services, including but not limited to, visual collections, e-media, web resources, research guides, and government document locator. Therefore, Project impacts to library facilities would be less than significant, and the Project Site can be adequately served by library facilities.

(g) Condition (e) Conclusion

As demonstrated above, the Project Site can be adequately served by all required utilities and public services. Therefore, the Project meets Categorical Exemption Condition (e).

b) Conditions Consistency Conclusion

As demonstrated above, the Project would be consistent with the applicable General Plan designations and policies and applicable zoning designations and regulations; would occur within City limits on a site less than five acres surrounded by urban uses; would occur on a site that has no value as habitat for endangered, rare, or threatened species; would not result in significant effects related to traffic, noise, air quality, or water quality; and would be adequately served by all required utilities and public services. Therefore, the Project meets all five conditions enumerated for a Class 32 Categorical Exemption under CEQA.

[83] Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L.

[84] Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L, http://clkrep.lacity.org/onlinedocs/2011/11-1100-S2_rpt_cao_11-16-10.pdf. Accessed June 2023.

4. PROJECT ANALYSIS OF EXCEPTIONS

a) Exceptions to a Categorical Exemption

[State CEQA Guidelines Section] 15300.2. Exceptions

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

(b) Cumulative Impact. 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.

(c) Significant Effect. 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.

(d) 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. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

(f) 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.

Exception (a): Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

This exception does not apply to the Project as the Project is seeking a Class 32 Categorical Exemption. Nonetheless, the Project would not impact an environmental resource of hazardous or critical concern (see also the discussion for Exception [e]), below). As discussed under Condition (c), above, the Project Site does not contain any habitat capable of sustaining any species identified as endangered, rare, or threatened. Therefore, Categorical Exemption Exception (a) is not applicable to the Project.

Exception (b): Cumulative Impact. 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.

Cumulative impacts are two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts (State CEQA Guidelines Section 15355). Cumulative impacts may be analyzed by considering a list of past, present, and probable future projects producing related or cumulative impacts (State CEQA Guidelines Section 15130[b][1][A]). An overview of each impact discussion is provided below, and as shown, the Project would not result in any Project-specific significant impacts, and would not have any impacts that are individually limited but cumulatively considerable. The related projects specifically included in the cumulative impacts analyses can be found in Appendix G of the Transportation Assessment (see **Appendix B** to this document).

1) Local Land Use Plans and Zoning

Development of related projects is reasonably anticipated to occur in accordance with adopted plans and regulations. It is also reasonably anticipated that most of related projects would be compatible with the zoning and land use designations of each related project site and its existing surrounding uses. In addition, it is reasonable to assume that related projects under consideration in the surrounding area would implement and support local and regional planning goals and policies. Therefore, cumulative land use impacts would be less than significant.

2) Endangered, Rare, or Threatened Species

The Project Site is located in an urbanized area. However, it is unknown whether or not any of the properties on which related projects may be located contain biological resources, such as sensitive species that may be listed at the federal or State level as endangered, rare, or threatened. Nonetheless, as the Project would not result in a potentially significant impact to listed species or habitat, there is no potential for the Project to contribute to a cumulative impact.

3) Transportation

Pursuant to the TAG, each of the plans, programs, ordinances, and policies to assess potential conflicts with proposed projects are reviewed to assess cumulative impacts that may result from the Project in combination with other nearby development projects. A cumulative impact could occur if the Project, with other future development projects located on the same block were to cumulatively preclude the City's ability to serve transportation user needs as defined by the City's transportation policy framework. Note that any other land development projects would be individually responsible for complying with the City's transportation plans, programs ordinances and policies. The Project does not have a significant transportation impact under CEQA Threshold T-1 (Conflicting with Plans, Programs, Ordinances, or Policies).

Cumulative VMT impacts are evaluated through a consistency check with the Southern California Association of Governments' (SCAG) Regional Transportation Plan/Sustainable Communities

Strategy (2016-2040 RTP/SCS) plan.[85] The RTP/SCS is the regional plan that demonstrates compliance with air quality conformity requirements and GHG reduction targets.

Per the City's TAG, projects that are consistent with the RTP/SCS plan in terms of development location and density are part of the regional solution for meeting air pollution and GHG goals. Projects that have less than a significant VMT impact are deemed to be consistent with the SCAG's 2016-2040 RTP/SCS and would have a less-than-significant cumulative impact on VMT.

As shown in the Transportation Analysis (see **Appendix B**), the Project VMT impact would not exceed the City's South Valley APC VMT impact thresholds and as such, the Project's contribution to the cumulative VMT impact is adequate to demonstrate there is no cumulative VMT impact that would preclude the City's ability to provide transportation mobility in the area.

Based on the Transportation Analysis evaluation of the CEQA thresholds, the Project does not create a significant transportation impact.

Therefore, no cumulative land development impacts have been identified that would preclude the City's ability to provide transportation mobility in the area. As such, the Project will not create any cumulative CEQA transportation impact.

4) Noise

Development of the Project in combination with related projects in the vicinity of the Project Site could result in an increase in construction noise in an already urbanized area of the City. There is only one related project within approximately 500 feet of the Project Site: a commercial project with 1,581 square feet of retail and 37,079 square feet of commercial market located at 11263 Ventura Boulevard, approximately 528 feet west from the Project Site. With respect to construction impacts, it is unknown whether any potential nearby projects would have overlapping construction schedules with the Project. However, as with the Project, any nearby project that could be built simultaneously with the Project would be required to meet the same LAMC requirements regarding construction noise levels. Specifically, construction of all projects would be subject to LAMC Section 41.40, which limits the hours of allowable construction activities. To comply with this and all applicable code standards, nearby development projects, much like the Project, would be required to implement best practices and/or project design features (as needed) to reduce construction noise levels. Accordingly, while concurrent construction of nearby projects in the vicinity of the Project Site could potentially contribute to cumulative increases in ambient noise levels, because the Project would not result in any significant construction noise increases, it would not result in a cumulatively considerable contribution to any such increase. Therefore, potential construction-related noise impacts would not be cumulatively significant.

[85] Updated Transportation Assessment for Multi-Family Residential Development, Located at Ventura Boulevard and Arch Drive in the City of Los Angeles, prepared by Overland Traffic Consultants, Inc., April 2022 (found in **Appendix B** of this document). LADOT issued an assessment letter for the Transportation Assessment on February 18, 2020, accepting the findings of the study. Therefore, although the RTP/SCS has since been updated, references herein remain consistent with the Transportation Assessment, as approved.

Cumulative operational noise impacts would occur primarily as a result of increased traffic on local roadways due to the Project and related projects within the study area. As discussed above, the Project would not add a significant amount of traffic to area roadways and would not result in a 3dBA increase in traffic noise in the Project Vicinity. Therefore, the Project is not anticipated to make a cumulatively considerable contribution to a cumulative noise impact associated traffic noise sources.

Operation of the Project in combination with other projects that could potentially be developed nearby could result in an increase in operational or mobile noise in this urbanized area of the City. However, as described above, mobile and long-term noise impacts from Project operations would be negligible, as building operations and human activities inside and outside the Project would generate minimal noise impacts. The closest related project is located at 11263 Ventura Boulevard, approximately 528 feet from the Project Site, at this distance, the noise generated by operations on-site at this location would be inaudible at the Project Site. The Project is not anticipated to significantly add to the cumulative noise environment. Specifically, on-site parking would be located in the subterranean parking levels and therefore noise from parking would not generally be heard outside of the property. Noise from use of the pool deck area and private balconies would be imperceptible at off-site receptor locations and will also be less than significant. Thus, Project operations would not result in a meaningful increase in noise as measured at the property line of surrounding sensitive uses compared to existing conditions. Moreover, as with the Project, other developments in the vicinity of the Project would be required to comply with the City's extensive regulatory requirements that limit operational noise sources to minimal levels. Accordingly, as the Project would not produce any significant operational noise impacts, it would not result in a cumulatively considerable contribution to any significant operational noise impacts. As such, cumulative on-site operational noise impacts would be less than significant.

5) Air Quality

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. Individual projects that generate emissions not in excess of SCAQMD's significance thresholds would not contribute considerably to any potential cumulative impact. 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 described above, the Project would not generate any regional or localized emissions that exceed SCAQMD's thresholds; therefore, the Project would not contribute to a cumulatively considerable increase in emissions for the pollutants which the Basin is in nonattainment, and cumulative air quality impacts would be less than significant.

6) Water Quality

With respect to construction impacts, it is unknown whether any related projects would have overlapping construction schedules with the Project. However, water quality impacts are project-specific and would generally be limited to the related project sites. Additionally, similar to the

Project, related projects would be required to comply with the City Building Code, NPDES requirements, etc. Assuming compliance with these regulatory requirements, similar to the Project, the cumulative water quality impact during construction would be less than significant.

With respect to operational impacts, development of the Project in combination with related projects would result in the further infilling in an already developed area. The Project Site and the surrounding area are served by the existing City storm drain system. Runoff from the Project Site and the adjacent land uses is typically directed into the adjacent streets, where it flows to the drainage system. There is one related project within approximately 500 feet of the Project Site: a commercial project with 1,581 square feet of retail and 37,079 square feet of commercial market located at 11263 Ventura Boulevard, approximately 528 feet west from the Project Site. It is likely that this related project would also drain to the surrounding street system or otherwise retain stormwater on-site as all projects would comply with existing stormwater/LID requirements, which would ensure impacts are less than significant.

The runoff associated with related projects would either be directed in non-erosive drainage devices to landscaped areas or directed to an existing storm drain system and would not encounter exposed soils. Related projects would include a drainage system with pipes that would adequately convey surface water runoff into the existing storm drain or the on-site cisterns. Additionally, related projects would be required to implement BMPs and to conform to the existing NPDES water quality program. Therefore, cumulative hydrology and water quality impacts during operation would be less than significant.

7) Utilities

(a) Water

Implementation of the Project in combination with related projects within the service area of LADWP would generate demand for additional water supplies. In terms of the City's overall water supply condition, the water demand for any project that is consistent with the City's General Plan and long-range SCAG growth projections has been accounted for in the adopted 2020 UWMP. The 2020 UWMP anticipates that the future water supplies would be sufficient to meeting existing and planned growth in the City to the year 2045 (the planning horizon required of 2020 UWMPs) under wet and dry year scenarios. The Project would be consistent with the Project Site's Community Plan land use designation as well as SCAG growth projections, and therefore, has been accounted for in the 2020 UWMP and its water demand would not be cumulatively considerable. Related projects as well as other development in the LADWP service area will be required to comply with current Green Building Code requirements to conserve water, and in addition, larger projects with over 500 residential units would have to prepare a Water Supply Assessment (pursuant to SB 610) to be reviewed and certified by LADWP to demonstrate adequate water supply. Therefore, because the 2020 UWMP forecasts adequate water supplies to meet all projected water demands in the City through the year 2045, significant cumulative impacts with respect to water supply are not anticipated from the development of the Project and related projects.

With respect to water treatment facilities, the remaining daily treating capacity of the LAAFP is 600 mgd. Therefore, the LAAFP would have adequate capacity to serve the additional water

demanded by the Project (which would consume 0.018 mgd) and, as such, the Project's and related projects' demand would not be cumulatively considerable.

Development of the Project and future new development in the vicinity of the Project Site would cumulatively increase demands on the existing water infrastructure system. Similar to the Project, related projects would be subject to LADWP review to assure the existing public infrastructure would be adequate to meet the domestic and fire water demands of each project and individual projects would be subject to LADWP and City requirements regarding infrastructure improvements needed to meet respective water demands, flow and pressure requirements. Furthermore, LADWP through the five-year updates of the LADWP 2020 UWMP, Los Angeles Department of Public Works, and the LAFD project specific checks would conduct on-going evaluations of its infrastructure. Therefore, the cumulative impact would be less than significant.

(b) Wastewater

Implementation of the Project in combination with related projects within the service area of the HTP would generate additional wastewater that would be treated at HTP. Currently, the HTP has an average daily flow of 260 mgd; however, the HTP has capacity to treat a maximum daily flow of 450 mgd. This equals a typical remaining capacity of 190 mgd of wastewater able to be treated at the HTP. Therefore, the HTP would have adequate capacity to serve the additional wastewater demanded by the Project (0.018 mgd) and, as such, the Project's demand would not be cumulatively considerable.

With respect to wastewater infrastructure in the City, under the rules and regulations established in the City's Sewer Allocation Ordinance (Ordinance No. 166,060), the Bureau of Sanitation assesses the anticipated wastewater flows from development projects at the time of connection, and makes the appropriate decisions on how best to connect to the local sewer lines at the time of construction. The applicants of related projects will be required to submit a Sewer Capacity Availability Request to verify the anticipated sewer flows and points of connection and to assess the condition and capacity of the sewer lines receiving additional sewer flows from the Project and other cumulative development projects. If it is determined that the sewer system in the local area has insufficient capacity to serve a particular development, the developer of that project would be required to replace or build new sewer lines to a point in the sewer system with sufficient capacity to accommodate that project's increased flows. Each project would be evaluated on a case-by-case basis and would be required to consult with the Bureau of Sanitation (for projects within the City) and comply with all applicable City and State water conservation programs and sewer allocation ordinances. Therefore, the cumulative impact would be less than significant.

(c) Solid Waste

Implementation of the Project in combination with related projects within the Southern California region that are serviced by area landfills will increase regional demands on landfill capacities. Construction of the Project and related projects generate C&D waste, resulting in a cumulative increase in the demand for inert (unclassified) landfill capacity. Given the requirements of the Citywide C&D Debris Recycling Ordinance (Ordinance No. 181,519), which requires all mixed C&D waste generated within City limits be taken to a City-certified C&D waste processor, it is anticipated that future cumulative development within the City would also implement similar

measures to divert C&D waste from landfills. Furthermore, as described above, the Sunshine Canyon Landfill and the Azusa Land Reclamation Landfill both have sufficient capacity to accommodate the Project and related project's, and, as such, the cumulative waste generation would not be considerable. Therefore, cumulative impacts from the C&D waste would be less than significant.

Operation of the Project in conjunction with related projects would generate municipal solid waste and result in a cumulative increase in the demand for waste disposal capacity at Class III landfills. The countywide demand for landfill capacity is continually evaluated by Los Angeles County through preparation of the County Integrated Waste Management Plan Annual Reports. Each Annual Report assesses future landfill disposal needs over a 15-year planning horizon. As such, the 2020 Annual Report (published October 2021) projects waste generation and available landfill capacity through 2035. Based on the 2020 Annual Report, Los Angeles County has the projected disposal capacity through 2035.[86] The Project's estimated increase in operational solid waste generation, in conjunction with related projects, would represent an insignificant portion of the estimated waste that is anticipated to be generated in 2025 (Project build-out year) and beyond. The County will continually address landfill capacity through the preparation of Annual Reports. The preparation of each Annual Report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. Moreover, a State-mandated 75 percent landfill diversion rate was required by 2020, which reduces the amount of solid waste being landfilled for related projects. Therefore, cumulative impacts from operational solid waste would be less than significant.

(d) Natural Gas

Implementation of the Project, in conjunction with related projects, would increase demands for natural gas. Energy consumption by new buildings in California is regulated by the State Building Energy Efficiency Standards, embodied in Title 24 of the California Code of Regulations. The efficiency standards apply to new construction of both residential and non-residential buildings and regulate insulation, glazing, lighting, shading, and water- and space-heating systems. Building efficiency standards are enforced through the local building permit process. The City has adopted green building standards consistent with Title 24 as the LA Green Building Code. Similar to the Project, related projects and future development must also abide by the same statues, regulations, and programs that mandate or encourage energy conservation. SCG is also required to plan for necessary upgrades and expansion to its systems to ensure that adequate service will be provided for other projects. Specifically, SCG regularly updates its infrastructure reports as required by law. Development projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. Therefore, cumulative impacts are less than significant.

(e) Electrical Power

Implementation of the Project, in conjunction with related projects, would increase demands for electrical power. As discussed above, LADWP utilizes renewable energy sources, met the

[86] Los Angeles County Department of Public Works, Countywide Integrated Waste Management Plan, 2019 Annual Report, published September 2020.

requirement of the RPS Enforcement Program to use at least 33 percent of the State's energy from renewables by 2020, and is committed to meeting the requirement of the RPS Enforcement Program to use at least 50 percent of the state's energy from renewables by 2030. All new development in California is required to be designed and constructed in conformance with State Building Energy Efficiency Standards outlined in Title 24. It is possible that implementation of related projects could require the removal of older structures that were not designed and constructed to conform with the more recent and stringent energy efficiency standards. Thus, it is possible that with implementation of related projects that the resulting demand for electricity supply could be the same or less than the existing condition. Nonetheless, the SLTRP considers a planning horizon through 2050 to guide LADWP as it executes major new and replacement projects and programs. The estimated power requirement for related projects would be part of the total load growth forecast for the City and would be accounted for in the planned growth of power system. LADWP undertakes expansion or modification of electrical service infrastructure and distribution systems to serve future growth in the City as required in the normal process of providing electrical service. Any potential cumulative impacts related to electric power service would be addressed through this process. Electrical service to related projects would be provided in accordance with the LADWP Power Rules and Regulations. Therefore, cumulative impacts related to electricity supply and infrastructure would be less than significant.

8) Public Services

(a) Fire Protection

Development of the Project in combination with related projects would cumulatively increase the demand for fire protection services. Over time, LAFD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, trucks and engines, ambulances, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded fire station would be funded via existing mechanisms (e.g., property and sales taxes, government funding, and developer fees) to which the Project and related projects would contribute.

Moreover, all of the cumulative development would be reviewed by LAFD in order to ensure adequate fire flow capabilities and adequate emergency access. Compliance with LAFD, City Building Code, and Fire Code requirements related to fire safety, access, and fire flow would ensure that cumulative impacts to fire protection would be less than significant.

(b) Police Protection

It is anticipated that the Project in combination with related projects would increase the demand for police protection services. This cumulative increase in demand for police protection services would increase demand for additional LAPD staffing, equipment, and facilities over time. Similar to the Project, other projects served by LAPD would implement safety and security features according to LAPD recommendations. LAPD would continue to monitor population growth and land development throughout the City and identify additional resource needs including staffing, equipment, vehicles, and possibly station expansions or new station construction that may

become necessary to achieve the desired level of service. Through the City's regular budgeting efforts, LAPD's resource needs would be identified and monies allocated according to the priorities at the time. Any new or expanded police station would be funded via existing mechanisms (e.g., property and sales taxes and government funding) to which the Project and cumulative growth would contribute. Therefore, the cumulative impact on police protection services would be less than significant.

(c) Schools

As discussed above, payment of developer impact fees in accordance with SB 50 and pursuant to Section 65995 of the California Government Code would ensure that the impacts of the Project on school facilities would be less than significant. Similar to the Project, related projects would be required to pay school fees to the appropriate school district wherein their site is located. The payment of school fees would fully address any potential impacts to school facilities. Therefore, cumulative impacts would be less than significant.

(d) Parks and Recreation

As discussed above, the Project would result in a less than significant impact on parks and recreational facilities. Similar to the Project, the related projects would be required to pay Parks and Recreation Fees to the City for the construction of residential dwelling units pursuant to LAMC Section 12.33. The payment of fees would address potential impacts to park and recreational facilities. Moreover, as with the Project, related projects containing residential uses would be required to comply with the City's open space requirements which would help offset new residential demand for park and recreational facilities. Therefore, the cumulative impact would be less than significant.

(e) Libraries

Related projects within the City and with a residential component could generate additional residents who could increase the demand on library services. Essentially, the provision of library services is the responsibility of local government, which is typically financed through the City general funds. Library funding is now mandated under the City Charter to be funded from property taxes including those assessed against the Project, which would increase with the new development and be utilized for additional staff, books, computers, and other library materials. Therefore, combined with the LAPL standards for new development and the fees to help to pay for any improvements that the LAPL may do in the future impacts to library facilities would be less than significant. Therefore, the cumulative impact would be less than significant.

9) Exception (b) Conclusion

As no cumulatively significant impacts would result from the Project, Categorical Exemption Exception (b) is not applicable to the Project.

Exception (c): Significant Effect. 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.

There are no unusual circumstances with the Project Site or the Project that would create a reasonable possibility of significant effects to the environment. The Project Site is located within a highly urbanized setting, and the Site would be developed with a multi-family residential building with paved and landscaped surfaces, which is a typical urban land use appropriate for the area. Moreover, the Lead Agency has not determined an unusual circumstance is applicable to the Project. By deed-restricting 13 percent (17 dwelling units) of the proposed 129 dwelling units for Very Low Income Households, the Project would be consistent with the underlying zoning, as well as the City's Affordable Housing Incentive Program. Moreover, as analyzed in Exception (b), above, the Project would not result in any Project-specific or cumulative traffic, noise, air quality, greenhouse gas, or water quality impacts. The proposed land uses are consistent and compatible with the Project Site's urban setting and are typical for an infill development located near transit. Therefore, as there are no unusual circumstances regarding the Project or Project Site, Categorical Exemption Exception (c) is not applicable to the Project.

Exception (d): 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. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.

There are no State-designated scenic highways or highways eligible for scenic designation in the Project Site vicinity.[87] There are also no locally-designated scenic highways in the Project Site vicinity.[88] Therefore, as the Project Site is not located along a state- or City-designated scenic highway, Categorical Exemption Exception (d) is not applicable to the Project.

Exception (e): Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

California Government Code Section 65962.5 requires various State agencies to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells, and solid waste facilities where there is known migration of hazardous waste, and submit such information to the Secretary for Environmental Protection on at least an annual basis. 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.

87 California Department of Transportation, California State Scenic Highway System Map.
88 City of Los Angeles Department of City Planning, Mobility Plan 2035, Citywide General Plan Circulation System, Map A2 – Valley Subarea, September 2016.

The Project Site was not identified on any list compiled pursuant to Government Code Section 65962.5, which includes the California Department of Toxic Substances Control's (DTSC) EnviroStor database,[89] SWRCB's GeoTracker database,[90] and DTSC's current "Cortese" list. Therefore, construction and operation of the Project would not pose an environmental hazard to surrounding sensitive uses or the environment in regards to siting the Project on a known hazardous waste site or any other type of site appearing on a list compiled pursuant to Section 65962.5 of the Government Code. As such, Categorical Exemption Exception (e) is not applicable to the Project.

Exception (f): 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.

Section 15064.5 of the *State CEQA Guidelines* defines an 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 which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record.

A significant adverse effect would occur if a project were to adversely affect an historical resource meeting one of the above definitions. 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 Project Site does is not within a Historic Preservation Review area, nor is the Project Site within a Historical Preservation Overlay Zone.[91] The Project Site, which is currently vacant, is not identified as an eligible resource by Survey LA, the City's office historic resources survey;[92] or as a City Historic-Cultural Monument.[93] Moreover, the Project Site, which is currently vacant, is not listed as a historical resource in national or State registries.[94] Furthermore, the Project Site, which

[89] State Water Resources Control Board, GeoTracker, http://geotracker.waterboards.ca.gov. Accessed June 2023.
[90] California Department of Toxic Substances Control, Hazardous Waste and Substances Site List (Cortese), http://www.envirostor.dtsc.ca.gov/public/mandated_reports.asp. Accessed June 2023.
[91] City of Los Angeles Department of City Planning, Zone Information & Map Access System, http://zimas.lacity.org. Accessed June 2023.
[92] City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map, http://historicplacesla.org/map. Accessed June 2023.
[93] City of Los Angeles Department of City Planning, Historic-Cultural Monument (HCM) List, June 3, 2022.
[94] City of Los Angeles Department of City Planning, Office of Historic Resources, Historic Places LA online map, http://historicplacesla.org/map. Accessed June 2023.

is currently vacant, is not identified as an individual resource in Survey LA's Historic Resources Survey Report for the Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan Area.[95] As none of the existing buildings are eligible as individual historic resources or as contributing buildings to an eligible historic district, demolition of the buildings would not result in any direct or indirect adverse impacts to any historical resources. Therefore, implementation of the Project would not result in a substantial adverse change to an historic resource. As such, Categorical Exemption Exception (f) is not applicable to the Project.

5. CLASS 32 CATEGORICAL EXEMPTION CONCLUSION

As the Project meets all five conditions enumerated for a Class 32 Categorical Exemption under CEQA and none of the six exceptions are applicable, the Project therefore qualifies for a Categorical Exemption under CEQA. No further analysis is required.

[95] City of Los Angeles Department of City Planning, Office of Historic Resources, Survey LA Historic Resources Survey Report, Sherman Oaks - Studio City - Toluca Lake - Cahuenga Pass Community Plan Area, January 2013.