

## 2 SUSTAINABLE COMMUNITIES STRATEGY CRITERIA

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<b>PRC § 21155(a). Consistency with the general use designation, density, building intensity, and applicable policies specified for the project area in a sustainable communities strategy.</b>	<b>Consistent</b>	
	<b>Yes</b>	<b>No</b>
<p>The Southern California Association of Governments (SCAG) is the metropolitan planning organization for the Project area, and the applicable “sustainable communities strategy” is SCAG’s 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy (2020-2045 RTP/SCS), adopted on September 3, 2020.</p> <p>The 2020-2045 RTP/SCS, includes strategies for accommodating forecasted population, household and employment growth in the SCAG region by 2045, as well as a transportation investment strategy for the region. These land use strategies are directly tied to supporting related greenhouse gas (GHG) emissions reductions through increasing transportation choices with a reduced dependence on automobiles; an increase growth within walkable, mixed-use communities, and high quality transit areas (HQTAs); and by encouraging growth near destinations and mobility options, promoting diverse housing choices, leveraging technology innovations, supporting implementation of sustainability policies, and promoting a green region.</p> <p>As a Land Use Tool, the 2020-2045 RTP/SCS identifies Priority Growth Areas (PGAs) throughout the SCAG region where 2020-2045 RTP/SCS strategies can be fully realized. These PGAs include Job Centers, Transit Priority Areas (TPAs), HQTAs, Neighborhood Mobility Areas (NMAs), Livable Corridors, and Spheres of Influence. These PGAs account for only four percent of region’s total land area, but implementation of SCAG’s growth strategies will help these areas accommodate an estimated 64 percent of forecasted household growth and 74 percent of forecasted employment growth between 2016 and 2045. This more compact form of regional development, if fully realized, can reduce travel distances, increase mobility options, improve access to workplaces, and conserve the region’s resource areas.</p> <ul style="list-style-type: none"> <li>• Job Centers: Areas with denser employment than their surroundings. The Project would be located near the Downtown Los Angeles Job Center. The 2020-2045 RTP/SCS prioritizes employment growth and residential growth in existing Job Centers in order to leverage existing density and infrastructure. When growth is concentrated in or near Job Centers, the length of vehicle trips for residents can be reduced.</li> <li>• TPAs: Areas within one-half mile of a major transit stop that is existing or planned. According to the 2020-2045 RTP/SCS, focusing regional growth in areas with planned or existing transit stops is key to achieving equity,</li> </ul>	<b>X</b>	

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<p>economic, and environmental goals. Infill within TPAs can reinforce the assets of existing communities, efficiently leveraging existing infrastructure and potentially lessening impacts on natural and working lands. Growth within TPAs supports strategies outlined in the 2020-2045 RTP/SCS for preserving natural lands and farmlands and alleviates development pressure in sensitive resource areas by promoting compact, focused infill development in established communities with access to high-quality transportation.</p> <ul style="list-style-type: none"> <li>• <b>HQTAs:</b> Areas within one-half mile from major transit stops and high quality transit corridors. New developments should be context-sensitive, responding to the existing physical conditions of the surrounding area. Sensitively designed TODs can preserve existing development patterns and neighborhood character while providing a balance of housing choices.</li> <li>• <b>NMAs:</b> Areas that focus on creating, improving, restoring and enhancing safe and convenient connections to schools, shopping, services, places of worship, parks, greenways and other destinations. NMAs have robust residential to non-residential land use connections, high roadway intersection densities and low-to-moderate traffic speeds. NMAs can encourage safer, multimodal, short trips in existing and planned neighborhoods and reduce reliance on single occupancy vehicles. NMAs support the principles of center focused placemaking. Fundamental to neighborhood scale mobility in urban, suburban and rural settings is encouraging “walkability,” active transportation and short, shared vehicular trips on a connected network through increased density, mixed land uses, neighborhood design, enhanced destination accessibility and reduced distance to transit. Targeting future growth in these areas has inherent benefits to Southern California residents – providing access to “walkable” and destination-rich neighborhoods to more people in the future.</li> <li>• <b>Livable Corridors:</b> Livable Corridor land-use strategies include development of mixed-use retail centers at key nodes along corridors, increasing neighborhood-oriented retail at more intersections, applying a “Complete Streets” approach to roadway improvements and zoning that allows for the replacement of underperforming auto- oriented strip retail between nodes with higher density residential and employment. Livable Corridors also encourage increased density at nodes along key corridors, and redevelopment of single-story, under-performing retail with well-designed, higher density housing and employment centers.</li> </ul> <p>The 2020-2045 RTP/SCS identifies these PGAs on Exhibits 3.4 through 3.10, which are included in Appendix B. As shown on the figures, the Project Site is located near a Job Center; within the boundaries of a TPA, an HQTA, and a NMA; and along a Livable Corridor. (The Project Site is not within a Sphere of Influence.)</p> <p>The Project would be consistent with the general use designation, density, and building intensity set forth in the 2020-2045 RTP/SCS for each of these PGAs in that</p>	
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<p>the Project includes development of multi-family housing on an infill site near transit and sources of shopping and employment, leveraging existing density and infrastructure and reduce the length of vehicle trips for residents.</p> <p>Consistent with the land use policies for TPAs, the Project would constitute compact, focused infill development in an established community with access to high-quality transportation. Given the urban nature of the Project Site area, Project residents would be able to walk and bike to work and to shop. In addition, the Project Site’s location near robust transit opportunities (Metro Local Lines 30, 204, and Metro Rapid 754) would further reduce dependence on automobile travel, reducing the need to own an automobile and pay for parking.</p> <p>Consistent with the land use policies for HQTAs, the Project would also be context-sensitive and respond to the existing physical conditions of the surrounding area. The Project would preserve existing development patterns and neighborhood character by developing the Project on an infill site with residential uses within a residential neighborhood, while providing additional housing choices for residents.</p> <p>Consistent with the 2020-2045 RTP/SCS’s general use designation, density, and building intensity for NMAs and Livable Corridors, the Project would develop new multi-family residential uses in a destination-rich area with robust residential to non-residential land use connections and high roadway intersection densities. The Project would increase density near the Vermont Avenue and Pico Boulevard corridors. The Project would also encourage “walkability” by locating new housing near existing retail, transit, and employment. Also, the Project would include approximately 89 long-term bicycle parking stalls and 9 short-term bicycle parking stalls, which would encourage bicycling as a form of exercise and transportation.</p> <p>This type of transit-oriented residential development helps to reduce dependence on automobile travel and to reduce associated mobile-source GHG emissions. Thus, the Project is consistent with SCAG’s land use strategies related to reducing GHG emissions by encouraging growth near destinations and mobility options. As such, the Project would be consistent with the land use, density, and intensity of development specified in the 2020-2045 RTP/SCS for projects near Job Centers and in TPAs, HQTAs, NMAs, and along Livable Corridors.</p> <p>As such, the Project is consistent with this criterion.</p>		
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PRC §21155(b). To be considered a Transit Priority Project (TPP) as defined by §21155(b), the project must meet all of the following criteria. A TPP shall:	Consistent	
	Yes	No
<p><b>(1) Contain at least 50 percent residential use, based on total building square footage and, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75;</b></p> <p>The Project would construct a residential building and adaptively reuse an existing single-family residential building resulting in a total floor area of 114,376 square feet, consisting of 128 multi-family residential units and associated residential amenities. Thus, the Project contains 100 percent residential uses. As such, the Project is consistent with this criterion.</p>	<b>X</b>	
<p><b>(2) Provide a minimum net density of at least 20 dwelling units per acre; and</b></p> <p>The Project would develop an approximately 0.9-acre site with a residential building that includes 128 residential units. Thus, the net density for the Project is approximately 142 dwelling units per acre, which exceeds the required minimum of 20 units per acre. As such, the Project is consistent with this criterion.</p>	<b>X</b>	
<p><b>(3) Be within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan. A major transit stop is as defined in Section 21064.3, except that, for purposes of this section, it also includes major transit stops that are included in the applicable regional transportation plan. For purposes of this section, a high-quality transit corridor means a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. A project shall be considered to be within one-half mile of a major transit stop or high-quality transit corridor if all parcels within the project have no more than 25 percent of their area further than one-half mile from the stop or corridor and if not more than 10 percent of the residential units or 100 units, whichever is less, in the project are farther than one-half mile from the stop or corridor.</b></p> <p>PRC Section 21064.3 defines a major transit stop as “a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.”</p> <p>The nearest major transit stop to the Project Site is located approximately 420 feet southwest at the intersection of Pico Boulevard and Vermont Avenue, which is served by Metro Local Line 30 (along Pico), Metro Local Line 204 (along Vermont), and Metro Rapid Line 754 (also along Vermont). Each of these lines provide transit service at a frequency interval of 15 minutes or less during the morning and afternoon peak commute periods, as shown on Table 3-1 in the Traffic Assessment Report (refer to Appendix K). Additionally, as stated previously, the Project is also located within an HQTAs as defined by SCAG and a TPA as defined by SB 743. As defined by SCAG, HQTAs are areas within one-half mile of a fixed guideway transit</p>	<b>X</b>	

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<p>stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours. As such, the Project is consistent with this criterion.</p>		
<p><b>PRC §21155.1(a). The Transit Priority Project complies with all of the following environmental criteria:</b></p>	<p align="center"><b>Consistent</b></p>	
<p><b>(1) The Transit Priority Project and other projects approved prior to the approval of the Transit Priority Project but not yet built can be adequately served by existing utilities, and the Transit Priority Project applicant has paid, or has committed to pay, all applicable in-lieu or development fees.</b></p> <p>The Project Site is currently served by existing utilities, including water mains, sewer lines, and public storm drain lines maintained by the Los Angeles Department of Water and Power (LADWP) and the City’s Department of Public Works (Bureau of Sanitation). The Project would connect to the existing utility structures, as explained in detail below.</p> <p><u>Water:</u> The water facilities required to serve the Project Site include the existing extensive water distribution system operated by the LADWP as well local infrastructure to meet the needs of the Project Site. According to LADWP’s 2015 Urban Water Management Plan (2015 UWMP), the most recent plan available, LADWP has sufficient supply to meet a total water demand of 675,700 acre-feet per year (afy) by the year 2040. LADWP has programs to reduce the demand to 565,600 afy by 2040, a difference of 110,100 afy. As such, LADWP can provide the needed water from its existing system pursuant of the provisions in 2015 UWMP. Therefore, LADWP would not require added water supply to meet the demand from the Project.</p> <p>Regarding the local infrastructure, based on the results provided by LADWP within the Service Advisory Request (SAR) dated April 9, 2020 (included as Exhibit 2 to the <i>Utility Infrastructure Technical Report: Water</i>, which is attached as Appendix D1), the existing 8-inch water main line in Menlo Avenue would have sufficient capacity to serve the Project’s estimated net demand of 18,063 gallons of water per day. As shown by the SAR and through compliance with LAFD and LADWP requirements, the Project’s fire-flow impacts to water infrastructure would be less than significant. Thus, there would be adequate capacity available to accommodate the required fire flows and domestic water demand generated by the Project and the Project would not require the relocation or construction of new or expanded water facilities.</p> <p><u>Wastewater:</u> The Project would connect to the existing 8-inch sewer line in Menlo Avenue. The wastewater from this line feeds into an 18-inch line along 11<sup>th</sup> Street, before discharging into a 21-inch sewer line on Dewey Avenue. According to the <i>Utility Infrastructure Technical Report: Wastewater</i> (refer to Appendix D2), given the current remaining capacity of the Hyperion Water Reclamation Plan (HWRP), the HWRP would have ample capacity to treat the Project’s wastewater generation of</p>	<p align="center"><b>X</b></p>	

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<p>0.015 million gallons per day (mgd), which would account for far less than one percent increase in demand at the HWRP.</p> <p>Additionally, based on the <i>Utility Infrastructure Technical Report: Wastewater</i>, capacities of sewer lines at 50 percent full were analyzed using FlowMaster software. The existing capacity of the upstream 8-inch sewer line in Menlo Avenue at 50 percent full is approximately 0.52 cubic feet per second (cfs). The existing capacity of the downstream 8-inch sewer also in Menlo Avenue at 50 percent full is approximately 0.74 cfs. The Project's net increase in sewage generation is approximately 15,025 gallons per day (approximately 0.0232 cfs). To be conservative, it is assumed that 100 percent of the sewer generation from the Project would go to the existing upstream sewer line in Menlo Avenue, which results in approximately 4.5 percent of the upstream pipe's half-full capacity and in approximately 3.1 percent of the downstream pipe's half-full capacity. For the closest impacted sewer for which the City's Bureau of Sanitation (BOS) was able to provide current gauging data, the 18-inch sewer main in Dewey Avenue, the estimated net increase represents less than half of a percent of its half-full capacity. Due to this fact and the findings from the Wastewater Services Information (WWSI) (refer to Exhibit 1 in Appendix D2), the Project would not require the relocation or construction of new or expanded wastewater facilities.</p> <p><u>Stormwater:</u> The Project Site is located in an urbanized area of the City. Under the existing condition, the Project Site is developed with three residential and classroom buildings and associated parking and landscaped areas. During a storm event, almost all stormwater that contacts the Project Site is directed to the existing storm drain system. Very little stormwater is absorbed into the ground at the Project Site.</p> <p>For the Project, the Project Applicant would be required to comply with the City's Low Impact Development (LID) Standards, and stormwater runoff from certain portions of the Project would be diverted to on-site bio-infiltration planters. Planter overflow and the remaining stormwater runoff would be directed to the existing storm drain system. The City would require that the Project be designed and constructed to minimize stormwater flows from the Project to not exceed existing flows. Thus, the Project's stormwater could be accommodated by existing drainage facilities.</p> <p><u>Electricity</u> Electricity supply to the Project Site is provided by LADWP. Currently, LADWP is able to supply over 7,880 megawatts (MW) of generation capacity with the highest recorded peak being 6,502 MW.<sup>1</sup> Peak demand is expected to grow to 5,933 MW in 2022-2023 (approximate Project buildout timeframe).<sup>2</sup> Despite these growth projections, demand would still not exceed the existing capacity of 7,880 MW. Thus, there is adequate supply capacity to serve the Project, as it is projected that the Project would consume approximately 506,890 kilowatt hours per year of electricity</p>	
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<sup>1</sup> LADWP, [https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?\\_adf.ctrl-state=12do6zwhm2\\_4&\\_afLoop=86275907941327](https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-factandfigures?_adf.ctrl-state=12do6zwhm2_4&_afLoop=86275907941327), accessed November 1, 2020.

<sup>2</sup> 2017 Power Strategic Long-Term Resource Plan, December 2017.

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<p>(refer to Appendix E1). Electrical conduits, wiring, and associated infrastructure would be conveyed to the Project Site from existing LADWP lines near the site. Thus, the Project's electricity needs could be accommodated via existing electricity infrastructure.</p> <p><u>Natural Gas</u> Natural gas supply to the Project Site is provided by the Southern California Gas Company (SoCalGas). Natural gas infrastructure near the Project Site includes a 2-inch line in Menlo Avenue. The Project would consume an estimated 1,761,746 cubic feet of natural gas per year (refer to Appendix E2).<sup>3</sup> Natural gas supply available to SoCalGas from California sources averaged 97 million cubic feet per day (cf/day) in 2019.<sup>4</sup> SoCalGas projects total natural gas demand to decrease at an annual rate of 1.0 percent per year through 2035. This decrease is due to modest economic growth, CPUC-mandated energy efficiency standards and programs, tighter standards created by revised Title 24 codes and standards, renewable electricity goals, the decline in commercial and industrial demand, and conservation savings linked to Advanced Metering Infrastructure (AMI). Thus, with natural gas consumption becoming more efficient and decreasing, SoCalGas's projection for natural gas demand also decreases. SoCalGas's storage fields have a combined theoretical storage working inventory capacity of 130 billion cubic feet. The Project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements. Thus, the Project's natural gas needs could be accommodated via existing electricity infrastructure.</p> <p>The Project would pay all applicable in-lieu or development fees pursuant to code requirements and conditions of Project approval. As such, the Project is consistent with this criterion.</p>		
<p><b>(2) The site of the Transit Priority Project does not contain wetlands or riparian areas and does not have significant value as a wildlife habitat, and the Transit Priority Project does not harm any species protected by the federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the Native Plant Protection Act (Chapter 10 (commencing with Section 1900) of Division 2 of the Fish and Game Code), or the California Endangered Species Act (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code), and the project does not cause the destruction or removal of any species protected by a local ordinance in effect at the time the application for the project was deemed complete.</b></p>	<p><b>X</b></p>	

<sup>3</sup> CalEEMod reports natural gas consumption in 1,000 British thermal units (kBtu). SoCalGas reports natural gas consumption in cubic feet (cf). For comparison purposes, the Project's natural gas consumption from the CalEEMod results has been converted into cf. One kBtu equals approximately 0.98 cf.

<sup>4</sup> 2020 California Gas Report, California Gas and Electric Utilities, October 2020.

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<p>The Project Site is located in an urbanized area of the City. The Project Site is currently developed with a three-story former single-family residential building (constructed 1911), a two-story classroom building (constructed 1967), a two-story multi-family residential building (constructed 1939), and a surface parking lot. The surrounding area is largely developed with mixed commercial and residential land uses, roadways, and utility infrastructure. No wetlands, riparian areas, or natural habitat that would support endangered, rare, or threatened species exists on the Project Site or in the areas surrounding the Project Site.</p> <p>There are five non-protected trees on the Project Site that would be removed as part of the Project.<sup>5</sup> (The Project includes 32 new trees.) Although the removal of non-protected tree species would not cause the destruction or removal of any species protected by a local ordinance, the removal of trees has the potential to impact nesting bird species, if they are present at the time of tree removal. Nesting birds are protected under the Migratory Bird Treaty Act (MBTA), as well as the regulations of the California Fish and Game Code, which prohibits take of all birds and their active nests. The removal the trees would occur in accordance with the MBTA and state and local requirements. Thus, the Project would not harm any species protected by the Federal Endangered Species Act of 1973 (16 U.S.C. Sec. 1531 et seq.), the Native Plant Protection Act (Chapter 10, commencing with Section 1900, of Division 2 of the Fish and Game Code), or the California Endangered Species Act (Chapter 1.5, commencing with Section 2050, of Division 3 of the Fish and Game Code). As such, the Project is consistent with this criterion.</p>		
<p><b>(3) The site of the Transit Priority Project is not included on any list of facilities and sites compiled pursuant to Section 65962.5 of the Government Code.</b></p> <p>Government Code Section 65962.5, amended in 1992, requires the California Environmental Protection Agency (CalEPA) to develop and update annually the Cortese List, which is a list of hazardous waste sites and other contaminated sites. While Government Code Section 65962.5 makes reference to the preparation of a list, many changes have occurred related to web-based information access since 1992, and information regarding the Cortese List is now compiled on the websites of different agencies. The California Department of Toxic Substances Control (DTSC) maintains a database (EnviroStor) that provides access to detailed information on hazardous waste permitted sites and corrective action, facilities, as well as existing site cleanup information. The Regional Water Quality Control Board (RWQCB) maintains a similar database (Geotracker). EnviroStor and Geotracker also provide information on investigation, cleanup, permitting, and/or corrective actions that are permitting, planned, being conducted, or have been completed under DTSC's and the RWQCB's respective oversight.</p>	<p><b>X</b></p>	

<sup>5</sup> *There are eight non-protected street trees located adjacent to the Project Site along Menlo Avenue. These trees would be preserved in place.*

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<p>The Project Site does not appear on any list compiled pursuant to Government Code Section 65962.5.<sup>6</sup> Thus, the Project would not create a hazard to the public or the environment as a result of being listed on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. As such, the Project meets this criterion.</p>		
<p><b>(4) The site of the Transit Priority Project is subject to a preliminary endangerment assessment prepared by a registered environmental assessor to determine the existence of any release of a hazardous substance on the site and to determine the potential for exposure of future occupants to significant health hazards from any nearby property or activity.</b></p> <p><b>(a) If a release of a hazardous substance is found to exist on the site, the release shall be removed or any significant effects of the release shall be mitigated to a level of insignificance in compliance with state and federal requirements.</b></p> <p><b>(b) If a potential for exposure to significant hazards from surrounding properties or activities is found to exist, the effects of the potential exposure shall be mitigated to a level of insignificance in compliance with state and federal requirements.</b></p> <p>A Phase I Environmental Site Assessment (Phase I ESA) was prepared for the Project Site by Stantec Consulting Services, Inc. (Stantec) on December 2, 2019 (refer to Appendix F). The purpose of the Phase I ESA was to identify any potential recognized environmental conditions (RECs), historic recognized environmental conditions (HRECs), and/or controlled recognized environmental conditions (CRECs) associated with the Project Site due to past or current use of the Project Site and/or off-site properties. In order to identify environmental conditions of the Project site, the Phase I ESA included a site inspection, interviews with parties familiar with the Project Site, historical research in the past uses of the site and an environmental records search with regard to the Project Site, adjoining and immediately surrounding properties, and the surrounding area. The Phase I ESA found that there are no RECs, HRECs, or CRECs associated with the Project Site or near the Project Site.</p> <p>Due to the age of the existing buildings on the Project Site, there is a potential for the buildings to contain asbestos-containing materials (ACMs) and lead-based paint (LBP). However, the Project Applicant would be required to comply with applicable regulations related to the abatement of ACMs and LBP. Specifically, in accordance with the South Coast Air Quality Management District’s (SCAQMD) Rule 1403 (Asbestos Emissions from Demolition/Renovation Activities), prior to demolition</p>	<p><b>X</b></p>	

<sup>6</sup> Department of Toxic Substances Control, <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress>, accessed June 1, 2020; State Water Resources Control Board, <https://geotracker.waterboards.ca.gov/map/?myaddress>, accessed June 1, 2020.

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<p>activities associated with the Project, the Project Applicant would be required by the City's Department of Building and Safety to conduct a survey of the existing areas where construction would occur to verify the presence or absence of any of these materials and conduct remediation or abatement before any disturbance occurs. Furthermore, the California Division of Occupational Safety and Health (Cal-OSHA) has established limits of exposure to lead contained in dusts and fumes through California Code of Regulations, Title 8, Section 1532.1, which provides for exposure limits, exposure monitoring, and respiratory protection, and mandates good working practices by workers exposed to lead, since demolition workers are at greatest risk of adverse health exposure. Lead-contaminated debris and other wastes must also be managed and disposed of in accordance with applicable provisions of the California Health and Safety Code. Mandatory compliance with these regulatory requirements would reduce any potential risks associated with ACMs and LBP to acceptable levels.</p> <p>For these reasons, the Project is consistent with these criteria.</p>		
<p><b>(5) The Transit Priority Project does not have a significant effect on historical resources pursuant to Section 21084.1.</b></p> <p>A Historical Resources Assessment Report was prepared for the Project by Historic Resources Group on April 6, 2020 (refer to Appendix G) and reviewed by the City of Los Angeles Office of Historic Resources, which concurred with the report's conclusions in an email dated April 8, 2020 (refer to Appendix G). The purpose of the report was to determine if historical resources as defined by CEQA are present on the Project Site and if so, to identify potential impacts of the Project to such historical resources.</p> <p>The Project Site most recently served as the Kochu Gakubu campus of the Japanese Language School Unified System (established in 1956) and contains a Craftsman-style former single-family residence; a classroom building; a Chateausque multi-family residence; and a surface parking lot. It is located within the Wilshire Community Plan Area of the City, and was surveyed by SurveyLA (i.e., the City's citywide survey of historical resources) between December 2013 and January 2015. The Project Site is located within the potential "Menlo Avenue-Westmoreland Avenue Multi-Family Residential Historic District," identified by SurveyLA as meeting eligibility standards for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a local Historic Preservation Overlay Zone (HPOZ).</p> <p>Both the former single-family residence and the Chateausque multi-family residence were identified as potential contributors to the potential historic district. In addition, the former single-family residence was found individually eligible as an example of early residential development in the Wilshire neighborhood, and as an excellent example of Craftsman residential architecture. Thus, both the potential historic district and the single-family residence are considered historical resources as defined by CEQA and were not re-evaluated in the Historical Resources Assessment Report.</p>	<p><b>X</b></p>	

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<p>The classroom building on the Project Site was not evaluated by SurveyLA. The building was constructed in 1966 as a classroom building for the Japanese language school on the site and was evaluated in the Historical Resources Assessment Report for potential historical significance based on an observation of existing conditions, primary and secondary source research related to the history of the building, a review of the relevant historic contexts, and an analysis under the eligibility criteria for listing in the National Register of Historic Places, the California Register of Historical Resources, and as a City Historic-Cultural Monument. Based on the detailed analysis in the Historical Resources Assessment Report, for the following reasons, the classroom building does not appear eligible for designation at the federal, state, or local levels and thus, the building is not considered a historical resource as defined by CEQA:</p> <ol style="list-style-type: none"> <li>1. The classroom building does not meet the eligibility standards as identified by the Japanese American context statement for SurveyLA. The building was used as a Japanese language school starting in the mid-1950s and was one of many such schools established during that period. There are two other Japanese language schools in the area that were identified as significant for an association with the Japanese American community. As such, the classroom building on the Project Site is not a rare example of the type, and it does not represent an important association with the Japanese American community in Los Angeles. There is no evidence to suggest that the classroom building has an association with important historic personages, represents an issue related to civil rights, or represents a significant movement associated with education and social history in Los Angeles. Therefore, the classroom building is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument under Criterion A/1/1.</li>   <li>2. No documentation was found to suggest that the sole former owner and occupant of the classroom building, the Japanese Arts and Culture Institute, rose to prominence in its group or made significant contributions to growth or development in Los Angeles while occupying the building. Therefore, the classroom building is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument under Criterion B/2/2.</li>   <li>3. The classroom building is Mid-century Modern in style and was designed by Japanese American architect Y. Tom Makino in 1966. Makino completed numerous commissions for the Japanese American community in the postwar era; however, his work is not widely known, and he is not considered a master architect. The classroom building does not represent an excellent example of the style or type, and it does not reflect a characteristic style or quality associated with Makino's work. The most prominent example of his work is the Los Angeles Homba Hongwanji Buddhist temple. Other examples of Makino's work, such as the San Fernando Valley Hongwanji Buddhist Temple, are less noteworthy architecturally; while several examples, including the West Los Angeles Buddhist Temple, are utilitarian buildings with little outward expression of their intended use. The classroom building is largely</li> </ol>		
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<p>utilitarian in nature, with minimal Mid-century Modern design details, including the horizontal massing, simple, geometric volume, flat roof with overhanging eaves, and floor-to-ceiling, fixed, divided light wood sash windows. It does not meet the eligibility standards developed by SurveyLA for evaluating Mid-century Modern architecture, as it does not exhibit quality of design through distinctive features. Therefore, the classroom building is not eligible for listing in the National Register of Historic Places, the California Register of Historical Resources, or as a City of Los Angeles Historic Cultural Monument for its architectural merit under Criterion C/3/3.</p> <p>Additionally, as mentioned above, the Historical Resources Assessment Report considered potential impacts of the Project to the potential Menlo Avenue-Westmoreland Avenue Multi-Family Historic District and the individually eligible former single-family residence on the Project Site. The Project includes demolition of the Chateausque multi-family residence, the classroom building, and the surface parking on the Project Site. With the exception of the rear service porch and kitchen that would be demolished (7,687 square feet), the former single-family building would be retained in place and rehabilitated in accordance with the Secretary of Interior’s Standards for Rehabilitation. The remainder of the Project Site would be developed with a six-story, 106,763-square-foot multi-family residential building.</p> <p>The immediate environs of the former single-family residence would be altered by the proposed new construction. The former single-family residence is significant for its association with early residential development in the Wilshire neighborhood and for its Craftsman architecture, which is primarily expressed on the west (primary) façade, facing Menlo Avenue. The new multi-family residential building would be separated from the existing residence by over eight feet at the east and south façades. There would be adequate separation between the old and new construction; the former single-family residence would retain its historic relationship to the street and to the immediately adjacent district contributors; and it would continue to convey its significance as an early 20<sup>th</sup> century Craftsman-style residence following implementation of the Project. The former single-family residence would retain eligibility for listing at the federal, state, and local levels as identified by SurveyLA, following construction of the new multi-family housing on the Project Site.</p> <p>Because the Project Site is located within the boundary of the potential Menlo Avenue-Westmoreland Avenue Multi-Family Residential Historic District, potential impacts to the district as a result of new construction were considered in the Historical Resources Report. As stated previously, the Project would construct a new six-story multi-family residential building on the Project Site, introducing height and density within the potential historic district that did not exist historically. However, in order for the new construction to be considered a substantial adverse change, it must be shown that the Project would materially impair the integrity and/or significance of the potential historic district.</p> <p>As discussed in the Historical Resources Report, integrity is the ability of a historical resource to convey its historic significance. Despite the introduction of new construction within the potential district boundary, all but one of the seven aspects</p>	
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<p>of integrity would be unaffected by the Project. The Project would not affect the integrity of location, design, materials, or workmanship within the potential district or its component contributing buildings. With the exception of the one contributor on the Project Site that would be demolished as part of the Project, all other contributing buildings to the potential district would remain intact in their current locations and would not be materially altered by the new construction. The potential district comprises two-story multi-family residences constructed in the 1930s and 1940s in Period Revival architectural styles. Other district characteristics include uniform setbacks with front lawns, concrete walkways and stairs, detached garages, and mature street trees. The construction of a new multi-story, multi-family residential building on the Project Site would not impact the character of the potential district overall or its significant character-defining features, which would remain in place, unaltered, and unobscured, following implementation of the Project. The potential district overall would retain a strong sense of time and place, and its association with 1930s-1940s multi-family residential development in the Wilshire neighborhood would remain intact and evident. Therefore, integrity of feeling and association would also remain unaffected by the new construction, as all the important physical characteristics would remain.</p> <p>The only aspect of integrity that could be affected by the new construction within the potential district is integrity of setting. As noted above, the introduction of additional height and mass would not impact the overall character of the district, as important features that contribute to the setting, including the uniform setbacks, consistent architectural vocabulary, and landscape and hardscape features, would remain intact. In addition, the Project Site is located at the southwestern edge of the potential historic district, immediately adjacent to a recently constructed five-story multi-family residence to the south and the former single-family residence to the north. The Project Site's location at the periphery of the potential district allows for new construction without interruption of the existing street frontage of the contributing buildings or the cohesion of the potential historic district along Menlo Avenue or Westmoreland Avenue to the east, where the Project Site is further separated by an alley from the adjacent district contributors. Due to its location, the new construction would not constitute a significant physical or visual intrusion to the potential historic district and would not substantially compromise integrity of setting within the potential historic district. Therefore, the Project would not materially impair the significance or integrity of the potential Menlo Avenue-Westmoreland Avenue Multi-Family Residential Historic District such that it would no longer convey its historic significance and following implementation of the Project, the potential district would remain eligible for listing at the federal, state, and local levels as identified by SurveyLA.</p> <p>The analysis of potential impacts to historical resources concluded that the Project would not result in a substantial adverse change in the significance of a historical resource and therefore, would not have a significant effect on the environment as defined by CEQA.</p> <p>The Project is consistent with this criterion.</p>		
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<p><b>(6) The Transit Priority Project site is not subject to any of the following:</b></p> <p><b>(a) A wildland fire hazard, as determined by the Department of Forestry and Fire Protection, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk of a wildland fire hazard.</b></p> <p>The Project Site is located in a highly urbanized area and is fully developed with a three-story former single-family residential building, a two-story classroom building, a two-story multi-family residential building, and a surface parking lot. The Project Site and surrounding area are not located within a State-designated Very High Fire Hazard Severity Zone.<sup>7</sup> Thus, the Project Site is not subject to a wildland fire hazard. As such, the Project meets this criterion.</p> <p><b>(b) An unusually high risk of fire or explosion from materials stored or used on nearby properties.</b></p> <p>The Project Site is developed with a three-story former single-family residential building, a two-story classroom building, a two-story multi-family residential building, and a surface parking lot. The site is surrounded by similar residential uses and other commercial uses typically found near residential uses. As described in the Phase I ESA (refer to Appendix F), there are no industrial or manufacturing uses, which might store potentially explosive or hazards materials, near the Project Site. Thus, the Project Site is not subject to an unusually high risk of fire or explosion from materials stored or used on nearby properties. As such, the Project meets this criterion.</p> <p><b>(c) Risk of a public health exposure at a level that would exceed the standards established by any state or federal agency.</b></p> <p>Refer to response to Criterion (4)(b) above. Based on the information provided there, the Project would not result in public health exposure, either to the public or to future tenants of the Project, at a level that would exceed the standards established by any state or federal agency. Additionally, the project site is not located in a designated Methane Hazard Zone. As such, the Project meets this criterion.</p> <p><b>(d) Seismic risk as a result of being within a delineated earthquake fault zone, as determined pursuant to Section 2622, or a seismic hazard zone, as determined pursuant to Section 2696, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk of an earthquake fault or seismic hazard zone.</b></p>	<p align="center"><b>X</b></p>	
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<sup>7</sup> California Department of Forestry and Fire Protection, Map of CAL FIRE'S Fire Hazard Severity Zones in State Responsibility Areas, Los Angeles, [https://osfm.fire.ca.gov/media/5830/los\\_angeles.pdf](https://osfm.fire.ca.gov/media/5830/los_angeles.pdf), accessed on June 1, 2020.

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<p>According to ZIMAS, the Project Site is located within the boundaries of the Puente Hills Blind Thrust Fault Zone. Based on a Preliminary Geotechnical Investigation Report prepared for the Project by Langan Engineering &amp; Environmental Services on December 20, 2019 (refer to Appendix H1), the Project Site is not located within the delineated Alquist-Priolo Fault Zone. Pursuant to LADBS correspondence dated September 8, 2020, a fault study is not required for the Project prior to Project approval.<sup>8</sup> Thus, the Project would not result in seismic risk as a result of being within a delineated earthquake fault zone or a seismic hazard zone. As such, the Project meets this criterion.</p> <p><b>(e) Landslide hazard, flood plain, flood way, or restriction zone, unless the applicable general plan or zoning ordinance contains provisions to mitigate the risk of a landslide or flood.</b></p> <p>The Project Site and surrounding area are fully developed and generally characterized by flat topography. The Project Site is not located in a landslide area as mapped by the City.<sup>9</sup></p> <p>The Project Site is not located within a designated 100-year flood plain area or flood way boundary as mapped by the Federal Emergency Management Agency (FEMA) or by the City (Federal Emergency Management Agency, Flood Insurance Rate Map, Map Number X, September 26, 2008; City of Los Angeles, Los Angeles General Plan Safety Element, November 1996, Exhibit F, 100-Year &amp; 500-Year Flood Plain, p. 57).</p> <p>Thus, the Project Site is not subject to hazards associated with landslide hazard, flood plain, flood way, or restriction zone. As such, the Project meets this criterion.</p>		
<p><b>(7) The Transit Priority Project site is not located on developed open space.</b></p> <p><b>(A) For the purposes of this paragraph, “developed open space” means land that meets all of the following criteria:</b></p> <p><b>(i) Is publicly owned, or financed in whole or in part by public funds.</b></p> <p><b>(ii) Is generally open to, and available for use by, the public.</b></p> <p><b>(iii) Is predominantly lacking in structural development other than structures associated with open spaces, including, but not limited to, playgrounds, swimming pools, ballfields, enclosed child play areas, and picnic facilities.</b></p>	<p><b>X</b></p>	

<sup>8</sup> City of Los Angeles, Casey Jensen, email correspondence, September 8, 2020. Refer to Appendix H2.

<sup>9</sup> Preliminary Geotechnical Investigation Report, Langan Engineering & Environmental Services, December 20, 2020. Refer to Appendix H1.

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<p>The Project Site is privately owned, has not been designated for acquisition by a public agency for use as open space, and is located in a highly urbanized area that includes a mixture of residential and commercial uses. The Project Site is currently developed with a three-story former single-family residential building, a two-story classroom building, a two-story multi-family residential building, and a surface parking lot and does not contain any recreational facilities. The site has not been used by the public for recreational purposes. Thus, the Project Site is not located on developed open space. As such, the Project meets this criterion.</p>		
<p><b>(8) The buildings in the Transit Priority Project are 15 percent more energy efficient than required by Chapter 6 of Title 24 of the California Code of Regulations and the buildings and landscaping are designed to achieve 25 percent less water usage than the average household use in the region.</b></p> <p>The Project would achieve its energy and water efficiency through the implementation of multiple measures, which are detailed in the <i>CEQA Exemption (8) Energy and Water Efficiency Compliance for 1216-1224 Menlo Avenue Residential Project</i> report prepared by Zinner Consultants, dated April 15, 2020 (refer to Appendix I). Based on the report, the Project would be designed to be approximately 15.3 percent more energy efficient than the standards contained in Title 24 of the California Code of Regulations (2019) and would be designed to achieve approximately 57.7 percent less water usage than MWD’s baseline usage.</p> <p>According to the <i>CEQA Exemption (8) Energy and Water Efficiency Compliance for 1216-1224 Menlo Avenue Residential Project</i>, the average household water use in the region is 318.1 gallons per day. The Project would use 134.6 gallons of water per household, per day. Therefore, the Project would use approximately 57.7 percent less water than MWD’s baseline usage.</p> <p>The energy efficiency calculations contained in the <i>CEQA Exemption (8) Energy and Water Efficiency Compliance for 1216-1224 Menlo Avenue Residential Project</i> were calculated using “whole building energy modeling” software approved by the California Energy Commission for Title 24 compliance. Tables 2 through 4 of the report list both the characteristics of the proposed design and that of the Title 24 Standard building, so that the characteristics and the energy consumption/efficiency could be compared against one another. The results of the modeling show that the Project has a targeted savings of approximately 15.3 percent over the Title 24 baseline.</p> <p>Therefore, the Project is designed to be at least 15 percent more energy-efficient than required by Chapter 6 of Title 24 of the California Code of Regulations, and is designed to achieve approximately 57.7 percent less water usage than MWD’s baseline usage. Additionally, the Project’s incorporation of energy conservation features and compliance with applicable regulations, including CALGreen and State energy standards under Title 24, would reduce the Project’s use of natural gas. As such, the Project meets this criterion.</p>	<p><b>X</b></p>	

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<b>PRC § 21155.1(b). The Transit Priority Project meets all of the following land use criteria:</b>	<b>Consistent</b>	
	<b>Yes</b>	<b>No</b>
<p><b>(1) The site of the Transit Priority Project is not more than eight acres in total area.</b></p> <p>The Project Site is approximately 0.9 acres. Thus, the Project Site is less than eight acres in size. As such, the Project meets his criterion.</p>	<b>X</b>	
<p><b>(2) The Transit Priority Project does not contain more than 200 residential units.</b></p> <p>The Project proposes 128 residential units. Thus, the Project would not include more than 200 residential units. As such, the Project meets this criterion.</p>	<b>X</b>	
<p><b>(3) The Transit Priority Project does not result in any net loss in the number of affordable housing units within the project area.</b></p> <p>The Project Site is currently developed with a three-story former single-family residential building (constructed 1911), a two-story classroom building (constructed 1967), a two-story multi-family residential building (constructed 1939), and a surface parking lot. None of the existing units is designated as affordable housing units.</p> <p>All of the proposed 128 residential units would be On-Site Restricted Affordable units, exclusive of the building manager’s unit. Thus, the Project would increase the number of affordable housing units at the Project Site and within the Project Site vicinity. As such, the Project meets this criterion.</p>	<b>X</b>	
<p><b>(4) The Transit Priority Project does not include any single level building that exceeds 75,000 square feet.</b></p> <p>The Project’s new building would be 6 stories and 114,376 square feet (not including parking square footage), and the retained and adaptively reused single-family residence would contain 7,687 square feet, for a total Project floor area of 114,376 square feet. Thus, the Project does not include a single-level building that exceeds 75,000 square feet. As such, the Project meets this criterion.</p>	<b>X</b>	
<p><b>(5) Any applicable mitigation measures or performance standards or criteria set forth in the prior environmental impact reports, and adopted in findings, have been or will be incorporated into the Transit Priority Project.</b></p> <p>There are no prior environmental impact reports (EIR) or other environmental documents prepared specifically for the project site.</p> <p>The City has identified one prior EIR with mitigation measures that could apply to the Project – SCAG 2020-2045 RTP/SCS Final Program EIR). The 2020-2045 SCAG RTP/SCS Final Program EIR Mitigation Monitoring and Reporting Program (SCAG MMRP) does not include project-level mitigation measures that would be</p>	<b>X</b>	

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<p>required of the Project.<sup>10</sup> The SCAG MMRP provides a list of mitigation measures that SCAG determined a lead agency can or should consider, as applicable and feasible.<sup>11</sup></p> <p>A discussion of applicability of these measures is contained in Appendix J. As described therein, many of the mitigation measures identified by SCAG would not apply to the Project and as such, would not be incorporated into the TPP (e.g., the Project). Nonetheless, as required under this criterion, Appendix J contains a full discussion of the applicability of the mitigation measures identified in the SCAG MMRP to the Project. As such, the Project meets this criterion.</p>		
<p><b>(6) The Transit Priority Project is determined not to conflict with nearby operating industrial uses.</b></p> <p>The nearest site zoned for any type industrial use is located at the intersection of Menlo Avenue and Venice Boulevard, approximately 0.3 miles south of the Project Site, that is zoned Hybrid Industrial. Due to distance from the Project as well as the buffering provided by existing development located between the Project and the nearest industrial zoned site, the Project would not conflict with nearby operating industrial uses. As such, the Project meets this criterion.</p>	<b>X</b>	
<p><b>(7) The Transit Priority Project is located within one-half mile of a rail transit station or a ferry terminal included in a regional transportation plan or within one-quarter mile of a high quality transit corridor included in a regional transportation plan.</b></p> <p>As stated previously and as shown on Exhibits 3.7 and 3.8 in Appendix B, the Project Site is in an area identified as a TPA and an HQTAs (respectively) by SCAG. As discussed previously, TPAs are areas located within one-half mile of an existing or planned major transit stop. HQTAs are areas within one-half mile of a fixed guideway transit stop or a bus transit corridor where buses pick up passengers at a frequency of every 15 minutes or less during peak commuting hours. Furthermore, PRC 21155(b)(3) defines a high-quality transit corridor as a corridor with fixed route bus service with service intervals no longer than 15 minutes during peak commute hours. The Project Site is less than one-quarter mile from Pico Boulevard, which is served by Metro Local Line 30, and is also less than one-quarter mile from Vermont Avenue, which is served by Metro Local Line 204 and Metro Rapid Line 754. As shown on Table 3-1 in the Traffic Assessment Report (refer to Appendix K), each of these Metro bus lines provide transit service at a frequency interval of 15 minutes or less during the morning and afternoon peak commute periods, and therefore, both corridors qualify as high-quality transit corridors. As such, the Project meets this criterion.</p>	<b>X</b>	

<sup>10</sup> The 2020-2045 RTP/SCS MMRP also includes various regional-level mitigation measures that would be implemented by SCAG (not at the project-level) and thus, are not discussed in Appendix J.

<sup>11</sup> SCAG, 2020-2045 RTP/SCS PEIR, Exhibit B Mitigation Monitoring and Reporting Program, available at: [http://scagtrpccs.net/Documents/2016/peir/final/2016fPEIR\\_ExhibitB\\_MMRP.pdf](http://scagtrpccs.net/Documents/2016/peir/final/2016fPEIR_ExhibitB_MMRP.pdf), 2016.

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PRC 21155.1(c). The Transit Priority Project meets at least one of the following three criteria:	Consistent	
	Yes	No
<p><b>(1) The Transit Priority Project meets both of the following:</b></p> <p><b>(a) At least 20 percent of the housing will be sold to families of moderate income, or not less than 10 percent of the housing will be rented to families of low income, or not less than 5 percent of the housing is rented to families of very low income.</b></p> <p><b>(b) The Transit Priority Project developer provides sufficient legal commitments to the appropriate local agency to ensure the continued availability and use of the housing units for very low, low-, and moderate-income households at monthly housing costs with an affordable housing cost or affordable rent, as defined in Section 50052.5 or 50053 of the Health and Safety Code, respectively, for the period required by the applicable financing. Rental units shall be affordable for at least 55 years. Ownership units shall be subject to resale restrictions or equity sharing requirements for at least 30 years.</b></p> <p>All of the proposed 128 residential units would be On-Site Restricted Extremely Low Income units, exclusive of the building manager’s unit. Pursuant to the requirements of the City’s Transit Oriented Communities program and the Project’s conditions of approval, prior to issuance of a building permit for the Project, a covenant acceptable to the Department of Housing and Community Investment (HCIDLA) shall be recorded with the Los Angeles County Recorder, guaranteeing that the Project’s affordability criteria will be observed for at least 55 years from the issuance of the Certificate of Occupancy. As such, the Project meets criteria a and b.</p>	<b>X</b>	
<p><b>(2) The Transit Priority Project developer has paid or will pay in-lieu fees pursuant to a local ordinance in an amount sufficient to result in the development of an equivalent number of units that would otherwise be required pursuant to paragraph (1).</b></p> <p>Not applicable. As discussed above, the Project meets criterion (1)(a). Thus, the Project meets the requirements of PRC 21155.1(c).</p>		<b>X</b>
<p><b>(3) The Transit Priority Project provides public open space equal to or greater than five acres per 1,000 residents of the project.</b></p> <p>Not applicable. As discussed above, the Project meets criterion (1)(a). Thus, the Project meets the requirements of PRC 21155.1(c).</p>		<b>X</b>