City of Los Angeles

Department of City Planning

City Hall • 200 N. Spring Street, Room 621 • Los Angeles, CA 90012

Sustainable Communities Environmental Assessment

Crenshaw Crossing Project

WEST ADAMS - BALDWIN HILLS - LEIMERT PLAN AREA

Case Number: ENV-2019-5426-SCEA

Project Location: 3510 and 3606 W. Exposition Boulevard, 3630 and 3642 S. Crenshaw Boulevard, and 3501 and 3505 W. Obama Boulevard in the City of Los Angeles.

Council District: 10—Wesson

Project Description: The Project includes 401 residential units would include 142 studios, 193 one-bedroom units, and 66 two-bedroom units, with a range of unit sizes from approximately 467 to 1,157 sq. ft. The Project would have a maximum height of approximately 86 feet to the top of the parapet, and a height of approximately 34 feet to the top of the parapet for the low-scale portion of the building along Victoria Avenue. The Project also includes approximately 380,112 sq. ft. of floor area with a FAR of 2.08:1, made up of approximately 339,116 sq. ft. for the residential component and approximately 40,996 sq. ft. for the commercial and community spaces component, which would include retail and restaurant uses, and a grocery store.

Public Review: A 30-day review period will begin on May 13, 2021, and end on June 14, 2021. Any interested person or agency may comment on this matter by submitting comments to Alan Como via email at Alan.Como@lacity.org; or by mail to 221 North Figueroa Street, Room 1350, Los Angeles, CA 90012.

APPLICANT:	ON BEHALF OF:
WIP Expo Crenshaw, LLC 2716 Ocean Park Boulevard, #2025 Santa Monica, CA 90405	City of Los Angeles Department of City Planning Major Projects Division

May 2021

DRAFT SCEA AND INITIAL STUDY

Crenshaw Crossing Project
City of Los Angeles

PREPARED FOR:

City of Los Angeles
Department of City Planning
Major Projects Division
200 N. Spring Street, Room 621
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May 2021

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1.0 INTRODUCTION

The subject of this Sustainable Communities Environmental Assessment (SCEA) is the proposed Crenshaw Crossing (Project), a mixed-use project including 401 residential units, with approximately 15 percent of the total units (61 units) reserved for Very-Low Income households and 5 percent of the total units (20 units) reserved for a range of Very-Low to Low-Income households, and approximately 40,996 sq. ft. of commercial and community space proposed at 3510 and 3606 W. Exposition Boulevard, 3630 and 3642 S. Crenshaw Boulevard, and 3501 and 3505 W. Obama Boulevard in the City of Los Angeles (Project Site). The Project is discussed in further detail in **Section 2.0: Project Description**. The Project Site is located within the adopted West Adams-Baldwin Hills-Leimert 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). This SCEA has been prepared pursuant to Section 21155.2 of the Public Resources Code (PRC).

Project Information

Project Title: Crenshaw Crossing

Project Applicant: WIP Expo Crenshaw, LLC
2716 Ocean Park Boulevard, #2025
Santa Monica, CA 90405

Lead Agency: City of Los Angeles Department of City Planning
221 N. Figueroa Street, 13th floor
Los Angeles, CA 90012

Senate Bill 375 and the SCEA

Senate Bill 375 (SB 375), also known as "The Sustainable Communities and Climate Protection Act of 2008," outlines growth strategies that better integrate regional land use and transportation planning and that help meet the State of California's greenhouse gas (GHG) emissions reduction mandates. SB 375 requires the State's 18 metropolitan planning organizations (MPO) to incorporate a "sustainable communities strategy" (SCS) into the regional transportation plans to achieve their respective region's GHG emission reduction targets set by the California Air Resources Board (CARB). Correspondingly, SB 375 provides various CEQA streamlining provisions for projects that are consistent with an adopted applicable SCS and meet certain objective criteria; one such CEQA streamlining tool is the SCEA. The Southern California Association of Governments (SCAG) is the MPO for the County of Los Angeles (along with the Counties of Imperial, San Bernardino, Riverside, Orange, and Ventura). On April 7, 2016, SCAG's Regional Council adopted the 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy (2016-2040 RTP/SCS). For the SCAG region, CARB has set GHG emissions reduction targets at eight

percent below 2005 per capita emissions levels by 2020, and 13 percent below 2005 per capita emissions levels by 2035. The 2016-2040 RTP/SCS outlines strategies to meet or exceed the targets set by CARB. By Executive Order, approved June 28, 2016, CARB officially determined that the 2016-2040 RTP/SCS would achieve CARB's 2020 and 2035 GHG emission reduction targets.

SB 375 allows the City, acting as lead agency, to prepare a SCEA as the environmental CEQA Clearance for "transit priority projects" (as described below) that are consistent with SCAG's 2016- 2040 RTP/SCS.

Transit Priority Project Criteria

SB 375 provides CEQA streamlining benefits to qualifying transit priority projects (TPPs). For purposes of projects in the SCAG region, a qualifying TPP is a project that meets the following four criteria [see PRC Section 21155 (a) and (b)]:

1. Is consistent with the general use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2016-2040 RTP/SCS;
2. Contains 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;
3. Provides a minimum net density of at least 20 units per acre; and
4. Is within one-half mile of a major transit stop or high-quality transit corridor included in a regional transportation plan.

SCEA Process and Streamlining Provisions

Qualifying TPPs that have incorporated all feasible mitigation measures and performance standards or criteria set forth in the prior applicable EIRs (and that are determined to not result in significant and unavoidable environmental impacts may be approved with a SCEA. The specific substantive and procedural requirements for the approval of a SCEA include the following:

1. An initial study shall be prepared for a SCEA to identify all significant impacts or potentially significant impacts, except for the following:
    a. Growth-inducing impacts, and
    b. Project-specific or cumulative impacts from cars and light trucks on global warming or the regional transportation network.
2. The initial study shall identify any cumulative impacts that have been adequately addressed and mitigated in a prior applicable certified EIR. Where the lead agency determines the impact has been adequately addressed and mitigated, the impact shall not be cumulatively considerable.

3. The SCEA shall contain mitigation measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the project required to be identified in the initial study.
4. A draft of the SCEA shall be circulated for a public comment period not less than 30 days, and the lead agency shall consider all comments received prior to acting on the SCEA.
5. The SCEA may be approved by the lead agency after the lead agency's legislative body conducts a public hearing, reviews comments received, and finds the following:
   a) All potentially significant or significant effects required to be identified in the initial study have been identified and analyzed, and
   b) With respect to each significant effect on the environment required to be identified in the initial study, either of the following apply:
      i. Changes or alterations have been required in or incorporated into the project that avoid or mitigate the significant effects to a level of insignificance.
      ii. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.
6. The lead agency's decision to review and approve a TPP with a SCEA shall be reviewed under the substantial evidence standard.

1.1 REQUIRED FINDINGS

Based on a review of the entire administrative record, the City of Los Angeles has determined that the Project qualifies for a SCEA, based on the following criteria:

1. The Project is consistent with the general use designations, density, building intensity, and applicable policies specified for the Project area in the RTP/SCS prepared by SCAG;
2. The State Air Resources Board, pursuant to subparagraph (H) of paragraph (2) of subdivision (b) of Section 65080 of the Government Code, has accepted SCAG's determination that the sustainable communities strategy adopted by SCAG in the 2016-2040 RTP/SCS would, if implemented, achieve the greenhouse gas emission reduction targets;
3. The Project qualifies as a transit priority project pursuant to PRC Section 21155(b);
4. The Project is a residential or mixed-use project as defined by PRC Section 21159.28(d);
5. The Project, as mitigated, incorporates all feasible mitigation measures, performance standards, or criteria set forth in the prior applicable environmental impact reports, including the 2016-2040 RTP/SCS Program Environmental Impact Report, the West Adams-Baldwin Hills-Leimert Community Plan Environmental Impact Report, and the Mid-City Redevelopment Plan Environmental Impact Report;
6. All potentially significant or significant effects required to be identified and analyzed pursuant to the CEQA have been identified and analyzed in an initial study; and

7. The Project, as mitigated, either avoids or mitigates to a level of insignificance all potentially significant or significant effects of the Project required to be analyzed pursuant to CEQA.

Therefore, the City of Los Angeles finds that the Project complies with the requirements of CEQA for using an SCEA as authorized pursuant to Public Resource Code Section 21155.2(b).

1.2 ORGANIZATION OF THE SCEA

This SCEA is organized into four sections as follows:

Section 1.0: Introduction provides introductory information, such as the Project title, the Project Applicant, and the lead agency for the Project.

Section 2.0: Project Description provides a detailed description of the Project, including the environmental setting, Project characteristics, related Project information, Project objectives, and environmental clearance requirements.

Section 3.0: SCEA Criteria describes the regulatory background and criteria for the use of a SCEA in completing the CEQA process for this Project.

Section 4.0: Initial Study identifies each environmental issue identified in the Initial Study Checklist which contains an assessment and discussion of impacts associated with each subject area. When the evaluation identifies potentially significant effects, as identified in the Checklist, mitigation measures are provided to reduce such impacts to a less than significant level.

In addition, appendices include Project-specific reports and data used to support the analysis and determinations in this SCEA.

2.0 PROJECT DESCRIPTION

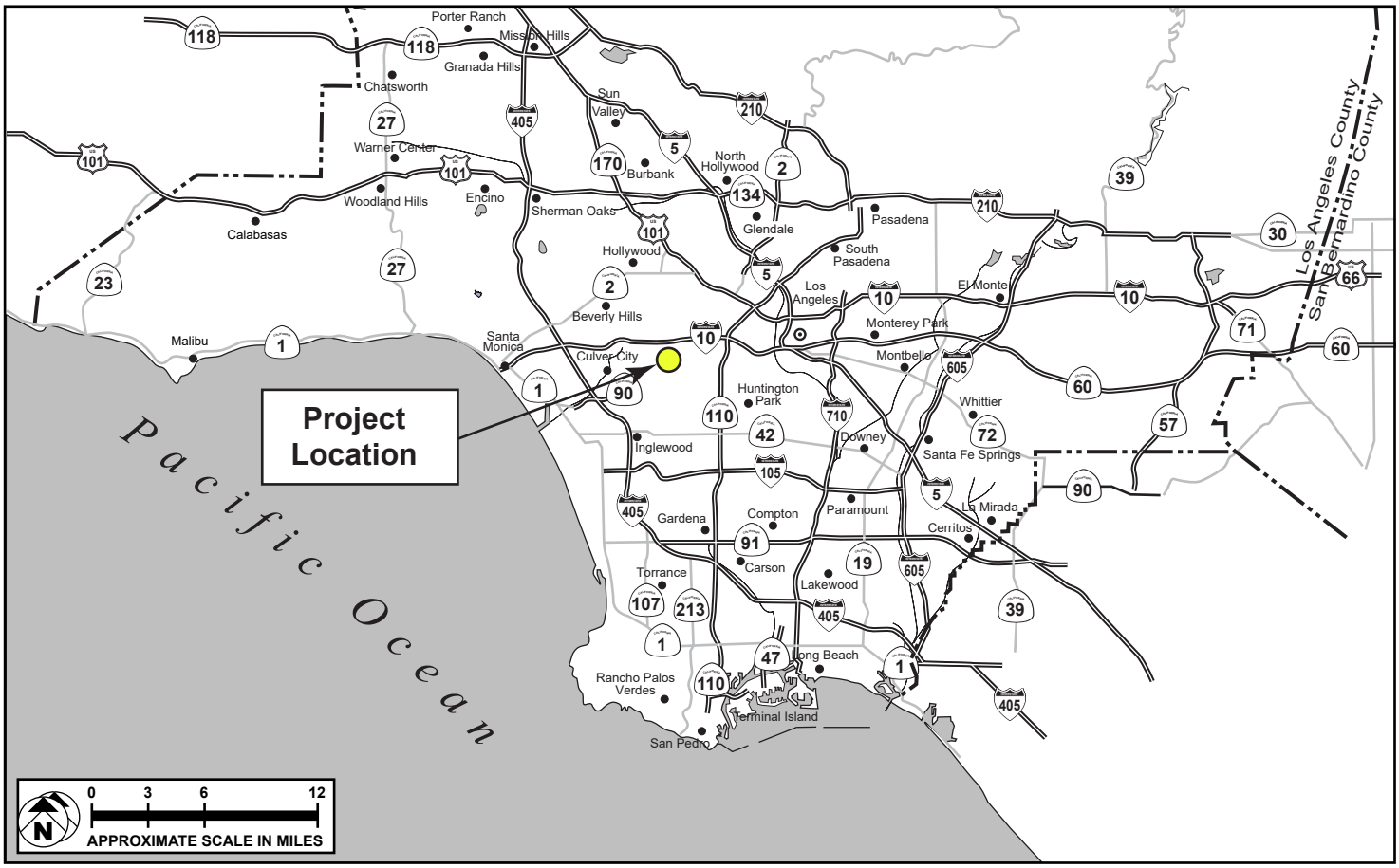
2.1 PROJECT SUMMARY

This SCEA evaluates the Crenshaw Crossing mixed-use project (Project) proposed at 3510 and 3606 W. Exposition Boulevard, 3630 and 3642 S. Crenshaw Boulevard, and 3501 and 3505 W. Obama Boulevard in the City of Los Angeles (Project Site), as shown in **Figure 2.0-1: Regional and Local Vicinity Map**.

The Project Site consists of two areas bifurcated by Crenshaw Boulevard and is located south and directly adjacent to the Metro E (formerly Expo) Line and north of Obama Boulevard. The area west of Crenshaw Boulevard is made up of one parcel owned by the County of Los Angeles (County) and the public right-of-way (ROW) of Lower Exposition Boulevard between Victoria Avenue and Crenshaw Boulevard (West Site). The southeast corner of this block includes a gas station that is not a part of the Project. The area east of Crenshaw Boulevard includes five parcels that make up the entire block and is owned by the Los Angeles County Metropolitan Transportation Authority (Metro), the public ROW of Lower Exposition Boulevard between Crenshaw Boulevard and Bronson Avenue, and a portion of the public ROW of Bronson Avenue between Lower Exposition Boulevard and Exposition Place (East Site). The public rights-of-way segments are to be merged as part of the Project into the Project Site (Merger Area, individually; or Merger Areas, collectively). The Project Site is generally bound by the Metro E Line right-of-way to the north, Obama Boulevard to the south, Victoria Avenue to the west, and Bronson Avenue to the east, with Crenshaw Boulevard located between the West and East Sites.

The West Site contains a one-story administrative office building formerly occupied by the County Probation Department, and its associated surface parking lot. The East Site is a vacant block being used by Metro for construction staging of the Crenshaw/LAX Transit Project currently under construction along Crenshaw Boulevard, as shown in **Figure 2.0-2: Site Map, Existing Conditions**. Development of the Project Site with the proposed mixed-use Project is part of the Metro and County's Expo/Crenshaw Station Joint Development Program.

One eight–story, mixed-use building is proposed on each of the West and East Sites. Commercial and community uses would be located on the ground floors of the proposed buildings fronting the Metro E Line, Crenshaw Boulevard, and Obama Boulevard with several pedestrian access points on all three frontages. Residential uses would be located above the commercial uses on floors four (4) through eight (8) on the West Site and on floors three (3) through eight (8) on the East Site. The portion of the building on the West Site along Victoria Avenue would consist of three-story, low-scale residential units to complement the scale of existing residential development across Victoria Avenue and allow for a transition to the taller portion of the building and commercial uses along Crenshaw Boulevard.



SOURCE: Google Earth - 2020; Meridian Consultants, LLC - 2020

FIGURE **2.0-1**

Meridian Consultants

Regional and Local Vicinity Map

253-001-19

SOURCE: Google Earth - 2020

FIGURE **2.0-2**

Meridian Consultants

Site Map, Existing Conditions

253-001-19

Parking garages will be provided on the West and East Sites to provide parking for the residential and commercial uses proposed on each site. The parking garage on the West Site includes ground level and three (3) above-grade levels. The parking garage on the East Site includes ground level, three (3) above-grade levels, and one (1) below grade level.

Construction of the Project would include demolition of the existing administrative building, parking lot, and other site improvements on the West Site and construction of the new buildings on both sites.

The Project includes requests for approval of the following discretionary actions by the City of Los Angeles (City):

1. Pursuant to Los Angeles Municipal Code (LAMC) Section 12.25 A.25, Density Bonus Compliance Review for:
    a. A seven percent (7%) density bonus on the West Site and Utilization of Density Bonus Parking Option 1 for the Project, in exchange for reserving fifteen percent (15%) of total units for Very-Low Income households, and five percent (5%) of total units for a range of Very-Low to Low-Income households;
    b. Two (2) On-Menu and (1) Off-Menu incentives:
        i. On-menu incentive to allow an increase in height of an additional 11 feet over the otherwise permitted 75 feet for the main buildings and an additional increase in height of an additional 4 feet over the otherwise permitted 30 feet for the low-scale residential buildings along S. Victoria Avenue; and
        ii. On-menu incentive to reduce LAMC open space requirement of 23,850 sq. ft. for the West Site by twenty percent (20%) for a total required open space of 19,080 sq. ft.; and
        iii. Off-menu incentive to reduce residential parking Density Bonus Parking Option 1 requirement of 279 parking spaces on the West Site by approximately twenty-eight percent (28%) and the East Site parking requirement of 188 parking spaces by approximately sixteen percent (16%).
    c. Three (3) Waiver of Development Standards:
        i. To request a relief of approximately 11 feet (portions of which request only an 11-inch relief) of the required 11-foot side yard setback for the residential parking and amenity deck uses along the east interior side on the West Site; and
        ii. To request a relief of approximately 5.5 feet of the required 11-foot side yard setback for the residential parking and amenity deck uses along the south side on the West Site; and
        iii. To allow approximately forty-three percent (43%) of the 203 primary residential parking spaces on the West Site and approximately thirty-four percent (34%) of the 159 primary residential parking spaces on the East Site to be compact spaces, in lieu of the required primary standard residential space.
2. Pursuant to LAMC Section 16.05, Site Plan Review for an increase of 50 or more dwelling units;
3. Pursuant to LAMC Section 12.24 W.1, a Master Conditional Use Permit for the sale of a full-line of alcoholic beverages for on-site consumption for up to six (6) establishments totaling approximately

17,179 sq. ft. of commercial use; and for the sale of a full-line of alcoholic beverages for off-site consumption in conjunction with one (1) grocery store totaling approximately 22,277 sq. ft. within the South Los Angeles Alcohol Sales Specific Plan;

4. Pursuant to LAMC Section 11.5.7 C, Project Permit Compliance Review to permit development within the Crenshaw Corridor Specific Plan (Specific Plan);
5. Pursuant to LAMC Section 11.5.14, Administrative Review to permit development within the Mid-City Recovery Redevelopment Project area;
6. Pursuant to LAMC Section 12.21 A.2, a Zoning Administrator Interpretation to determine that publicly accessible open space on the Project Site may count towards satisfying the Project's LAMC open space requirement; and
7. Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map to merge the existing lots, consisting of one lot on the West Site and five lots on the East Site, including portions of ROW of Lower Exposition Boulevard and Bronson Avenue, and re-subdivide into two (2) ground lots and thirty-four (34) airspace lots, and the waiver of one-foot dedication along Bronson Avenue.

In addition to the entitlements identified above, the following approvals may also be required from other City entities for the Project, including, but not limited to, approvals and permits from the City's Departments of Building and Safety and Public Works for the following Project construction activities: demolition, haul route, excavation, shoring, grading, foundation, building and interior improvements and the removal of 41 unprotected on-site trees and two unprotected street trees in public ROW on the West Site, and 3 protected sycamore trees on the East Site.

2.2 PROJECT LOCATION

The Project Site is located south of the Santa Monica (I-10) Freeway and west of the Harbor Freeway (Interstate-110/State Route 110), as shown in in **Figure 2.0-1**. The Project Site is located at 3510 and 3606 W. Exposition Boulevard, 3630 and 3642 S. Crenshaw Boulevard, and 3501 and 3505 W. Obama Boulevard as shown in **Figure 2.0-2**.

As described above, the Project is made up of the West and East Sites located at the southwest and southeast corners of the intersection of Crenshaw Boulevard and Lower Exposition Boulevard, respectively, as shown in **Figure 2.0-3: Site Plan**. The Project Site is bordered by the Metro E Line to the north. The West Site includes one parcel, Assessor Parcel Number (APN) 5046-022-900, located at 3606 & 3633 W. Exposition Boulevard and an adjacent portion of the public right-of way for Exposition Boulevard. The East Site includes five parcels, APN numbers 5044-002-901; 5044-002-902; 5044-002-903 (previously 5044-002-006); 5044-002-904 (previously 5044-002-008); and 5044-002-905 (previously 5044-002-009 located at 3630 S. Crenshaw Boulevard; 3502 & 3510 W. Exposition Boulevard and 3631 & 3633 S. Bronson Avenue; 3515 & 3519 W. Obama Boulevard and 3642, 3644, & 3646 S. Crenshaw Boulevard; 3505 W. Obama Boulevard; 3635, 3639, & 3645 S. Bronson Avenue and 3501 W. Obama Boulevard and adjacent

portions of the public right-of-way for Lower Exposition Boulevard and S. Bronson Avenue. The addresses and associated parcel numbers are shown in **Table 2.0-1: Project Site Summary**.

Table 2.0-1
Project Site Summary

Site	Assessor Parcel Number	Address
West Site		
	5046-022-900	3606 W. Exposition Boulevard 3633 W. Obama Boulevard
	NA (Merger Area)	Portion of Exposition Boulevard between Victoria Avenue and Crenshaw Boulevard to be merged into the Project Site as part of Project.
East Site		
	5044-002-901	3630 S. Crenshaw Boulevard
	5044-002-902	3502 & 3510 W. Exposition Boulevard 3631 & 3633 S. Bronson Avenue
	5044-002-903 (previously 5044-002-006)	3515 & 3519 W. Obama Boulevard 3642-3646 S. Crenshaw Boulevard
	5044-002-904 (previously 5044-002-008)	3505 W. Obama Boulevard
	5044-002-905 (previously 5044-002-009)	3635, 3639, & 3645 S. Bronson Avenue 3501 W. Obama Boulevard
	NA (Merger Areas)	Portion of Exposition Boulevard between Crenshaw Boulevard and Bronson Avenue; and portion of Bronson Avenue between Exposition Boulevard and Exposition Place to be merged into the Project Site as part of Project.

2.3 EXISTING SITE CONDITIONS

The approximately 4.18-acre (182,446.51 sq. ft.) Project Site consists of six parcels and the Merger Areas. The West Site includes one 1.65-acre (72,260.34 sq. ft.) parcel plus the Merger Area for a total of 1.93 acres (84,250.94 sq. ft.), and the East Site includes five contiguous parcels that add up to approximately 1.75-acres (76,540 sq. ft.) plus the Merger Area for a total of 2.25 acres (98,446.51 sq. ft.).

The West Site is owned by the County and contains a vacant one-story building formerly occupied by the County Probation Department, and its associated surface parking lot. In response to Governor Newsom's Executive Order issued on January 8, 2020, the County is currently utilizing the parking lot associated with the West Site as a site for interim housing for vulnerable homeless families living on the streets or in their vehicles. This interim use is temporary and, for this reason, is not considered as a part of the baseline conditions or Project conditions as defined and analyzed in this SCEA.

The East Site is a vacant block owned by the Metro being used by Metro for construction staging for the Crenshaw/LAX Transit Project currently under construction in Crenshaw Boulevard. The Expo/Crenshaw Station is located below Crenshaw Boulevard between the West and East Sites. The portion of the East Site located along Crenshaw Boulevard is currently under construction to provide the entrance (portal) to the below-grade Expo/Crenshaw Station. The remaining portion of the East Site is vacant except for construction equipment and trailers, and a Los Angeles Department of Water and Power pad mounted transformer building, which will remain, in the northeastern portion of the East Site.

There are 41 unprotected on-site trees and 11 unprotected street trees in the ROW on and adjacent to the West Site, and 3 protected on-site trees on the East Site.

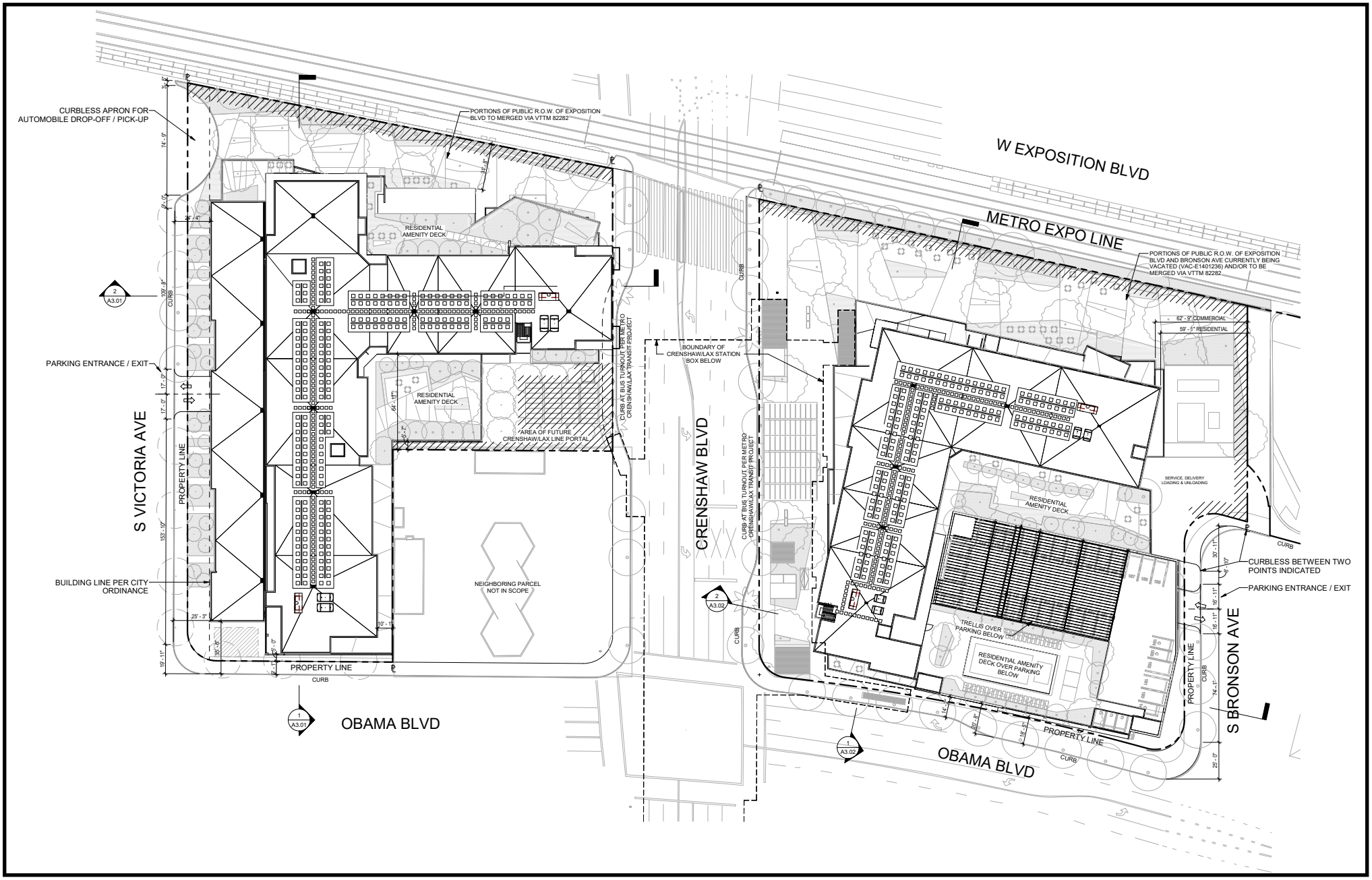
2.4 GENERAL PLAN LAND USE AND ZONING DESIGNATIONS

The Project Site is located within the West Adams-Baldwin Hills-Leimert Community Plan area. The Community Plan land use designation for the Project Site is Community Commercial as shown in **Figure 2.0-4: Land Use and Zoning**. Community Commercial areas are intended to encourage a mix of uses that are compatible with the needs of local residents and accommodate viable existing neighborhood businesses.

The Project Site is zoned C2-2D-SP. Pursuant to LAMC Section 12.14.A.4, the C2 Commercial Zone permits a variety of uses, such as multiple dwelling residential; retail with limited manufacturing; service stations and garages; and office uses, hotels, and hospitals. This zone also permits residential uses and a wide range of commercial uses, such as restaurants, retail commercial stores, and coffee shops, uses currently in operation near the Project Site.

The additional zone suffix of SP denotes the Project Site is located in the Crenshaw Corridor Specific Plan area. Specifically, the Project Site is located within the Transit Oriented Development (TOD) Area of Subarea A of the Crenshaw Corridor Specific Plan. The Crenshaw Corridor Specific Plan includes certain use limitations for off-site alcohol sales except for sales by grocery stores and certain convenience stores, automobile-related uses, and freestanding fast-food establishments.

The Height District No. 2 permits a floor-area-ratio (FAR) of 6:1 and does not limit building heights. However, the “D” limitation requires the property to be developed pursuant to the Crenshaw Corridor Specific Plan, which permits a maximum FAR of 3:1 for mixed-use projects and limits building heights to a maximum of 75 feet, excluding architectural features that may reach a maximum height of 90 feet, and a maximum transitional height adjacent to residential zones of 30 feet.



SOURCE: Belzberg Architects - 2019

FIGURE **2.0-3**

Meridian Consultants

Site Plan

253-001-19

SOURCE: Belzberg Architects - 2019

FIGURE **2.0-4**

Meridian Consultants

Land Use and Zoning

253-001-19

The Project Site is also located within the South Los Angeles Alcohol Sales Specific Plan, which provides specific procedures and requires additional findings for obtaining conditional use permits for the sale of alcoholic beverages for off-site consumption in the South Central area of the City. Additionally, the Project Site is located within the Crenshaw Boulevard Streetscape Plan which provides design guidelines for improvements in the public right-of-way.

Given the Project Site's proximity to various high-quality mass transit options, the Project Site is located within Tier 4 of the City's Transit Oriented Communities (TOC) Incentive Program Guidelines, as the Project Site is located within a one-half mile radius of a major transit stop. Specifically, the Project Site is located less than 500 feet south of the Metro E Line Expo/Crenshaw Station and will include the portal entrance to the Crenshaw/LAX Line currently scheduled to open in 2021.

Lastly, the Project Site is located within the Los Angeles State Enterprise Zone. Pursuant to LAMC Section 12.21.A.4(x)(3), the Project's commercial uses are required to provide at least two parking spaces per 1,000 sq. ft. of gross commercial area.

2.5 SURROUNDING LAND USES

Figure 2.0-4 displays the Project Site and surrounding uses. Land uses surrounding the Project Site include a mix of one and two-story residential, retail commercial, office, and commercial manufacturing buildings, various public facilities, and a parking structure. The uses around the Project Site are described further below:

North: The Metro E Line, an approximately 15.2-mile light rail line running between Downtown Los Angeles and Santa Monica, runs in an east-west direction directly adjacent to the north of the Project Site. The properties directly across the Metro E Line to the north of Upper Exposition Boulevard also have Community Commercial land use designations and are zoned C2-2D-SP similar to the Project Site. The property on the northwest corner of Crenshaw and Upper Exposition Boulevards is developed with a low-scale commercial building and surface parking lot currently occupied by several community serving retail and commercial uses. Further northwest on the corner of Upper Exposition Boulevard and Victoria Avenue are one-story and two-story single-family and multiple family dwellings. The property on the northeast corner of Crenshaw and Upper Exposition Boulevards is developed with the 5,000-seat West Angeles Cathedral and associated surface parking lot. Further northeast are various auto repair shops as well as multiple one-story and two-story single-family and multiple family dwellings.

East: The properties directly to the east, across S. Bronson Avenue, have a Hybrid Industrial and Low Medium II Residential land use designation, and are zoned CM-2D-SP and RD2-1, respectively. The properties along Obama Boulevard include single-family residential homes, while the properties directly north of the residential uses along Exposition Place contain industrial and manufacturing buildings, consistent with the Hybrid Industrial land use designation and CM (Commercial Manufacturing) zone.

South: The properties directly to the south of the Project Site also have Community Commercial land use designations and are zoned C2-2D-SP similar to the Project Site. The southwest corner of Crenshaw and Obama Boulevards is developed with community-serving commercial retail uses fronting Crenshaw Boulevard and associated surface parking lots to the west of the commercial buildings. The southeast corner of Crenshaw and Obama Boulevards is undeveloped and has been the subject of several proposed large mixed-use projects.

West: The properties directly to the west of the Project Site across Victoria Avenue have a Low Medium II Residential land use designation and a RD1.5-1 zone and are currently developed with two-story multifamily residential buildings. As noted above, the Project includes low-scale residential buildings on the West Site along Victoria Avenue to complement the scale of the existing multifamily buildings and provide a transition to the taller portions of the building proposed on the West Site.

2.6 PROJECT CHARACTERISTICS

The Project Site is being developed as part of Metro and County's Joint Development Program for the Expo/Crenshaw Station pursuant to an Exclusive Negotiation Agreement (ENA) between the County, Metro, and WIP-A, LLC, the Project Applicant. The ENA identifies development standards for the joint development project including, but not limited to, requiring the Project to provide: (i) at least 400 residential units, of which at least 20 percent (20%) of the total project units shall be reserved for households earning between thirty and eighty percent (30-80%) of Area Median Income (AMI) of which at least 15 percent (15%) of the total project units shall be reserved for households earning at or below fifty percent (50%) of AMI; (ii) at least 40,996 sq. ft. of commercial/community space; (iii) provide parking limited to the greater of (a) one (1) parking space for each market-rate residential unit plus one-half (0.5) parking space for each affordable residential unit, plus three (3) parking spaces for each 1,000 sq. ft. of commercial/retail or community serving space, and (b) the minimum parking required by the entitling agency; and (iv) construct the Project to meet the Leadership in Energy and Environmental Design (LEED) Silver Standard or its equivalent. The ENA also requires the Project to provide an additional nine (9) accessible (ADA) vehicle parking spaces reserved exclusively for Metro mass transit patrons and nine (9) vehicle parking spaces reserved for leasing staff on the East Site, and a bicycle parking facility reserved for Metro mass transit riders.

Consistent with the ENA, the Project would include 401 residential units, with approximately 15 percent of the total units (61 units) reserved for Very-Low Income households and 5 percent of the total units (20 units) reserved for a range of Very-Low to Low-Income households, and approximately 40,996 sq. ft. of commercial and community space. As previously mentioned, the Project would also merge public ROW along Exposition Boulevard between Victoria Avenue and Crenshaw Boulevard, and Exposition Boulevard and Bronson Avenue, east of Crenshaw Boulevard. The Merger Areas would provide a landscaped, publicly accessible, pedestrian promenade and plaza areas adjacent to the Project's commercial uses and along

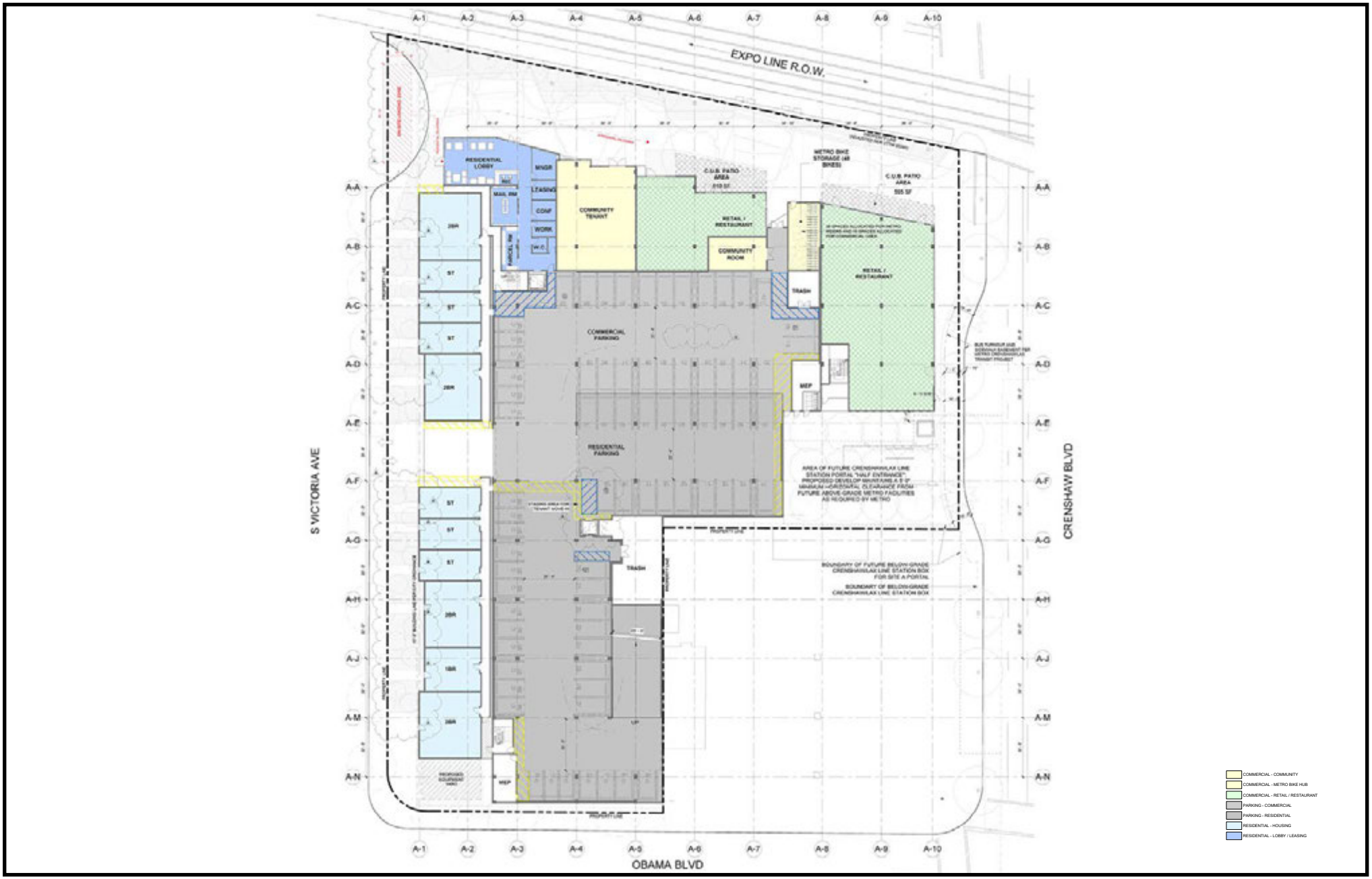
the Metro E Line thereby providing Metro mass transit riders and the public at-large direct access into the Project Site, including the portal to the below-grade Crenshaw/LAX Line, and bus stops along the perimeter. Bicycle parking facilities would be provided within the plaza area and throughout the Project Site.

The Project has been designed to be consistent with Metro's plans to increase mobility in the area through the under-construction Crenshaw/LAX Line. The West and East Sites are located adjacent to the approximately 800-foot long subterranean station box running beneath Crenshaw Boulevard.

The design of the East Site integrates the mass transit plaza with escalators, stairs, elevator access to the below-grade Expo/Crenshaw Station, and a bus turnout and stop facing Crenshaw Boulevard on the East Site, which are a part of Metro's Crenshaw/LAX Line improvements currently under construction. This plaza is oriented north-to-south along Crenshaw Boulevard between the Metro E Line and Obama Boulevard and has a depth of approximately 50-feet. Metro is constructing mass transit improvements on this portion of the East Site, including a steel and glass entrance canopy that covers two public escalators and stairs leading to the below-grade station mezzanine level. Other plaza elements include two elevators, at-grade wayfinding elements such as map cases and an identity pylon, enhanced paving, landscape, shafts for ventilation, and access to underground equipment and in-pavement emergency exit hatches.

The West Site also contains a bus turnout and stop facing Crenshaw Boulevard, which are a part of Metro's Crenshaw/LAX Line improvements currently under construction, to provide access for patrons connecting between bus and rail. The Project also preserves the southeast portion of the West Site as a landscaped plaza to allow Metro to construct an additional access portal to the Expo/Crenshaw Station mezzanine and light rail platform below. This portion of the West Site includes a knock-out panel which would allow for a direct connection to the under-construction below-grade light rail station. This second portal and associated improvements, including a canopy, plaza, bicycle facilities, and landscaping, can be accommodated on this portion of the Project Site. This additional portal would likely include, one escalator, one stair, one elevator, and associated signage and wayfinding including map cases at street level.

The site plan is shown in **Figure 2.0-3**. The ground floor plan and typical floor plans for the other floors are provided for the buildings proposed on the West and East Sites in **Figures 2.0-5: Ground Floor Plan West Site**, **2.0-6: General Floor Plans Overview—West Site**, **Figure 2.0-7: Ground Floor Plan East Site**, and **2.0-8: General Floor Plans Overview—East Site**. **Figures 2.0-9: Sections—West Site**, and **2.0-10: Sections—East Site** shows the cross section of both buildings.



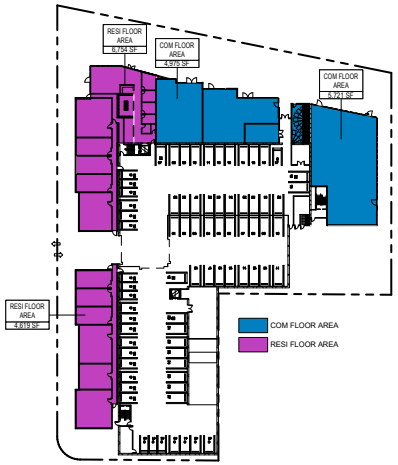
SOURCE: Belzberg Architects - 2020

FIGURE **2.0-5**

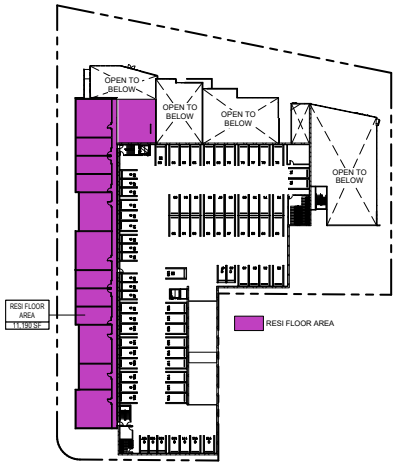
Meridian Consultants

Ground Floor Plan West Site

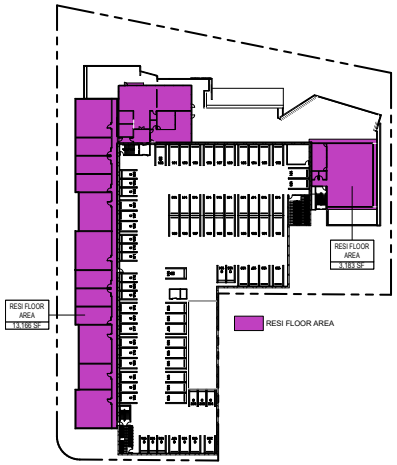
253-001-19



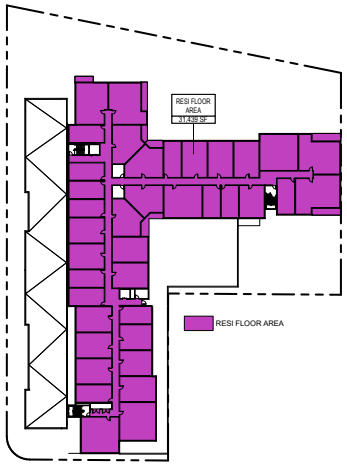
SITE A - LEVEL 1



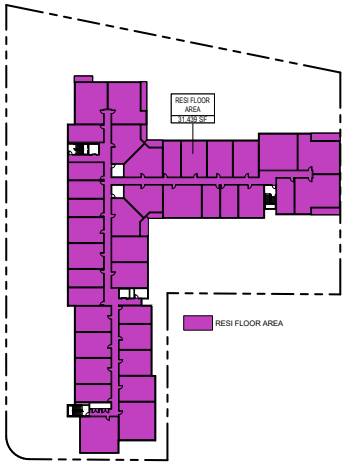
SITE A - LEVEL 2



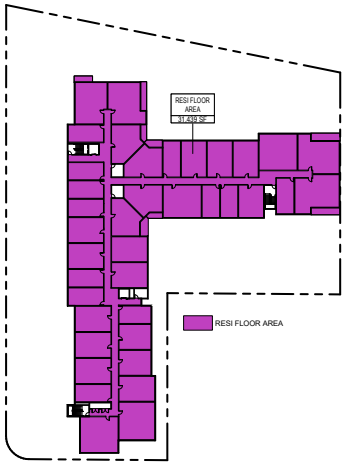
SITE A - LEVEL 3



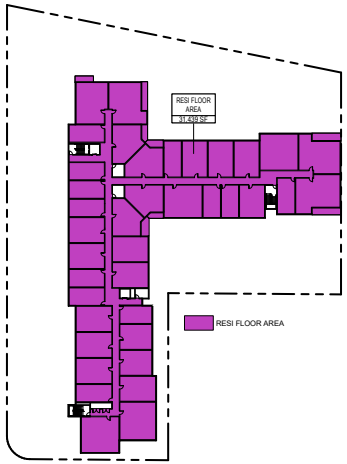
SITE A - LEVEL 4



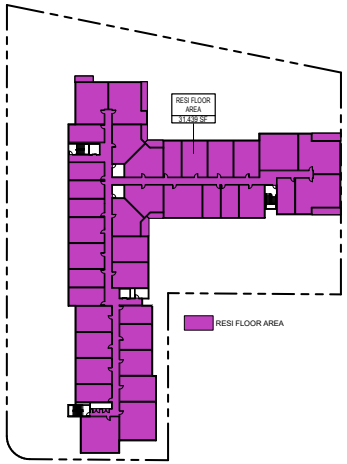
SITE A - LEVEL 5



SITE A - LEVEL 6



SITE A - LEVEL 7



SITE A - LEVEL 8

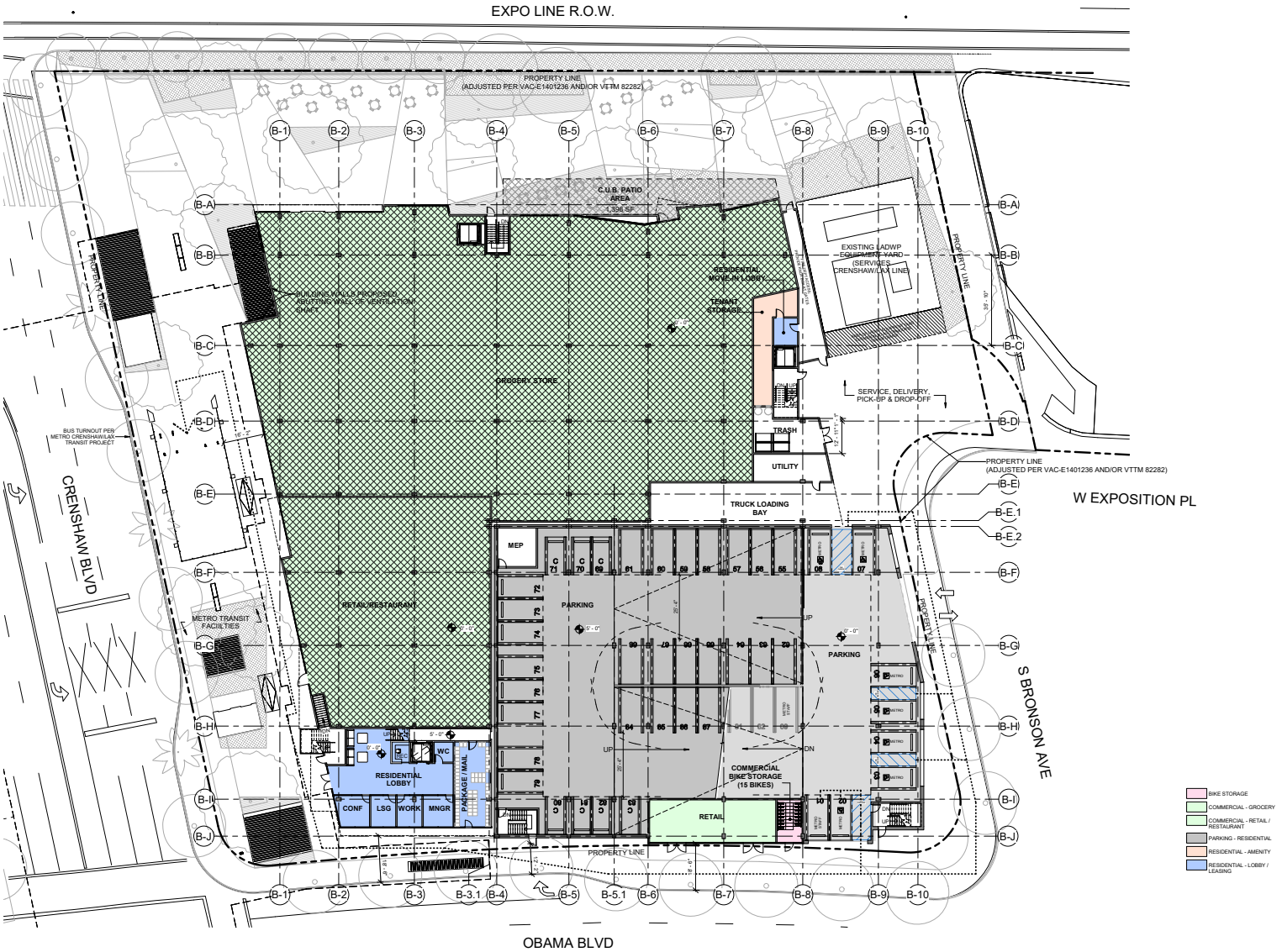
SOURCE: Belzberg Architects - 2019

FIGURE **2.0-6**

Meridian Consultants

General Floor Plans Overview - West Site

253-001-19



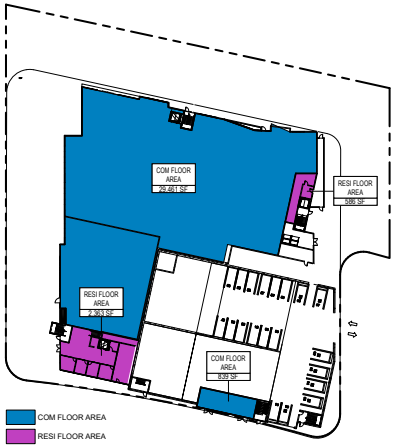
SOURCE: Belzberg Architects - 2019

FIGURE **2.0-7**

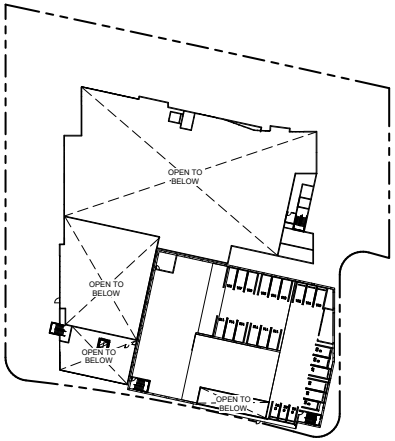
Meridian Consultants

Ground Floor Plan East Site

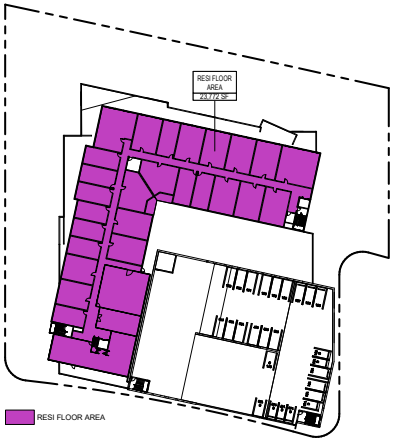
253-001-19



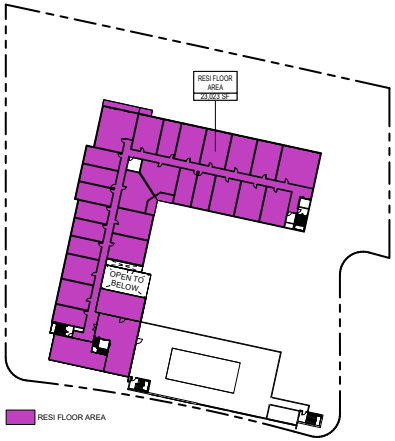
SITE B - LEVEL 1



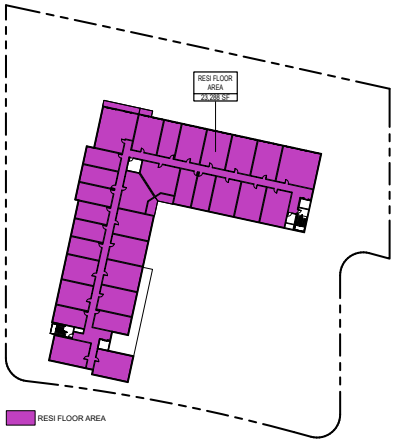
SITE B - LEVEL 2



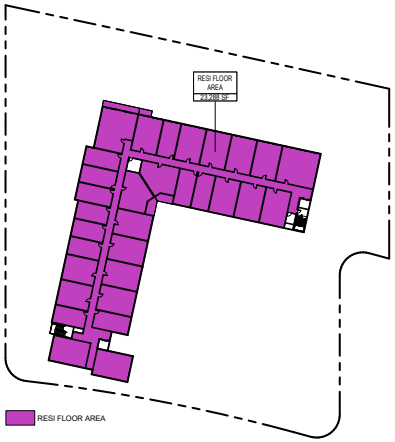
SITE B - LEVEL 3



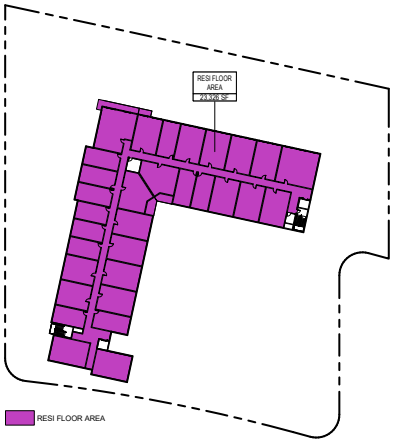
SITE B - LEVEL 4



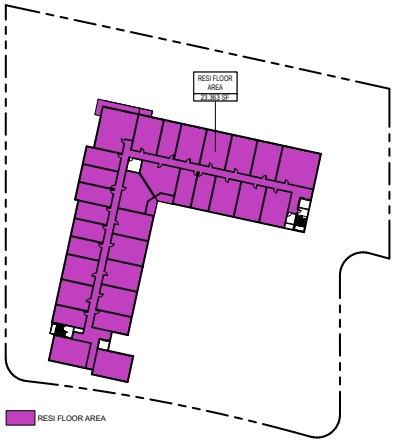
SITE B - LEVEL 5



SITE B - LEVEL 6



SITE B - LEVEL 7



SITE B - LEVEL 8

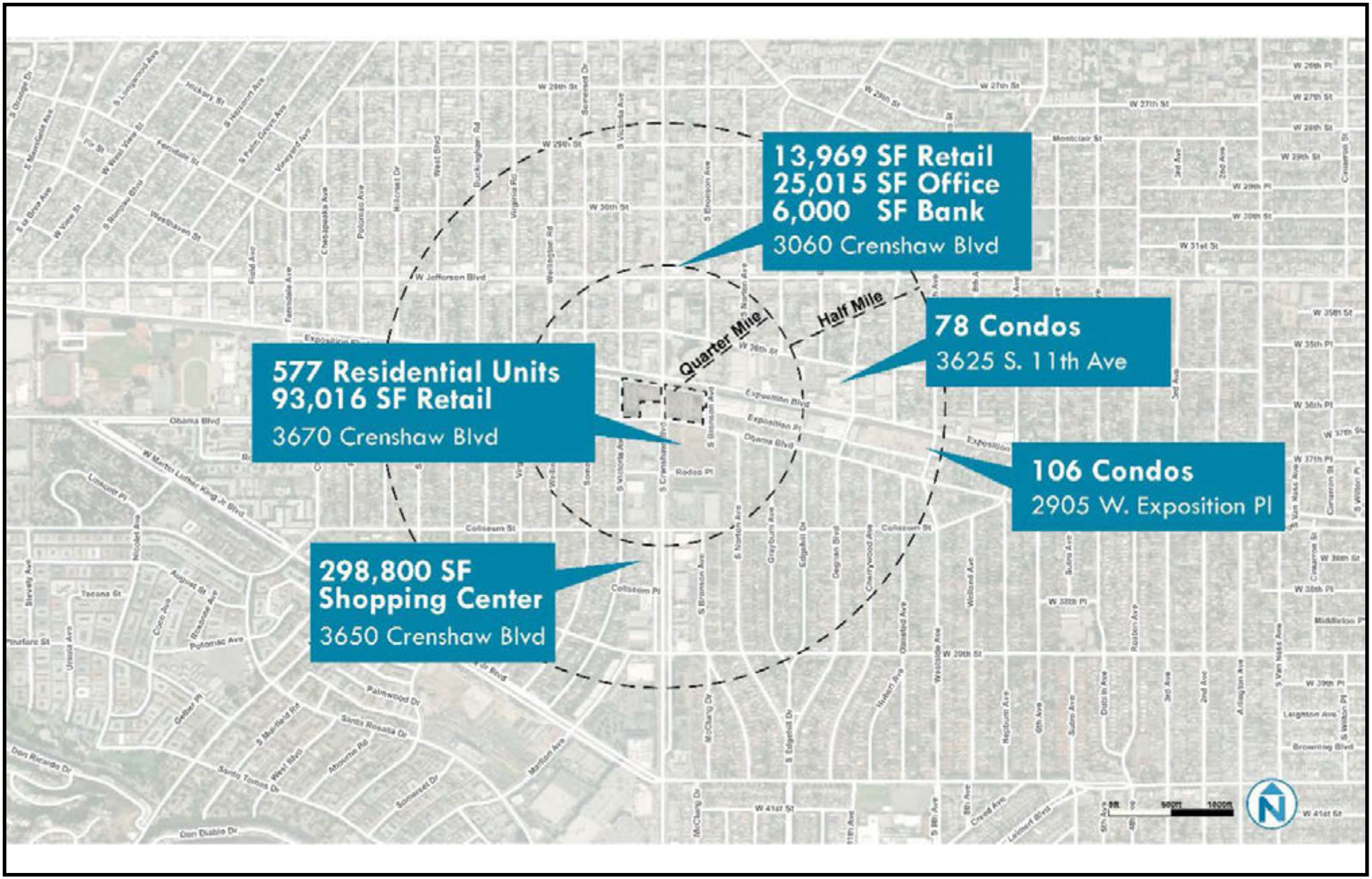
SOURCE: Belzberg Architects - 2019

FIGURE **2.0-8**

Meridian Consultants

General Floor Plans Overview - East Site

253-001-19



SOURCE: Nelson Nygarrd - 2020

FIGURE **2.0-9**

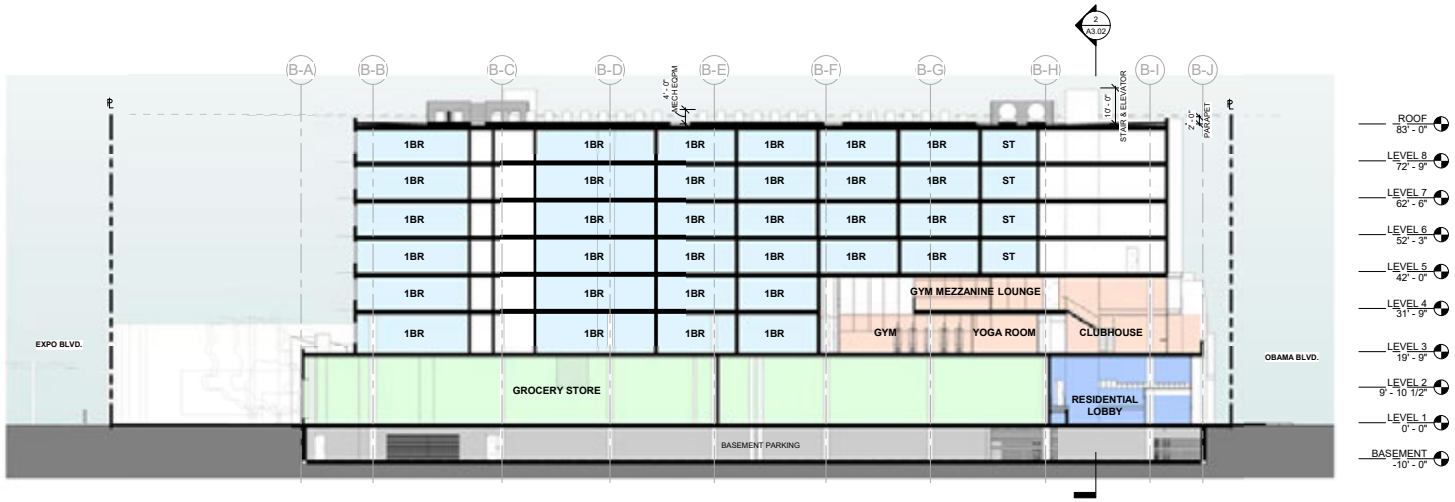
Meridian Consultants

Related Projects

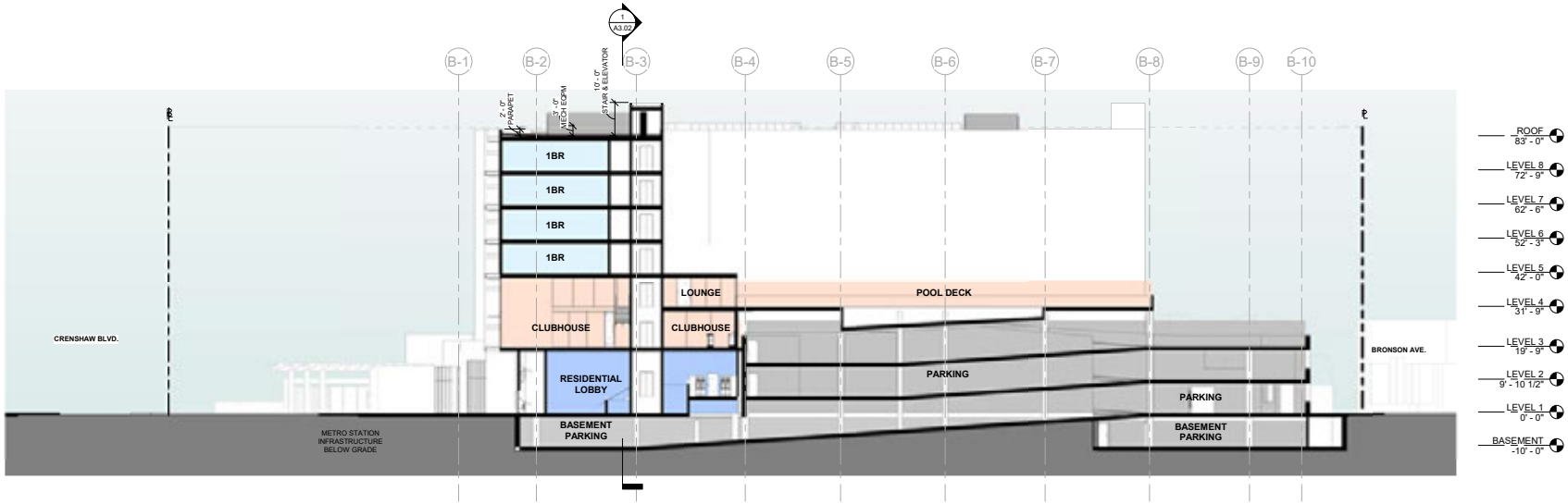
253-001-19

KEYNOTES / LEGENDS

- COMMERCIAL - RETAIL / RESTAURANT
- PARKING - COMMERCIAL
- PARKING - RESIDENTIAL
- RESIDENTIAL - AMENITY
- RESIDENTIAL - HOUSING



METRO EAST SITE N-S SECTION 1/16" = 1'-0" **1**



METRO EAST SITE E-W SECTION 1/16" = 1'-0" **2**

SOURCE: Belzberg Architects - 2019

FIGURE **2.0-10**

Meridian Consultants

Sections - East Site

253-001-19

The Project includes approximately 380,112 sq. ft. of floor area with a FAR of 2.08:1, made up of approximately 339,116 sq. ft. for the residential component and approximately 40,996 sq. ft. for the commercial and community spaces component, which would include retail and restaurant uses, and a grocery store. The 401 residential units would include 142 studios, 193 one-bedroom units, and 66 two-bedroom units, with a range of unit sizes from approximately 467 to 1,157 sq. ft. The Project would have a maximum height of approximately 86 feet to the top of the parapet, and a height of approximately 34 feet to the top of the parapet for the low-scale portion of the building along S. Victoria Avenue.

The residential component would be located above the commercial uses and above-grade parking on floors four (4) through eight (8) on the West Site and on floors three (3) through eight (8) on the East Site. Also, a low-scale, three-story residential portion of the West Site would front Victoria Avenue that would provide a transitional buffer between the lower-density residential uses across Victoria Avenue and the Project's higher density and commercial uses towards Crenshaw Boulevard, as seen in **Figure 2.0-3**.

The Project's affordable housing component would be operated in partnership with the West Angeles Community Development Corporation, the nonprofit community development of the West Angeles Cathedral (Church of God in Christ), located directly north of the Project Site across Upper Exposition Boulevard. The West Angeles Cathedral is a 5,000-seat building serving thousands of community members in the South Los Angeles community as a place of worship and community gathering. The West Angeles Cathedral also has a large above-grade parking structure directly north of the cathedral across W 36th Street which provides additional parking for Metro mass transit-riders accessing the Metro E Line at the Expo/Crenshaw Metro Station.

Implementation of the Project would require demolition of the existing one-story, approximately 19,000 square-foot administrative building and its associated surface parking lot on the West Site. No demolition is proposed on the East Site.

Access & Circulation

Regional Roadways

Primary regional access to the Project Site is provided by the Santa Monica Freeway (I-10) which runs in an east-west direction approximately 0.9 miles south of the Project Site, the Harbor Freeway/State Route 110 (I-110/SR 110), which runs in a northeast-southwest direction 3.4 miles west of the Project Site. In addition, the San Diego Freeway (I-405) is 5.2 miles east of the Project Site and the Glen Anderson Freeway (I-105) is 6.9 miles south of the Project Site.

Local Roadways

Local roadways that serve the Project include Upper and Lower Exposition Boulevards, Crenshaw Boulevard, Obama Boulevard and Jefferson Boulevard, which also provide additional connections to other local and regional streets. These and other local streets are described below.

- **Upper Exposition Boulevard** is an east-west arterial located directly north of the Metro E Line right of way. Adjacent to the Project Site, the boulevard is primarily one 10-foot travel lane and a 5-foot bike lane (class II bike route) in each direction with added 10' wide turn pockets at intersections. Exposition Boulevard continues west as a two-way road on the north side of the Metro E Line tracks. The street is classified as a Collector Street in the *Mobility Plan 2035,* which is recommended to provide 56-feet*,* and is also included in the Pedestrian Enhanced Districts network.
- **Lower Exposition Boulevard** is an east-west neighborhood street located adjacent to, the Project Site, of which segments would be merged into the Project Site – between Victoria Avenue and Crenshaw Boulevard into the West Site, and between Crenshaw Boulevard and Bronson Avenue into the East Site. The road extends from Farmdale Avenue in the west to Bronson Avenue in the east. The street is classified as a Local Street in the *Mobility Plan 2035*, which is recommended to provide a 60-foot ROW. Currently, its ROW varies, with a 40-foot width west of Crenshaw Boulevard and 50-foot width on the east side.
- **Crenshaw Boulevard** is a north-south arterial containing two 10-foot travel lanes with added 10- foot wide turn pockets at intersections in each direction. In the Project area, the boulevard extends from 29th Street in the north to Martin Luther King Jr. Boulevard to the south. The street is classified as an Avenue I Street Designation in the *Mobility Plan 2035* and is also included in the Pedestrian Enhanced Districts Network. The Mobility Plan 2035 recommends a 100-foot width and 70-foot roadway. Currently, the segment immediately adjacent to the Project Site provides a 100-foot width ROW with varied roadway widths as Metro is currently constructing to incorporate bus turnouts along the corridor within the Project area. The ROW immediately adjacent to the Project Site is subject to Metro's design standards as it relates to the Crenshaw Station purposes and Metro's bus turnouts. The 50-foot half ROW on the west side would consist a 40-foot roadway and 10-foot sidewalk and would narrow for the bus turnout, and the 50-foot half ROW on the east side would consist of a 38-foot half roadway and 12-foot sidewalk and also narrow for the bus turnout.
- **Obama Boulevard** is an east-west arterial with two 10-foot to 12-foot travel lanes in each direction with added 10-foot turn pockets at intersections. On-street parking exists on both sides of the street west of Victoria Avenue, on the north side of the street east of Bronson Avenue, and on the south side of the street east of Norton Avenue. In the Project area, the street extends from Olmstead Avenue to the east and Muirfield Road to the west. The street is classified as a Modified Avenue II in the *Mobility Plan 2035* with a recommended 80-foot ROW and 48-foot roadway. Currently the segment immediately adjacent to the Project Site has a 90-foot ROW on both sides of Crenshaw Boulevard. The 45-foot half ROW west of Crenshaw Boulevard has a 35-foot roadway and 10-foot

sidewalk, and the 45-foot half ROW east of Crenshaw Boulevard has a 28-foot roadway and 17-foot sidewalk.

- **Victoria Avenue** is a north-south street with one travel lane in each direction. The street is the west boundary of the Project's West Site and has unrestricted parking aside from street sweeping hours on both sides. In the Project area, the street extends from Lower Exposition Boulevard in the north to Martin Luther King Jr. Boulevard in the south. The street is classified as a Local Street in the *Mobility Plan 2035* with a recommended 60-foot ROW made up of a 36-foot roadway and 12-foot sidewalks. Currently the segment immediately adjacent to the Project Site meets the recommended dimensions with a 60-foot ROW where its 30-foot half ROW is made up of an 18-foot roadway and 12-foot sidewalk.
- **Bronson Avenue** is a north-south street with one travel lane in each direction. The street is the east boundary of the Project's East Site and has unrestricted parking. In the Project area, the street extends from Lower Exposition Boulevard in the north to Obama Boulevard in the south. The street is classified as a Local Street in the *Mobility Plan 2035* with a recommended 60-foot ROW with the 30-foot half ROW made up of an 18-foot roadway and a 12-foot sidewalk. Currently the segment immediately adjacent to the Project Site has a 58-foot ROW with its 29-foot half ROW made up of an 18-foot roadway and 11-foot sidewalk. The north segment of Bronson Avenue makes up the east portion of the East Site, as the Project proposes to merge it into the Project Site.

Metro operates heavy rail, light rail, and fixed-route bus transit service. Within the Project area, there are five bus routes that operate during weekdays (Monday through Friday) and limited service on weekends. Also, within the Project area are two Metro operated light rail lines, the Metro E Line and the soon-to-be opened (2020) Metro Crenshaw/LAX Line. [1]

Rail

- **Metro E Line** operates weekday, weekend, and holiday service between the City of Santa Monica and Downtown Los Angeles. Weekday service operates from 3:36 AM to 2:32 AM with Friday night service being extended to 2:52 AM. Weekend and holiday service runs between 3:36 AM and 2:32 AM, with Saturday night service being extended to 2:52 AM. This Metro Light Rail Line operates at approximately 15-minute headways (the frequency, or interval of time between buses traveling in any given direction along a designated route). The portion of the Metro E Line within the Project area operates at-grade. The Metro E Line platforms for the Expo/Crenshaw station are located in the median of Exposition Boulevard on either side of its intersection with the Crenshaw Boulevard.
- **Metro Crenshaw/LAX Line** Phase 1 is planned to open mid-2020. Phase 1 will link the Metro E Line from Exposition/Crenshaw Station to the Metro Green Line at Aviation/LAX Station. The line will connect to the LAX people mover at Aviation/Century Station. The line will serve the Crenshaw District,

1 Los Angeles Metropolitan Transportation Authority (LA Metro) Timetables. Regular Bus and Rail Schedules effective June 23, 2019. https://www.metro.net/riding/maps/system-maps/.

City of Inglewood, and Westchester. This portion of the Crenshaw/LAX Line near the Project Site operates below-grade for its first mile.

Bus

- **Route 740** operates weekday and weekend service between Jefferson Park at the Expo/Crenshaw station to the north, and the South Bay Galleria to the south. Weekday service is from 4:51 AM to 9:34 PM, and weekend service is between 5:31 AM and 9:19 PM. This route does not have service on Sundays or during select holidays. During hours of operation, this Metro Rapid bus route operates at approximately 15-minute headways. The nearest stops in proximity to the Project are at the intersection of Upper Exposition Boulevard and Crenshaw Boulevard, north of the Metro E Line Station.
- **Route 210** operates weekday and weekend services between the Hollywood/Vine Red Line Station and South Bay Galleria Transit Center in Hermosa Beach. Weekday service is from 4:21 AM to 2:39 AM, and weekend service is between 4:15 AM and 2:36 AM. This local route operates both Saturday and Sunday service along the 210/710 route. During hours of operation, this fixed-route local bus route operates at approximately 10-15-minute headways during both weekday and weekend service. The nearest stops in proximity to the Project Site are at the intersection of Exposition Boulevard and Crenshaw Boulevard, north of the Metro E Line Station.
- **Route 710** operates weekday and weekend services between the Hollywood/Vine Red Line Station and South Bay Galleria Transit Center in Hermosa Beach. Weekday service is from 5:17 AM and 9:24 PM, and weekend service is between 6:04 AM and 8:54 PM. This route does not have service on Sundays or during select holidays. During hours of operation, this fixed-route Metro bus route operates at approximately 15-minute headways during both weekday and weekend service. The nearest stops in proximity to the Project Site are at the intersection of Upper Exposition Boulevard and Crenshaw Boulevard, north of the Metro E Line Station.
- **Route 705** operates weekday and weekend services between West Hollywood at the intersection of San Vicente Boulevard and Santa Monica Boulevard and the City of Vernon at the intersection of Pacific Boulevard /E Vernon Boulevard and Santa Fe Avenue. Weekday service is from 5:00 AM to 9:19 PM. This line does not run service on weekends or select holidays. During hours of operation, this fixed-route Metro Rapid bus route operates at approximately 10-25-minute headways during weekday service. The nearest stop in proximity to the Project Site is at Martin Luther King, Jr Boulevard and Crenshaw Boulevard.
- **Route 38** operates between Broadway and Venice Avenue west of the Fashion District of Los Angeles and Washington/Fairfax Transit Hub near Culver City between 4:05 AM and 1:03 AM on weekdays, with Westbound service terminating at 12:27 AM. On Saturdays, the bus route operates between from 4:17 AM and 1:03 AM, with Westbound service terminating at 12:27 AM. During hours of operation, this fixed-route bus route operates at approximately 30-minute headways during weekday service. In the Project area, the bus route operates along Jefferson Boulevard. The nearest bus stop is located at the intersection Jefferson Boulevard and Crenshaw Boulevard.

The Los Angeles Department of Transportation (LADOT) operates fixed-route bus transit service. Within the Project area, there are three DASH routes operated by LADOT (Midtown, Leimert/Slauson, and Crenshaw Routes) that operate during weekdays (Monday through Friday) as well as weekends (Saturday and Sunday). None of the three lines provide holiday service. [2]

- **DASH Midtown Route** operates between Mid-City and Crenshaw between 6:00 AM and 7:40 PM on weekdays, with Southbound service terminating at 7:48 PM. On Saturdays, the bus route operates between from 9:00 AM and 6:40 PM, with Southbound service terminating at 6:48 PM. In the Project area, the bus route makes a loop using Jefferson Boulevard, Crenshaw Boulevard, Coliseum Street, and Buckingham Road. The nearest bus stop is located on the same block as the Project Site west of Crenshaw Boulevard.
- **DASH Leimert/Slauson Route** operates as a bidirectional loop from Martin Luther King Boulevard at Crenshaw Mall to the LA Memorial Coliseum to the east. The clockwise route operates between 6:05 AM and 7:44 PM on weekdays. The counterclockwise route operates between the same hours. Saturdays and Sundays, the bus route operates between from 9:00 AM and 6:54 PM. In the Project area, the bus route operates along Crenshaw Boulevard, Martin Luther King, Jr Boulevard, and Marlton Avenue. The nearest bus stop is located at the intersection of Martin Luther King Boulevard and Crenshaw Boulevard.
- **DASH Crenshaw Route** operates as a bidirectional loop from Martin Luther King, Jr Boulevard at Crenshaw Mall to the Rancho Cienega Recreation Center. The route operates between 6:00 AM and 7:35 PM on weekdays. The counterclockwise route operates between the same hours. On Saturdays, the bus route operates between from 9:00 AM and 6:35 PM, with southbound service terminating at 6:48 PM. In the Project area, the bus route operates along Crenshaw Boulevard, Coliseum Street, W 39th Street, and Menalto Avenue. The nearest bus stop is located on the west of Crenshaw Boulevard.

Vehicle Parking

Parking garages will be provided on the West and East Sites to provide parking for the residential and commercial uses proposed on each site. The parking garage on the West Site includes ground level and three (3) above-grade levels. The parking garage on the East Site includes ground level and three (3) above-grade levels and one (1) below grade level.

The Project would provide approximately 502 vehicle parking spaces, consisting of 232 spaces on the West Site and 270 spaces on the East Site, consistent with the parking requirements in the ENA intended to increase mass transit ridership while creating a project with current and future viability. Of this total, 484 parking spaces would be provided for the residential and commercial uses. Included in the 502 parking spaces are nine (9) accessible American with Disabilities Act-compliant (ADA) parking spaces reserved

2 Los Angeles Department of Transportation (LADOT), Downtown Area Short Hop (DASH), https://www.ladottransit.com/index.html#mNavDash.

exclusively for Metro mass transit riders and an additional nine (9) spaces reserved for leasing staff on the East Site as required by the ENA.

The residential parking program would include approximately 362 parking spaces for the residential uses, of which 203 parking spaces would be for the residential uses and located on the West Site, and 159 parking spaces would be for the residential uses and located on the East Site, resulting in approximately 0.90 parking spaces per unit.

Of the 502 parking spaces, 122 parking spaces would be provided for the commercial uses with 29 spaces for the commercial uses and located on the West Site, and 93 parking spaces for the commercial uses and located on the East Site, including the proposed full-service grocery store.

Bicycle Parking and Facilities

The Project would provide approximately 316 bicycle parking spaces, consisting of 271 long-term spaces and 45 short-term spaces to meet the LAMC requirements for residential and commercial land uses. The West Site would include 144 residential bicycle parking spaces (13 short-term and 131 long-term) to meet the City's requirement of 144 residential bicycle parking spaces (13 short-term and 131 long-term), and 12 commercial spaces (6 short-term and 6 long-term) to meet the City's requirement of 12 commercial bicycle spaces (6 short-term and 6 long-term). The East Site would include 130 bicycle spaces (11 short-term and 119 long-term) for residential uses to meet the City's residential bicycle parking requirement of 130 bicycle spaces (11 short-term and 119 long-term), and 30 commercial bicycle parking spaces (15 short-term and 15 long-term) to meet the City's requirement of 30 commercial bicycle parking spaces (15 short-term and 15 long-term). The Project would also provide long-term, secure bicycle storage for Metro riders via the Metro Bike and Bike Locker program on the ground floor of the West Site.

The short-term bicycle parking spaces for the residential uses and commercial uses would be located on the ground level of the proposed parking structure. The long-term bicycle parking spaces for the residential uses and commercial uses would be located within the one (1) subterranean level on the East Site and three (3) above-grade parking levels on the West and East Sites consistent with the LAMC requirements.

Bicycle, Pedestrian, and Vehicular Safety

The Project has been designed to provide safe and efficient circulation for various modes of transportation. The Project Site is located along the Crenshaw Corridor which features steady pedestrian volume due to the various mass transit options available to pedestrians. Consistent with the surrounding neighborhood, the Project has been designed to be pedestrian-oriented with ground floor commercial and community spaces uses fronting five different frontages of the Project Site (the Metro E Line and Crenshaw Boulevard

on the West Site; and the Metro E Line and Obama and Crenshaw Boulevards on the East Site). The street level commercial and community uses proposed include a full-service grocery store, retail commercial, and restaurant uses, each with its own direct entrance from the adjacent streets. In addition, the proposed buildings step back from the property line at various places, to allow for outdoor dining and areas for outdoor public programming.

The Project supports cycling as a mass transit option by providing various bicycle parking locations throughout the Project Site. The short-term bicycle parking for commercial and residential uses would be safely and conveniently located within the ground floor of the parking structure near pedestrian activity and the entrances to the residential and commercial uses. The long-term bicycle parking would be located on the various levels of the parking structure. Access to the long-term parking would be through the lobby elevators on the ground floor. Bicycle circulation has been designed to be separated from vehicle circulation. The Project would also provide long-term bicycle storage dedicated to Metro mass transit riders on the West Site adjacent to the Metro E Line within the various ground-level commercial uses.

Vehicular access to the West Site parking structure would be provided from Victoria Avenue and vehicular access to the East Site parking structure would be provided from Bronson Avenue. A vehicle drop-off and pick-up area is proposed at the northwest portion of the West Site along Victoria Avenue adjacent to the Metro E Line frontage to separate vehicular and pedestrian traffic and provide a safe and convenient environment for pedestrians entering and exiting vehicles.

Recreation, Open Space, and Landscaping

The Project would include several types of open spaces in the form of indoor and outdoor recreational amenities, passive open space that has been programmed for residents, and publicly accessible open space with additional programming opportunities. The Project would provide approximately 44,464 sq. ft. of publicly-accessible open space and residential amenities, including a publicly accessible open space plaza landscaped with a variety of trees and shrubs along the Metro E Line frontage, to meet the total open space requirement for the Project of 36,890 sq. ft. based on a Density Bonus On-Menu Incentive which permits up to a twenty-percent (20%) reduction of the LAMC open space requirement, which would be utilized to reduce the open space requirement for the West Site. The West Site would include approximately 22,388 sq. ft. of open space to meet the 19,080 square-foot requirement, while the East Site would include approximately 22,076 sq. ft. of open space to meet the 17,900 square foot requirement.

The open space would include publicly accessible outdoor common space located between the Metro E Line and along the north frontage of the ground floor and promenades along the Metro E Line, and along Crenshaw and Obama Boulevards. This area would be made up of the Merger Areas that would provide a

wide landscaped pedestrian promenade and plaza that would provide a passive open space area available for community events.

Open space for the proposed residential uses would also include indoor and outdoor residential common spaces on the third and fourth floors, including common outdoor amenity decks. The amenities for the West Site would include a yoga room, fitness center, conference facilities, multipurpose rooms, lounge areas, and outdoor amenity space. The amenities for the East Site would be like those on the West Site, but also include a viewing deck on Level 3 and a pool deck located on Level 4.

The Project would remove 41 unprotected on-site trees and two unprotected street trees in public ROW on the West Site, and three protected Sycamore trees on the East Site. While LAMC Section 17.02 requires protected trees to be replaced at a (2:1) ratio, the Project would replace the three sycamore trees to be removed at a (4:1) ratio, providing a total of 12 replacement trees in accordance with City Urban Forestry's best practice. There are also 11 street trees adjacent to the West Site, two of which are to be removed and replaced at a (2:1) ratio pursuant to LAMC Section 62.170. In addition, the Project is required to provide 101 trees for the new residential uses, pursuant to LAMC Section 12.21 G (one tree for every four dwelling units. In total, the Project would be required to provide 117 trees -- 101 trees for the new residential uses (57 on the West Site and 44 on the East Site), 12 replacement trees of the protected Sycamore trees from the East Site, and four replacement street trees for the two unprotected trees to be removed in the public ROW adjacent to the West Site. The Project would provide a total of 157 trees on-site or within its adjacent ROW, with 78 trees on the West Site, and 79 trees on the East Site.

Sustainability

The location of the Project within a walkable and bikeable neighborhood near various public transportation options would contribute to the reduction of vehicle miles traveled for residents of and visitors to the Project. In addition to providing the required short-term and long-term bicycle parking spaces for its residential and commercial uses, the Project would also include a Metro bicycle storage room for Metro mass transit riders located among the ground floor commercial uses on the West Site.

Consistent with the development requirements in the ENA, the Project would be constructed to meet LEED Silver standard or equivalent to create efficient green buildings. The Project would also be constructed pursuant to applicable local and State requirements, including but not limited California Building Energy Efficiency Title 24 Standards to provide increased energy efficiency through use of efficient fixtures and other energy conservation features. The Project's design also incorporates drought-tolerant landscaping, an automated water sprinkler system, water efficient fixtures and appliances, and other water conservation features to reduce overall water usage. The Project would also provide 30 percent EV

Ready and 10 percent EV Charging Stations of the total 502 parking spaces, consistent with Ordinance No. 186,485.

Building Orientation

The Project Site plan responds to the neighborhood context of the Site by primarily orienting the commercial uses toward the mass transit frontages along Exposition Boulevard. The retail commercial space on the East Site wraps around the building along Crenshaw Boulevard and includes a small amount of additional retail commercial space on Obama Boulevard. Access to the residential uses is provided via multiple entrances for those that travel by foot, bus, or rail, and provides convenient bicycle storage throughout the property for those that travel by bicycle. Commercial spaces would have their own respective entrance directly along the promenades facing the Metro E Line or adjacent streets. The low-scale residential scale along Victoria Avenue with a 15-foot setback also helps transition between the low-scale residential surrounding uses to the west and the eight-story building toward Crenshaw Boulevard. Buildings are also oriented so that vehicular traffic and access points into each of the parking garages are tucked behind via the local streets – Victoria Avenue and Bronson Avenue – in order to minimize conflicts with pedestrian and bicycle traffic that would be mostly along the other frontages.

Landscaping

The Project would provide landscaping consistent with applicable LAMC requirements and the Crenshaw Corridor Specific Plan. The Project would provide a variety of drought tolerant trees and shrubs along the frontages of the site, including the publicly accessible open space areas along Exposition Boulevard to enhance and beautify the streetscape while providing shading and areas to congregate for pedestrians.

Off-Street Parking and Driveways

Project parking would be provided in two parking structures– two (2) above ground floors on the West Site, and three (3) above ground floors and one (1) subterranean floor on the East Site. Access for vehicles to these parking structure would be provided via driveways from Victoria Avenue for the West Site, and Bronson Avenue for the East Site.

Building Signage and Lighting

New Project signage would be used for building identification, wayfinding, and security markings in compliance with the Crenshaw Corridor Specific Plan. Signage for the commercial uses would be like existing street front commercial signage in the vicinity of the Project Site and would be used for tenant identification.

Sidewalks

The Project is located within the Crenshaw Corridor Specific Plan area, which promotes planning of Crenshaw Boulevard as a pedestrian corridor in South Los Angeles. Crenshaw Boulevard adjacent to the Project Site, which is currently undergoing street improvements by Metro as part of the Crenshaw/LAX Line construction project, would create pedestrian-friendly sidewalk conditions to allow for easy and safe pedestrian access into the Project and to and from the nearby mass transit options. The Project's sidewalks would be consistent with applicable LAMC requirements and with adjacent Metro improvements and will continue to maintain a safe and comfortable space for all types of pedestrian traffic.

Utilities

The Project would place utility equipment underground and/or in the specified zones identified in the City of Los Angeles Walkability Checklist for Site Plan Review. This checklist, developed by the Department of City Planning Urban Design Studio, consists of a list of design principles intended to the pedestrian environment, protect neighborhood character, and promote high quality urban form to assess the pedestrian orientation of a project when making the required findings for approval of a project.

2.7 APPROVAL ACTIONS

The discretionary entitlements, reviews, permits, and approvals required to implement the Project include, but are not limited to, the following:

1. Pursuant to LAMC Section 12.22 A.25, Density Bonus Compliance Review, for:
    a. A seven percent (7%) density bonus on the West Site and Utilization of Density Bonus Parking Option 1, in exchange for reserving fifteen percent (15%) of total units for Very-Low Income households, and five percent (5%) of total units for a range of Very-Low to Low-Income households;
    b. Two (2) On-Menu and (1) Off-Menu incentives:
        i. On-menu incentive to allow an increase in height of an additional 11 feet over the otherwise permitted 75 feet for the main buildings and an additional increase in height of an additional 4 feet over the otherwise permitted 30 feet for the low-scale residential buildings along Victoria Avenue;
        ii. On-menu incentive to reduce LAMC open space requirement of 23,850 sq. ft. for the West Site by twenty percent (20%) for a total required open space of 19,080 sq. ft. (a total of 22,388 sq. ft. of open space would be provided on the West Site); and
        iii. Off-menu incentive to reduce residential parking Density Bonus Parking Option 1 requirement of 279 parking spaces on the West Site by approximately twenty-eight percent (28%) and the East Site parking requirement of 188 parking spaces by approximately sixteen percent (16%).

c. Three (3) Waiver of Development Standards:
   i. To request a relief of approximately 11 feet (portions of which request only an 11-inch relief) of the required 11-foot side yard setback for the residential parking and amenity deck uses along the east interior side on the West Site;
   ii. To request a relief of approximately 5.5 feet of the required 11-foot side yard setback for the residential parking and amenity deck uses along the south side on the West Site; and
   iii. To allow approximately forty-three percent (43%) of the 203 primary residential parking spaces on the West Site and approximately thirty-four percent (34%) of the 159 primary residential parking spaces on the East Site to be compact spaces, in lieu of the required primary standard residential space.

2. Pursuant to LAMC Section 16.05, Site Plan Review for an increase of 50 or more dwelling units;
3. Pursuant to LAMC Section 12.24.W 1, a Master Conditional Use Permit for the sale of a full-line of alcoholic beverages for on-site consumption for up to six (6) establishments totaling approximately 17,179 sq. ft. of commercial use; and for the sale of a full-line of alcoholic beverages for off-site consumption in conjunction with one (1) grocery store totaling approximately 22,277 sq. ft. within the South Los Angeles Alcohol Sales Specific Plan;
4. Pursuant to LAMC Section 11.5.7 C, Project Permit Compliance Review to permit development within the Crenshaw Corridor Specific Plan (Specific Plan);
5. Pursuant to LAMC Section 11.5.14, Administrative Review to permit development within the Mid-City Recovery Redevelopment Project area;
6. Pursuant to LAMC Section 12.21.A 2, a Zoning Administrator Interpretation to determine that publicly accessible open space on the Project Site may count towards satisfying the Project's LAMC open space requirement; and
7. Pursuant to LAMC Section 17.15, a Vesting Tentative Tract Map to merge the existing lots, including portions of public ROW of Lower Exposition Boulevard and Bronson Avenue, and re-subdivide into two (2) ground lots and thirty-four (34) airspace lots, and a waiver of a one-foot dedication on Bronson Avenue.

This SCEA will serve as the environmental document for the City's discretionary action and ministerial permits or approvals associated with development of the Project, including approval of the haul route. These documents are also intended to cover all federal, State, regional, and/or local government discretionary or ministerial permits or approvals that may be required to develop the Project, whether or not explicitly identified above.

2.8 RELATED PROJECTS

In accordance with CEQA Guidelines Section 15064(h), this SCEA includes an evaluation of the Project's cumulative impacts. The guidance provided under CEQA Guidelines Section 15064 (h) is as follows:

(1) When assessing whether a cumulative effect requires an EIR, the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable. An EIR must be prepared if the cumulative impact may be significant and the project's incremental effect, though individually limited, is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

A lead agency may determine in an initial study that a project's contribution to a significant cumulative impact will be rendered less than cumulatively considerable and thus is not significant. When a project might contribute to a significant cumulative impact, but the contribution will be rendered less than cumulatively considerable through mitigation measures set forth in a mitigated negative declaration, the initial study shall briefly indicate and explain how the contribution has been rendered less than cumulatively considerable.

A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program (including, but not limited to, water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plan, plans or regulations for the reduction of greenhouse gas emissions) that provides specific requirements that will avoid or substantially lessen the cumulative problem within the geographic area in which the project is located. Such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. When relying on a plan, regulation or program, the lead agency should explain how implementing the particular requirements in the plan, regulation or program ensure that the project's incremental contribution to the cumulative effect is not cumulatively considerable. If there is substantial evidence that the possible effects of a particular project are still cumulatively considerable notwithstanding that the project complies with the specified plan or mitigation program addressing the cumulative problem, an EIR must be prepared for the project.

The mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project's incremental effects are cumulatively considerable.

Based on this guidance, an adequate discussion of potential cumulative impacts can be based on either: (1) a list of past, present, and probable future producing related impacts; or (2) a summary of projections contained in an adopted local, regional, Statewide plan, or related planning document that describes conditions contributing to the cumulative effect. (CEQA Guidelines Section 15130(b)(1)(A)-(B)). The lead agency may also blend the "list" and "plan" approaches to analyze the severity of impacts and their likelihood of occurrence. Accordingly, all proposed, recently approved, under construction, or reasonably

foreseeable projects that could produce a related or cumulative impact on the local environment, when considered in conjunction with the Project, were identified for evaluation.

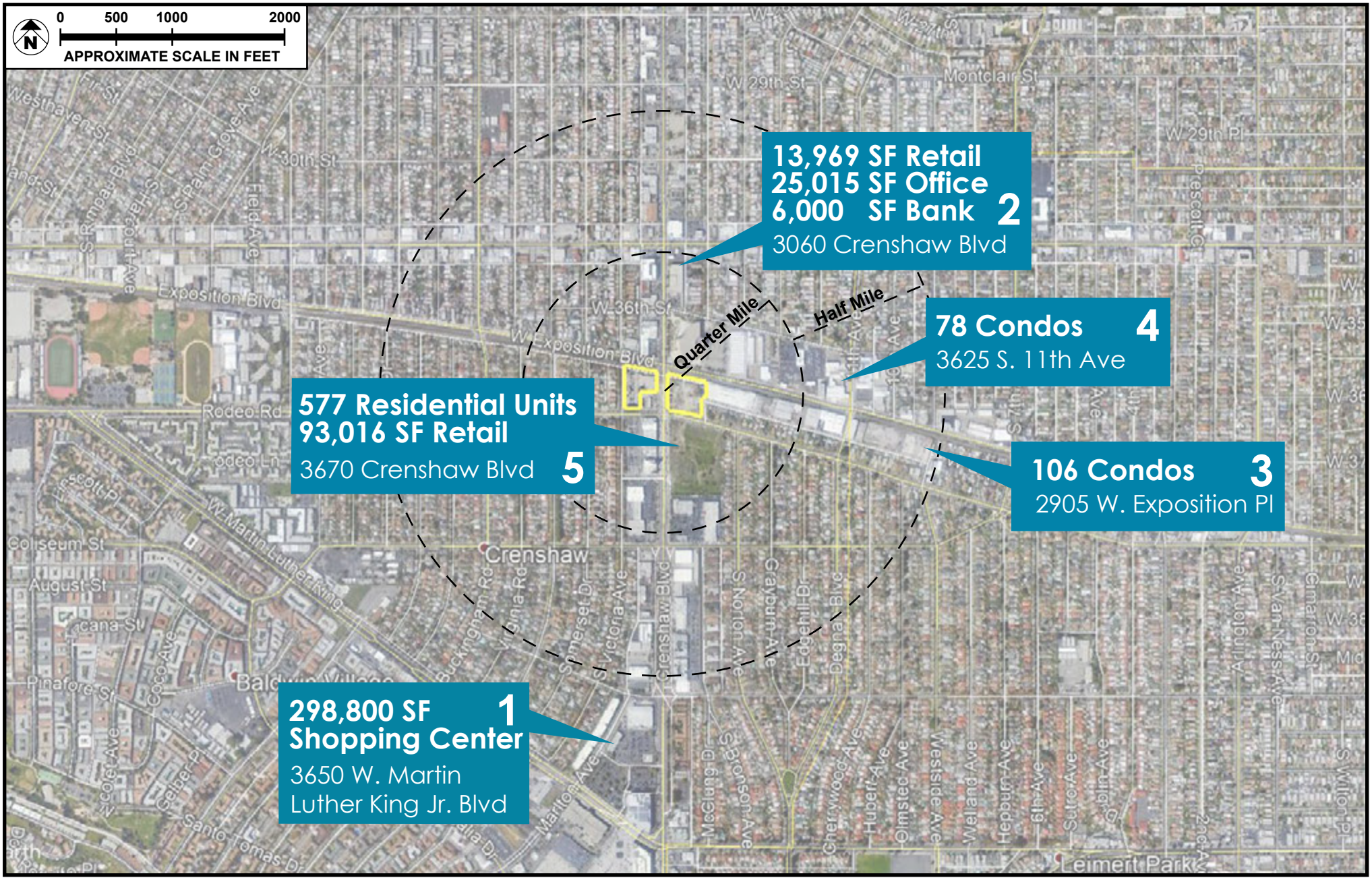
The City of Los Angeles Department of Transportation Assessment Guidelines require that related projects considered in the cumulative analysis of transportation impacts include known related projects within a one-quarter mile (1,320 foot) radius of a project site.

Table 2.0-2: Related Projects List identifies the five (5) related projects identified within a one-quarter mile of the Project Site. The locations of these related projects are shown in **Figure 2.0-11: Related Projects**. Project 1 is located at 3650 W. Martin Luther King Jr. Boulevard, approximately 0.75 miles south of the West Site and Project 5 is located at 3670 S. Crenshaw Boulevard, immediately south of the East Site. Projects 2, 3, and 4 are located north and east of the Project Site. In November 2019, the South Los Angeles Area Planning Commission granted an appeal of the Director of Planning's approval of Related Project 5. This related project is included in the list of related projects, however, to address the potential cumulative impacts from development of this site.

An analysis of the cumulative impacts associated with these related projects and the Project are provided under each individual environmental impact category in **Section 3.0: SCEA Criteria** of this SCEA.

Table 2.0-2
Related Projects List

Project ID	Year	Title	Description	Address
1	2009	Shopping Center	298,800 sq. ft. Shopping Center	3650 W. Martin Luther King Jr. Boulevard
2	2007	Retail/ Office Building	13,969 sq. ft. Retail, 25,015 sq. ft. Office + 6,000 sq. ft. Bank	3060 S. Crenshaw Boulevard
3	2016	2905 Exposition Pl Condos	106 Condos	2905 W. Exposition Place
4	2017	LA 10th & 11th Condos	78 Condos	3625 S. 11th Avenue
5	2019	District Square Mixed-Use	577 Residential Units 93,016 sq. ft. Retail	3670 S. Crenshaw Boulevard



SOURCE: Nelson Nygarrd - 2020; Google Earth - 2020

FIGURE **2.0-11**

Meridian Consultants

Related Projects

253-001-19

3.0 SCEA CRITERIA

3.1 REGULATORY BACKGROUND

The State of California adopted Senate Bill (SB) 375, the Sustainable Communities and Climate Protection Act of 2008, to outline growth strategies and better integrate regional land use and transportation planning, which will help the State meet its GHG reduction mandates. SB 375 requires that the State's 18 metropolitan planning organizations incorporate a "sustainable communities strategy" with their respective regional transportation plans to achieve their respective region's GHG emission reduction targets set by CARB. SCAG is the metropolitan planning organization that has jurisdiction over the Project Site.

For the SCAG region, pursuant to SB 375, CARB set GHG emission reduction targets that were updated in 2018 to an 8 percent reduction by 2020 and a 19 percent reduction by 2035 in per capita passenger vehicle GHG emissions, which became effective October 1, 2018.[1] On September 3, 2020, SCAG adopted the 2020–2045 RTP/SCS: Connect SoCal The 2020–2045 RTP/SCS outlines strategies that meet or exceed these targets set by CARB.[2] On October 30, 2020, pursuant to California Government Code Section 65080(b)(2)(1), CARB accepted SCAG's determination that its 2020-2045 RTP/SCS would, when implemented, meet the applicable 2035 greenhouse gas (GHG) emissions reduction target for automobiles and light trucks as established by CARB in 2018, specifically, a 19 percent per capita reduction by 2035 relative to 2005 levels.[3]

3.2 TRANSIT PRIORITY PROJECT CRITERIA

SB 375 provides CEQA streamlining benefits to transit priority projects (TPPs). A TPP is a project that meets the following four criteria (PRC Section 21155 (a) and (b)):

1. Is consistent with the use designation, density, building intensity, and applicable policies specified for the project area in the SCAG 2020–2045 RTP/SCS;
2. Contains at least 50 percent residential use, based on total building square footage and if, if the project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75; and
3. Provides a minimum net density of at least 20 units per acre.
4. Is located within one-half mile of a major transit stop or high-quality transit corridor included in the 2020–2045 RTP/SCS.

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1 California Air Resources Board, SB 375 Regional Plan Climate Targets, https://ww2.arb.ca.gov/ourwork/programs/sustainable-communities-program/regional-plan-targets, accessed November 2019.

2 Southern California Association of Governments, 2016–2040 Regional Transportation Plan / Sustainable Communities Strategy, Introduction, April 19, 2012, http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS.pdf, accessed December 2019.

3 California Air Resources Board, Executive Order No. G-20-239, https://scag.ca.gov/sites/main/files/file-attachments/carb-2020-scs-evaluation-packet.pdf?1606337689, accessed December 2019.

Consistency with Criterion 1: Project uses designation, density, building intensity, and applicable policies specified for the Project area in the SCAG 2020–2045 RTP/SCS.

The Project does not conflict with applicable goals and policies in the SCAG 2020–2045 RTP/SCS, as demonstrated by the analysis presented in **Table 3.2-1: Consistency Analysis 2020–2045 RTP/SCS**. Goals and policies that are not applicable are those not identified for implementation by local jurisdictions. The Project's consistency with all actions/strategies identified for implementation by the local jurisdictions is assessed below.

Table 3.2-1
Consistency Analysis 2020–2045 RTP/SCS

Goals and Policies	Consistency Analysis
Goal 1: Encourage regional economic prosperity and global competitiveness	**No Conflict**. This Goal is directed towards actions taken by SCAG and the City and does not apply to the Project.
Goal 2: Improve mobility, accessibility, reliability, and travel safety for people and goods.	**No Conflict**. The Project Site is located in an urbanized area in the City within a High-Quality Transit Area (HQTA) and a Transit Priority Area (TPA). The Project would develop 401 residential units, including studio units, one-bedroom units, and two-bedroom units. The Project Site is well served by mass transit with frequency of service intervals of 15 minutes or less during peak commute periods. The Project would provide residents and visitors with convenient access to mass transit and opportunities for walking and biking. The location of the Project encourages a variety of transportation options and access.
Goal 3: Enhance the preservation, security, and resilience of the regional transportation system.	**No Conflict**. While not necessarily applicable to an individual development project, the Project would support this goal by improving the viability of alternative forms of transportation through providing higher density development, and improved pedestrian and bicycle infrastructure adjacent to the regional light rail system. A robust variety of transportation options will help to ensure the mobility needs of residents and visitors are met. Additionally, as discussed in the Traffic Study (**Appendix J.1**), the Project would not result in significant impacts on the surface transportation system.
Goal 4: Increase person and goods movement and travel choices within the transportation system.	**No Conflict**. While not necessarily applicable to an individual development project, the Project would support this goal by improving local access to alternative forms of transportation, with appropriate design considerations to account for future population growth and multimodal choices.
Goal 5: Reduce greenhouse gas emissions and improve air quality.	**No Conflict**. The Project would place new residential units and commercial uses in a HQTA and a TPA and includes improvements to the pedestrian

Goals and Policies	Consistency Analysis
	and bicycle circulation systems. The Project Site location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Project promotes the use of a variety of transportation options, which includes walking and use of the regional light rail and bus systems. Further, the Project would activate the street frontages adjacent to the proposed buildings and introduce new landscaping, seating areas, and street furniture, encouraging pedestrian activity. As mentioned previously, the Project would also include new bicycle infrastructure to encourage bicycle use. The Project would promote use of multimodal transportation options which would reduce greenhouse gas emissions and improve air quality.
Goal 6: Support healthy and equitable communities.	**No Conflict**. The Project would place new residential units and commercial uses in a HQTA and a TPA. The Project Site's location near mass transit and proximity to services, retail stores, and employment opportunities promotes a pedestrian-friendly environment. The location of the Project promotes the use of a variety of transportation options, which includes walking, and bicycle and public transportation use. By improving access to multimodal transportation options, the Project supports the development of a healthy and equitable community
Goal 7: Adapt to a changing climate and support an integrated regional development pattern and transportation network.	**No Conflict**. This policy is directed towards SCAG actions to support regional development patterns areas. However, the Project is an infill development within a HQTA and a TPA, which is consistent with this policy. In regard to adaptation to a changing climate, the Project would comply with the California Green Building Standards Code (CALGreen) and the City's Green Building Code, and would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, nonVOC paints/adhesives, drought tolerant planting, and high-performance building envelopment.
Goal 8: Leverage new transportation technologies and data-driven solutions that result in more efficient travel.	**No Conflict**. This policy is directed towards SCAG actions to leverage the use of new transportation technologies using data-driven solutions. However, as stated above, the Project is an infill development within an HQTA and a TPA, which both offer highly-efficient travel opportunities, consistent with this policy.

Goals and Policies	Consistency Analysis
Goal 9: Encourage development of diverse housing types in areas that are supported by multiple transportation options.	**No Conflict**. The Project would provide 401 residential units would include 142 studios, 193 one-bedroom units, and 66 two-bedroom units with 20% of the proposed units to be restricted as affordable housing. The Project would contribute to a range of housing choice and available to all persons, including existing employees and residents in the City. As stated above, the Project Site is located in an urbanized area in the City within a HQTA and a TPA. The Project Site is well served by mass transit being located on two light rail lines with more than a dozen of bus lines in walking distance with frequency of service intervals of 15 minutes or less during peak commute periods. The Project would provide residents and visitors with convenient access to mass transit and opportunities for walking and biking as well as 502 vehicle parking spaces, consisting of 232 spaces on the West Site and 270 spaces on the East Site.
Goal 10: Promote conservation of natural and agricultural lands and restoration of habitats.	**No Conflict**. The Project is proposed on an infill development site in an urbanized area and would not directly or indirectly affect any natural or agricultural lands.
Guiding Principle 1: Base transportation investments on adopted regional performance indicators and MAP-21/FAST Act regional targets.	**No Conflict**. This principle is directed towards actions by SCAG and other public agencies in allocating transportation investments and does not apply to individual development projects.
Guiding Principle 2: Place high priority for transportation funding in the region on projects and programs that improve mobility, accessibility, reliability and safety, and that preserve the existing transportation system.	**No Conflict**. This principle is directed towards actions by SCAG and other public agencies in allocating transportation system funding. However, the Project would contribute to a safe, well maintained, and efficient multimodal transportation system by placing new residential and commercial uses in a location that will encourage use of mass transit and including improvements that will improve pedestrian and bicycle use. Additionally, as discussed in the Traffic Study (**Appendix J.1**), the Project would not result in significant impacts on the surface transportation system.
Guiding Principle 3: Assure that land use and growth strategies recognize local input, promote sustainable transportation options, and support equitable and adaptable communities.	**No Conflict**. This principle is directed towards the development of land use and growth strategies by public agencies and does not apply it to individual development projects. However, the Project advances the local smart growth initiatives of Metro and the County, and the City's Transit Oriented Communities Program, by locating residential and commercial uses designed to facilitate multiple modes of transportation.
Guiding Principle 4: Encourage RTP/SCS investments in strategies that collectively result in reduced non-recurrent congestion and demand for single occupancy vehicle use, by leveraging new transportation technologies and expanding travel choices.	**No Conflict**. This principle relates to RTP/SCS investments and not to individual development projects. However, the Project would support this principle as it is located within a HQTA and a TPA and would support public transportation and other alternative methods of transportation.

Goals and Policies	Consistency Analysis
Guiding Principle 5: Encourage transportation investments that will result in improved air quality in public health, and reduced greenhouse gas emissions.	**No Conflict**. This principle is directed towards investments in transportation by public agencies and is not applicable to individual development projects. However, the Project leverages investments made in the regional light rail network by placing residential and commercial uses adjacent to two light rail lines, which will encourage use of public transportation and result in improvements in air quality and reductions in greenhouse gas emissions.
Guiding Principle 6: Monitor progress on all aspects of the plan, including the timely implementation of projects, programs, and strategies.	**No Conflict**. This principle addresses monitoring of the implementation of actions by SCAG and is not applicable to individual development projects.
Guiding Principle 7: Regionally, transportation investments should reflect best known science regarding climate change vulnerability, in order to design for long term resilience.	**No Conflict**. This principle addresses regional transportation investments and is not applicable to individual development projects.
Core Vision Topic 1: **Sustainable Development** Through our continuing efforts to better align transportation investments and land use decisions, we strive to improve mobility and reduce greenhouse gases by bringing housing, jobs and transit closer together.	**No Conflict.** The Project leverages investments made in the regional light rail network by aligning land use planning by placing residential and commercial uses adjacent to two light rail lines, which will encourage use of public transportation and result in improvements in air quality and reductions in greenhouse gas emissions. The Project would place new residential units and commercial uses in a HQTA and a TPA, which will bring housing, jobs and mass transit closer together.
Core Vision Topic 2: **System Preservation and Resilience** "Fix it First" has been a guiding principle for prioritizing transportation funding in the RTP for the last decade. The cost of rebuilding roadways is eight times more than preventative maintenance. Preservation of the transportation system can extend the pavement life in a cost effective manner and can also improve safety.	**No Conflict**. This topic addresses the maintenance of existing roadways and is not applicable to individual development projects.
Core Vision Topic 3: Demand and System Management Better managing the existing transportation system through demand management strategies and Intelligent Transportation Systems (ITS) yields significant mobility benefits in a cost-effective manner.	**No Conflict**. This topic addresses better managing the existing transportation system through demand management strategies. By placing housing and commercial uses near a variety of mass transit options, the Project will support demand management strategies by increasing mass transit use.
Core Vision Topic 4: **Transit Backbone** Expanding the transit network and fostering development in transit-oriented communities is central to the region's plan for meeting mobility and sustainability goals while continuing to grow the regional economy.	**No Conflict**. The Project is a transit-oriented mixed use project that supports this core vision topic of developing transit-oriented communities.
Core Vision Topic 5: **Complete Streets** Creating "complete streets" that are safe and inviting to all roadway users is critical to increasing mobility choices, reducing traffic fatalities and serious injuries and meeting greenhouse gas reduction targets.	**No Conflict.** The Project supports increasing mobility choices by placing housing and commercial uses near to a variety of mass transit options and improvements that promote walking, bicycle use, and ride-sharing.
Core Vision Topic 6: **Goods Movement** The efficient movement of goods is critical to a strong economy and improves quality of life in the SCAG region by	**No Conflict.** This core vision topic addresses the movement of goods and is not applicable to the development of new housing and commercial uses.

Goals and Policies	Consistency Analysis
providing jobs and access to markets through trade. However, increased volumes of goods moving across the transportation system contribute to greater congestion, safety concerns and harmful emissions. It is critical to integrate land use decisions and technological advancements to minimize environmental and health impacts while fostering continued growth in trade and commerce.	Nonetheless, the Project Site's location near a variety of mass transit options will minimize environmental and health impacts, which will indirectly foster continued economic growth.
Sustainable Community Strategy 1: **Focus Growth Near Destinations and Mobility Options**	
Sustainable Community Strategy 1a: Emphasize land use patterns that facilitate multimodal access to work, educational and other destinations.	**No Conflict.** The location of the mixed-use Project would encourage the use of multimodal transportation options, including walking bicycling and use of public transportation. The Project Site is located adjacent to the Metro E Line, Crenshaw/LAX Line and bus lines, and is also within a ½ mile of additional regional and local bus routes with peak commute service intervals of 15 minutes or less.
Sustainable Community Strategy 1b: Focus on a regional jobs/housing balance to reduce commute times and distances and expand job opportunities near transit and along center-focused main streets	**No Conflict.** The Project promotes a regional jobs/housing balance that would reduce commute times and distances and expand job opportunities by placing housing and commercial uses adjacent to two light rail lines and a variety of bus routes.
Sustainable Community Strategy 1c: Plan for growth near transit investments and support implementation of first/last mile strategies	**No Conflict.** The Project leverages investments made in the regional light rail network placing residential and commercial uses adjacent to two light rail lines and numerous bus routes which will encourage use of public transportation to implement first/last mile strategies
Sustainable Community Strategy 1d: Promote the redevelopment of underperforming retail developments and other outmoded nonresidential uses.	**No Conflict**. The Project involves the proposed redevelopment of a site acquired by Metro to support construction of the Metro Crenshaw/LAX and existing E light rail lines and property owned by the County of Los Angeles containing an outmoded nonresidential use, an older office building, consistent with this strategy.
Sustainable Community Strategy 1e: Prioritize infill and redevelopment of underutilized land to accommodate new growth, increase amenities and connectivity in existing neighborhoods.	**No Conflict.** The Project involves the proposed redevelopment of a low-intensive use of land in an infill location adjacent to two regional light rail lines consistent with this strategy.
Sustainable Community Strategy 1f: Encourage design and transportation options that reduce the reliance on number of solo car trips (this could include mixed uses or locating and orienting close to existing destinations).	**No Conflict.** The Project Site is located in a HQTA and a TPA as defined by CEQA and would develop new residential and commercial uses on a major commercial corridor adjacent to two light rail lines. The location and design of the Project provides access to a variety of transportation options that will that reduce the need for, and reliance on, solo car trips.
Sustainable Community Strategy 1g: Identify ways to "right size" parking requirements and promote alternative parking strategies (e.g. shared parking or smart parking).	**No Conflict.** The Project would provide residents and visitors with convenient access to mass transit and opportunities for walking and biking as well as

Goals and Policies	Consistency Analysis
	502 vehicle parking spaces, consisting of 232 spaces on the West Site and 270 spaces on the East Site
Sustainable Community Strategy 2: Promote Diverse Housing Choices	
Sustainable Community Strategy 2a: Preserve and rehabilitate affordable housing and prevent displacement.	**No Conflict.** The Project proposes the redevelopment of two sites developed or previously developed with commercial uses and would not displace any existing affordable housing.
Sustainable Community Strategy 2b: Identify funding opportunities for new workforce and affordable housing development.	**No Conflict.** This strategy addresses funding opportunities for new workforce and affordable housing development. The Project is proposed in response to Metro and County of Los Angeles supporting the development of new affordable housing on property owned by these agencies adjacent to two light rail lines.
Sustainable Community Strategy 2c: Create incentives and reduce regulatory barriers for building context-sensitive accessory dwelling units to increase housing supply.	**No Conflict.** This strategy addresses the regulation of accessory dwelling units and is not applicable to the proposed mixed-use transit oriented development infill project.
Sustainable Community Strategy 2d: Provide support to local jurisdictions to streamline and lessen barriers to housing development that supports reduction of greenhouse gas emissions.	**No Conflict.** The Project is infill transit oriented development, including housing, on property owned by Metro and the County of Los Angeles that will support reduction of greenhouse gas emissions.
Sustainable Community Strategy 3: Leverage Technology Innovations	
Sustainable Community Strategy 3a: Promote low emission technologies such as neighborhood electric vehicles, shared rides hailing, car sharing, bike sharing and scooters by providing supportive and safe infrastructure such as dedicated lanes, charging and parking /drop off space.	**No Conflict.** The Project would provide 30 percent EV Ready and 10 percent EV Charging Stations of the 502 parking spaces included in the Project, consistent with Ordinance No. 186485. The 502 parking spaces would consist of 232 spaces on the West Site and 270 spaces on the East Site, nine (9) of which are American with Disabilities Act-compliant (ADA) parking spaces reserved exclusively for Metro mass transit riders.
Sustainable Community Strategy 3b: Improve access to services through technology such as telework and telemedicine as well as other incentives such as a "mobility wallet", an app-based system for storing transit and other multi modal payments.	**No Conflict.** This strategy addresses technology options to reduce transportation impacts and does not apply to individual development projects.
Sustainable Community Strategy 3c: Identify ways to incorporate "micro-power grids" in communities, for example solar energy, hydrogen fuel cell power storage and power generation.	**No Conflict.** This strategy applies to local power generation technologies on a community wide scale and does not apply to individual development projects. However, the Project would comply with the California Green Building Standards Code (CALGreen), and would incorporate eco-friendly building materials, systems, and features wherever feasible, including Energy Star appliances, water saving/low flow fixtures, non-VOC paints/adhesives, drought tolerant planting, and high-performance building envelopment to reduced energy needs.

Goals and Policies	Consistency Analysis
Sustainable Community Strategy 4: Support Implementation of Sustainability Policies	
Sustainable Community Strategy 4a: Pursue funding opportunities to support local sustainable development implementation projects that reduce greenhouse gas emissions.	**No Conflict.** This policy addresses pursuing funding to support local sustainable development implementation projects that reduce greenhouse gas emissions. The Project, an infill mixed use TOD development, is proposed in response to a Metro TOD development program facilitated on the Project Site by the participation of Los Angeles County. By locating mixed use development adjacent to two light rail lines and near numerous bus routes, the Project will reduce reliance on auto travel and will reduce greenhouse gas emissions.
Sustainable Community Strategy 4b: Support statewide legislation that reduces barriers to new construction and that incentivizes development new transit corridors and stations.	**No Conflict.** This strategy is directed towards SCAG support for statewide legislation and does not apply to individual development projects.
Sustainable Community Strategy 4c: Support local jurisdictions in the establishment of Enhanced Infrastructure Financing Districts (EIFDs), Community Revitalization and Investment Authorities (CRIAs), or other tax increment or value capture tools to finance sustainable infrastructure and development projects, including parks and open space.	**No Conflict.** This strategy is directed towards SCAG support for public finance programs to support sustainable infrastructure and development projects and does not apply to individual development projects.
Sustainable Community Strategy 4d: Work with local jurisdictions/communities to identify opportunities and assess barriers to implement sustainability strategies.	**No Conflict.** This strategy addresses SCAG working with local agencies on sustainability strategies and does not apply to individual development projects. However, the Project is the result of local strategies to promote TOD development as a sustainability strategy.
Sustainable Community Strategy 4e: Enhance partnerships with other planning organizations to promote resources and best practices in the SCAG region.	**No Conflict.** This strategy is directed towards SCAG actions and does not apply to individual development projects.
Sustainable Community Strategy 4f: Continue to support long range planning efforts by local jurisdictions.	**No Conflict.** This strategy is directed towards SCAG actions and does not apply to individual development projects.
Sustainable Community Strategy 4g: Provide educational opportunities to local decisionmakers and staff on new tools, best practices and policies relating to implementing the Sustainable Communities Strategy.	**No Conflict.** This strategy is directed towards SCAG actions and does not apply to individual development projects.
Sustainable Community Strategy 5: Promote a Green Region	
Sustainable Community Strategy 5a: Support development of local climate adaptation and hazard mitigation plans, as well as project implementation that improves community resiliency to climate change and natural hazards.	**No Conflict.** This strategy addresses SCAG support of local planning efforts related to community resiliency and does not apply to individual development projects.
Sustainable Community Strategy 5b: Support local policies for renewable energy production, reduction of urban heat islands and carbon sequestration.	**No Conflict.** This strategy addresses SCAG support for local policies on renewable energy production, reduction of urban heat islands and carbon sequestration and does not apply to individual development projects. However, the Project would be consistent with this strategy in that the Project would provide new outdoor open space areas including balconies, rooftop garden, and a central

Goals and Policies	Consistency Analysis
	green area which are design features that would reduce the urban heat island characteristics of the Project.
Sustainable Community Strategy 5c: Integrate local food production into the regional landscape.	**No Conflict.** This strategy addresses local food production in the region and does not apply to individual development projects.
Sustainable Community Strategy 5d: Promote more resource efficient development focus on conservation, recycling and reclamation.	**No Conflict.** This strategy is directed towards actions by SCAG to promote resource efficiency. and does not apply to individual development projects. However, the Project would comply with the California Green Building Standards Code (CALGreen), and incorporate eco-friendly building materials, systems and high-performance building envelopment. Additionally, the Project would be designed and constructed to incorporate environmentally sustainable design features that would be equivalent to the Silver level under the LEED green building program. As such, the Project would promote resource efficient development.
Sustainable Community Strategy 5e: Preserve, enhance and restore regional wildlife connectivity.	**No Conflict**. This policy addresses regional wildlife movement and corridors and does not apply to an infill TOD development project. The Project would not remove any areas that have significant value as wildlife habitat as the Project site is located in an urban developed area and has been previously developed.
Sustainable Community Strategy 5f: Reduce consumption of resource areas, including agricultural land.	**No Conflict**. The Project would involve the redevelopment of land in an urbanized area and would not result in the consumption of resource areas. By accommodating housing and commercial uses in an urbanized area the Project will reduce the need to accommodate development on resource lands.
Sustainable Community Strategy 5g: Identify ways to improve access to public park space.	**No Conflict.** This strategy addresses access to public park space and does not apply to individual development projects. The West Adams-Baldwin Hills-Leimert Community Plan, identifies 19 parks and recreational facilities in the Community Plan Area, and 432 acres of land dedicated to parks and open space. The Project would include publicly accessible open space adjacent to two light rail lines and near numerous bus lines and would also include improvements to pedestrian and bicycle circulation systems that would enhance access to mass transit which can be uses to access public park space in the area.

Source: SCAG, Connect SoCal, 2020–2045 RTP/SCS, September 2020.

General Use Designations

Using data collected from local jurisdictions, including general plans, SCAG categorized existing land use into land use types, then combined the land use types into 35 Place Types, and then classified sub-regions into one of three Land Use Development Categories (LDCs): urban, compact, or standard. SCAG used each of these categories to describe the conditions that exist and/or are likely to exist within each specific area of the region.[4]

The Project Site is within an area designated as "Urban" LDC with the highest density and intensity of land development as determined by SCAG.[5] SCAG describes the Urban LDC as areas often found within and/or directly adjacent to moderate and high-density urban centers, where virtually all new development would be considered infill or redevelopment. Housing tends to be higher density of multifamily and attached single-family (townhome) varieties, which overall, consume less water and energy than larger residences in less urban locations. Urban LDC areas have high levels of mobility, particularly for people who choose not to drive or do not have access to a vehicle, seen through the presence of a variety of regional and local transit services and a development pattern that is conducive to walking. These areas offer enhanced access and connectivity for people who choose not to drive or do not have access to a vehicle.[6]

The Project is consistent with the general use designations of the Urban Land Use Development Category as it is an infill redevelopment of higher density multifamily residential in a location with high level of mobility due to its access to mass transit. The Project is located within a HQTA as defined by SCAG and a TPA as defined by SB 743. Furthermore, the Project Site is within walking distance of many community services and amenities.

Density and Building Intensity

The Project Site is consistent with the Town Mixed Use place type. SCAG defines a Town Mixed Use area as "walkable mixed-use neighborhoods, such as the mixed-use core of a small city or transit-oriented development, with a variety of uses and building types." Within this place type, buildings are typically "between 3 and 8 stories tall, with ground-floor retail space, and offices and/or residences on the floors above.[7] The Project would develop two new, 8-story mixed-use buildings containing 401 total units and a total of approximately 40,996 sq. ft. of ground floor commercial space.

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4 SCAG, 2016- 2040 RTP/SCS, 20-21.
5 SCAG, 2016-2040 RTP/SCS; 28, 29.
6 SCAG, 2016-2040 RTP/SCS, 20.
7 Southern California Association of Governments, 2016-2040 RTP/SCS Background Documentation, Urban Footprint Place Types, http://scagrtpscs.net/documents/2016/supplemental/UrbanFootprint_PlaceTypesSummary.pdf, accessed September 2019.

Based on the City's current household demographics the average household size is 2.41 persons per household.[8] The construction of 401 units would result in an increase of approximately 970 residents in the City. The current estimated City population is approximately 4,059,665 people.[9] Therefore, the Project would represent a nominal increase of far less than one percent of the City's current population. According to growth estimates from SCAG's 2020–2045 RTP/SCS, the City had an estimated population of 3,933,800 people in 2016 and is projected to have a population of 4,771,300 in 2045.[10] The addition of approximately 970 people would be well within the SCAG's population forecasts for the City.

For all the foregoing reasons, the Project would be consistent with Criterion 1.

Consistency with Criterion 2: Based on total building square footage, the Project contains at least 50 percent residential use, and if Project contains between 26 percent and 50 percent nonresidential uses, a floor area ratio of not less than 0.75.

The Project includes the construction of a total building square footage of approximately 380,112 sq. ft. of which there would be approximately 339,116 sq. ft. of residential floor area, which is equivalent to approximately 89 percent. As such, the Project would be consistent with Criterion 2 since the Project would contain more than 50 percent residential use.

Consistency with Criterion 3: The Project includes a minimum net density of at least 20 dwelling units per acre.

The Project Site includes 182,446 sq. ft. (4.18 acres). The Project includes 401 dwelling units, which over the 4.18 acres, results in a density of 95 dwelling units per acre. As such, the Project would be consistent with Criterion 3 in that it would exceed a net density of 20 units per acre.

Consistency with Criterion 4: The Project Site is located within one-half mile of a major transit stop or high-quality transit corridor included in the 2020–2045 RTP/SCS.

A major transit stop is defined 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" and is included in the applicable regional transportation plan (PRC Sections 21064.3 and 21155(b)). A high-quality transit corridor is "[a] corridor with fixed route bus service with service intervals no longer than 15

8 Jack Tsao, Data Analyst II, Los Angeles Department of City Planning, July 31, 2019.
9 SCAG, Profile of the City of Los Angeles, May 2019, https://www.scag.ca.gov/Documents/LosAngeles.pdf
10 SCAG, "Demographics and Growth Forecast" (adopted September 2020), https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocal_demographics-and-growth-forecast.pdf?1606001579

minutes during peak commute hours" (PRC Section 21155(b)).[11] The City defines peak hours as between 6 a.m. and 9 a.m. and between 3 p.m. and 7 p.m.[12]

The Project Site is located less than 500 feet from the Metro E Line Expo/Crenshaw Station and is, therefore, located near a major transit stop. The Metro E Line operates weekday, weekend, and holiday service between the City of Santa Monica and Downtown Los Angeles. Weekday service operates from 3:36 AM to 2:32 AM with Friday night service being extended to 2:52 AM. Weekend and holiday service runs between 3:36 AM and 2:32 AM, with Saturday night service being extended to 2:52 AM. This Metro light rail line operates at approximately 15-minute intervals.

Moreover, the Metro Crenshaw/LAX Line is planned to open in 2021, linking the Metro E Line from Exposition/Crenshaw Station to the Metro Green Line at Aviation/LAX Station. The line will connect to Metro's Airport Connector at the Aviation/Century Station. The line will serve the Crenshaw District, City of Inglewood, and Westchester.

The Project Site is located within a HQTA defined by SCAG and TPA under SB 743. Since the Project Site is located within 0.5 miles of a major transit stop, it is not required to further demonstrate its proximity to intersecting bus routes or high-quality transit corridors that provide bus service intervals of 15 minutes or less. However, the Project Site is also located in proximity to multiple bus stops with high frequency transit service, as it is serviced by nearby mass transit lines including DASH Midtown Route, Leimert/Slauson Route, and Crenshaw Route, and regular Metro Lines 38, 210, 705, 710, and 740. As such, the Project would be consistent with Criterion 4.

3.3 INCORPORATION OF MITIGATION FROM PRIOR EIRS

PRC Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports (EIRs). There are three prior EIRs applicable to the Project Site:

1. *SCAG 2020–2045 RTP/SCS Program EIR,* September 2020.
2. *City of Los Angeles West Adams-Baldwin Hills-Leimert Community Plan EIR,* May 2016.
3. *Community Redevelopment Agency of the City of Los Angeles (CRA/LA) Mid-City Redevelopment Plan EIR,* April 1996.

11 PRC, "California Legislative Information," https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=21155, accessed November 2019.

12 City of Los Angeles Transit Oriented Communities Affordable Housing Incentive Program Guidelines (TOC Guidelines) https://planning.lacity.org/ordinances/docs/toc/TOCGuidelines.pdf.

Metro also prepared an Environmental Impact Statement/Environmental Impact Report (EIS/EIR) for the Crenshaw/LAX Transit Corridor Project. This Final EIS/EIR was completed in April 2011. This FEIS/EIR addresses the construction and operation of the Crenshaw/LAX light rail line and does not include analysis of Metro joint development projects, including such projects as this Project. For this reason, this FEIS/FEIR is not a prior EIR applicable to the Project or Project Site, and thus, its mitigation measures are not incorporated.

To comply with PRC Section 21151.2, the City has reviewed all mitigation measures contained in the SCAG 2020–2045 RTP/SCS Program EIR, the City of Los Angeles West Adams-Baldwin Hills-Leimert Community Plan EIR, and the CRA/LA Mid-City Redevelopment Plan EIR and determined their applicability to the Project. For each such applicable mitigation measure, the City considered whether to incorporate the prior mitigation measures as stated in those EIR's or an equally or more effective City mitigation measure or federal, State, regional, or City regulation.

The SCAG 2020–2045 RTP/SCS Program EIR identified mitigation measures designed to help avoid or minimize significant environmental impacts. Mitigation measures in the Program EIR are categorized into two categories: (1) Mitigation measures to be implemented by SCAG in its role as the Metropolitan Planning Organization (MPO) for the SCAG Region; and (2) mitigation measures that may be considered by Lead Agencies in conjunction with evaluation and consideration of individual projects. This table addresses category (2): mitigation measures that may be considered by Lead Agencies in conjunction with evaluation and consideration of individual projects.

The tables below include the mitigation measures from each of these prior applicable EIRs and identifies which measures have been incorporated into the Project. Measures incorporated into the Project are also identified within **Section 4.0: Environmental Impact Analysis** of this SCEA:

- **Table 3.3-1: Mitigation Measures from the 2020–2045 RTP/SCS Program EIR Incorporated into the Project**
- **Table 3.3-2: Mitigation Measures from the 2020–2045 RTP/SCS Program EIR Not Incorporated into the Project**
- **Table 3.3-3: Mitigation Measures from the West Adams-Baldwin Hills-Leimert New Community Plan (West Adams New Community Plan) EIR Incorporated into the Project**
- **Table 3.3-4: Mitigation Measures from the West Adams-Baldwin Hills-Leimert New Community Plan (West Adams New Community Plan) EIR Not Incorporated into the Project**
- **Table 3.3-5: Mitigation Measures from the Mid-City Redevelopment Plan EIR Incorporated into the Project**
- **Table 3.3-6: Mitigation Measures from the Mid-City Redevelopment Plan EIR Not Incorporated into the Project**

2020–2045 RTP/SCS Program EIR

Table 3.3-1[13]
Mitigation Measures from the
2020–2045 RTP/SCS Program EIR Incorporated into the Project

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
Air Quality		
Violation of air quality standards.	PMM AQ-1: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency: a. Minimize land disturbance. b. Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes. c. Cover trucks when hauling dirt. d. Stabilize the surface of dirt piles if not removed immediately. e. Limit vehicular paths on unpaved surfaces and stabilize any temporary roads. f. Minimize unnecessary vehicular and machinery activities. g. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. h. Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities. i. On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications. j. Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. Daily	Applicable provisions of this mitigation measure are incorporated as **PMM AQ-1** as identified in **Section 4.0** of this SCEA. Provisions of this mitigation measure which are not applicable to the Project are as follows: Item "i" is not incorporated into the Project because it is specifically applicable to Caltrans projects. Item "v" is not incorporated into the Project because it is specifically applicable to airport projects. Item "w" is not incorporated into the Project because it is specifically applicable to port projects. Item "x" is not incorporated into the Project because it is specifically applicable to airport projects. Item "y" is not incorporated into the Project because it is specifically applicable to Projects within 500 feet of a

13 The SCAG 2020–2045 RTP/SCS Program EIR identified programmatic mitigation measures to be implemented by SCAG, identified as SCAG Mitigation Measures (SMMs), and project-level mitigation measures, identified as Project Mitigation Measures (PMMs), that SCAG encourages local agencies to implement, as appropriate and feasible, as part of project-specific environmental review.

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	logging of the operating hours of the equipment should also be required. k. Ensure that all construction equipment is properly tuned and maintained. l. Minimize idling time to 5 minutes or beyond regulatory requirements —saves fuel and reduces emissions. m. Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway. n. Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators. o. Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts. p. As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site. q. Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the	freeway or other source of large particulate matter. Item "z" is not incorporated into the Project because it is specifically applicable to Projects that require MERV filters.

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible. r. Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. s. Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects. t. Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs. u. Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors). v. As applicable for airport projects, the following measures should be considered: − Considering operational improvements to reduce taxi time and auxiliary power unit usage, where feasible. Additionally, consider single engine taxing, if feasible as allowed per Federal Aviation Administration guidelines. − Set goals to achieve a reduction in emissions from aircraft operations over the lifetime of the proposed project. − Require the use of ground service equipment (GSE) that can operate on battery-power. If electric equipment cannot be obtained, require the use of alternative fuel, the cleanest gasoline equipment, or Tier 4, at a minimum. w. As applicable for port projects, the following measures should be considered: − Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE).	

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	− Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress. − Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power. − Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized. − Maximize participation in the Port of Los Angeles' Vessel Speed Reduction Program or the Port of Long Beach's Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin. − Encourage the participation in the Green Ship Incentives. − Offer incentives to encourage the use of on-dock rail. x. As applicable for rail projects, the following measures should be considered: − Provide the highest incentives for electric locomotives and then locomotives that meet Tier 5 emission standards with a floor on the incentives for locomotives that meet Tier 4 emission standards. y. Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit. z. Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters. − Disclose potential health impacts to prospective sensitive receptors from living in close proximity to freeways or other sources of air pollution and the reduced effectiveness of air filtration systems when windows are open or residents are outside. − Identify the responsible implementing and enforcement agency to ensure that enhanced filtration units are installed on-site before a permit of occupancy is issued. − Disclose the potential increase in energy costs for running the HVAC system to prospective residents. − Provide information to residents on where MERV filters can be purchased. − Provide recommended schedule (e.g., every year or every six months) for replacing the enhanced filtration units.	

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	− Identify the responsible entity such as future residents themselves, Homeowner's Association, or property managers for ensuring enhanced filtration units are replaced on time. − Identify, provide, and disclose ongoing cost-sharing strategies, if any, for replacing the enhanced filtration units. − Set criteria for assessing progress in installing and replacing the enhanced filtration units; and − Develop a process for evaluating the effectiveness of the enhanced filtration units. aa. Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. bb. The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible: − Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. − Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%. − Nonroad diesel engines on site shall be Tier 2 or higher. − Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp. − Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer. − Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less. − The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following: i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment. ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer,	

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation. iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date. − The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities. − The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes: i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date. ii. Any problems with the equipment or emission controls. iii. Certified copies of fuel deliveries for the time period that identify: 1. Source of supply 2. Quantity of fuel 3. Quantity of fuel, including sulfur content (percent by weight) cc. Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency: − Install programmable thermostat timers − Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24). − Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the *Energy Star and Other Climate Protection Partnerships* Annual Reports.) − Install higher efficacy public street and area lighting − Limit outdoor lighting requirements − Replace traffic lights with LED traffic lights − Establish onsite renewable or carbon neutral energy systems – generic, solar power and wind power − Utilize a combined heat and power system − Establish methane recovery in Landfills and Wastewater Treatment Plants.	

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	− Locate project near bike path/bike lane − Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers. − Provide traffic calming measures, such as: i. Marked crosswalks ii. Count-down signal timers iii. Curb extensions iv. Speed tables v. Raised crosswalks vi. Raised intersections vii. Median islands viii. Tight corner radii ix. Roundabouts or mini-circles x. On-street parking xi. Chicanes/chokers − Create urban non-motorized zones − Provide bike parking in non-residential and multi-unit residential projects − Dedicate land for bike trails − Limit parking supply through: i. Elimination (or reduction) of minimum parking requirements ii. Creation of maximum parking requirements iii. Provision of shared parking − Require residential area parking permit. − Provide ride-sharing programs i. Designate a certain percentage of parking spacing for ride sharing vehicles ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles iii. Providing a web site or messaging board for coordinating rides iv. Permanent transportation management association membership and finding requirement.	
Greenhouse Gases		
Cumulative Impacts	**PMM GHG-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	This mitigation measure is incorporated into the Project as Mitigation Measure **PMM GHG-1** as identified in **Section 4.0** of this SCEA.

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	a. Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including: i. Use energy efficient materials in building design, construction, rehabilitation, and retrofit. ii. Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems. iii. Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight. iv. Incorporate passive environmental control systems that account for the characteristics of the natural environment. v. Use high-efficiency lighting and cooking devices. vi. Incorporate passive solar design. vii. Use high-reflectivity building materials and multiple glazing. viii. Prohibit gas-powered landscape maintenance equipment. ix. Install electric vehicle charging stations. x. Reduce wood burning stoves or fireplaces. xi. Provide bike lanes accessibility and parking at residential developments. b. Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the *State CEQA Guidelines*. c. Include off-site measures to mitigate a project's emissions. d. Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to: i. Use energy and fuel-efficient vehicles and equipment; ii. Deployment of zero- and/or near zero emission technologies; iii. Use lighting systems that are energy efficient, such as LED technology; iv. Use the minimum feasible amount of GHG-emitting construction materials; v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production; vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;	

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy; viii. Incorporate design measures to reduce water consumption; ix. Use lighter-colored pavement where feasible; x. Recycle construction debris to maximum extent feasible; xi. Plant shade trees in or near construction projects where feasible; and xii. Solicit bids that include concepts listed above. e. Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following: i. Promote transit-active transportation coordinated strategies; ii. Increase bicycle carrying capacity on transit and rail vehicles; iii. Improve or increase access to transit; iv. Increase access to common goods and services, such as groceries, schools, and day care; v. Incorporate affordable housing into the project; vi. Incorporate the neighborhood electric vehicle network; vii. Orient the project toward transit, bicycle and pedestrian facilities; viii. Improve pedestrian or bicycle networks, or transit service; ix. Provide traffic calming measures; x. Provide bicycle parking; xi. Limit or eliminate park supply through: i. Elimination (or reduction) of minimum parking requirements ii. Creation of maximum parking requirements iii. Provision of shared parking. xii. Unbundle parking costs; xiii. Provide parking cash-out programs; xiv. Implement or provide access to commute reduction program; f. Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network; g. Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and h. Adopting employer trip reduction measures to reduce employee trips such as vanpool and	

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that: i. Provide car-sharing, bike sharing, and ride-sharing programs; ii. Provide transit passes; iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services; iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle; v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms; vi. Provide employee transportation coordinators at employment sites; vii. Provide a guaranteed ride home service to users of non-auto modes. i. Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles; j. Land use siting and design measures that reduce GHG emissions, including: i. Developing on infill and brownfields sites; ii. Building compact and mixed-use developments near transit; iii. Retaining on-site mature trees and vegetation, and planting new canopy trees; iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling, composting, and reuse. k. Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible. l. Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in.	

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	m. Encourage telecommuting and alternative work schedules, such as: i. Staggered starting times ii. Flexible schedules iii. Compressed work weeks n. Implement commute trip reduction marketing, such as: i. New employee orientation of trip reduction and alternative mode options ii. Event promotions iii. Publications o. Implement preferential parking permit program p. Implement school pool and bus programs q. Price workplace parking, such as: i. Explicitly charging for parking for its employees; ii. Implementing above market rate pricing; iii. Validating parking only for invited guests; iv. Not providing employee parking and transportation allowances; and v. Educating employees about available alternatives.	
Hazards and Hazardous Materials		
Routine transport use or disposal of hazardous materials, reasonably foreseeable upset, accident. Hazardous emissions near a school	**PMM HAZ-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials. b) Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, state, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, state, and local statutes and regulations, in the business plan for projects as applicable and appropriate.	This mitigation measure is incorporated into the Project as Mitigation Measure **PMM-HAZ-1** as identified in **Section 4.0** of this SCEA.

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	c) Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following: - The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids. - The location of such hazardous materials. - An emergency response plan including employee training information. - A plan that describes the way these materials are handled, transported and disposed. d) Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction. e) Avoid overtopping construction equipment fuel gas tanks. f) Properly contain and remove grease and oils during routine maintenance of construction equipment. g) Properly dispose of discarded containers of fuels and other chemicals. h) Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible. i) Identify and implement more stringent tank car safety standards. j) Improve rail transportation route analysis, and modification of routes based on that analysis. k) Use the best available inspection equipment and protocols and implement positive train control. l) Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size. m) Limit storage of crude oil tank cars in urbanized areas of any size and provide	

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	appropriate security in storage yards for all shipments. n) Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident. o) Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified. p) Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training. q) Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.	
Noise		
Expose people to noise in excess of local standards. Excessive groundborne vibration or noise levels. Substantial permanent increase in noise level. Substantial temporary increase in noise levels.	**PMM NOISE-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that expose people to excessive noise levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Install temporary noise barriers during construction. b) Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. c) Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance d) Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem. e) Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are	This mitigation measure is incorporated into the Project as Mitigation Measure **PMM-NOISE-1** as identified in **Section 4.0** of this SCEA.

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	expected to exceed limits established in the noise element of the general plan or noise ordinance. f) Designate an on-site construction complaint and enforcement manager for the project. g) Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. h) Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. i) Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors. j) Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction. k) Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned l) Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant. m) Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is	

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	compatible with adjacent transportation facilities and land uses; n) Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance. o) Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. p) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. q) Use of portable barriers in the vicinity of sensitive receptors during construction. r) Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts. s) Monitor the effectiveness of noise attenuation measures by taking noise measurements. t) Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities. u) Construct sound reducing barriers between noise sources and noise-sensitive land uses. v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction. w) Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. x) Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations	

Topic	2020–2045 RTP/SCS PEIR Project Mitigation Measure	Applicability to Project
	away from sensitive receptors to the maximum extent feasible. y) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.	
Expose people to excessive groundborne vibration or noise.	**PMM NOISE-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to temporary construction noise, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations. b) For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds. c) For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain. d) Restrict construction activities to permitted hours in accordance with local jurisdiction regulation. e) Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps). f) Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.	This mitigation measure is incorporated into the Project as Mitigation Measure **PMM-NOISE-2** as identified in **Section 4.0** of this SCEA.

Source: 2020–2045 SCAG/RTP SCS FEIR

Table 3.3-2[14]
Mitigation Measures from the
2020–2045 RTP/SCS Program EIR Not Incorporated into the Project

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
Aesthetics		
Scenic Vistas	**SMM AES-1:** SCAG shall facilitate minimizing impacts to scenic vistas through cooperation, information sharing regarding the locations of designated scenic vistas, and regional program development as part of SCAG's ongoing regional planning efforts, such as web-based planning tools for local government including REVISION, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts such as sharing of associated online training materials. Caltrans and lead agencies, such as county and city planning departments, shall be consulted during this update process.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Scenic Vistas	**PMM AES-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts to scenic vistas, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use a palette of colors, textures, building materials that are graffiti-resistant, and/or plant materials that complement the surrounding landscape and development. b) Use contour grading to better match surrounding terrain. Contour edges of major cut-and-fill to provide a more natural looking finished profile. c) Design new corridor landscaping to respect existing natural and man-made features and to complement the dominant landscaping of the surrounding areas. d) Replace and renew landscaping along corridors with road	This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, and the City's Zoning Information (ZI) File No. 2452, state that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Furthermore, the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA that the Project's impacts would not have an adverse aesthetic effect.

14 The SCAG 2020–2045 RTP/SCS Program EIR identified programmatic mitigation measures to be implemented by SCAG, identified as SCAG Mitigation Measures (SMMs), and project-level mitigation measure, identified as Project Mitigation Measures (PMMs), that SCAG encourages local agencies to implement, as appropriate and feasible, as part of project-specific environmental review.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	widenings, interchange projects, and related improvements. e) Retain or replace trees bordering highways, so that clear-cutting is not evident. f) Provide new corridor landscaping that respects and provides appropriate transition to existing natural and man-made features and is complementary to the dominant landscaping or native habitats of surrounding areas. g) Reduce the visibility of construction staging areas by fencing and screening these areas with low contrast materials consistent with the surrounding environment, and by revegetating graded slopes and exposed earth surfaces at the earliest opportunity; Use see-through safety barrier designs (e.g. railings rather than walls)	
Visual Character	**PMM AES-2**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Minimize contrasts in scale and massing between the projects and surrounding natural forms and development, minimize their intrusion into important viewsheds, and use contour grading to better match surrounding terrain in accordance with county and city hillside ordinances, where applicable. b) Design landscaping along highway corridors to add significant natural elements and visual interest to soften the hard-edged, linear transportation corridors. c) Require development of design guidelines for projects that make elements of proposed buildings/facilities visually compatible or minimize visibility of changes in visual quality or character through use of hardscape and softscape solutions. Specific measures to be addressed	This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, and the City's Zoning Information (ZI) File No. 2452, state that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Furthermore, the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA that the Project's impacts related to visual character would not have an adverse aesthetic effect.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	include setback buffers, landscaping, color, texture, signage, and lighting criteria. d) Design projects consistent with design guidelines of applicable general plans. e) Require that sites be kept in a blight/nuisance-free condition. Remove blight or nuisances that compromise visual character or visual quality of project areas including graffiti abatement, trash removal, landscape management, maintenance of signage and billboards in good condition, and replace compromised native vegetation and landscape. f) Where sound walls are proposed, require sound wall construction and design methods that account for visual impacts as follows: - use transparent panels to preserve views where sound walls would block views from residences; - use landscaped earth berm or a combination wall and berm to minimize the apparent sound wall height; - construct sound walls of materials whose color and texture complements the surrounding landscape and development; g) Design sound walls to increase visual interest, reduce apparent height, and be visually compatible with the surrounding area; and landscape the sound walls with plants that screen the sound wall, preferably with either native vegetation or landscaping that complements the dominant landscaping of surrounding areas.	
Light, glare, shade	**SMM AES-2:** SCAG shall facilitate minimizing impacts on aesthetics related to new sources of light or glare through cooperation, information sharing regarding guidelines and policies, design approaches, building materials, siting, and technology, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts and sharing of associated online training materials. Lead agencies, such as county and city planning departments, shall be consulted during this update process.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Light, glare, shade	**PMM AES-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential aesthetic impacts	This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, and the City's Zoning Information (ZI) File No.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	that substantially degrade visual character, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Use lighting fixtures that are adequately shielded to a point below the light bulb and reflector and that prevent unnecessary glare onto adjacent properties. b) Restrict the operation of outdoor lighting for construction and operation activities to the hours of 7:00 a.m. to 10:00 p.m. or as otherwise required by applicable local rules or ordinances. c) Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. d) Use unidirectional lighting to avoid light trespass onto adjacent properties. e) Design exterior lighting to confine illumination to the project site, and/or to areas which do not include light-sensitive uses. f) Provide structural and/or vegetative screening from light-sensitive uses. g) Shield and direct all new street and pedestrian lighting away from light-sensitive off-site uses. h) Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. i) Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties.	2452, state that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Furthermore, the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA that the Project's impacts related to light, glare, and shade would not have an adverse aesthetic effect.
Agriculture and Forestry		
Conversion of farmland or forest land.	**SMM AG-1:** SCAG shall host a Natural & Farmlands Conservation Working Group which will provide a forum for stakeholders to share best practices and develop recommendations for natural and agricultural land conservation throughout the region, including the development and implementation of Connect SoCal's Natural Lands Conservation Strategies.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Development of tools for conservation of farmland or forest land.	**SMM AG-2:** SCAG shall develop a Regional Greenprint, which is a strategic web-based conservation tool that provides the best available scientific data and scenario visualizations to help	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	cities, counties and transportation agencies make better land use and transportation infrastructure decisions and conserve natural and farm lands. SCAG shall use the Greenprint to identify priority conservation areas and work with CTCs to develop advanced mitigation programs or include them in future transportation measures by (1) funding pilot programs that encourage advance mitigation including data and replicable processes, (2) participating in state-level efforts that would support regional advanced mitigation planning in the SCAG region, and (3) supporting the inclusion of advance mitigation programs at county level transportation measures.	measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Leveraging funding opportunities, pilot programs to implement conservation strategies.	**SMM AG-3:** SCAG shall align with funding opportunities and pilot programs to begin implementation of conservation strategies through (1) seeking planning and implementation funds, such as Greenhouse Gas Reduction Funds that could advance local action on acquisition and restoration projects locally and regionally, (2) supporting CTCs and other partners, and (3) continuing policy alignment with the State Wildlife Action Plan 2015 Update and its implementation.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Incentives for protection of habitat corridors.	**SMM AG-4:** SCAG shall provide incentives to jurisdictions that cooperate across county lines to protect and restore natural habitat corridors, especially where corridors cross county boundaries, as detailed in the Natural & Farmlands Technical Report strategies of Connect SoCal. SCAG will work with stakeholders to identify incentives and leverage resources that help protect habitat corridors.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Conversion of farmland or forest land.	**PMM AG-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to address potential adverse effects on agricultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** that the Project would not result in potentially significant impacts to agriculture and forestry.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	a) Require project sponsors to mitigate for loss of farmland by providing permanent protection of in-kind farmland in the form of easements, fees, or elimination of development rights/potential. b) Project relocation or corridor realignment to avoid Prime Farmland, Unique Farmland, or Farmland of Local or Statewide Importance. c) Maintain and expand agricultural land protections such as urban growth boundaries. d) Provide for mitigation fees to support a mitigation bank1 that invests in farmer education, agricultural infrastructure, water supply, marketing, etc. that enhance the commercial viability of retained agricultural lands. e) Minimize severance and fragmentation of agricultural land by constructing underpasses and overpasses at reasonable intervals to provide property access. f) Use berms, buffer zones, setbacks, and fencing to reduce conflicts between new development and farming uses and protect the functions of farmland.	
Zoning for Ag use, Williamson Act Contract	**PMM AG-2:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects on Williamson Act contracts to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Project relocation or corridor realignment to avoid lands in Williamson Act contracts. b) Establish conservation easements consistent with the recommendations of the Department of Conservation, or 20-year Farmland Security Zone contracts (Government Code Section 51296 et seq.), 10-year Williamson Act contracts (Government Code Section 51200 et seq.) or use of other conservation tools available from the California Department of Conservation Division of Land Resource Protection.	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** that the Project would not result in potentially significant impacts to agriculture and forestry.
Construction Equipment	**PMM AG-3:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland to maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures:	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** that the Project would not result in potentially significant impacts to agriculture and forestry.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	a) Minimize construction related impacts to agricultural and forestry resources by locating materials and stationary equipment in such a way as to prevent conflict with agriculture and forestry resources.	
Minimize loss of farmland or forest lands	**PMM AG-4:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Design proposed projects to minimize, to the greatest extent feasible, the loss of the highest valued agricultural land. b) Redesign project features to minimize fragmenting or isolating Farmland. Where a project involves acquiring land or easements, ensure that the remaining non-project area is of a size sufficient to allow economically viable farming operations. The project proponents shall be responsible for acquiring easements, making lot line adjustments, and merging affected land parcels into units suitable for continued commercial agricultural management. c) Reconnect utilities or infrastructure that serve agricultural uses if these are disturbed by project construction. If a project temporarily or permanently cuts off roadway access or removes utility lines, irrigation features, or other infrastructure, the project proponents shall be responsible for restoring access as necessary to ensure that economically viable farming operations are not interrupted.	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** that the Project would not result in potentially significant impacts to agriculture and forestry.
Invasive species	**PMM AG-5:** Project level mitigation measures can and should be considered by Lead Agencies as applicable and feasible. Measures to reduce substantial adverse effects, through the conversion of Farmland, to the maximum extent practicable, as determined appropriate by each Lead Agency, may include the following, or other comparable measures: a) Manage project operations to minimize the introduction of invasive species or weeds that may affect agricultural production on adjacent agricultural land. Where a project has the potential to introduce sensitive species or habitats or have other spill-over effects on nearby agricultural lands, the project proponents shall be	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** that the Project would not result in potentially significant impacts to agriculture and forestry.

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	responsible for acquiring easements on nearby agricultural land and/or financially compensating for indirect effects on nearby agricultural land. Easements (e.g., flowage easements) shall be required for temporary or intermittent interruption in farming activities (e.g., because of seasonal flooding or groundwater seepage). Acquisition or compensation would be required for permanent or significant loss of economically viable operations.	
Air Quality		
Development of Southern California Disadvantaged Communities Planning Initiative	**SMM AQ-1:** SCAG shall develop the Southern California Disadvantaged Communities Planning Initiative which would provide funds to selected applicants to develop a low-cost, high-impact model which leverages SCAG's staff, data, and outreach resources to deliver context-sensitive plans in high-need, low-resourced active transportation infrastructure and frameworks. As part of the initiative, the model will be operationalized through the development of plans in six communities and refined to provide a sustainable resource for SCAG staff partner with local agencies to develop local active transportation plans.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Analysis of public health outcomes	**SMM AQ-2:** SCAG shall continue its commitment to analyze public health outcomes as part of Connect SoCal. As part of the public health analysis for the Plan, SCAG shall continue to analyze the Plan's impacts on air quality through its Public Health Working group and continue to support policy change at the city and country level through education programs.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Air quality analysis in environmental justice areas	**SMM AQ-3:** SCAG shall continue to conduct air quality-related technical analyses on the region, specifically in vulnerable areas that are typically environmental justice areas. For example, SCAG staff conducted technical analysis of emissions impacts on populations within 500 feet of freeways and highly travelled corridors in the Connect SoCal Environmental Justice Appendix. SCAG staff shall also continue to work with districts and relevant stakeholders to be informed of any updates new and/or	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local

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	changes to air quality issue areas through various forums like the Environmental Justice Working Group.	agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Biological Resources		
Candidate, sensitive, or special status species. Riparian or other sensitive natural community. Wetlands. Species movement. Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	**SMM BIO-1:** SCAG shall facilitate reducing future impacts to species identified as a candidate, sensitive, or special status species and its habitats through cooperation, information sharing, and program development. SCAG shall consult with the resource agencies, such as the USFWS, NMFS, USACE, USFS, BLM, and CDFW, as well as local jurisdictions including cities and counties, to incorporate designated critical habitat, federally protected wetlands, the protection of sensitive natural communities and riparian habitats, designated open space or protected wildlife habitat, local policies and tree preservation ordinances, applicable HCPs and NCCPs, or other related planning documents into SCAG's ongoing regional planning efforts and programs such as, based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts and sharing of associated online Training materials. Planning efforts shall be consistent with the approach outlined in the California Wildlife Action Plan. Additionally, SCAG's shall vet and distribute environmental data (i.e., endangered species and important habitat areas) to local jurisdictions.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Regional Conservation Strategy	**SMM BIO-2:** SCAG shall continue to develop a regional conservation strategy in coordination with local jurisdictions and other stakeholders, including the county transportation commissions. The conservation strategy will build upon existing efforts including those at the sub-regional and local levels to identify potential priority conservation areas. SCAG will also collaborate with stakeholders to establish a new Regional Advanced Mitigation Program (RAMP) initiative to preserve habitat. The RAMP would establish and/or supplement regional conservation and mitigation banks and/or other approaches to offset the impacts of transportation and other development projects. To assist in defining the RAMP, SCAG shall lead a multi-year effort to	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.

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	develop new regional tools, like the Regional Data Platform and Regional Greenprint that will provide an easily accessible resource to help municipalities, conservation groups, developers and researchers prioritize lands for conservation based on best available scientific data. The Regional Greenprint effort shall also produce a whitepaper on the RAMP initiative, which includes approaches for the RAMP in the SCAG region, needed science and analysis, models, challenges and opportunities and recommendations.	
Candidate, sensitive, or special status species. Riparian or other sensitive natural community. Wetlands. Species movement. Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	**PMM BIO-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to threatened and endangered species, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Require project design to avoid occupied habitat, potentially suitable habitat, and designated critical habitat, wherever practicable and feasible. b) Where avoidance is determined to be infeasible, provide conservation measures to fulfill the requirements of the applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal ESA, Section 2081 of the California ESA to support issuance of an incidental take permit, and/or as identified in local or regional plans. Conservation strategies to protect the survival and recovery of federally and state-listed endangered and local special status species may include: i. Impact minimization strategies ii. Contribution of in-lieu fees for in-kind conservation and mitigation efforts iii. Use of in-kind mitigation bank credits iv. Funding of research and recovery efforts v. Habitat restoration vi. Establishment of conservation easements vii. Permanent dedication of in-kind habitat c) Design projects to avoid desert native plants protected under the California Desert Native Plants Act, salvage and relocate desert native plants, and/or pay in lieu fees to support off-site long-term conservation strategies.	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** that the Project would not result in potentially significant impacts to biological resources.

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	d) Temporary access roads and staging areas will not be located within areas containing sensitive plants, wildlife species or native habitat wherever feasible, so as to avoid or minimize impacts to these species. e) Develop and implement a Worker Environmental Awareness Program (environmental education) to inform project workers of their responsibilities to avoid and minimize impacts on sensitive biological resources. f) Retain a qualified botanist to document the presence or absence of special status plants before project implementation. g) Appoint a qualified biologist to monitor construction activities that may occur in or adjacent to occupied sensitive species' habitat to facilitate avoidance of resources not permitted for impact. h) Appoint a qualified biologist to monitor implementation of mitigation measures. i) Schedule construction activities to avoid sensitive times for biological resources (e.g. steelhead spawning periods during the winter and spring, nesting bird season) and to avoid the rainy season when erosion and sediment transport is increased. j) Develop an invasive species control plan associated with project construction. k) If construction occurs during breeding seasons in or adjacent to suitable habitat, include appropriate sound attenuation measures required for sensitive avian species and other best management practices appropriate for potential local sensitive wildlife. l) Conduct pre-construction surveys to delineate occupied sensitive species' habitat to facilitate avoidance. m) Where projects are determined to be within suitable habitat and may impact listed or sensitive species that have specific field survey protocols or guidelines outlined by the USFWS, CDFW, or other local agency, conduct preconstruction surveys that follow applicable protocols and guidelines and are conducted by qualified and/or certified personnel. n) Project design should address the protection of habitat on both sides of a freeway to improve effectiveness of the crossings.	

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	o) Project sponsors shall consider the impacts of nitrogen deposition on sensitive species.	
Riparian or other sensitive natural community. Wetlands. Species movement. Local policies or ordinances protection biological resources.	**PMM BIO-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to riparian habitats and other sensitive natural communities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFWS and NMFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA. b) Consult with the USFS where such state-designated sensitive or riparian habitats provide potential or occupied habitat for federally listed rare, threatened, and endangered species afforded protection pursuant to the federal ESA and any additional species afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-county area: Angeles, Cleveland, Los Padres, and San Bernardino. c) Consult with the CDFW where such state-designated sensitive or riparian habitats provide potential or occupied habitat for state-listed rare, threatened, and endangered species afforded protection pursuant to the California ESA, or Fully Protected Species afforded protection pursuant to the State Fish and Game Code. d) Consult with the CDFW pursuant to the provisions of Section 1600 of the State Fish and Game Code as they relate to Lakes and Streambeds. e) Consult with the USFWS, USFS, CDFW, and counties and cities in the SCAG region, where state-designated sensitive or riparian habitats are occupied by birds afforded protection pursuant to the MBTA during the breeding season. f) Consult with the CDFW for state-designated sensitive or riparian habitats where furbearing mammals, afforded protection pursuant to the provisions of the State Fish and Game Code for fur-beaming mammals, are actively using the areas in conjunction with breeding activities.	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** that the Project would not result in potentially significant impacts to biological resources.

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	g) Require project design to avoid sensitive natural communities and riparian habitats, wherever practicable and feasible. Where practicable and feasible, require upland buffers that sufficiently minimize impacts to riparian corridors. h) Where avoidance is determined to be infeasible, develop sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) to protect sensitive natural communities and riparian habitats and develop appropriate compensatory mitigation, where required. i) Appoint a qualified wetland biologist to monitor construction activities that may occur in or adjacent to sensitive communities. j) Appoint a qualified wetland biologist to monitor implementation of mitigation measures. k) Schedule construction activities to avoid sensitive times for biological resources and to avoid the rainy season when erosion and sediment transport is increased. l) When construction activities require stream crossings, schedule work during dry conditions and use rubber-wheeled vehicles, when feasible. Have a qualified wetland scientist determine if potential project impacts require a Notification of Lake or Streambed Alteration to CDFW during the planning phase of projects. m) Consult with local agencies, jurisdictions, and landowners where such state-designated sensitive or riparian habitats are afforded protection pursuant an adopted regional conservation plan. n) Install fencing and/or mark sensitive habitat to be avoided during construction activities. o) Salvage and stockpile topsoil (the surface material from 6 to 12 inches deep) and perennial native plants, when recommended by the qualified wetland biologist, for use in restoring native vegetation to areas of temporary disturbance within the project area. Salvage of soils containing invasive species, seeds and/or rhizomes will be avoided as identified by the qualified wetland biologist. p) Revegetate with appropriate native vegetation following the completion of construction activities, as identified by the qualified wetland biologist.	

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	q) Complete habitat enhancement (e.g., through removal of non-native invasive wetland species and replacement with more ecologically valuable native species). r) Use Best Management Practices (BMPs) at construction sites to minimize erosion and sediment transport from the area. BMPs include encouraging growth of native vegetation in disturbed areas, using straw bales or other silt-catching devices, and using settling basins to minimize soil transport.	
Wetlands Species movement. Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	**PMM BIO-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wetlands, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency. a) Require project design to avoid federally protected aquatic resources consistent with the provisions of Sections 404 and 401 of the CWA, wherever practicable and feasible. b) Where the lead agency has identified that a project, or other regionally significant project, has the potential to impact other wetlands or waters, such as those considered Waters of the State of California under the State Wetland Definition and Procedures for Dischargers of Dredged or Fill Material to Waters of the State, not protected under Section 404 or 401 of the CWA, seek comparable coverage for these wetlands and waters in consultation with the SWRCB, applicable RWQCB, and CDFW. c) Where avoidance is determined to be infeasible, develop sufficient conservation measures to fulfill the requirements of the applicable authorization for impacts to federal and state protected aquatic resource to support issuance of a permit under Section 404 of the CWA as administered by the USACE. The use of an authorized Nationwide Permit or issuance of an individual permit requires the project applicant to demonstrate compliance with the USACE's Final Compensatory Mitigation Rule. The USACE reviews projects to ensure environmental impacts to aquatic resources are avoided or minimized as much as possible. Consistent with the administration's performance standard of "no net	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** that the Project would not result in potentially significant impacts to biological resources.

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	loss of wetlands" a USACE permit may require a project proponent to restore, establish, enhance or preserve other aquatic resources in order to replace those affected by the proposed project. This compensatory mitigation process seeks to replace the loss of existing aquatic resource functions and area. Project proponents required to complete mitigation are encouraged to use a watershed approach and watershed planning information. The new rule establishes performance standards, sets timeframes for decision making, and to the extent possible, establishes equivalent requirements and standards for the three sources of compensatory mitigation: - Permittee-responsible mitigation - Contribution of in-kind in-lieu fees - Use of in-kind mitigation bank credits - Where avoidance is determined to be infeasible and d) Where avoidance is determined to be infeasible and proposed projects' impacts exceed an existing Nationwide Permit (NWP) and/or California SWRCB-certified NWP, or applicable County Special Area Management Plan (SAMP), the lead agency should provide USACE and SWRCB (where applicable) an alternative analysis consistent with the Least Environmentally Damaging Practicable Alternatives in this order of priorities: - Avoidance - Impact Minimization - On-site alternatives - Off-site alternatives e) Require review of construction drawings by a certified wetland delineator as part of each project-specific environmental analysis to determine whether aquatic resources will be affected and, if necessary, perform formal wetland delineation.	
Protection of Natural wildlife corridors.	**SMM BIO-3:** SCAG shall coordinate with Caltrans and facilitate research, programs and policies to identify, protect and restore natural habitat corridors, especially where corridors cross county boundaries. Additionally, continue support for preserving wildlife corridors and wildlife crossings to minimize the impact of transportation projects on wildlife species and habitat fragmentation. SCAG shall disseminate key information related to the preservation and implementation of wildlife	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This

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	corridors and crossings by showcasing best practices at SCAG's Natural Lands Working Groups. SCAG shall also distribute wildlife corridors and crossings data to local jurisdictions, so they may incorporate said data into their general plans, as applicable.	measure is not incorporated into the Project because it is not applicable.
Species movement. Local policies or ordinances protecting biological resources. HCP, NCCP or other conservation plans.	**PMM BIO-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to wildlife movement, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the USFS where impacts to migratory wildlife corridors may occur in an area afforded protection by an adopted Forest Land Management Plan or Resource Management Plan for the four national forests in the six-County area: Angeles, Cleveland, Los Padres, and San Bernardino. b) Consult with counties, cities, and other local organizations when impacts may occur to open space areas that have been designated as important for wildlife movement related to local ordinances or conservation plans. c) Prohibit construction activities within 500 feet of occupied breeding areas for wildlife afforded protection pursuant to Title 14 § 460 of the California Code of Regulations protecting fur-bearing mammals, during the breeding season. d) Conduct a survey to identify active raptor and other migratory nongame bird nests by a qualified biologist at least two weeks before the start of construction at project sites from February 1 through August 31. e) Prohibit construction activities with 300 feet of occupied nest of birds afforded protection pursuant to the Migratory Bird Treaty Act, during the breeding season. f) Ensure that suitable nesting sites for migratory nongame native bird species protected under the Migratory Bird Treaty Act and/or trees with unoccupied raptor nests should only be removed prior to February 1, or following the nesting season. g) When feasible and practicable, proposed projects will be designed to minimize impacts to	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** that the Project would not result in potentially significant impacts to biological resources.

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	wildlife movement and habitat connectivity and preserve existing and functional wildlife corridors. h) Conduct site-specific analyses of opportunities to preserve or improve habitat linkages with areas on- and off-site. i) Long linear projects with the possibility of impacting wildlife movement should analyze habitat linkages/wildlife movement corridors on a broad scale to avoid critical narrow choke points that could reduce function of recognized movement corridor. j) Require review of construction drawings and habitat connectivity mapping by a qualified biologist to determine the risk of habitat fragmentation. k) Pursue mitigation banking to preserve habitat linkages and corridors (opportunities to purchase, maintain, and/or restore offsite habitat). l) When practicable and feasible design projects to promote wildlife corridor redundancy by including multiple connections between habitat patches. m) Evaluate the potential for installation of overpasses, underpasses, and culverts to create wildlife crossings in cases where a roadway or other transportation project may interrupt the flow of species through their habitat. Retrofitting of existing infrastructure in project areas should also be considered for wildlife crossings for purposes of mitigation. n) Install wildlife fencing where appropriate to minimize the probability of wildlife injury due to direct interaction between wildlife and roads or construction. o) Where avoidance is determined to be infeasible, design sufficient conservation measures through coordination with local agencies and the regulatory agency (i.e., USFWS or CDFW) and in accordance with the respective counties and cities general plans to establish plans to mitigate for the loss of fish and wildlife movement corridors and/or wildlife nursery sites. The consideration of conservation measures may include the following measures, in addition to the measures outlined in **SMM-BIO-1(b)**, where applicable: - Wildlife movement buffer zones - Corridor realignment - Appropriately spaced breaks in center barriers - Stream rerouting	

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	- Culverts - Creation of artificial movement corridors such as freeway under- or overpasses - Other comparable measures p) Where the lead agency has identified that an RTP/SCS project, or other regionally significant project, has the potential to impact other open space or nursery site areas, seek comparable coverage for these areas in consultation with the USFWS, CDFW, NMFS, or other local jurisdictions. q) Incorporate applicable and appropriate guidance (e.g. FHWA-HEP-16-059), as well as best management practices, to benefit pollinators with a focus on native plants. r) Implement berms and sound/sight barriers at all wildlife crossings to encourage wildlife to utilize crossings. Sound and lighting should also be minimized in developed areas, particularly those that are adjacent to or go through natural habitats. s) Reduce lighting impacts on sensitive species through implementation of mitigation measures such as, but not limited to: -Use high pressure sodium and/or cut-off fixtures instead of typical mercury-vapor fixtures for outdoor lighting. - Design exterior lighting to confine illumination to the project site -Provide structural and/or vegetative screening from light-sensitive uses. - Use non-reflective glass or glass treated with a non-reflective coating for all exterior windows and glass used on building surfaces. - Architectural lighting shall be directed onto the building surfaces and have low reflectivity to minimize glare and limit light onto adjacent properties. t) Reduce noise impacts to sensitive species through implementation of mitigation measures such as, but not limited to: - Install temporary noise barriers during construction. - Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses. - Ensure that construction equipment are properly maintained per manufacturers' specifications and	

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	fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded. - Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures. - Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned - Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction. - Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures. u) Require large buffers between sensitive uses and freeways. v) Create corridor redundancy to help retain functional connectivity and resilience.	
Local policies or ordinances protection biological resources. HCP, NCCP or other conservation plans.	**PMM BIO-5:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce conflicts with local policies and ordinances protecting biological resources, as applicable and feasible. Such measures may	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in

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	include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate local agency responsible for the administration of the policy or ordinance protecting biological resources. b) Prioritize retention of trees on-site consistent with local regulations. Provide adequate protection during the construction period for any trees that are to remain standing, as recommended by an International Society of Arboriculture (ISA) certified arborist. c) If specific project area trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," obtain approval for encroachment or removals through the appropriate entity, and develop appropriate mitigation measures at that time, to ensure that the trees are replaced. Mitigation trees shall be locally collected native species, as directed by a qualified biologist. d) Appoint an ISA certified arborist to monitor construction activities that may occur in areas with trees are designated as "Protected Trees," "Landmark Trees," or "Heritage Trees," to facilitate avoidance of resources not permitted for impact. Before the start of any clearing, excavation, construction or other work on the site, securely fence off every protected tree deemed to be potentially endangered by said site work. Keep such fences in place for duration of all such work. Clearly mark all trees to be removed. e) Establish a scheme for the removal and disposal of logs, brush, earth and other debris that will avoid injury to any protected tree. Where proposed development or other site work could encroach upon the protected perimeter of any protected tree, incorporate special measures to allow the roots to breathe and obtain water and nutrients. Minimize any excavation, cutting, filing, or compaction of the existing ground surface within the protected perimeter. Require that no change in existing ground level occur from the base of any protected tree at any time. Require that no burning or use of equipment with an open flame occur near or within the protected perimeter of any protected tree. f) Require that no storage or dumping of oil, gas, chemicals, or other substances that may be harmful to trees occur from the base of any protected trees, or any other location on the site	potentially significant impacts to biological resources.

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	from which such substances might enter the protected perimeter. Require that no heavy construction equipment or construction materials be operated or stored within a distance from the base of any protected trees. Require that wires, ropes, or other devices not be attached to any protected tree, except as needed for support of the tree. Require that no sign, other than a tag showing the botanical classification, be attached to any protected tree. g) Thoroughly spray the leaves of protected trees with water periodically during construction to prevent buildup of dust and other pollution that would inhibit leaf transpiration, as directed by the certified arborist. h) If any damage to a protected tree should occur during or as a result of work on the site, the appropriate local agency will be immediately notified of such damage. If, such tree cannot be preserved in a healthy state, as determined by the certified arborist, require replacement of any tree removed with another tree or trees on the same site deemed adequate by the local agency to compensate for the loss of the tree that is removed. Remove all debris created as a result of any tree removal work from the property within two weeks of debris creation, and such debris shall be properly disposed of in accordance with all applicable laws, ordinances, and regulations. Design projects to avoid conflicts with local policies and ordinances protecting biological resources i) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the applicable policy or ordinance shall be developed, such as to support issuance of a tree removal permit. The consideration of conservation measures may include: - Avoidance strategies - Contribution of in-lieu fees - Planting of replacement trees - Re-landscaping areas with native vegetation post-construction Other comparable measures developed in consultation with local agency and certified arborist.	
Local policies or ordinances protection biological	**PMM BIO-6:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the	This mitigation measure is not incorporated, because the City

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resources. HCP, NCCP or other conservation plans.	State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on HCPs and NCCPs, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consult with the appropriate federal, state, and/or local agency responsible for the administration of HCPs or NCCPs. b) Wherever practicable and feasible, the project shall be designed to avoid lands preserved under the conditions of an HCP or NCCP. c) Where avoidance is determined to be infeasible, sufficient conservation measures to fulfill the requirements of the HCP and/or NCCP, which would include but not be limited to applicable authorization for incidental take pursuant to Section 7 or 10(a) of the federal Endangered Species Act or Section 2081 of the California ESA, shall be developed to support issuance of an incidental take permit or any other permissions required for development within the HCP/NCCP boundaries. The consideration of additional conservation measures would include the measures outlined in **SMM-BIO-2**, where applicable.	determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in potentially significant impacts to biological resources.
Cultural Resources		
Creation and implementation of web -based planning tools.	**SMM CULT-1:** Impacts to cultural resources shall be minimized through cooperation, information sharing, and SCAG's ongoing regional planning efforts such as web-based planning tools for local governments including CA LOTS, and other GIS tools and data services, including, but not limiting to, Map Gallery, GIS library, and GIS applications (note that no confidential cultural or tribal cultural resource location information will be housed in this database. All regulations pertaining to cultural resources site location confidentiality will be respected); and direct technical assistance efforts such as Toolbox Tuesday series and sharing of associated online Training materials. SCAG shall consult with resource agencies such as the National Park Service, Office of Historic Preservation, and Native American Heritage Commission, and with Native American tribes, to identify opportunities for early and effective consultation to identify archaeological sites, historical resources, and cemeteries to avoid such resources wherever practicable and feasible and reduce or mitigate for conflicts in compatible land use to the maximum extent practicable.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.

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Historical and archaeological resources	**PMM CULT-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to historical resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Pursuant to CEQA Guidelines Section 15064.5, conduct a record search during the project planning phase at the appropriate Information Center to determine whether the project area has been previously surveyed and whether historical resources were identified. b) During the project planning phase, retain a qualified architectural historian, defined as an individual who meets the Secretary of the Interior's (SOI) Professional Qualification Standards (PQS) in Architectural History, to conduct historic architectural surveys if a built environment resource greater than 45 years in age may be affected by the project or if recommended by the Information Center. c) Comply with Section 106 of the National Historic Preservation Act (NHPA) including, but not limited to, projects for which federal funding or approval is required for the individual project. This law requires federal agencies to evaluate the impact of their actions on resources included in or eligible for listing in the National Register. Federal agencies must coordinate with the State Historic Preservation Officer in evaluating impacts and developing mitigation. These mitigation measures may include, but are not limited to the following: - Employ design measures to avoid historical resources and undertake adaptive reuse where appropriate and feasible. If resources are to be preserved, as feasible, carry out the maintenance, repair, stabilization, rehabilitation, restoration, preservation, conservation or reconstruction in a manner consistent with the Secretary of the Interior's Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings. If resources would be impacted, impacts should be minimized to the extent feasible. - Where feasible, noise buffers/walls and/or visual buffers/landscaping should be constructed to preserve the contextual setting of significant built resources. d) If a project requires the relocation, rehabilitation, or alteration of an eligible historical resource, the Secretary of the Interior's Standards for the Treatment of Historic Properties should be used to the maximum extent possible to ensure the historical significance of the resource is not impaired. The application of the standards should be overseen by an architectural historian or historic architect meeting the SOI PQS. Prior to any construction activities that may affect the historical resource, a report, meeting industry standards, should identify and specify the treatment of character-defining features and	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact to cultural resources. In addition, avoidance or minimization of impacts to historic resources is required by CEQA Guidelines Section 15064.5.

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	construction activities and be provided to the Lead Agency for review and approval. e) If a project would result in the demolition or significant alteration of a historical resource eligible for or listed in the National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), or local register, recordation should take the form of Historic American Buildings Survey (HABS), Historic American Engineering Record (HAER), or Historic American Landscape Survey (HALS) documentation, and should be performed by an architectural historian or historian who meets the SOI PQS. Recordation should meet the SOI Standards and Guidelines for Architectural and Engineering, which defines the products acceptable for inclusion in the HABS/HAER/HALS collection at the Library of Congress. The specific scope and details of documentation should be developed at the project level in coordination with the Lead Agency. f) During the project planning phase, obtain a qualified archaeologist, defined as one who meets the SOI PQS for archaeology, to conduct a record search at the appropriate Information Center of the California Historical Resources Information System (CHRIS) to determine whether the project area has been previously surveyed and whether resources were identified. g) Contact the NAHC to request a Sacred Lands File search and a list of relevant Native American contacts who may have additional information. h) During the project planning phase, obtain a qualified archaeologist or architectural historian (depending on applicability) to conduct archaeological and/or historic architectural surveys as recommended by the qualified professional, the Lead Agency, or the Information Center. In the event the qualified professional or Information Center will make a recommendation on whether a survey is warranted based on the sensitivity of the project area for archaeological resources. Survey shall be conducted where the records indicate that no previous survey has been conducted, or if survey has not been conducted within the past 10 years. If tribal resources are identified during tribal outreach, consultation, or the record search, a Native American representative traditionally affiliated with the project area, as identified by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with archaeological surveys. i) If potentially significant archaeological resources are identified through survey, and impacts to these resources cannot be avoided, a Phase II Testing and Evaluation investigation should be performed by a qualified archaeologist prior to any construction-related ground-disturbing activities to determine significance. If resources determined significant or unique through Phase II testing, and avoidance is not possible,	

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	appropriate resource-specific mitigation measures should be established by the lead agency, in consultation with consulting tribes, where appropriate, and undertaken by qualified personnel. These might include a Phase III data recovery program implemented by a qualified archaeologist and performed in accordance with the OHP's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format and Guidelines for Archaeological Research Designs. Additional options can include 1) interpretative signage, or 2) educational outreach that helps inform the public of the past activities that occurred in this area. Should the project require extended Phase I testing, Phase II evaluation, or Phase III data recovery, a Native American representative traditionally affiliated with the project area, as indicated by the NAHC, shall be given the opportunity to provide a representative or monitor to assist with the archaeological assessments. The long-term disposition of archaeological materials collected from a significant resource should be determined in consultation with the affiliated tribe(s), where relevant; this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe. j) In cases where the project area is developed and no natural ground surface is exposed, sensitivity for subsurface resources should be assessed based on review of literature, geology, site development history, and consultation with tribal parties. If this archaeological desktop assessment indicates that the project is located in an area sensitive for archaeological resources, as determined by the Lead Agency in consultation with a qualified archaeologist, the project should retain an archaeological monitor and, in the case of sensitivity for tribal resources, a tribal monitor, to observe ground disturbing operations, including but not limited to grading, excavation, trenching, or removal of existing features of the subject property. The archaeological monitor should be supervised by an archaeologist meeting the SOI PQS k) Conduct construction activities and excavation to avoid cultural resources (if identified). If avoidance is not feasible, further work may be needed to determine the importance of a resource. Retain a qualified archaeologist, and/or as appropriate, a qualified architectural historian who should make recommendations regarding the work necessary to assess significance. If the cultural resource is determined to be significant under state or federal guidelines, impacts to the cultural resource will need to be mitigated. l) Stop construction activities and excavation in the area where cultural resources are found until a qualified archaeologist can determine whether these resources are significant, and tribal consultation can be conducted, in the case of tribal resources. If the archaeologist determines that the discovery is significant,	

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	its long-term disposition should be determined in consultation with the affiliated tribe(s); this could include curation with a recognized scientific or educational repository, transfer to the tribe, or respectful reinternment in an area designated by the tribe.	
Human remains	**PMM CULT-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to human remains, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) In the event of discovery or recognition of any human remains during construction or excavation activities associated with the project, in any location other than a dedicated cemetery, cease further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains until the coroner of the county in which the remains are discovered has been informed and has determined that no investigation of the cause of death is required. b) If any discovered remains are of Native American origin, as determined by the county Coroner, an experienced osteologist, or another qualified professional: - Contact the County Coroner to contact the NAHC to designate a Native American Most Likely Descendant (MLD). The MLD should make a recommendation to the landowner or the person responsible for the excavation work, for means of treating or disposing of, with appropriate dignity, the human remains and any associated grave goods. This may include obtaining a qualified archaeologist or team of archaeologists to properly excavate the human remains. In some cases, it is necessary for the Lead Agency, qualified archaeologist, or developer to also reach out to the NAHC to coordinate and ensure notification in the event the Coroner is not available. - If the NAHC is unable to identify a MLD, or the MLD fails to make a recommendation within 48 hours after being notified by the commission, or the landowner or his representative rejects the recommendation of the MLD and the mediation by the NAHC fails to provide measures acceptable to the landowner, obtain a culturally affiliated Native American monitor, and an archaeologist, if recommended by the Native American monitor, and rebury the Native American human remains and any associated grave goods, with appropriate dignity, on the property and in a location that is not subject to further subsurface disturbance.	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact to human remains. In addition, the State's Health and Safety Code Section 7050.5 addresses the discovery and appropriate handling of human remains.
Geology and Soils		
Soil erosion, loss of topsoil	**SMM-GEO-1:** SCAG shall facilitate the minimization of substantial soil erosion or loss of topsoil through cooperation, information sharing, and regional program development as part	This mitigation measure is identified as a SCAG Mitigation Measure

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	of SCAG's ongoing regional planning efforts. Such efforts shall include web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts such as training series and sharing of associated online training materials. Resource agencies, such as the U.S. Geology Survey, shall be consulted during this update process.	(SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Soil erosion, loss of topsoil, unstable geologic unit or soil, expansive soils	**PMM-GEO-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to geology and soils, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that site-specific geotechnical investigations conducted by a qualified geotechnical expert are conducted to ascertain soil types prior to preparation of project designs. These investigations can and should identify areas of potential failure and recommend remedial geotechnical measures to eliminate any problems. b) Consistent with the requirements of the State Water Resources Control Board (SWRCB) for projects over one acre in size, obtain coverage under the General Construction Activity Storm Water Permit (General Construction Permit) issued by the SWRCB and prepare a stormwater pollution prevention plan (SWPPP) and submit the plan for review and approval by the Regional Water Quality Control Board (RWQCB). At a minimum, the SWPPP should include a description of construction materials, practices, and equipment storage and maintenance; a list of pollutants likely to contact stormwater; site-specific erosion and sedimentation control practices; a list of provisions to eliminate or reduce discharge of materials to stormwater; best management practices (BMPs); and an inspection and monitoring program. c) Consistent with the requirements of the SWRCB and local regulatory agencies with oversight of development associated with the Plan, ensure that project designs provide adequate slope drainage and appropriate landscaping to minimize the occurrence of slope instability and erosion. Design features should include measures to reduce erosion caused by storm water. Road cuts should be designed to maximize the potential for revegetation.	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** that the Project would not result in potentially significant impacts to geology and soils.

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	d) Consistent with the CBC and local regulatory agencies with oversight of development associated with the Plan, ensure that, prior to preparing project designs, new and abandoned wells are identified within construction areas to ensure the stability of nearby soils.	
Paleontological resource tools	**SMM GEO-2:** Impacts to paleontological resources shall be minimized through cooperation, information sharing, and SCAG's ongoing regional planning efforts such as web-based planning tools for local governments including CA LOTS, and other GIS tools and data services, including, but not limiting to, Map Gallery, GIS library, and GIS applications; and direct technical assistance efforts such as training series and sharing of associated online training materials. SCAG shall consult with resource agencies such as the National Park Service, United States Forest Service, and Bureau of Land Management to identify opportunities for early and effective consultation to identify unique paleontological resources and unique geological features to avoid such resources wherever practicable and feasible and reduce or mitigation for conflicts in compatible land use to the maximum extent practicable.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Paleontological resources	**PMM GEO-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to paleontological resources. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure compliance with the Paleontological Resources Preservation Act, the Federal Land Policy and Management Act, the Antiquities Act, Section 5097.5 of the Public Resources Code (PRC), adopted county and city general plans, and other federal, state and local regulations, as applicable and feasible, by adhering to and incorporating the performance standards and practices from the 2010 Society for Vertebrate Paleontology (SVP) standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. b) Obtain review by a qualified paleontologist (e.g. who meets the SVP standards for a Principal Investigator or Project Paleontologist or the Bureau of Land Management (BLM) standards for a Principal Investigator), to determine if the project has the potential to require ground disturbance of parent material with potential to contain unique paleontological or resources, or to require the substantial alteration of a unique geologic feature. The assessment should include museum records searches, a review of geologic mapping and the scientific literature, geotechnical studies (if available), and potentially a pedestrian survey, if units with paleontological potential are present at the surface. c) Avoid exposure or displacement of parent material with potential to yield unique paleontological resources.	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact to paleontological resources. In addition, the project would be consistent with the Section 5097.5 of the Public Resources Code which addresses the discovery and handling of paleontological resources.

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	d) Where avoidance of parent material with the potential to yield unique paleontological resources is not feasible: 1. All on-site construction personnel receive Worker Education and Awareness Program (WEAP) training prior to the commencement of excavation work to understand the regulatory framework that provides for protection of paleontological resources and become familiar with diagnostic characteristics of the materials with the potential to be encountered. 2. A qualified paleontologist prepares a Paleontological Resource Management Plan (PRMP) to guide the salvage, documentation and repository of unique paleontological resources encountered during construction. The PRMP should adhere to and incorporate the performance standards and practices from the 2010 SVP Standard procedures for the assessment and mitigation of adverse impacts to paleontological resources. If unique paleontological resources are encountered during construction, use a qualified paleontologist to oversee the implementation of the PRMP. 3. Monitor ground disturbing activities in parent material, with a moderate to high potential to yield unique paleontological resources using a qualified paleontological monitor meeting the standards of the SVP or the BLM to determine if unique paleontological resources are encountered during such activities, consistent with the specified or comparable protocols. 4. Identify where ground disturbance is proposed in a geologic unit having the potential for containing fossils and specify the need for a paleontological monitor to be present during ground disturbance in these areas. e) Avoid routes and project designs that would permanently alter unique geological features. f) Salvage and document adversely affected resources sufficient to support ongoing scientific research and education. g) Significant recovered fossils should be prepared to the point of curation, identified by qualified experts, listed in a database to facilitate analysis, and deposited in a designated paleontological curation facility. h) Following the conclusion of the paleontological monitoring, the qualified paleontologist should prepare a report stating that the paleontological monitoring requirement has been fulfilled and summarize the results of any paleontological finds. The report should be submitted to the lead CEQA and the repository curating the collected artifacts, and should document the methods and results of all work completed under the PRMP, including treatment of paleontological materials, results of specimen processing, analysis, and research, and final curation arrangements.	

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Greenhouse Gas Emissions		
Adoption of GHG reduction plans and implementation of local climate initiatives	**SMM GHG-1:** SCAG, in partnership with local air districts, shall continue to work with the counties and cities to adopt qualified GHG reduction plans (e.g., climate action plans [CAPs], develop GHG-reducing planning policies, and implement local climate initiatives. These reductions can be achieved through a combination of programs that implement plans developed collaboratively, including ZNE in new construction, retrofits of existing buildings, incentivizing the development of renewable energy sources that serve both new and existing land uses, as well as measures to reduce GHG emissions form transportation sources. Additionally, SCAG shall continue to update the Green Region Initiative (GRI) Sustainability Indicators Mapping tool, which serves as an interactive information resource for jurisdictions within the SCAG region to measure and track sustainability progress in the region across 12 categories and 29 sustainability indicators. The tool fosters collaboration through the sharing of best practices across the 191 cities and six counties in the SCAG region, and identifies opportunities for improving sustainability practices (due to the recent inclusion of SB 535 Disadvantaged Communities data).	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Energy efficient design	**SMM GHG-2:** SCAG shall encourage energy efficient design for buildings, through SCAG's Sustainable Communities Program potentially including strengthening local building codes for new construction and renovation to achieve a higher level of energy efficiency.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Deployment of zero-emission (ZEV) vehicles	**SMM GHG-3:** SCAG shall continue supporting deployment of zero-emission (ZEV) vehicles and ZEV infrastructure in the region through its Clean Cities Program and Electric Vehicle (EV) Program. This will include working with partners such as universities, utilities, regulating agencies, the private sector, national laboratories and the US Department of Energy, NGOs, and member agencies to share information, resources, and	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level

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	data, to showcase best practices, and to provide support or teaming arrangements to help bring funding, projects, or other resources to the region. SCAG shall also support member agencies and other stakeholders in making decisions about and removing barriers to ZEV infrastructure. Potential deliverables include, but are not limited to: - EV Charging Station Studies - On-going webinars, meetings, outreach and GRI data to support AB1236 compliance and the forthcoming Hydrogen Permitting Guidebook. SCAG shall also create the framework for a program to identify funding and provide rebates and/or other funding for light duty ZEVs and supportive infrastructure.	environmental review. This measure is not incorporated into the Project because it is not applicable.
Agency partnerships	**SMM GHG-4:** SCAG shall continue to pursue partnerships with SCE, municipal utilities, locally operated electricity providers and CPUC to promote energy efficient development in the SCAG region, through coordinated planning and data and information sharing activities.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Hazards and Hazardous Materials		
Transport of hazardous materials	**SMM HAZ-1:** SCAG shall work with the U.S. DOT, the Office of Environmental Service Caltrans, and the private sector to continue to conduct driver safety training programs and enforce speed limits on roadways. In an effort to reduce risks associated with the transport of hazardous materials in the SCAG region, SCAG shall encourage the U.S. Department of Transportation and the California Highway Patrol to continue to enforce speed limits and existing regulations governing goods movement and hazardous materials transportation.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Disposal of hazardous waste and materials	**SMM HAZ-2:** SCAG shall notify member agencies of the importance of ensuring that construction and operation of transportation projects provide for the safe transport and disposal of hazardous waste, consistent with the provisions of HMR, 49 CFR Parts 171–180.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project

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		Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Remedial design of transportation infrastructure	**SMM HAZ-3:** SCAG shall coordinate with the Office of Environmental Services to identify any transportation infrastructure elements within the SCAG region where risks to people and property occur at an above-average incident level, potentially warranting consideration for remedial design in future regional transportation plans (RTPs).	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Accidental release of hazardous materials	**PMM HAZ-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce hazards related to the reasonably foreseeable upsets and accidents involving the release of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Require implementation of safety standards regarding transport of hazardous materials, including but not limited to the following: a) Removal of the most volatile elements, including flammable natural gas liquids, prior to shipment; b) More stringent tank car safety standards; c) Improved rail transportation route analysis, and modification of routes based on that analysis; d) Utilization of the best available inspection equipment and protocols, and implementation of positive train control; e) Reduced train car speeds to 40 miles per hour when passing through urbanized areas of any size; f) Limitations on storage of hazardous materials tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments;	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to the accidental release of hazardous materials.

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	g) Advance notification to county and city emergency operations offices of all crude oil and hazardous materials shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident; h) Quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying hazardous materials.	
Release of hazardous materials near schools	**PMM HAZ-3:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the release of hazardous materials within one-quarter mile of schools, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where the construction and operation of projects involves the transport of hazardous materials, avoid transport of such materials within one-quarter mile of schools, when school is in session, wherever feasible. b) Where it is not feasible to avoid transport of hazardous materials, within one-quarter mile of schools on local streets, provide notifications of the anticipated schedule of transport of such materials.	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to release of hazardous materials near schools.
Hazardous materials sites, Government Code section 65962.5.	**PMM HAZ-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to projects that are located on a site which is included on the Cortese List, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) For any listed sites or sites that have the potential for residual hazardous materials as a result of historic land uses, complete a Phase I Environmental Site Assessment, including a review and consideration of data from all known databases of contaminated sites, during the process of planning, environmental clearance, and construction for projects.	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to hazardous materials sites.

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	b) Where warranted due to the known presence of contaminated materials, submit to the appropriate agency responsible for hazardous materials/wastes oversight a Phase II Environmental Site Assessment report if warranted by a Phase I report for the project site. The reports should make recommendations for remedial action, if appropriate, and be signed by a Registered Environmental Assessor, Professional Geologist, or Professional Engineer. c) Implement the recommendations provided in the Phase II Environmental Site Assessment report, where such a report was determined to be necessary for the construction or operation of the project, for remedial action. d) Submit a copy of all applicable documentation required by local, state, and federal environmental regulatory agencies, including but not limited to: permit applications, Phase I and II Environmental Site Assessments, human health and ecological risk assessments, remedial action plans, risk management plans, soil management plans, and groundwater management plans. e) Conduct soil sampling and chemical analyses of samples, consistent with the protocols established by the U.S. EPA to determine the extent of potential contamination beneath all underground storage tanks (USTs), elevator shafts, clarifiers, and subsurface hydraulic lifts when on-site demolition or construction activities would potentially affect a particular development or building. f) Consult with the appropriate local, state, and federal environmental regulatory agencies to ensure sufficient minimization of risk to human health and environmental resources, both during and after construction, posed by soil contamination, groundwater contamination, or other surface hazards including, but not limited to, underground storage tanks, fuel distribution lines, waste pits and sumps. g) Obtain and submit written evidence of approval for any remedial action if required by a local, state, or federal environmental regulatory agency. h) Cease work if soil, groundwater, or other environmental medium with suspected contamination is encountered unexpectedly during construction activities (e.g., identified by odor or visual staining, or if any underground storage tanks, abandoned drums, or other	

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	hazardous materials or wastes are encountered), in the vicinity of the suspect material. Secure the area as necessary and take all appropriate measures to protect human health and the environment, including but not limited to, notification of regulatory agencies and identification of the nature and extent of contamination. Stop work in the areas affected until the measures have been implemented consistent with the guidance of the appropriate regulatory oversight authority. i) Soil generated by construction activities should be stockpiled on-site in a secure and safe manner. All contaminated soils determined to be hazardous or non-hazardous waste must be adequately profiled (sampled) prior to acceptable reuse or disposal at an appropriate off-site facility. Complete sampling and handling and transport procedures for reuse or disposal, in accordance with applicable local, state and federal laws and policies. j) Groundwater pumped from the subsurface should be contained on-site in a secure and safe manner, prior to treatment and disposal, to ensure environmental and health issues are resolved pursuant to applicable laws and policies. Utilize engineering controls, which include impermeable barriers to prohibit groundwater and vapor intrusion into the building. k) As needed and appropriate, prior to issuance of any demolition, grading, or building permit, submit for review and approval by the Lead Agency (or other appropriate government agency) written verification that the appropriate federal, state and/or local oversight authorities, including but not limited to the Regional Water Quality Control Board (RWQCB), have granted all required clearances and confirmed that the all applicable standards, regulations, and conditions have been met for previous contamination at the site. l) Develop, train, and implement appropriate worker awareness and protective measures to assure that worker and public exposure is minimized to an acceptable level and to prevent any further environmental contamination as a result of construction. m) If asbestos-containing materials (ACM) are found to be present in building materials to be removed, submit specifications signed by a	

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	certified asbestos consultant for the removal, encapsulation, or enclosure of the identified ACM in accordance with all applicable laws and regulations, including but not necessarily limited to: California Code of Regulations, Title 8; Business and Professions Code; Division 3; California Health and Safety Code Section 25915-25919.7; and other local regulations. n) Where projects include the demolitions or modification of buildings constructed prior to 1978, complete an assessment for the potential presence or lack thereof of ACM, lead based paint, and any other building materials or stored materials classified as hazardous waste by state or federal law. o) Where the remediation of lead-based paint has been determined to be required, provide specifications to the appropriate agency, signed by a certified Lead Supervisor, Project Monitor, or Project Designer for the stabilization and/or removal of the identified lead paint in accordance with all applicable laws and regulations, including but not necessarily limited to: California Occupational Safety and Health Administration's (Cal OSHA's) Construction Lead Standard, Title 8 California Code of Regulations (CCR) Section 1532.1 and Department of Health Services (DHS) Regulation 17 CCR Sections 35001–36100, as may be amended. If other materials classified as hazardous waste by state or federal law are present, the project sponsor should submit written confirmation to the appropriate local agency that all state and federal laws and regulations should be followed when profiling, handling, treating, transporting, and/or disposing of such materials.	
Aviation planning issues	**SMM HAZ-5:** SCAG shall continue to collaborate with key stakeholders on regional aviation planning issues through the Aviation Technical Advisory Committee (ATAC). The ATAC is a partnership between the airports, transportation agencies and commissions, experts, and other community members.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.

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Emergency evacuation response plans	**PMM HAZ-5:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Continue to coordinate locally and regionally based on ongoing review and integration of projected transportation and circulation conditions. b) Develop new methods of conveying projected and real time information to citizens using emerging electronic communication tools including social media and cellular networks; c) Continue to evaluate lifeline routes for movement of emergency supplies and evacuation.	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to emergency evacuation plans.
Hydrology and Water Quality		
Violation of water quality standards or waste discharge requirements. Alteration of site drainage, runoff exceeding stormwater drainage system capacity, other degrading water quality.	**SMM HYD-1:** SCAG shall continue to work with local jurisdictions and water quality agencies to encourage regional-scale planning for improved water quality management and pollution prevention. Future impacts to water quality shall be avoided to the extent practical and feasible through cooperative planning, information sharing, and comprehensive pollution control measure development within the SCAG region. This cooperative planning shall occur as part of current and existing coordination, an integral part of SCAG's ongoing regional planning efforts.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Violation of water quality standards or waste discharge requirements. Alteration of site drainage, runoff exceeding stormwater drainage system capacity, other degrading water quality.	**PMM HYD-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects from violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact to water quality, waste discharge or groundwater. In addition, the project would be consistent with the NPDES permitting system, LAMC Article 4.4, and the low impact

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	a) Complete, and have approved, a Stormwater Pollution Prevention Plan (SWPPP) prior to initiation of construction. b) Implement Best Management Practices to reduce the peak stormwater runoff from the project site to the maximum extent practicable. c) Comply with the Caltrans storm water discharge permit as applicable; and identify and implement Best Management Practices to manage site erosion, wash water runoff, and spill control. d) Complete, and have approved, a Standard Urban Stormwater Management Plan, prior to occupancy of residential or commercial structures. e) Ensure adequate capacity of the surrounding stormwater system to support stormwater runoff from new or rehabilitated structures or buildings. f) Prior to construction within an area subject to Section 404 of the Clean Water Act, obtain all required permit approvals and certifications for construction within the vicinity of a watercourse: g) Where feasible, restore or expand riparian areas such that there is no net loss of impervious surface as a result of the project. h) Install structural water quality control features, such as drainage channels, detention basins, oil and grease traps, filter systems, and vegetated buffers to prevent pollution of adjacent water resources by polluted runoff where required by applicable urban storm water runoff discharge permits, on new facilities. i) Provide operational best management practices for street cleaning, litter control, and catch basin cleaning are implemented to prevent water quality degradation in compliance with applicable storm water runoff discharge permits; and ensure treatment controls are in place as early as possible, such as during the acquisition process for rights-of-way, not just later during the facilities design and construction phase. j) Comply with applicable municipal separate storm sewer system discharge permits as well as Caltrans' storm water discharge permit including long-term sediment control and drainage of roadway runoff. k) Incorporate as appropriate treatment and control features such as detention basins, infiltration strips, and porous paving, other features to control surface runoff and facilitate groundwater recharge into the design of new	development requirements, which address reduction of potential water quality, waste discharge and groundwater impacts during the construction and operation of a project.

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	transportation projects early on in the process to ensure that adequate acreage and elevation contours are provided during the right-of-way acquisition process. l) Upgrade stormwater drainage facilities to accommodate any increased runoff volumes. These upgrades may include the construction of detention basins or structures that will delay peak flows and reduce flow velocities, including expansion and restoration of wetlands and riparian buffer areas. System designs shall be completed to eliminate increases in peak flow rates from current levels. m) Encourage Low Impact Development (LID) and incorporation of natural spaces that reduce, treat, infiltrate and manage stormwater runoff flows in all new developments, where practical and feasible.	
Regional water planning	**SMM HYD-2:** SCAG shall build from existing efforts including those at the sub-regional and local level and shall continue to work with local jurisdictions and water agencies, to encourage regional-scale planning for improved stormwater management and groundwater recharge, including consideration of alternative recharge technologies and practices. Future adverse impacts may be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Drainage patterns	**SMM HYD-3:** SCAG shall build from existing efforts including those at the sub-regional and local level and shall continue to work with local jurisdictions to encourage regional-scale planning for maintaining and/or improving existing drainage patterns. Future adverse impacts may be avoided through cooperative planning, information sharing, and comprehensive implementation efforts within the SCAG region.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Flood protection collaboration	**SMM HYD-4:** SCAG shall continue to work with local jurisdictions and water quality agencies to encourage flood protection and prevent development in flood hazard areas that do not have appropriate protections. This shall be accomplished through cooperation and	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project

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	information sharing regarding specific alignments and rights-of-way planning for RTP projects, and regional program development as part of SCAG's ongoing regional planning efforts. These include but are not limited to web-based data distribution planning tools and sustainability programs in conjunction with local governments. Such services would potentially consist of an inventory of areas located in or near a 100-year flood hazard zone or hazard areas that would potentially be affected by a failure of a levee or dam; or inundation by seiche, tsunami, or mudflow.	Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Structures within 100- year floodplain hazard area, risk due to levee or dam failure, seiche, tsunami, or mud flow.	**PMM HYD-4:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures capable of avoiding or reducing the potential impacts of locating structures that would impede or redirect flood flows, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Ensure that all roadbeds for new highway and rail facilities be elevated at least one foot above the 100-year base flood elevation. Since alluvial fan flooding is not often identified on FEMA flood maps, the risk of alluvial fan flooding should be evaluated and projects should be sited to avoid alluvial fan flooding. Delineation of floodplains and alluvial fan boundaries should attempt to account for future hydrologic changes caused by global climate change.	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to flood hazards.
Land Use and Planning		
Promotion of best planning practices	**SMM LU-1:** SCAG shall coordinate with local County Transportation Commissions, Caltrans and other implementing agencies when siting new facilities in residential areas to facilitate minimizing future impacts of transportation projects on established communities, through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts to promote best planning practices.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Physically divide a community.	**PMM LU-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section**

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	measures to reduce substantial adverse effects that physically divide a community, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Facilitate good design for land use projects that build upon and improve existing circulation patterns b) Encourage implementing agencies to orient transportation projects to minimize impacts on existing communities by: - Selecting alignments within or adjacent to existing public rights of way. - Design sections above or below-grade to maintain viable vehicular, cycling, and pedestrian connections between portions of communities where existing connections are disrupted by the transportation project. - Wherever feasible incorporate direct crossings, overcrossings, or under crossings at regular intervals for multiple modes of travel (e.g., pedestrians, bicyclists, vehicles). c) Where it has been determined that it is infeasible to avoid creating a barrier in an established community, consider other measures to reduce impacts, including but not limited to: - Alignment shifts to minimize the area affected. - Reduction of the proposed right-of-way take to minimize the overall area of impact. - Provisions for bicycle, pedestrian, and vehicle access across improved roadways.	**4.0** of this SCEA, that the Project would not result in a potentially significant impact related to physically dividing a community.
Intergovernmental Review (IGR)	**SMM LU-2:** SCAG shall continue to promote the Intergovernmental Review (IGR) Program as an internal and external informational tool by reviewing and monitoring all projects submitted to SCAG for review and working with local jurisdictions to ensure that submitted projects support the most currently adopted Connect SoCal Plan. SCAG shall provide comment letters on regionally significant projects to provide policies and goals from Connect SoCal, recommend the application of project-level mitigation measures from the Connect SoCal PEIR and provide additional resources to help the lead agency support or develop projects that are consistent with the Plan, as appropriate. The IGR Mapping Tool can also be utilized by local	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.

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	jurisdictions to assess regional impacts. To visit the IGR Mapping tool, please go to: https://maps.scag.ca.gov/IGR/. For more information on SCAG's IGR Program, please visit: http://www.scag.ca.gov/programs/Pages/IGR.aspx.	
General Plan	**SMM LU-3:** SCAG shall encourage cities and counties in the region to provide SCAG with electronic versions of their most recent general plan (and associated environmental document) and any updates as they are produced.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Data in General Plan Updates	**SMM LU-4:** SCAG shall continue to provide targeted technical services such as GIS and data support for cities and counties to update their general plans at least every ten years, as recommended by the Governor's Office of Planning and Research.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Plan Implementation	**SMM LU-5:** SCAG shall provide technical assistance and regional leadership to encourage implementation of the Plan goals and strategies that integrate growth and land use planning with the existing and planned transportation network.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Land use plans, policies and regulations.	**PMM LU-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the

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	that conflict with an adopted policy or regulation, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) When an inconsistency with the adopted general plan policy or land use regulation (adopted for the purpose of avoiding or mitigating an impact) is identified modify the transportation or land use project to eliminate the conflict; or, determine if the environmental, social, economic, and engineering benefits of the project warrant an amendment to the general plan or land use regulation.	Project would not result in a potentially significant impact related to Land Use.
Mineral Resources		
Loss of availability of a known mineral resource.	**SMM MIN-1:** SCAG shall coordinate with the Department of Conservation, California Geological Survey to maintain a database of (1) available mineral resources in the SCAG region including permitted and unpermitted aggregate resources and (2) the anticipated 50-year demand for aggregate and other mineral resources. Based on the results of this survey, SCAG shall work with local agencies on strategies to address anticipated demand, including identifying future sites that may seek permitting and working with industry experts to identify ways to encourage and increase recycling to reduce the demand for aggregate.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Loss of availability of a known mineral resource.	**PMM MIN-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the use of mineral resources that could be of value to the region, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Provide for the efficient use of known aggregate and mineral resources or locally important mineral resource recovery sites, by ensuring that the consumptive use of aggregate resources is minimized and that access to recoverable sources of aggregate is not precluded, as a result of construction, operation and maintenance of projects. b) Where avoidance is infeasible, minimize impacts to the efficient and effective use of recoverable sources of aggregate through measures that have been identified in county and	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to mineral resources.

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	city general plans, or other comparable measures such as: 1) Recycle and reuse building materials resulting from demolition, particularly aggregate resources, to the maximum extent practicable. 2) Identify and use building materials, particularly aggregate materials, resulting from demolition at other construction sites in the SCAG region, or within a reasonable hauling distance of the project site. 3) Design transportation network improvements in a manner (such as buffer zones or the use of screening) that does not preclude adjacent or nearby extraction of known mineral and aggregate resources following completion of the improvement and during long-term operations. 4) Avoid or reduce impacts on known aggregate and mineral resources and mineral resource recovery sites through the evaluation and selection of project sites and design features (e.g., buffers) that minimize impacts on land suitable for aggregate and mineral resource extraction by maintaining portions of MRZ-2 areas in open space or other general plan land use categories and zoning that allow for mining of mineral resources.	
Noise		
Expose people to noise in excess of local standards.	**SMM-NOISE-1:** SCAG shall coordinate with CTCs and member agencies as part of SCAG's outreach and technical assistance to local governments to encourage transportation projects and projects involving residential and commercial land uses to mitigate noise and vibration or be developed in areas that are normally acceptable or conditionally acceptable, consistent with applicable guidelines (i.e., OPR, Caltrans, etc.).	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Population, Housing and Employment		
Sustainability	**SMM-POP-1:** SCAG shall promote the Sustainability Program which will provide technical assistance to local jurisdictions that support local planning and implementation of the Connect SoCal Plan. The program recognizes sustainable solutions to local growth challenges and will result in local plans that promote sustainability through the integration of	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local

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	transportation and land use. For more information please visit: http://sustain.scag.ca.gov/Documents/Sustainable%20Communities%20Program%20Guidelines.pdf.	agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Affordable Housing Sustainable Communities (AHSC) grants program	**SMM-POP-2:** SCAG shall provide technical assistance to local governments, transit agencies and developers within the region to build housing capacity to compete in the statewide Affordable Housing Sustainable Communities (AHSC) grants program. The AHSC program is one of the few state funding opportunities to address housing shortages within the state. For more information please visit: http://ahsc.scag.ca.gov/Pages/Home.aspx.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Housing crisis summits	**SMM-POP-3:** SCAG shall host summits that addresses the housing crisis and provides solutions to build more housing. Examples include the 2016 Housing Summit (http://www.scag.ca.gov/SiteAssets/HousingSummit/index.html) and the Eighth Annual Economic Summit (https://www.scag.ca.gov/calendar/Pages/8thEconomicSummit.aspx).	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Local Profile Reports	**SMM-POP-4:** SCAG shall continue to produce the biennial Local Profile reports for all member jurisdictions in the SCAG region for the purpose of data and information sharing. The Local Profiles reports provide a variety of demographic, economic, education, housing, and transportation information that local jurisdictions can utilize like project and program planning. For more information about the most recently release 2019 Local Profiles, please visit: http://www.scag.ca.gov/DataAndTools/Pages/LocalProfiles.aspx.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Funding for public TOD infrastructure improvements	**SMM-POP-5:** SCAG shall assist cities to identify funding and financing opportunities and potential partnerships for public infrastructure improvements for transit-oriented development and other smart growth projects.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project

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		Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Displacement of housing requiring replacement housing elsewhere.	**PMM-POP-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the displacement of existing housing, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Evaluate alternate route alignments and transportation facilities that minimize the displacement of homes and businesses. Use an iterative design and impact analysis where impacts to homes or businesses are involved to minimize the potential of impacts on housing and displacement of people. b) Prioritize the use existing ROWs, wherever feasible. c) Develop a construction schedule that minimizes potential neighborhood deterioration from protracted waiting periods between right-of-way acquisition and construction. d) Review capacities of available urban infrastructure and augment capacities as needed to accommodate demand in locations where growth is desirable to the local lead Agency and encouraged by the SCS (primarily TPAs, where applicable). e) When General Plans and other local land use regulations are amended or updated, use the most recent growth projections and RHNA allocation plan.	This mitigation measure is not incorporated because the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to displacement of housing.
Public Services		
Assistance during a major emergency and during recovery period	**SMM PSF-1:** SCAG shall assist planners, first responders, and recovery teams in a supporting role, in three key areas, before a major emergency and during the recovery period: • Provide a policy forum to help develop regional consensus and education on security policies and emergency responses.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level

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	• Assist in expediting the planning and programming of transportation infrastructure repairs from major disasters. • Encourage integration of transportation security measures into transportation projects early in the project development process by leveraging SCAG's relevant plans, programs, and processes, including regional ITS architecture. An example includes SCAG's participation in the development of the Southern California Catastrophic Earthquake Preparedness Plan.[15]	environmental review. This measure is not incorporated into the Project because it is not applicable.
Fire-wise Land Management	**SMM PSF-2:** SCAG shall facilitate minimizing future impacts to fire protection services through information sharing regarding Fire-wise Land Management (data regarding fire-resistant vegetation, fire-resistant materials, locations where development is potentially hazardous in regard to wildfire, and management of brush and other fire risks in the immediate vicinity of development in areas with high fire threat) with county and city planning departments.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Libraries	**SMM PSP-1:** SCAG shall facilitate minimizing future impacts to library services through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to Map Gallery, GIS library, and GIS applications, and promote acceptable service ratios regarding library services.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Regional transportation safety and security	**SMM PSP-2:** SCAG shall help to enhance the region's ability to deter and respond to acts of terrorism, human-caused or natural disasters through regionally cooperative and collaborative strategies. SCAG shall work with local officials to develop regional consensus on regional transportation safety, security, and safety security policies.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level

15 California Emergency Management Agency, *Southern California Catastrophic Earthquake Response Plan,* December 2010 https://www.caloes.ca.gov/PlanningPreparednessSite/Documents/SoCalCatastrophicConops(Public)2010.pdf, accessed October 31, 2019.

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		environmental review. This measure is not incorporated into the Project because it is not applicable.
Emergency response ability	**SMM PSP-3:** SCAG shall help to enhance the region's ability to deter and respond to terrorist incidents, human-caused or natural disasters by strengthening relationship and coordination with transportation. This will be accomplished by the following: • SCAG shall work with local officials to develop regional consensus on regional transportation safety, security, and safety security policies. • SCAG shall encourage all SCAG elected officials are educated in NIMS. • SCAG shall work with partner agencies, federal, state and local jurisdictions to improve communications and interoperability and to find opportunities to leverage and effectively utilize transportation and public safety/security resources in support of this effort.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Mutual aid agreements for government services during recovery periods	**SMM PSP-4:** SCAG shall encourage and provide a forum for local jurisdictions to develop mutual aid agreements for essential government services during any incident recovery.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Adverse effects associated with new or physically altered government facilities for fire protection, police protection, and emergency response.	**PMM PSP-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new emergency response facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Coordinate with emergency response agencies to ensure that there are adequate governmental facilities to maintain acceptable service ratios, response times or other performance objectives for emergency response services and that any	This mitigation measure is not incorporated because the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to emergency response facilities.

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	required additional construction of buildings is incorporated into the project description. • Where current levels of services at the project site are found to be inadequate, provide fair share contributions towards infrastructure improvements, as appropriate and applicable, to mitigate identified CEQA impacts. • Project sponsors can and should develop traffic control plans for individual projects. Traffic control plans should include information on lane closures and the anticipated flow of traffic during the construction period. The basic objective of each traffic control plan (TCP) is to permit the contractor to work within the public right of way efficiently and effectively while maintaining a safe, uniform flow of traffic. The construction work and the public traveling through the work zone in vehicles, bicycles or as pedestrians must be given equal consideration when developing a traffic control plan.	
Schools	**SMM PSS-1:** SCAG shall facilitate minimizing future impacts to school services through cooperation, information sharing, and regional program development as part of SCAG's ongoing regional planning efforts, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to, Map Gallery, GIS library, and GIS applications, and direct technical assistance efforts to promote school planning efforts.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Adverse effects associated with new or physically altered government facilities for schools.	**PMM PSS-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of constructing new or physically altered school facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of school facilities is required to meet public school service ratios, require school district fees, as applicable.	This mitigation measure is not incorporated because the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact to schools.
Libraries	**SMM PSL-1:** SCAG shall facilitate minimizing future impacts to library services through cooperation, information sharing, and regional program development as part of SCAG's ongoing	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation

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	regional planning efforts, such as web-based planning tools for local government including CA LOTS, and other GIS tools and data services, including, but not limited to Map Gallery, GIS library, and GIS applications, and promote acceptable service ratios regarding library services.	measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Adverse effects associated with new or physically altered government facilities for libraries.	**PMM PSL-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects of construction of new or altered library facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Where construction or expansion of library facilities is required to meet public library service ratios, require library fees, as appropriate and applicable, to mitigate identified CEQA impacts.	This mitigation measure is not incorporated because the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact to libraries.
Parks and Recreation		
Improvements to residential park access.	**SMM REC-1:** SCAG shall continue the commitment to analyze public health outcomes as part of the Regional Transportation Plan/Sustainable Communities Strategy (Plan). As part of the public health analysis for the Plan, SCAG shall continue to analyze resident access to parks and recreational facilities from a county level to help local jurisdictions to improve resident access to parks. SCAG shall communicate the impacts of the Plan through its Public Health Working group, and continue to support policy changes at the city and county level through educational programs.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Increase use and physical deterioration of recreational facilities.	**PMM REC-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on the use of existing neighborhood and regional parks or other recreational facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of	This mitigation measure is not incorporated because the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact to recreational facilities.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	equivalent Quimby fees, consider increasing the accessibility to natural areas and lands for outdoor recreation from the proposed project area, in coordination with local and regional open space planning and/or responsible management agencies. b) Prior to the issuance of permits, where projects require the construction or expansion of recreational facilities or the payment of equivalent Quimby fees, encourage patterns of urban development and land use which reduce costs on infrastructure and make better use of existing facilities, using strategies such as: i. Increasing the accessibility to natural areas for outdoor recreation ii. Utilizing "green" development techniques iii. Promoting water-efficient land use and development iv. Encouraging multiple uses, such as the joint use of schools v. Including trail systems and trail segments in General Plan recreation standards.	
Transportation, Traffic, and Safety		
VMT minimization through community engagement	**SMM TRA-1:** SCAG shall facilitate minimizing VMT and related vehicular delay by minimizing impacts to circulation and access, improve mobility, and encourage transit and Active Transportation via workshops (i.e., Mobility 21 workshop and Regional Transportation Workgroups) and web-based planning tools for local governments, forums with policy makers, and County Transportation Commissions, Planning Agencies, member cities, and state partners.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
VMT reduction through land-use strategies	**SMM TRA-2:** SCAG shall identify further reduction in VMT set forth by CARB, and fuel consumption that could be obtained through land-use strategies, additional car-sharing programs with linkage to public transportation, additional vanpools, additional bicycle sharing and parking programs, and implementation of a universal employee transit access pass (TAP) program.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
Use of VMT metric for transportation impact analysis	**SMM TRA-3:** SCAG shall continue to facilitate an SB 743 implementation program. Following initiation in 2018, the Sustainable Communities Program will continue to provide direct planning resources to support jurisdictions seeking to establish vehicle miles traveled (VMT) as the metric for evaluating transportation impacts, which will result in more efficient development patterns and support a comprehensive strategy for regional mitigation options. The SB 743 implementation program is a State grant-funded project, co-sponsored by SCAG and LADOT, which seeks to provide technical and mitigation strategy development guidance to local jurisdictions in the six-county SCAG region to facilitate implementation of the VMT-based CEQA transportation impact analysis provisions of SB 743. This coordinated program of technical guidance, evaluation of options, and cooperative engagement with local communities will serve to smooth the transition to the new VMT-reducing development paradigm, helping to ensure a successful region-wide implementation of SB 743 and attainment of the associated GHG reduction goals. Some of the primary features of the scope of work include: • Evaluate the feasibility of various alternative VMT mitigation options, including local and regional VMT exchange and banking programs. • Establish CEQA nexus to reduce VMT through a VMT mitigation exchange or banking program alternative. • Substantiate the legal basis of a VMT exchange program for satisfying CEQA mitigation requirements. • Collaborate with other communities and jurisdictions to reduce VMT through implementation of a VMT mitigation exchange or bank program. • Improve the dissemination of transportation project VMT mitigation options. • Support a variety of TDM strategies for Transportation Management Organization (TMO) membership agencies. • Provide guidance to facilitate establishment of VMT mitigation exchange or bank programs throughout the region and state	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
Development of a regional, market-based system for peak hour auto trips.	**SMM TRA-4:** SCAG shall continue to analyze and develop potential implementation strategies for a regional, market-based system to price or charge for auto trips during peak hours.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Employee vanpool program	**SMM TRA-5:** SCAG shall develop a vanpool program for SCAG employees' commute trips.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
TOD development and multimodal transportation	**SMM TRA-6:** SCAG shall encourage new developments to incorporate both local and regional transit measures into the project design that promote the use of alternative modes of transportation.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Conflict with measures of effectiveness for performance of the circulation system.	**PMM-TRA-1**: In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to transportation-related impacts, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • Transportation demand management (TDM) strategies should be incorporated into individual	This mitigation measure is not incorporated because the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to transportation.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	land use and transportation projects and plans, as part of the planning process. Local agencies should incorporate strategies identified in the Federal Highway Administration's publication: Integrating Demand Management into the Transportation Planning Process: A Desk Reference (August 2012) into the planning process (FHWA 2012). For example, the following strategies may be included to encourage use of transit and non-motorized modes of transportation and reduce vehicle miles traveled on the region's roadways: - include TDM mitigation requirements for new developments; - incorporate supporting infrastructure for non-motorized modes, such as, bike lanes, secure bike parking, sidewalks, and crosswalks; - provide incentives to use alternative modes and reduce driving, such as, universal transit passes, road and parking pricing; - implement parking management programs, such as parking cash-out, priority parking for carpools and vanpools; - develop TDM-specific performance measures to evaluate project-specific and system-wide performance; - incorporate TDM performance measures in the decision-making process for identifying transportation investments; - implement data collection programs for TDM to determine the effectiveness of certain strategies and to measure success over time; and - set aside funding for TDM initiatives. - The increase in per capita VMT on facilities experiencing LOS F represents a significant impact compared to existing conditions. To assess whether implementation of these specific mitigation strategies would result in measurable traffic congestion reductions, implementing actions may need to be further refined within the overall parameters of the proposed Plan and matched to local conditions in any subsequent project-level environmental analysis.	
Qualify transportation infrastructure resilience	**SMM TRA-7:** SCAG shall, in cooperation with local and state agencies, identify critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. In addition,	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	SCAG shall establish transportation infrastructure practices that promote and enhance security.	Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Emergency planning forum	**SMM TRA-8:** SCAG shall provide a forum for collaboration in planning, communication, and information sharing before, during, or after a regional emergency (i.e. seismic activities, wildfires, and other natural disasters). This will be accomplished by the following: • SCAG shall develop and incorporate strategies and actions pertaining to response and prevention of security incidents and events as part of the on-going regional planning activities. • SCAG shall offer a regional repository of GIS data for use by local agencies in emergency planning, and response, in a standardized format. • SCAG shall enter into mutual aid agreements with other MPOs (as feasible) to provide this data, in coordination with the California OES in the event that an event disrupts SCAG's ability to function.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Inadequate emergency access. Impair or interfere with Emergency Response Plan or Evacuation Plan.	**PMM TRA-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects which may substantially impair implementation of an adopted emergency response plan or emergency evacuation plan, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Prior to construction, project implementation agencies can and should ensure that all necessary local and state road and railroad encroachment permits are obtained. The project implementation agency can and should also comply with all applicable conditions of approval. As deemed necessary by the governing jurisdiction, the road encroachment permits may require the contractor to prepare a traffic control plan in accordance with professional engineering standards prior to construction. Traffic control plans can and should include the following requirements: - Identification of all roadway locations where special construction techniques (e.g., directional	This mitigation measure is not incorporated, because the City has determined that the existing regulatory requirements listed below would apply to the Project and are equal to or more effective than the SCAG RTP/SCS Program EIR **MM-TRA-2**: Specifically, the Project would be subject to the City's existing regulations that require the Project to comply with the Fire Code and LAMC emergency access requirements. Additionally, the LAFD would require the Project Applicant to prepare an emergency response plan that would address the following: mapping of emergency exits,

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	drilling or night construction) would be used to minimize impacts to traffic flow. - Development of circulation and detour plans to minimize impacts to local street circulation. This may include the use of signing and flagging to guide vehicles through and/or around the construction zone. - Scheduling of truck trips outside of peak morning and evening commute hours. - Limiting of lane closures during peak hours to the extent possible. - Usage of haul routes minimizing truck traffic on local roadways to the extent possible. - Inclusion of detours for bicycles and pedestrians in all areas potentially affected by project construction. - Installation of traffic control devices as specified in the California Department of Transportation Manual of Traffic Controls for Construction and Maintenance Work Zones. - Development and implementation of access plans for highly sensitive land uses such as police and fire stations, transit stations, hospitals, and schools. The access plans would be developed with the facility owner or administrator. To minimize disruption of emergency vehicle access, affected jurisdictions can and should be asked to identify detours for emergency vehicles, which will then be posted by the contractor. Notify in advance the facility owner or operator of the timing, location, and duration of construction activities and the locations of detours and lane closures. - Storage of construction materials only in designated areas. - Coordination with local transit agencies for temporary relocation of routes or bus stops in work zones, as necessary. - Ensure the rapid repair of transportation infrastructure in the event of an emergency through cooperation among public agencies and by identifying critical infrastructure needs necessary for: a) emergency responders to enter the region, b) evacuation of affected facilities, and c) restoration of utilities. - Enhance emergency preparedness awareness among public agencies and with the public at large.	evacuation routes for vehicles and pedestrians, and locations of nearest hospitals and fire departments.
Tribal Cultural Resources		
Tribal cultural resources	**SMM TCR-1:** SCAG shall consult with the Native American Heritage Commission, as well as Native	This mitigation measure is identified as a SCAG Mitigation

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	American tribes, to identify opportunities for early and effective consultation to identify tribal cultural resources to avoid such resources wherever practicable and feasible and reduce or mitigate for conflicts in compatible land use to the maximum extent practicable.	Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Tribal cultural resources	**PMM TCR-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on tribal cultural resources, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Avoidance and preservation of the resources in place, including, but not limited to, planning and construction to avoid the resources and protect the cultural and natural context, or planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria; b) Treating the resource with culturally appropriate dignity taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following: protecting the cultural character and integrity of the resource; protecting the traditional use of the resource; and protecting the confidentiality of the resource; c) Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places; and protecting the resource.	This mitigation measure is not incorporated, because the City determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact to tribal cultural resources.
Utilities and Service Systems		
Landfill capacity, solid waste diversion.	**SMM USSW-1:** During the planning, design, and project-level CEQA review process for individual development projects, SCAG shall coordinate with waste management agencies and the appropriate local and regional jurisdictions to facilitate the development of measures and to encourage diversion of solid waste such as recycling and composting programs, as needed. This includes discouraging siting of new landfills unless all other waste reduction and prevention actions have	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	been fully explored to minimize impacts to neighborhoods.	measure is not incorporated into the Project because it is not applicable.
Recycling programs, composting programs.	**SMM USSW-2:** SCAG shall coordinate with waste management agencies, and the appropriate local and regional jurisdictions, measures to facilitate and encourage diversion of solid waste such as recycling and composting programs.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Landfill capacity, solid waste diversion.	**PMM USSW-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce the generation of solid waste, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: Integrate green building measures with CALGreen (California Building Code Title 24) into project design, including but not limited to the following: a) Reuse and minimization of construction and demolition (C&D) debris and diversion of C&D waste from landfills to recycling facilities. b) Inclusion of a waste management plan that promotes maximum C&D diversion. c) Source reduction through (1) use of materials that are more durable and easier to repair and maintain, (2) design to generate less scrap material through dimensional planning, (3) increased recycled content, (4) use of reclaimed materials, and (5) use of structural materials in a dual role as finish material (e.g., stained concrete flooring, unfinished ceilings, etc.). d) Reuse of existing structure and shell in renovation projects. e) Development of indoor recycling program and space. f) Discourage the siting of new landfills unless all other waste reduction and prevention actions have been fully explored. If landfill siting or expansion is necessary, site landfills with an adequate landfill-owned, undeveloped land	This mitigation measure is not incorporated because the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to solid waste.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	buffer to minimize the potential adverse impacts of the landfill in neighboring communities. g) Discourage exporting of locally generated waste outside of the SCAG region during the construction and implementation of a project. Encourage disposal within the county where the waste originates as much as possible. Promote green technologies for long-distance transport of waste (e.g., clean engines and clean locomotives or electric rail for waste-by-rail disposal systems) and consistency with SCAQMD and Connect SoCal policies can and should be required. h) Encourage waste reduction goals and practices and look for opportunities for voluntary actions to exceed the 80 percent waste diversion target. i) Encourage the development of local markets for waste prevention, reduction, and recycling practices by supporting recycled content and green procurement policies, as well as other waste prevention, reduction and recycling practices. j) Develop ordinances that promote waste prevention and recycling activities such as: requiring waste prevention and recycling efforts at all large events and venues; implementing recycled content procurement programs; and developing opportunities to divert food waste away from landfills and toward food banks and composting facilities. k) Develop and site composting, recycling, and conversion technology facilities that have minimum environmental and health impacts. l) Integrate reuse and recycling into residential industrial, institutional and commercial projects. m) Provide education and publicity about reducing waste and available recycling services. n) Implement or expand city or county-wide recycling and composting programs for residents and businesses. This could include extending the types of recycling services offered (e.g., to include food and green waste recycling) and providing public education and publicity about recycling services.	
Encourage regional-scale planning for wastewater, stormwater management.	**SMM-USWW-1:** SCAG shall work with local jurisdictions and wastewater agencies to encourage regional-scale planning for improved wastewater and stormwater management. Future impacts to wastewater and stormwater facilities shall be avoided to the extent practical and feasible through cooperative planning, information sharing, and comprehensive	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	pollution control measure development within the SCAG region. This cooperative planning shall occur as part of current and existing coordination, an integral part of SCAG's ongoing regional planning efforts.	agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Require new or expanded entitlements for wastewater treatment.	**PMM-USWW-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects on utilities and service systems, particularly for construction of wastewater facilities, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: • During the design and CEQA review of individual future projects, implementing agencies and projects sponsors shall determine whether sufficient wastewater capacity exists for the proposed projects. There CEQA determinations must ensure that the proposed development can be served by its existing or planned treatment capacity. If adequate capacity does not exist, project sponsors shall coordinate with the relevant service provider to ensure that adequate public services and utilities could accommodate the increased demand, and if not, infrastructure improvements for the appropriate public service or utility shall be identified in each project's CEQA documentation. The relevant public service provider or utility shall be responsible for undertaking project-level review as necessary to provide CEQA clearance for new facilities.	This mitigation measure is not incorporated because the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to wastewater facilities.
Implementation of Urban Greening, Greenbelts, Community Separator land use strategies	**SMM USWS-1:** SCAG shall coordinate with local agencies as part of SCAG's Sustainability Program regarding the implementation of Urban Greening, Greenbelts and Community Separator land use strategies. Primary features of land use strategies address the following: • Increased trail and greenway connectivity; • Improved water quality, groundwater recharge and watershed health; • Strategies for stormwater and rainwater collection, infiltration, treatment and release; • Reduce urban runoff; • Expand the urban forest; • Provision of wildlife habitat and increased biodiversity; • Expand recreation opportunities and beautification;	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	• Preserving agrarian economies; • Restore severed wildlife corridors.	
Require new or expanded entitlements for water supply.	**PMM USWS-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to ensure sufficient water supplies, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) Reduce exterior consumptive uses of water in public areas, and should promote reductions in private homes and businesses, by shifting to drought-tolerant native landscape plantings, using weather-based irrigation systems, educating other public agencies about water use, and installing related water pricing incentives. b) Promote the availability of drought-resistant landscaping options and provide information on where these can be purchased. Use of reclaimed water especially in median landscaping and hillside landscaping can and should be implemented where feasible. c) Implement water conservation best practices such as low-flow toilets, water-efficient clothes washers, water system audits, and leak detection and repair. d) For projects located in an area with existing reclaimed water conveyance infrastructure and excess reclaimed water capacity, use reclaimed water for non- potable uses, especially landscape irrigation. For projects in a location planned for future reclaimed water service, projects should install dual plumbing systems in anticipation of future use. Large developments could treat wastewater onsite to tertiary standards and use it for non-potable uses onsite.	This mitigation measure is not incorporated because the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact to water supply. In addition, the project would be consistent with the State Water Code (Section 10910-10915 and the California Green Building Code which addresses water supply within the City.
Wildfire		
Wildfire resilience	**SMM WF-1:** SCAG shall facilitate minimizing future impacts to fire protection services through information sharing regarding Fire-wise Land Management (vegetation data, fire-resistant building materials, locations where development is vulnerable to wildfire, and best practices for safe land management) with county and city planning departments. SCAG shall provide an annual forum (or forums) aimed at increased wildfire resilience. Forums shall focus on how high wildfire risk towns, cities, and counties in the region can adopt a wildland-urban interface (WUI) code (or similar code) specifically designed to mitigate the risks from	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	wildfire to life and property. Topics to be addressed will include best practices around: - Structure density and location: number of structures allowed in areas at risk from wildfire, plus setbacks (distance between structures and distance between other features such as slopes). - Building materials and construction: roof assembly and covering, eaves, vents, gutters, exterior walls, windows, non-combustible building materials, and non-combustible surface. - Vegetation management: tree thinning, spacing, limbing, and trimming; removal of any vegetation growing under tree canopies (typically referred to as "ladder fuels"), surface vegetation removal, and brush clearance; vegetation conversion, fuel modifications, and landscaping. - Emergency vehicle access and evacuation routes: driveways, turnarounds, emergency access roads, marking of roads, and property address markers. - Water supply: approved water sources and adequate water supply. - Fire protection: automatic sprinkler system, spark arresters, and propane tank storage. The outcome of the forum shall be a summary of actionable items for local planners. Furthermore, SCAG shall examine wildfire risk management strategies in areas where at-risk critical electrical infrastructure is located based on CPUC and CAL FIRE maps.	
Protection of Southern California communities, economies from disruptions from wildfires.	**SMM WF-2:** SCAG, in partnership with technical experts and stakeholders shall launch or continue existing initiatives to help local towns, cities, and counties to protect Southern California communities and economies from the disruption of wildfire occurrences. Initiatives could include but not be limited to seminars that review the risk of wildfire and approaches for preparation, including strengthening of infrastructure, emergency services, emergency evacuation plans and reviewing building safety codes.	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Regional Climate Adaptation Framework	**SMM WF-3:** SCAG shall develop a Regional Climate Adaptation Framework, which will assist local and regional jurisdictions in managing the negative impacts of wildfires and other hazards	This mitigation measure is identified as a SCAG Mitigation Measure (SMM), a programmatic mitigation

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	caused by climate change. The Climate Adaptation Framework will integrate existing State initiatives, policies, and guidance into the regional framework, helping to connect local and regional land use and transportation planning with State policy goals. The framework will specifically provide communication & outreach strategies and templates for local jurisdictions; toolkits for local jurisdictions to support project implementation, land use, and transportation infrastructure decisions; resources for cities to comply with Senate Bill 379; resources and templates for other metropolitan planning organizations (MPOs); tools and metrics for tracking implementation progress; and a regional framework and coordination strategy. SCAG shall also assist local jurisdictions with wildfire safety requirements for General Plan Updates by providing the most recent fire-risk data and maps from state-wide resources, including isolated areas that could be subject to fire risk with limited egress routes based on the transportation modeling components of SCAG's Regional Climate Adaptation Framework.	measure to be implemented by SCAG, and not as a Project Mitigation Measure (PMM) to be considered by local agencies in project-level environmental review. This measure is not incorporated into the Project because it is not applicable.
Wildfire risk	**PMM WF-1:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a. Launch fire prevention education for local cities and counties such that local fire agencies, homeowners, as well as commercial and industrial businesses are aware of potential sources of fire ignition and the related procedures to curb or lessen any activities that might initiate fire ignition. b. Ensure structures in high fire risk areas are built to current state and federal standards which serve to greatly increase the chances the structure will survive a wildfire and also allow for people to shelter-in-place. c. Improve road access for emergency response and evacuation so people can evacuate safely and timely when necessary. d. Improve, and educate regarding, local emergency communications and notifications with residents and businesses. e. Enforce defensible space regulations to keep overgrown and unmanaged vegetation,	This mitigation measure is not incorporated because the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to wildfires.

Topic	2020–2045 RTP/SCS PEIR Mitigation Measure	Applicability to Project
	accumulations of trash and other flammable material away from structures. f. Provide public education about wildfire risk and fire prevention measures, and safety procedures and practices to allow for safe evacuation and/or options to shelter-in-place. g. Include external sprinklers with an independent water source to reduce flammability of structures. h. Include local solar power paired with batteries to reduce power flow in electricity lines. i. For developments in high fire-prone areas, have a fire protection plan for residents and businesses. j. Provide fire hazard and fire safety education for homeowners in or near fire hazard areas. k. Developments in fire-prone areas should have fire-resistant feature, such as: − Ember-resistant vents − Fire-resistant roofs − Surrounding defensible space − Proper maintenance and upkeep of structures and surrounding area	
Very High Hazard Severity Zones, SRAs	**PMM WF-2:** In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to wildfire risk, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency: a) New development or infrastructure activity within very high hazard severity zones or SRAs shall be required to: - Submit a fire protection plan including the designation of fire watch staff; - Maintain water and other fire suppression equipment designated solely for firefighting on site for any construction and maintenance activities; - Locate construction and maintenance equipment in designated "safe areas" such that they do not discharge combustible materials; and - Designate trained fire watch staff during project construction to reduce risk of fire hazards.	This mitigation measure is not incorporated because the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project would not result in a potentially significant impact related to wildfires.

Source: 2020–2045 SCAG/RTP SCS FEIR

West Adams-Baldwin Hills-Leimert New Community Plan EIR

Table 3.3-3
Mitigation Measures from the
West Adams-Baldwin Hills-Leimert New Community Plan
(West Adams New Community Plan) EIR
Incorporated into the Project

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
Air Quality		
	AQ1: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that all contractors to include the following best management practices in contract specifications: • Use properly tuned and maintained equipment. • Construction contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations. • Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g. engine catalysts) to the extent they are readily available and feasible. • Use heavy duty diesel-fueled equipment that uses low NOX diesel fuel to the extent it is readily available and feasible. • Use construction equipment that uses low polluting fuels (i.e. compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible. • Maintain construction equipment in good operating condition to minimize air pollutants. • All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with Best Available Control Technologies devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.	This mitigation measure is incorporated as **MM-AQ1** as identified in the analysis of this topic in **Section 4.0** of this SCEA.

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
	• Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible. • Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic. • Construction contractors shall utilize super-compliant architectural coatings as defined by the South Coast Air Quality Management District (VOC standard of less than ten grams per liter). • Construction contractors shall utilize materials that do not require painting, as feasible. • Construction contractors shall use pre-painted construction materials, as feasible. • Construction contractors shall provide temporary traffic controls such as a flag person, during all phases of construction to maintain smooth traffic flow. • Construction contractors shall provide dedicated turn lanes for movement of • construction trucks and equipment on- and off-site, as feasible. • Construction contractors shall reroute construction trucks away from congested streets or sensitive receptor areas, as feasible. • Construction contractors shall appoint a construction relations officer to act as a community liaison concerning on-site construction activity including resolution of issues related to PM10 generation.	
Biological Resources		
	BR2: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that during the final design phase of the proposed project, and prior to the start of the demolition/construction phase, the project applicant shall submit a final landscape plan to the City of Los Angeles for approval by the City's Chief Forester and the Director of the Bureau of Street Services. The final landscape plan shall include provisions to either protect in place the existing protected trees in or adjacent to the	This mitigation measure is incorporated as **MM-BR2** as identified in the analysis of this topic in **Section 4.0** of this SCEA.

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
	project site, per the requirements of the City of Los Angeles Tree Preservation Ordinance.	
Cultural Resources		
	CR4: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that prior to excavation and construction on a proposed project site, the project applicant shall perform a cultural resources literature and records search by an institution recognized and approved by the City of Los Angeles Planning Department to assess the potential for the proposed project site to contain sensitive protected cultural resources.	This mitigation measure is incorporated as **MM-CR4** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	CR5: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that prior to excavation and construction on a proposed project site, the prime construction contractor and any subcontractor(s) shall be cautioned on the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the proposed project site.	This mitigation measure is incorporated as **MM-CR5** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	CR6: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that if during any phase of project construction any cultural materials are encountered, construction activities within a 50-meter radius shall be halted immediately, and the project applicant shall notify the City. A qualified prehistoric archaeologist (as approved by the City) shall be retained by the project applicant and shall be allowed to conduct a more detailed inspection and examination of the exposed cultural materials. During this time, excavation and construction would not be allowed in the immediate vicinity of the find. However, those activities could continue in other areas of the project site.	This mitigation measure is incorporated as **MM-CR6** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	CR7: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that if any find were determined to be significant by the archaeologist, the City and the archaeologist would meet to determine the appropriate course of action.	This mitigation measure is incorporated as **MM-CR7** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	CR8: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that all cultural materials recovered from the site would be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.	This mitigation measure is incorporated as **MM-CR8** as identified in the analysis of this topic in **Section 4.0** of this SCEA.

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
Hazards and Hazardous		
	HM1: Any approval of a Discretionary project or "Active Change Area Project" that involves new construction that will involve soil disturbance shall ensure that a Phase I Environmental Site Assessment (ESA) is prepared. The assessment shall be prepared by a Registered Environmental Assessor (REA) in accordance with State standards/guidelines to evaluate whether the site or the surrounding area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste or materials. Depending on the results of this study, further investigation and remediation may be required in accordance with local, State, and federal regulations and policies. Any further study found necessary by an REA or relevant federal, state or local agency shall be performed prior to project approval and any remediation found necessary by the REA or any relevant federal, state or local agency shall be performed prior to project approval or made a condition on the project if that is found to be adequate for remediation by an REA or the relevant federal, state or local agency.	This mitigation measure is incorporated as **MM-HM1** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
Noise and Vibration		
	N1: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that all contractors include the following best management practices in contract specifications: • Construction haul truck and materials delivery traffic shall avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences. • The construction contractor shall locate construction staging areas away from sensitive uses. • When construction activities are located in close proximity to noise sensitive land uses, noise barriers (e.g., temporary walls or piles of excavated material) shall be constructed between activities and noise sensitive uses. • Impact pile drivers shall be avoided where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that shall be utilized where geological conditions permit their use.	This mitigation measure is incorporated as **MM-N1**, as identified in the analysis of this topic in **Section 4.0** of this SCEA.

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
	Noise shrouds shall be used when necessary to reduce noise of pile drilling/driving. • Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements. • The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.	
	N2: Prior to any approval of a Discretionary project or "Active Change Area Project" that is adjacent to buildings listed or determined eligible for listing in the National Register of Historic Places or the California Register of Historical Resources, designated as a Historic-Cultural Monument by the City of Los Angeles, or within a Historic Preservation Overlay Zone ("historic buildings"), the City shall ensure all of the following requirements are or will be met: • Historic buildings adjacent to the project's construction zones are identified. • A Vibration Control Plan is prepared and approved by the City. • The Vibration Control Plan shall be completed by a qualified structural engineer. • The Vibration Control Plan shall include a pre-construction survey letter establishing baseline conditions at potentially affected buildings. The survey letter shall provide a shoring design to protect the identified land uses from potential damage. The structural engineer may recommend alternative procedures that produce lower vibration levels such as sonic pile driving or caisson drilling instead of impact pile driving. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-up letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).	This mitigation measure is incorporated as **MM-N2**, as identified in the analysis of this topic in **Section 4.0** of this SCEA.

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
Public Services		
	PS1: Discretionary projects in the CPIO or the Crenshaw Corridor Specific Plan shall be reviewed at the discretion of the Los Angeles Police Department (LAPD). Per department standards, the LAPD will determine if any additional crime prevention and security features would be available that are consistent with the development standards as applied to the design of the project. Any additional design features identified by the LAPD shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.	This mitigation measure is incorporated as **MM-P1** as identified in the analysis of this topic in **Section 4.0** of this SCEA.

Source: West Adams New Community Plan

Table 3.3-4
Mitigation Measures from the
West Adams-Baldwin Hills-Leimert New Community Plan (West Adams New Community Plan) EIR
Not Incorporated into the Project

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
Aesthetics		
	AE1: Any approval of a Discretionary project or "Active Change Area Project," with new construction located on commercial or industrially planned land in CPIO subareas or the Crenshaw Corridor Specific Plan that directly abuts or is across an alley from residentially planned land must transition in the following manner: • Where the rear or side property line is contiguous with that of a residential lot or separated by an alley property, the building shall be set back or "stepped back" one foot for every one foot in height as measured fifteen feet above grade at the shared/residential property line, or as specified through the individual CPIO or Specific Plan ordinances when more restrictive. • New construction located opposite the front yard setback of residentially zoned land along local streets shall not exceed 30 feet in height for the first 50 feet of lot depth as	This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, and the City's Zoning Information (ZI) File No. 2452, state that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Furthermore, the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA that the Project's impacts would not have an adverse aesthetic effect.

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
	measured from the commercial or industrial property line opposite the residential lot. • Adjustments and Exceptions (permitted): The fifteen foot "step back" height limitation at the residential property line may be increased by not more than 20 percent or as specified through the CPIO or Specific Plan procedures when more restrictive through adjustment, otherwise, through the exception procedures pursuant to the Los Angeles Municipal Code.	
	AE2: Any approval for any Discretionary project or "Active Change Area Project," shall ensure that all lighting be directed and/or shielded to minimize lighting spillover effects onto adjacent and nearby properties.	This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, and the City's Zoning Information (ZI) File No. 2452, state that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Furthermore, the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA that the Project's impacts would not have an adverse aesthetic effect.
	AE3: Any approval of a Discretionary or "Active Change Area Project," shall ensure that glare effects be limited by using nonreflective building and construction materials, such as concrete, wood, and stucco. This shall include, but not be limited to, art installations, fencing material, and recreational equipment.	This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, and the City's Zoning Information (ZI) File No. 2452, state that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
		significant impacts on the environment." Furthermore, the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA that the Project's impacts would not have an adverse aesthetic effect.
Biological Resources		
	BR1: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that in order to prevent the disturbance of nesting native and/or migratory bird species, all clearing of a project site should take place between September 1 and February 14. If construction is scheduled or ongoing during bird nesting season (February 15 to August 31), qualified biologists shall survey the area within 200 feet (or up to 300 feet, depending on topography or other factors, and 500 feet for raptors) of the construction activity to determine if construction would disturb nesting birds. If nesting activity is being compromised, construction shall be suspended in the vicinity of the nest until fledging is complete. This mitigation measure shall be implemented by a qualified biologist under contract with the project applicant(s). The project biologist should prepare a report detailing the results of the construction monitoring efforts. The report should be submitted to the California Department of Fish and Wildlife (CDFW) within two months of the completion of the monitoring activities.	This mitigation measure is not incorporated because the City has determined that the existing regulatory compliance requirements identified below would apply to the Project and are equal to or more effective than West Adams Community Plan EIR **MM-BR-1**. The applicable regulatory requirements include the MBTA (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the California Department of Fish and Wildlife Code, which regulates vegetation removal during the nesting season (February 15 to August 15) to ensure that significant impacts to migratory birds would not occur. Compliance with these existing regulations would ensure that any potential impacts would be less than significant.
Cultural Resources		
	CR1: Before approval of a Discretionary project or "Active Change Area Project" involving properties designated as Historic-Cultural Monuments or listed in or determined eligible for the National Register or California Register, the project shall be reviewed by the Department of City Planning Office of Historic Resources.	This mitigation measure is not incorporated, because the City has determined, based on the Historic Resource Assessment (PaleoWest, October 2019, **Appendix C.1**) for the Project Site prepared by a qualified historian meeting the Secretary of the Interior's

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
		Professional Qualification Standards that the Project Site does not contain any buildings designated as a Historic-Cultural Monument or eligible for listing on the National Register or California Register.
	CR2: Before approval of any building permits for a Discretionary project or "Active Change Area Project," developed in a Historic Preservation Overlay Zone, the City shall require written approval from the Department of City Planning Office of Historic Resources.	This mitigation measure is not incorporated, because the Project Site is not located within a Historic Preservation Overlay Zone.
	CR3: Before approval of a Discretionary project or "Active Change Area Project," involving properties identified in the SurveyLA Historic Resources Survey Report: "West Adams – Baldwin Hills - Leimert Community Plan Area" as eligible for listing, the City of Los Angeles Office of Historic Resources (OHR) shall find that the project is consistent with the U.S. Secretary of the Interior's Standards for Rehabilitation or that upon further review or study, the property is not eligible for designation as a historic resource.	This mitigation measure is not incorporated, because the City has determined, based on the Historic Resource Assessment (PaleoWest, October 2019, **Appendix C.1**) for the Project Site prepared by a qualified historian meeting the Secretary of the Interior's Professional Qualification Standards that the Project Site is not identified in the SurveyLA Historic Resources Survey Report: "West Adams – Baldwin Hills - Leimert Community Plan Area" as eligible for listing.
	CR9: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that during excavation and grading, if paleontological resources are uncovered, all work in that area shall cease and be diverted so as to allow for a determination of the value of the resource. Construction activities in that area may commence once the uncovered resources are collected by a paleontologist and properly processed. Any paleontological remains and/or reports and surveys shall be submitted to the Los Angeles County Natural History Museum.	This mitigation measure is not incorporated, because the City has determined that the existing regulatory measures listed below would apply to the Project and is equal to or more effective than West Adams New Community Plan **MM-CR-9**: If paleontological resources are discovered during excavation, grading, or construction, the City of Los Angeles Department of Building and Safety will be notified immediately, and all work will cease in the area of the find until a qualified

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
		paleontologist evaluates the find. Construction activity may continue unimpeded on other portions of the Project site. The paleontologist shall determine the location, the time frame, and the extent to which any monitoring of earthmoving activities shall be required. The found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.
	CR10: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that if human remains are unearthed at a project site during construction, work at the specific construction site at which the remains have been uncovered shall be suspended, and the City of Los Angeles Public Works Department and County coroner shall be immediately notified. No further disturbance shall occur until the Los Angeles County Coroner has made the necessary findings as to origin and disposition in accordance with California Health and Safety Code Section 7050.5. If the remains are determined to be those of a Native American, the Native American Heritage Commission (NAHC) in Sacramento shall be contacted before the remains are removed in accordance with Section 21083.2 of the California Public Resources Code	This mitigation measure is not incorporated, because the existing regulatory requirements listed below regarding discovery of human remains would apply to the Project and are equal to or more effective than the West Adams New Community Plan **MM-CR-10**: If human remains are encountered unexpectedly during construction demolition and/or grading activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to California Public Resources Code (PRC) Section 5097.98. If human remains are discovered during excavation activities, work will stop immediately and the County Coroner will be contacted. If the remains are determined to be of Native American descent, the Coroner has 24 hours to notify the Native American Heritage

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
		Commission (NAHC). The NAHC would immediately notify the person it believes to be the most likely descendent of the deceased Native American. The most likely descendent has 48 hours to make recommendations to the owner, or representative, for the treatment or disposition, with proper dignity, of the human remains and grave goods. If the owner does not accept the descendant's recommendations, the owner or the descendent may request mediation by the NAHC.
Greenhouse Gas Emissions		
	GHG1: Any approval of a Discretionary project or "Active Change Area Project" shall ensure that the following greenhouse gas reduction measures are incorporated into the project design" • Install energy efficient lighting (e.g., light emitting diodes), heating and cooling systems, appliances, equipment, and control systems). • Install light colored "cool" roofs and cool pavements. • Create water-efficient landscapes. • Install water-efficient fixtures and appliances.	This mitigation measure is not incorporated, because the City has determined that the existing regulatory requirements listed below, including but not limited to the City's Green Building Code are applicable, and are equal to or more effective than the West Adams New Community Plan EIR **MM-GHG-1** in avoiding or reducing the potential to conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of greenhouse gases that are within the jurisdiction and authority of California Air Resources Board, local air districts, and/or Lead Agencies. Such features and regulatory requirements include the following: The Project must meet Title 24 2019 standards and include ENERGY STAR appliances. Energy Star rated appliances would reduce the projects

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
		energy demand during the operational life of the 401 dwelling units. The Project is subject to construction waste reduction of at least 50 percent pursuant to the California Integrated Waste Management Act of 1989 In addition, operations at the Project Site are subject to the Integrated Waste Management Act requirements to divert 50 percent of solid waste to landfills through source reduction, recycling, and composting. Finally, the Project is required by the California Solid Waste Reuse and Recycling Access Act of 1991 to provide adequate storage areas for collection and storage of recyclable waste materials. As mandated by the LA Green Building Code, the Project would be required to provide a schedule of plumbing fixtures and fixture fittings that reduce potable water use within the development by at least 20 percent. It must also provide irrigation design and controllers that are weather- or soil moisture-based and automatically adjust in response to weather conditions and plants' needs. The Project would use energy from the Los Angeles Department of Water and Power (LADWP), which has goals to diversify its portfolio of energy sources to increase the use of renewable energy.

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
		The Project would use water-efficient landscaping including point-to-point irrigation and a smart controller drip system to reduce water use consistent with the State Water Code (Section 10910-10915). The Project would be consistent with state, regional, and City GHG emission reduction goals and objectives, such as CALgreen and the L.A. Green Building Code, and thus would not conflict with any applicable plan, policy, or regulation of an agency adopted for purposes of reducing the emission of GHGs. Finally, pursuant to California Public Resources Code Sections 21155.2 and 21159.28, a SCEA prepared for a TPP that is consistent with the 2016-2040 RTP/SCS and its applicable mitigation measures does not need to prepare or discuss project specific or cumulative GHG emission impacts associated with car or light duty truck trips.
Noise and Vibration		
	N3: Any approval of a Discretionary project or "Active Change Area Project" that includes industrial uses located within 1,000 feet of a residential land use shall ensure that a noise study is completed that uses the significance thresholds established in the City of Los Angeles CEQA Thresholds Guide (including as it may be amended in the future). Identified impacts shall be mitigated per the City's Noise Ordinance or through any measures identified in the noise study.	This mitigation measure is not incorporated into the Project because the Project Site does not include industrial uses or structures intended for industrial uses.
Public Services		
	PS2: Subject to available resources and funding, the City shall prioritize the implementation of	This mitigation measure is not incorporated because it is not

Topic	West Adams New Community Plan Project Level Mitigation Measure	Applicability to Project
	recreation and park projects in parts of the West Adams Community Plan Area with the greatest existing deficiencies.	applicable to individual private development projects. Furthermore, the Project Applicant would be required to pay park fees in accordance with mandates set forth in Los Angeles Municipal Code Sections 17.12 and 12.33.
	PS3: Subject to available resources and funding, the City shall establish joint-use agreements with the Los Angeles Unified School District and other public and private entities which could contribute to the availability of recreational opportunities in the West Adams Community Plan Area.	This mitigation measure is not incorporated because it does not apply to individual private development projects. Furthermore, the Project Applicant would be required to pay park fees in accordance with mandates set forth in Los Angeles Municipal Code Section 17.12 and 12.33.
	PS4: Subject to available resources and funding, the City shall monitor appropriate recreation and park statistics and compare with population projections and demand to identify the existing and future recreation and park needs of the West Adams Community Plan Area.	This mitigation measure is not incorporated because it does not apply to individual private development projects. However, the Applicant would be required to pay the Quimby Act Fees or, if applicable, fees in accordance with the Parks Dedication and Fee Update ordinance (Ordinance No. 184,505), which would be used to provide additional park facilities in the Project area. Moreover, the availability of the Project's on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services, and accordingly the Project would not substantially increase the use of existing neighborhood and regional parks.

Source: West Adams New Community Plan

Mid-City Redevelopment Plan EIR

Table 3.3-5
Mitigation Measures from the
Mid-City Redevelopment Plan EIR
Incorporated into the Project

Topic	Mid-City Redevelopment EIR Project Level Mitigation Measure	Applicability to Project
Air Quality		
Construction Phase	**AQ1:** Fugitive Dust Control. Maintain a fugitive dust control program consistent with the provisions of SCAQMD Rule 403 for any grading or earthwork activity that may be required. Measures to be implemented shall include: Wetting. Water all active projects with multiple daily applications to assure proper dust control. Haul Trucks. Wash down the under carriage of all haul trucks leaving site. Install vehicle wheel-washers before the roadway entrance at construction sites. Require all trucks hauling dirt, sand, soil, or other loose substances and building materials to be covered, or to maintain a minimum freeboard of two feet between the top of the load and the top of the truck bed sides. Unpaved Areas. Use of soil binders or vegetation; on all undeveloped or nonbuilt areas of the site. Chemically treat unattended construction areas disturbed lands which have been or are expected to be unused for four or more consecutive days). Require paving; curbing; and vegetative stabilization of the unpaved areas adjacent to roadways on which vehicles could potentially drive (i.e., road shoulders). Driveways and Curbs. Pave all driveways and internal roadways as early as practicable in the site construction process. Install all curbs at the initial phase 1 of development within the proposed Recovery Program Area. Street Sweeping. Utilize street sweeping equipment on all adjacent streets used by haul trucks or vehicles that have been on-site. Barriers. Construct a temporary wall or barriers of sufficient height along the perimeter of the site to restrict windblown dust from affecting adjacent residences. Open Stock Piles. Contractors will cover, enclose or chemically stabilize any open stockpiles. of soil, sand and/ or other aggregate materials. Phasing. Require a phased schedule for construction activities to minimize daily emissions. Suspend grading -operations during first- and second stage smog alerts, and during high winds, i.e., greater than 25 miles per hour: Vehicle's -on Unpaved Surfaces. Prohibit parking on unpaved and untreated parking lots. Enforce low vehicle speeds on unpaved roads or surface areas.	This mitigation measure is incorporated as **MM-A1** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
Construction Phase	**AQ2:** Equipment Emissions. Construction equipment will be shut off to reduce idling when not in direct use. Diesel engines, motors, or equipment shall be located as far away as possible from existing residential areas. Low sulfur fuel should be used for construction equipment.	This mitigation measure is incorporated as **MM-A2** as identified in the analysis of this topic in **Section 4.0** of this SCEA.

Topic	Mid-City Redevelopment EIR Project Level Mitigation Measure	Applicability to Project
	AQ3: Location of Staging Areas. If required, haul truck staging areas shall be approved by the Department of Building and Safety. Haul trucks shall be staged in nonresidential areas.	This mitigation measure is incorporated as **MM-A3** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	AQ6: Amenities for Non-Vehicular' Modes. Provision of amenities that would encourage transit; pedestrian or bicycle access to developments within the proposed Recovery Program Area. Such amenities would include bus shelters, visible signage identifying transit routes and stops, bike racks/shower facilities, bicycle lanes, attractive pedestrian pathways and sidewalks, shuttle service to nearby activity centers or park and ride lots, free information on transit, services, free or subsidized transit passes, and guaranteed ride home programs. This measure shall also entail the establishment of additional bus or transit stops and services; where feasible.	This mitigation measure is incorporated as **MM-A6** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
Geology and Seismicity		
Geology	**GS1:** Geotechnical investigations should be performed before final design of any project facilities and recommendations provided in these investigations should be implemented, as appropriate.	This mitigation measure is incorporated as **MM-GS1** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	GS2: Settlement. Areas of potential settlement should be identified during the geotechnical investigations for project facilities. Proper mitigation is dependent on the planned facilities and the amount of anticipated settlement.	This mitigation measure is incorporated as **MM-GS2** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	GS3: Soils. The impacts of corrosive soils should be mitigated by use of a sulfate resistant cement in foundations. Soils should be assessed to determine their potential for development on an individual project basis.	This mitigation measure is incorporated as **MM-GS3** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
Seismic Hazards	**GS4:** Ground Shaking**.** The impacts of strong ground shaking on structures may be mitigated by designing the facilities in accordance with the Uniform Building Code' s earthquake design criteria which provide a certain level of protection to life and property.	This mitigation measure is incorporated as **MM-GS4** as identified in the analysis of this topic in **Section 4.0** of this SCEA.

Topic	Mid-City Redevelopment EIR Project Level Mitigation Measure	Applicability to Project
	GS5: Liquefaction/Subsidence**.** If moderate to high liquefaction potential in portions of the proposed Recovery Program Area or earthquake induced subsidence potential is confirmed by geotechnical analyses, then mitigation should be implemented. Appropriate mitigation, which could include the use of soil improvement techniques such as stone columns, dynamic compaction or use of deep foundations is dependent on site- specific conditions, which should be identified by the geotechnical investigations for individual projects.	This mitigation measure is incorporated as **MM-GS5** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
Hydrology		
	H2: Groundwater A hydrological assessment shall be prepared for all proposed Recovery Program projects in areas with a high groundwater table. This assessment shall include effects on associated aquifers as well as pumping and dewatering requirements.	This mitigation measure is incorporated as **MM-H2** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
Noise		
	N1: Construction (which could include demolition of existing uses) shall comply with applicable City noise regulations.	This mitigation measure is incorporated as **MM-NO1**, as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	N2: A procedure shall be established to notify adjacent property owners and tenants, particularly residences, and other sensitive land uses such as schools of time periods when there would be noisy construction activities.	This mitigation measure is incorporated as **MM-NO2**, as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	N3: During construction (which could include demolition of existing uses), the contractors for projects within the proposed Recovery Program Area shall muffle and shield intakes and exhaust, shroud and shield impact tools, and use electric-powered rather than diesel-powered construction equipment, as feasible.	This mitigation measure is incorporated as **MM-NO3**, as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	N4: During construction of projects within the proposed Recovery Program Area truck haul routes (demolition waste, dirt excavation, cement, materials delivery) shall be designated and approved.	This mitigation measure is incorporated as **MM-NO4**, as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	N5: As projects are designed and developed within the proposed Recovery Program Area, truck loading and trash pickup areas shall be located as far away as possible from adjacent residences. These facilities shall utilize screening walls or be enclosed.	This mitigation measure is incorporated as **MM-NO5**, as identified in the analysis of this topic in **Section 4.0** of this SCEA.

Topic	Mid-City Redevelopment EIR Project Level Mitigation Measure	Applicability to Project
Public Services		
Fire Protection	**PS1:** Fire-flows shall be closely monitored to ensure that they do not fall below the minimum requirements. Any necessary improvements to the water system in the area shall be made to maintain minimum fire flow requirements.	This mitigation measure is incorporated as **MM-PS1**, as identified in the analysis of this topic in **Section 4.0** of this SCEA.
Police Protection	**PS3:** Security plans should be prepared in consultation with the LAPD crime prevention unit prior to approval for site specific developments within the proposed Recovery Program Area. The security plans should include consideration of such issues as on-site security officers for new development, security lighting and surveillance equipment for interior and exterior building areas.	This mitigation measure is incorporated as **MM-PS3**, as identified in the analysis of this topic in **Section 4.0** of this SCEA.
Schools		
	PS6: With regard to site-specific projects: the LAUSD should be given the opportunity to review any project which contains 35 units or more of housing. If the project's impact on enrollment is shown to be significant, based on thresholds established by the LAUSD, mitigation measures will be established to include where appropriate: donation of land, provision of portable classrooms, funding of transportation for students to other sites.	This mitigation measure is incorporated as **MM-PS6**, as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	PS7: Mitigation of impacts on schools by specific projects within the proposed Recovery Program Area would be addressed under provisions of the California Community Redevelopment Law.	This mitigation measure is incorporated as **MM-PS7**, as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	PS11: Contractors must guarantee that safe and convenient school pedestrian routes are maintained. Pedestrian route maps for each school will be furnished by LAUSD upon request.	This mitigation measure is incorporated as **MM-PS11** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	PS12: Contractors must maintain on-going communication with administrators at impacted school sites providing sufficient notice to forewarn children and parents when currently existing school pedestrian routes will be impacted. Alternate pedestrian route maps must be provided for parents and students.	This mitigation measure is incorporated as **MM-PS12** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	PS13: Appropriate traffic controls (signs and signals) must be installed as needed to ensure pedestrian/vehicular safety. Sufficient prior notice of intent for modification must be given.	This mitigation measure is incorporated as **MM-PS13** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	PS14: Construction scheduling should be sequenced to minimize conflicts with pedestrians, school buses and cars. This would pertain to the arrival and dismissal times of each school's day.	This mitigation measure is incorporated as **MM-PS14** as identified in the analysis of this

Topic	Mid-City Redevelopment EIR Project Level Mitigation Measure	Applicability to Project
		topic in **Section 4.0** of this SCEA.
	PS15: Funding for crossing guards to be provided when the safety of children will be compromised by construction-related activities at impacted crossings. Intersections to be determined by joint consultation between LAUSD and contractors.	This mitigation measure is incorporated as **MM-PS15** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	PS16: Funding for a flag person to be provided as needed where construction-related activities compromise the safety of pedestrians and/or motorists while traveling to and from school.	This mitigation measure is incorporated as **MM-PS16** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	PS17: Barriers must be constructed as needed to minimize trespassing, vandalism and short- cut attractions.	This mitigation measure is incorporated as **MM-PS17** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	PS18: Security patrols should be funded and provided to minimize trespassing and short-cut attractions.	This mitigation measure is incorporated as **MM-PS18** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	PS20: In addition to the Quimby fees collected from developers of residential and mixed-use projects, commercial developers should be encouraged to provide their buildings' occupants with some basic park features in certain portions of their landscaped areas. Large mixed-use projects should incorporate an area of open space.	This mitigation measure is incorporated as **MM-PS20** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
Utilities		
	U2: Automatic sprinkler systems should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.	This mitigation measure is incorporated as **MM-U2** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	U3: All landscaped areas in the proposed Recovery Program Area shall be provided with an irrigation water system separate from the potable water system to allow future use of reclaimed water.	This mitigation measure is incorporated as **MM-U3** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	U4: Drip irrigation systems should be used for any proposed irrigation systems.	This mitigation measure is incorporated as **MM-U4** as identified in the analysis of this topic in **Section 4.0** of this SCEA.

Topic	Mid-City Redevelopment EIR Project Level Mitigation Measure	Applicability to Project
Storm Water Drainage	**U5:** A drainage plan for each proposed site area shall be developed to the satisfaction of the City Engineer for review and approval, prior to development of any drainage improvements.	This mitigation measure is incorporated as **MM-U5** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	U8: For commercial and industrial projects as well as multifamily housing projects with more than 20 units, commercial size trash compactors shall be installed in all portions of each component of the proposed Recovery Program.	This mitigation measure is incorporated as **MM-U8** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
Safety/Risk of Upset		
	S1: Projects involving hazardous materials shall be reviewed for proper handling procedures and safe operating practices. A detailed engineering analysis should be conducted to include a review of spill containment procedures and waste minimization appraisal.	This mitigation measure is incorporated as **MM-S1** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	S2: The project sponsor shall obtain all necessary, regulatory, agency permits prior to commencing the project. A hazardous material inventory business plan shall be registered with the Fire Department's Hazardous Material Unit.	This mitigation measure is incorporated as **MM-S2** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	S3: If the evidence of soil contamination or the presence of an underground storage tank is revealed, excavation shall be conducted to remove the tank and/or remediate contaminated soils and groundwater. The procedure' shall be performed by a qualified environmental professional in conformance with applicable City, State and Federal Standards.	This mitigation measure is incorporated as **MM-S3** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	S4: Projects involving hazardous waste shall only use properly trained and qualified hazardous waste handlers to address hazardous waste disposal needs.	This mitigation measure is incorporated as **MM-S4** as identified in the analysis of this topic in **Section 4.0** of this SCEA.
	S5: Site specific Phase I: Environmental Assessments are recommended for proposed development within the proposed Recovery Program Area. Where applicable, asbestos and/ or lead-based paint investigation shall be conducted on structures to be demolished or rehabilitated.	This mitigation measure is incorporated as **MM-S5** as identified in the analysis of this topic in **Section 4.0** of this SCEA.

Source: Mid-City Recovery Program FEIR.

Table 3.3-6
Mitigation Measures from the
Mid-City Redevelopment Plan EIR
Not Incorporated into the Project

Topic	Mid-City Recovery Program FEIR Project Level Mitigation Measure	Applicability to Project
Urban Design and Aesthetics		
Disruption of Scenic Vistas, Removal of Urban Design Resources, Casting of Shadows or Shade, Light and Glare	**UD1:** New developments greater than one-story shall be setback or stepped back from adjacent residential properties to avoid or minimize adverse shade and shadow impacts.	This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, and the City's Zoning Information (ZI) File No. 2452, state that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Furthermore, the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA that the Project's impacts would not have an substantial adverse aesthetic effect.
	UD2: Ornamental and security lighting associated with future developments shall be oriented to avoid or minimize illumination of adjacent residential properties. In addition, illuminated signs shall be prohibited on the portion of commercial building facades that directly face residential areas.	This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, and the City's Zoning Information (ZI) File No. 2452, state that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Furthermore, the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA that the Project's impacts would not have an substantial adverse aesthetic effect.
	UD3: The proposed industrial area on Adams Boulevard shall be reconfigured to either avoid the removal of the building at 5361 West Adams Boulevard or that this	This measure is not incorporated into the Project because the Project Site is not located in the industrial area on Adams Boulevard nor does it

Topic	Mid-City Recovery Program FEIR Project Level Mitigation Measure	Applicability to Project
	building should be adaptively reused and incorporated into the project**.**	include the building at 5361 West Adams Boulevard.
	UD4: Should the area become a redevelopment area, the agency shall adopt design for development which shall include design guidelines to ensure compatibility of new development with the existing character and urban design quality with specific intent to maintain building articulation, heights, materials and bay size.	This mitigation measure is not incorporated, because PRC Section 21099, enacted by Senate Bill 743, and the City's Zoning Information (ZI) File No. 2452, state that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." Furthermore, the City has determined, based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project's impacts would not have an adverse aesthetic effect.
Cultural Resources/Archaeological		
Archaeological Resources, Historical/Architectural Resources, Key Corridor Impacts	**CAR1:** To the extent feasible, existing architectural and historical resources shall not be demolished and shall be incorporated into future development.	This mitigation measure is not incorporated, because the City has determined, based on the Historic Resource Assessment of the Project Site (PaleoWest, October 2019, **Appendix C.1**) prepared by a qualified historian meeting the Secretary of the Interior's Professional Qualification Standards that the Project would not result in any significant impacts related to historical resources.
	CAR2: Rehabilitation of architecturally or historically significant buildings shall meet the U.S. Secretary of the Interior's Standards for Rehabilitation.	This mitigation measure is not incorporated in the Project because the City has determined that the Project Site does not contain any architecturally or historically significant buildings based on the analysis of this topic in **Section 4.0** of this SCEA, that the Project's impacts related to cultural resources would be less than significant.
	CAR3: New developments adjacent to significant historic or architectural resources should be compatible in size, scale, materials, fenestration and massing.	This mitigation measure is not incorporated in the Project because the City has determined that the Project Site is not located adjacent

Topic	Mid-City Recovery Program FEIR Project Level Mitigation Measure	Applicability to Project
		to significant historic or architectural resources (**Appendix C.1**).
	CAR4: The proposed industrial area on the north side of Adams Boulevard should either avoid or incorporate though adaptive re-use the commercial building at 5361 West Adams Boulevard.	This mitigation measure is not incorporated because the Project Site is not located in the industrial area on the north side of Adams Boulevard.
Housing, Population, and Employment		
Housing	**HPE1**: Housing units displaced within the proposed Recovery Program Area corridors shall be subject to the real property acquisition policies of the Community Redevelopment Agency.	This mitigation measure is not incorporated because the Project would consist of the development of new housing and commercial land uses on a site that is currently developed with nonresidential uses and, therefore, no displacement of existing housing would occur.
	HPE2: Since most of the dwelling units to be displaced may be considered affordable housing, this stock of units shall be replaced, at minimum on a one for one basis. Affordability shall be determined per guidance established by U.S. Department of Housing and Urban Development (HUD).	This mitigation measure is not incorporated because the Project would consist of the development of new housing and commercial land uses on a site that is currently developed with nonresidential uses and, therefore, no displacement of existing housing would occur.
Population	**HPE3:** Displaced residents shall receive assistance under the established relocation assistance procedures of the Community Redevelopment Agency of the City of Los Angeles.	This mitigation measure is not incorporated because the Project would consist of the development of new housing and commercial land uses on a site that is currently developed with nonresidential uses and, therefore, no displacement of existing housing would occur.
	HPE4: Procedures shall be established that allow displaced residents the right of first refusal for new housing or to relocate within the proposed Recovery Program Area, if desired.	This mitigation measure is not incorporated because the Project would consist of the development of new housing and commercial land uses on a site that is currently developed with nonresidential uses and, therefore, no displacement of existing housing would occur.
Employment	**HPE5:** Explicit procedures shall be established that displaced businesses are able to relocate within the proposed Recovery Program Area, if desired.	This mitigation measure is not incorporated because the Project Site does not contain any existing operating businesses and, therefore, no displacement of businesses would occur.
	HPE6: The proposed Recovery Program shall contain financial mechanisms to allow	This mitigation measure is not incorporated because the Project

Topic	Mid-City Recovery Program FEIR Project Level Mitigation Measure	Applicability to Project
	and financial incentives to encourage displaced businesses to re-enter into new developments that may be constructed.	Site does not contain any existing operating businesses and, therefore, no business would be displaced.
Traffic and Circulation		
	TC1: Western Avenue and. Wilshire Boulevard (Infill, Moderate, and Maximum) - Widen and restripe Wilshire Boulevard to provide dual exclusive left-turn lanes on both the eastbound and westbound approaches. This measure would require narrowing the existing 15-foot sidewalks on either side of Wilshire Boulevard to 10 feet in the vicinity of the intersection, including adjacent to the Metro Red Line station under construction on the northeast comer of the intersection.	This mitigation measure is not incorporated because the intersection at Western Avenue and Wilshire Boulevard is not located near the Project Site or impacted by the Project.
	TC2: La Brea Avenue and San Vicente Boulevard (Infill, Moderate, and Maximum) - Cut back the raised median on San Vicente Boulevard on both sides by two feet (on both the eastbound and westbound approaches) and restripe to add an exclusive right-turn lane on both the westbound and eastbound approaches.	This mitigation measure is not incorporated because the intersection at La Brea Avenue and San Vicente Boulevard is not located near the Project Site or impacted by the Project.
	TC3: Pico Boulevard and Fairfax Avenue (Infill, Moderate, and Maximum) - Restripe the eastbound Pico Boulevard exclusive right -turn lane as a shared through/right-tum lane. This improvement would require prohibiting on-street parking during the peak periods on both the eastbound approach and departure.	This mitigation measure is not incorporated because the intersection at Pico Boulevard and Fairfax Avenue is not located near Project Site or impacted by the Project.
	TC4: Pico Boulevard and La Brea Avenue (Infill, Moderate, and Maximum) - Implement a morning peak period parking restriction along the north side of Pico Boulevard. This would create an additional. morning peak hour through lane in the westbound direction. Similarly, implement an evening peak period parking restriction on the south side of Pico Boulevard. This would create an additional travel lane in the eastbound direction during the evening peak hour.	This mitigation measure is not incorporated because the intersection at Pico Boulevard and La Brea Avenue is not located near Project Site or impacted by the Project.
	TC5: Pico Boulevard and Crenshaw Boulevard (Infill, Moderate, and Maximum) **-** Restripe the northbound approach to provide an additional left-turn lane. The	This mitigation measure is not incorporated because the intersection at Pico Boulevard and S. Crenshaw Boulevard is not located

Topic	Mid-City Recovery Program FEIR Project Level Mitigation Measure	Applicability to Project
	northbound departure would also need to be restriped to keep the intersection aligned. This measure would require removal of on -street parking spaces along the east side of Crenshaw Boulevard.	near the Project Site or impacted by the Project.
	TC6: Venice Boulevard and Crenshaw Boulevard (Infill, Moderate, and Maximum) **-** Restripe the northbound Crenshaw Boulevard approach to provide an additional left - turn lane. The northbound departure would also need to be restriped to keep the intersection aligned. This measure would require removal of on - street parking spaces along the east side of Crenshaw Boulevard.	This mitigation measure is not incorporated because the intersection at Venice Boulevard and S. Crenshaw Boulevard is not located near the Project Site or impacted by the Project.
	TC7: Apple Street and Fairfax Avenue (Infill, Moderate, and Maximum) - Restripe the eastbound Apple Street to provide two exclusive left -tum lanes and a shared through/right-turn lane.	This mitigation measure is not incorporated because the intersection at Apple Street and Fairfax Avenue is not located near the Project Site or impacted by the Project.
	TC8: Santa Monica Fwy. WB Off-Ramp and Washington Boulevard (Infill. Moderate. and Maximum) **-** Widen and restripe the westbound Santa Monica Freeway off-ramp' for approximately 150 feet to provide an exclusive left-turn lane, a shared left-turn/through lane and an exclusive right-turn lane.	This mitigation measure is not incorporated, because the intersection at Santa Monica Fwy. WB Off-Ramp and Washington Boulevard is not located near the Project Site or impacted by the Project.
	TC9: Washington Boulevard and Redondo Boulevard (Moderate and Maximum) **-** For approximately 250 feet east of and west of the intersection, extend the existing morning peak period parking restriction on the south side of Washington Boulevard to include the evening peak period. This improvement would result in an additional eastbound Washington Boulevard through lane at the intersection.	This mitigation measure is not incorporated because the intersection at Washington Boulevard and Redondo Boulevard is not located near the Project Site or impacted by the Project.
	TC10: Washington Boulevard and La Brea Avenue (Infill, Moderate, and Maximum) **-** Widen (narrow sidewalks) and restripe the La Brea Avenue northbound and southbound approaches to provide dual left-turn lanes on each approach.	This mitigation measure is not incorporated because the intersection at Washington Boulevard and La Brea Avenue is not located near the Project Site or impacted by the Project.
	TC11: Santa Monica Fwy. WB Ramps and Arlington Avenue (Infill, Moderate, and Maximum) - Remove the existing raised	This mitigation measure is not incorporated because the intersection at Santa Monica Fwy.

Topic	Mid-City Recovery Program FEIR Project Level Mitigation Measure	Applicability to Project
	median island (north of and south of the intersection) and restripe Arlington Avenue to provide an additional southbound through lane. This would result in two through lanes and one shared through/right turn lane in the southbound direction at the westbound ramps. The additional southbound through lane would lead directly into an additional left-turn lane at the eastbound ramps. The resulting lane configuration at the eastbound ramps would be, two exclusive left-turn-lanes and two through lanes in the southbound, direction.	west bound Ramps and Arlington Avenue is not located near the Project Site or impacted by the Project.
	TC 12: Santa Monica Fwy. EB Ramps and Arlington Avenue (Infill, Moderate, and Maximum**)** **-** Remove the existing raised median island (north of and south of the intersection) and restripe Arlington Avenue to provide an additional southbound through lane. This would result in two through lanes and one shared through/right-turn lane in the southbound direction at the westbound ramps. The additional southbound through lane would lead directly into an additional left -turn lane at the eastbound ramps. The resulting lane configuration at the eastbound ramps would be, two exclusive left-turn lanes and two through lanes in the southbound direction.	This mitigation measure is not incorporated because the intersection at Santa Monica Fwy. east bound Ramps and Arlington Avenue is not located near the Project Site or impacted by the Project.
	TC13: Santa Monica Fwy. WB Ramps and Western Avenue (Infill, Moderate, and Maximum) **-** Restripe Western Avenue north of the westbound ramps to add a fourth southbound lane leading directly into the left-turn lane to the eastbound ramps, thus starting the left-turn lane prior to the westbound ramp intersection.	This mitigation measure is not incorporated because the intersection at Santa Monica Fwy. west bound Ramps and Western Avenue is not located near the Project Site or impacted by the Project.
	TC14: Santa Monica Fwy. EB Ramps and Western Avenue (Infill, Moderate, and Maximum) Open the left-most southbound left-turn lane, currently designated for high-occupancy vehicle (HOV) use only, to mixed -flow traffic (restricting the inside left-turn lane to HOVs only would likely have limited effectiveness in the future if the projected heavy southbound mixed -flow left-turn volumes materialize, as the mixed-flow queue would block HOV vehicle	This mitigation measure is not incorporated because the intersection at Santa Monica Fwy. east bound Ramps and Western Avenue is not located near the Project Site or impacted by the Project.

Topic	Mid-City Recovery Program FEIR Project Level Mitigation Measure	Applicability to Project
	access to the turn lane until the last minute, rendering the travel time differential small).	
	TC15: Adams Boulevard and Redondo Boulevard (Maximum) - Restripe the westbound Adams Boulevard approach to provide an exclusive right -tum lane. This improvement would require removing on-street parking on the north side of westbound Adams Boulevard approach. Also, a slight off-set (approximately two feet) would be created therefore striping through the intersections would be required.	This mitigation measure is not incorporated because the intersection at Adams Boulevard and Redondo Boulevard is not located near the Project Site or impacted by the Project.
	TC16: La Brea Avenue and Adams Boulevard (Moderate, and Maximum) - Restripe the westbound Adams Boulevard approach to provide an exclusive right-turn lane. This improvement could be implemented without any removal of on-street parking.	This mitigation measure is not incorporated, because the intersection at La Brea and Adams Boulevard is not located near the Project Site or impacted by the Project.
Air Quality		
Operation Phase	**AQ4:** Transportation Management Association. Creation of a Transportation Management Association (TMA) within the proposed Recovery Program Area. The TMA would be charged with the responsibility of implementing and achieving a Transportation Demand Management Plan (TDM) with specific trip reduction goals for the developments within the proposed Recovery Program Area that would be' consistent with AQMP trip reduction targets above the requirements of Regulation XV. The TMA shall also provide public education regarding the importance of reducing vehicle miles traveled and the related air quality impacts through the use of brochures, classes, and other informational tools.	This mitigation measure is not incorporated because it does not apply to individual private development projects.
	AQ5: Parking Management. Creation of Preferential parking for high occupancy vehicles, as well as other forms of parking management that would encourage higher vehicle occupancies.	This mitigation measure is not incorporated because it does not apply to individual private development projects.

Topic	Mid-City Recovery Program FEIR Project Level Mitigation Measure	Applicability to Project
	AQ7: Non-Travel Incentives. Encourage and facilitate the reduction of the number of trips that an individual makes from home or work by introducing compressed work weeks, telecommuting, and the combining of nonwork trips.	This mitigation measure is not incorporated because it does not apply to individual private development projects.
	AQ8: Peak Hour Travel Restrictions. Encourage the reduction of trips during the most congested periods and spread them throughout the day by introducing alternative work hours, flexible, work hours, staggered work hours, as well as vehicle and truck use restrictions.	This mitigation measure is not incorporated because it is not applicable to the Project because it does not apply to individual private development projects.
Public Services		
Fire Protection	**PS2:** Intersection improvement measures as discussed in Section 5.5 (Transportation and Circulation) shall be implemented to improve intersection traffic operations and thereby improve initial emergency response capabilities.	This mitigation measure is not incorporated because it is not applicable to individual private development projects.
	PS4: Additional police personnel and equipment shall be provided as needed by the city in order to maintain an adequate level of police protection to the proposed Recovery Program Area. Sources, of funding for additional personnel and equipment could include fees generated by the new development as a result of implementation of the Recovery Program.	This mitigation measure is not incorporated because it is applicable to the individual private development projects.
Schools	**PS5:** According, to the Los Angeles Unified School District, increased enrollment to schools within the proposed Recovery Program Area that are operating over capacity can be mitigated by paying a temporary transport fee to bus the new students to nearby schools which are operating at less than full capacity. This fee shall be negotiated with the Los Angeles, Unified School District and shall be paid until adequate schools are built to accommodate the increased number of students in the proposed Recovery Program Area.	This measure is not incorporated because the City has identified regulatory measures, consisting of regulations from the California Education Code Section 17620 and Government Code Section 65995.5-7, that are equal or more effective, as discussed in **Section 4.0** of this SCEA. Accordingly, the Project would not result in a potentially significant impact related to schools.
	PS8: The LAUSD has set forth measures to address student population increases within targeted growth areas defined in the City of Los Angeles General Plan	This mitigation measure is not incorporated because it does not apply to individual private development projects.

Topic	Mid-City Recovery Program FEIR Project Level Mitigation Measure	Applicability to Project
	Framework, particularly in the vicinity of transit station areas, which would include the proposed MTA Pico/ San Vicente station. These shall include but are not limited to the following: **Permitted Use.** Public schools shall be permitted in any zone within a transit station area as close as possible to transit stations so students may utilize transit travelling to and from school. **Phasing of Development.** Development shall be [phased with relation to the availability of classroom seats at schools which serve the area. Square footage shall be dedicated for school use in proportion to the total permitted buildout. **Joint Public Services Authority.** The City of Los Angeles and the LAUSD should establish a Joint Public Services Authority, which would have the authority to collect fees and develop a capital improvement program. Funds from development within a transit station area would be- used to provide or expand school facilities in designated locations within the station area. Density Bonus Credits. The City should grant density bonus credits to developers who donate or dedicate facilities for school use. **Classrooms in Office and Multifamily Buildings.** Primary centers and other school facilities should be a preferred "mixed-use" to be encouraged in office buildings and large residential developments, particularly in areas adjacent to existing and planned schools.	
	PS9: When site-specific projects are proposed, specific direct impacts shall be; evaluated for areas adjacent to school sites which may include the following measures: - Provision of sufficient on-street parking for use by school staff and students and appropriate restriction of construction vehicle parking on streets adjacent to schools. - During the times when school is in session, routes shall be	This mitigation measure is not incorporated because the Project Site is not located adjacent to any school sites.

Topic	Mid-City Recovery Program FEIR Project Level Mitigation Measure	Applicability to Project
	designated for construction vehicles which do not (a) conflict with drop-off and pick-up of students at school arrival and dismissal times and (b) compromise the safety of designated student walk routes to and from school. - Timely notice of future construction activities in the vicinity of schools shall be given, and -provision shall be made for safe access for students to and from schools, funding for crossing guards, and appropriate security measures to prevent trespassing and vandalism of designated student walk routes to and from school.	
	PS10: LAUSD Transportation Branch, (213) 227-4400, must be contacted regrading school bus routes traveling on impacted streets, and the potential loss of loading and unloading zones.	This mitigation measure is not incorporated because is the Project would not result in buses traveling on impacted streets and would not have the potential loss of any loading and unloading zones.
Parks and Recreational Facilities	**PS19:** Where feasible and appropriate, open space in existing public facilities such as school grounds should be available for after-hour recreational use**.**	This mitigation measure is not incorporated because the Project is not a public facility.
Utilities		
Available Water Supply	**U1:** During the course of the buildout of development within the proposed Recovery Program Area, over a 15 -year period; it may become necessary for individual developments to make a fair share contribution to replace and update the water delivery infrastructure.	This mitigation measure is not incorporated because it does not apply to individual private development projects.
Solid Waste and Disposal	**U6:** To reduce the volume of solid waste generated by each' component of the proposed Recovery Program, a recycling program shall be established on-site by the management of each facility.	This mitigation measure is not incorporated into the Project because the City has identified a regulatory measure, consisting of the Solid Waste Integrated Resources Plan, that is equal or more effective as discussed in **Section 4.0** of this SCEA. Accordingly, the Project would not result in a potentially significant impact related to solid waste and disposal.
	U7: Trash pick-up areas shall be of sufficient size to allow the provision of separate bins	This mitigation measure is not incorporated into the Project

Topic	Mid-City Recovery Program FEIR Project Level Mitigation Measure	Applicability to Project
	for newspapers, cardboard/ brown paper, aluminum cans, plastic glass, "white" paper, landscape/yard clippings and/or other recyclable materials to allow materials to be easily hauled off-site and recycled via a recycling program established by the management of each facility on- site and/ or the City of Los Angeles.	because the City has identified a regulatory measure, consisting of the Space Allocation Ordinance (Ordinance No. 171,687), that is equal or more effective as discussed in **Section 4.0** of this SCEA. Accordingly, the Project would not result in a potentially significant impact related to solid waste and disposal.
Hydrology		
	H1: Surface Water Resources**.** Temporary erosion control measures should be provided during the construction phase for future projects in the proposed Recovery Program Area, as required by current grading codes. In addition, a permanent erosion control program should be implemented for individual development projects as they are proposed. This program should include proper care of drainage control devices, proper irrigation, rodent control and landscaping. Erosion control devices should be field-checked following heavy rainfall periods to confirm that they are performing as designed. Individual projects would be subject to the permit requirements of the Regional Water Quality. Control Board (RWCQB). Permits issued by the RWQCB include the General Construction Storm Water Permit for construction activities that disturb five or more acres of total land area and the General Industrial Storm Water Permit. In order to achieve water quality objectives, effluent limitations, and discharge prohibitions, the Regional Board has issued and enforced discharge requirements for each wastewater discharger, public and private, in the form of National Pollutant Discharge Elimination System (NPDES) permits for all discharges to surface watercourses and non -NPDES permits for all discharges to groundwaters. For dischargers not in compliance with the respective waste discharge requirements, schedules of compliance are also included in the permit.	This mitigation measure is not incorporated into the Project because the City has identified regulatory measures, consisting of NPDES permits, that are equal or more effective which would require the approval of an erosion control plan and a Stormwater Pollution Prevention Plan (SWPPP) . Accordingly, as discussed in **Section 4.0** of this SCEA, the Project would not result in a potentially significant impact related to surface water resources.

Source: Mid-City Recovery Program FEIR

Topic	Mid-City Recovery Program FEIR Project Level Mitigation Measure	Applicability to Project

4.0 INITIAL STUDY CHECKLIST AND ENVIRONMENTAL ANALYSIS

CITY OF LOS ANGELES
CALIFORNIA ENVIRONMENTAL QUALITY ACT
INITIAL STUDY and CHECKLIST

LEAD CITY AGENCY: City of Los Angeles, Department of City Planning	**COUNCIL DISTRICT:** CD 10 – Wesson	**DATE:**
RESPONSIBLE AGENCIES:		
PROJECT TITLE: Crenshaw Crossing Project	**ENVIRONMENTAL CASE:** ENV-2019-5426-SCEA	**CASE NOS:** CPC-2019-5425-DB-MCUP-SPP-ZAI-SPR-PHP
PREVIOUS ACTIONS CASE NO. No recent activity.	☐ DOES have significant changes from previous actions. ☐ DOES NOT have significant changes from previous actions	
PROJECT LOCATION: 3510 and 3606 W. Exposition Boulevard, 3630 and 3642 S. Crenshaw Boulevard, and 3501 and 3505 W. Obama Boulevard in the City of Los Angeles.		
PROJECT DESCRIPTION: The Project includes 401 residential units would include 142 studios, 193 one-bedroom units, and 66 two-bedroom units, with a range of unit sizes from approximately 467 to 1,157 sq. ft. The Project would have a maximum height of approximately 86 feet to the top of the parapet, and a height of approximately 34 feet to the top of the parapet for the low-scale portion of the building along Victoria Avenue. The Project also includes approximately 380,112 sq. ft. of floor area with a FAR of 2.08:1, made up of approximately 339,116 sq. ft. for the residential component and approximately 40,996 sq. ft. for the commercial and community spaces component, which would include retail and restaurant uses, and a grocery store.		
COMMUNITY PLAN AREA: West Adams-Baldwin Hills-Leimert **STATUS:** ☐ Preliminary ☒ Does Conform to Plan ☐ Proposed ☐ Does NOT Conform to Plan ☒ Adopted in 2016	**AREA PLANNING COMMISSION:** West Adams-Baldwin Hills-Leimert	**CERTIFIED NEIGHBORHOOD COUNCIL:** West Adams
EXISTING ZONING: C2-2D-SP	**MAX DENSITY ZONING:** 3:1 FAR	**LA River Adjacent:** No
GENERAL PLAN LAND USE: Community Commercial	**MAX. DENSITY PLAN:** Same as zoning	**PROPOSED PROJECT DENSITY:** 2.08:1 FAR

Determination (to be completed by Lead Agency)

On the basis of this initial evaluation:

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

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

☒ I find that the Project is a qualified "transit priority project" that satisfies the requirements of Sections 21155 and 21155.2 of the Public Resources Code (PRC), and/or a qualified 'residential or mixed use residential project" that satisfies the requirements of Section 21159.28(d) of the PRC, and although the Project could have a potentially significant effect on the environment, there will not be a significant effect in this case, because this Sustainable Communities Environmental Assessment (SCEA) identifies measures that either avoid or mitigate to a level of insignificance all potentially significant or significant effects of the Project.

_____ _____ _____

Signature

I. AESTHETICS

Except as provided in Public Resources Code (PRC) Section 21099, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?	☐	☐	☒	☐
c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

The Project is an infill site located in a Transit Priority Area (TPA). Pursuant to Public Resources Code (PRC) Section 21099, enacted by Senate Bill (SB) 743, and the City's Zoning Information (ZI) File No. 2452, for infill projects located within a TPA, aesthetic impacts are not considered significant impacts on the environment.

PRC Section 21099 provides that "aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment." PRC Section 21099 defines a "transit priority area" as an area within one-half mile of a major transit stop that is "existing or planned, if the planned stop is scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations." PRC Section 21064.3 defines "major transit stop" as "a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit service or the intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods." PRC Section 21099 defines an infill site as a lot located within an urban area that has been previously developed, or on a vacant site where at least 75 percent of the perimeter of the site adjoins or

is separated only by an improved public right-of-way from, parcels that are developed with qualified urban uses. This State law supersedes the aesthetic impact threshold in the L.A. CEQA Thresholds Guide. Additionally, the City ZI File No. 2452 provides further guidance for the analysis to Aesthetics and Parking impacts within TPAs stating that "visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered an impact for infill projects within TPAs pursuant to CEQA." However, ZI No. 2452 requires that projects in transit priority areas (TPA) be evaluated for consistency with relevant City land use plans and regulations governing scenic quality and CEQA requires analysis of aesthetic impacts on cultural resources. Accordingly, evaluation of the Project's physical impacts associated with aesthetic resources is not required by CEQA and is provided in this Initial Study for informational purposes only.

The Project is a mixed-use infill development with 401 residential dwelling units and 40,996 sq. ft. of ground-floor commercial and community space, consisting of approximately 10,696 sq. ft. for the West Site and 30,300 sq. ft. for the East Site, as shown in **Figure 4.0-1: Rendering**. The Project Site is currently served by the Los Angeles County Metropolitan Transportation Authority (Metro) E Line's Expo/Crenshaw Station, which is an at-grade station located directly adjacent to north of the Project Site, with frequency of service intervals of 15 minutes or less during the morning and afternoon peak commute periods and are identified as located within a TPA. In addition, the Project Site will be served by the Metro Crenshaw/LAX Line, which will terminate at the subterranean Expo/Crenshaw Station accessed at its portal on the East Site. Furthermore, the Project Site does not contain any historical or cultural resources, as discussed in **Section V: Cultural Resources** of this SCEA. As such, the Project meets all criteria specified in Section 21099 of the PRC.

As stated above, visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within TPAs pursuant to CEQA. However, PRC 21009 and ZI No. 2452 did not limit the ability of the City to regulate, or study aesthetic related impacts pursuant to other land use regulations found in the Los Angeles Municipal Code (LAMC), or the City's General Plan, including specific plans. For example, the shade and shadow effects of a project would need to be addressed if expressly required in a specific plan, Community Design Overlays (CDOs), or Historic Preservation Overlay Zones (HPOZs). The consistency of the Project with all applicable land use policies, including policies in the City's General Plan, West Adams - Baldwin Hills – Leimert Community Plan, Crenshaw Corridor Specific Plan, and the City's Walkability Checklist, is addressed in **Section XI: Land Use and Planning** in this Initial Study. Also note that the limitation of aesthetic impacts pursuant to Section 21099 of the PRC does not include impacts to historic or cultural resources. Impacts to historic or cultural resources are required to

evaluated pursuant to CEQA regardless of project location.[1] Impact to historic and cultural resources are addressed in **V: Cultural Resources** in this Initial Study.

Impact Analysis

a. Have a substantial adverse effect on a scenic vista?

For Informational Purposes Only.

Less Than Significant Impact. A scenic vista generally provides focal views of objects, settings, or features of visual interest; or panoramic views of large geographic areas of scenic quality, primarily from a given vantage point. Scenic vistas are generally associated with public vantages. A significant impact may occur if the Project introduces incompatible visual elements within a field of view containing a scenic vista or substantially alters a view of a scenic vista.

As stated above, SB 743 made several changes to CEQA for projects located in areas served by mass transit. Among other changes, SB 743 eliminates the need to evaluate aesthetic and parking impacts of a project in some circumstances. Specifically, aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered to have a significant impact on the environment. As discussed above, the Project Site is located within a TPA under SB 743. Nonetheless, the following analysis is provided for informational purposes.

The Project Site is located on relatively flat land in an urbanized portion of the City within the West Adams CPA, approximately 0.9 miles south of the Santa Monica Freeway (I-10), approximately 3.4 miles west of the Harbor Freeway (I-110), approximately 5.2 miles east of the San Diego Freeway (I-405), and approximately 6.9 miles north of the Glen Anderson Freeway (I-105). As documented in the West Adams-Baldwin Hills-Leimert Community Plan EIR, the majority of the community plan area is flat and because of the area's dense urban fabric, public scenic views are generally available only through public street corridors and from public parks that have street corridor views or are set back from existing buildings. These include limited views of distant features, including hills and cityscapes. Specifically, the Community Plan EIR identifies that topographic features visible from the West Adams CPA include the Baldwin Hills and Santa Monica Mountains, which are partially visible from the southern portions of the West Adams Community Plan Area and more distant citywide views of Century City, Hollywood, and downtown Los Angeles.

The Project Site is located in one of the flat portions of the Community Plan Area and views in the vicinity of the Project Site are largely constrained by existing buildings near the Project Site, such as the 138-foot tall West Angeles Cathedral located on the northeast corner of Exposition and Crenshaw Boulevards, and

1 City of Los Angeles Department of City Planning, Zoning Information File ZI No. 2452, http://zimas.lacity.org/documents/zoneinfo/ZI2452.pdf, accessed June 2020.

the area's relatively flat topography. Due to the existing built environment, views are limited to partially obstructed views of the Santa Monica Mountains and Hollywood Hills, located approximately 5.5 miles to the north.

The Community Plan EIR evaluated the height standards in the Community Plan at the Exposition Light Rail line station at Crenshaw Boulevard and along the Crenshaw Corridor and concluded that the design standards and guidelines included in the Community Plan and the Crenshaw Corridor Specific Plan would result in buildings that would not have substantial adverse impacts on scenic vistas, recognized and valued views or obstruct views.

The Project would include low-scale three-story residential units along the western edge of the Project along Victoria Avenue to provide an appropriate transition between the Project and the existing residential area to the west. The remainder of the Project would be eight stories, with a height of 86 feet to the top of the parapet. The Project is consistent with the applicable height standards and design guidelines and will not, therefore, result in an adverse effect on available scenic vistas, recognized and valued views or obstruct views.

Construction of the Project would result in temporary changes to the visual character of the Project Site. The East Site has been used as a staging area for the construction of the Crenshaw/LAX Line since 2014. Construction of the Project will not result in a substantial change to the existing visual character of the East Site for this reason. Construction on the West Site will include demolition of the existing building and site improvements and construction the new buildings. The temporary change in the visual character of the West Site will be consistent with the existing visual character of the East Site. Since the Project Site is located in area with limited scenic vistas or recognized and valued views and the proposed buildings will not have an adverse effect on any scenic vistas or recognized valued views, construction of these buildings will not result in any adverse effects.

With regard to potential cumulative effects on scenic vistas and views, the nearest related project is proposed on a site located south of the Project Site and Rodeo Road. This mixed-use project is proposed to have a height of approximately 60-feet, consistent with the height allowed along this portion of Crenshaw Boulevard. The other related projects are more distant from the Project Site and lower in scale. The Proposed Project and related projects would not result in a significant adverse cumulative effect on the limited scenic vistas available.

Moreover, consistent with State and local regulations, SB 743 and ZI File No. 2452, impacts to scenic resources or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

SOURCE: Belzberg Architects - 2019

FIGURE **4.0-1**

Meridian Consultants

Rendering

253-001-19

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

For Informational Purposes Only.

Less than Significant Impact. The nearest State Designated Scenic Highway to the Project Site is Pacific Coast Highway, located approximately 7 miles southwest of the Project Site.[2]

Therefore, since the Project Site is not located near, or visible from any designated or eligible State scenic highway, and does not contain scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized scenic natural features visible form any State-designated scenic highway, the Project would not result in substantial adverse effects.

Moreover, consistent with State and local regulations, SB 743 and ZI File No. 2452, impacts to scenic resources or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

For Informational Purposes Only.

Less Than Significant Impact. The Project Site is located in an urbanized area in the West Adams - Baldwin Hills – Leimert Community Plan Area. The Project Site is also located within Subarea A of the Crenshaw Corridor Specific Plan. Subarea A is designated in the Crenshaw Corridor Specific Plan for Transit Oriented Development.

The West Adams-Baldwin Hills-Leimert Community Plan designates the Project Site Community Commercial Area, C2-2D-SP zone. Community Commercial areas are intended to encourage a mix of uses that are compatible with the needs of residents and accommodate viable existing neighborhood businesses.

The West Adams-Baldwin Hills-Leimert Community Plan designates the Project Site for Community Commercial uses and zoning for the Site is C2-2D-SP zone. The Project Site is within the Crenshaw Corridor

2 ArcGIS, California Scenic Highways, https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=f0259b1ad0fe4093a5604c9b838a486a, accessed June 2020.

Specific Plan. The Specific Plan is divided into the eight subareas A-H. The Project Site is located within Subarea A of the Crenshaw Corridor Specific Plan, the Expo/Crenshaw Transit Oriented Development (TOD) Area. TOD Areas as defined in the Specific Plan promote neighborhood serving uses, which encourage pedestrian activity and promote reduced traffic generation. As stated in the Crenshaw Corridor Specific Plan, wherever this Specific Plan contains provisions establishing regulations (including, but not limited to, floor area ratios (FAR), uses, heights, parking, setbacks, and sign requirements) different from, more restrictive, or more permissive than would be allowed pursuant to Chapter 1 of the LAMC and the provisions of other portions of the LAMC specifically referenced below, the Specific Plan prevails and supersedes the applicable regulations of the LAMC unless expressly overridden by the LAMC. Section 5 of the Specific Plan defines the procedures for granting Project Permit Compliance review, adjustments, modifications, exceptions, or interpretations to the requirements of this Specific Plan, consistent with LAMC Section 11.5.7. The Specific Plan defines standards limiting the height, massing, and setbacks for buildings to ensure that new development is compatible with the existing character and scale of the area to avoid any substantial adverse effect on the scenic quality of the area. The consistency of the Project with these standards is discussed below.

Height

The Crenshaw Corridor Specific Plan, limits building heights in Subarea A to a maximum of 75 feet, excluding architectural features which may reach a maximum height of 90 feet. The Crenshaw Corridor Specific Plan also limits projects located opposite the front yard of residentially zoned land along local streets to 30 feet in height for the first 50 feet of lot depth as measured from the commercial or industrial property line opposite the residentially zoned land. The primary Project buildings have a proposed height of 86 feet to the top of the parapet and the low-scale residential building along Victoria Avenue have a proposed height of 34 feet.

The Project includes a request to increase the allowable height for the proposed buildings by 11 feet over the 75 feet permitted for the main buildings and by 4 feet over the otherwise 30 feet permitted for the low-scale residential buildings along Victoria Avenue. The proposed increase in height is being requested as on-menu incentive pursuant to LAMC 12.22 A.25(f)(5), which allows for a maximum of 11 additional feet or one additional story, whichever is lower, to provide Restricted Affordable Units. The Project would provide 20 percent of the total units reserved for affordable income households, or approximately 81 units, of which 15 percent would be for Very-Low Income households, or approximately 61 units, and five percent would be for a range of Very-Low to Low-Income households, or approximately 20 units, as defined by the City's density bonus ordinance LAMC Section 12.22 A.25.

With application of the incentives established by the LAMC, the height of the Project as proposed does not conflict with the height standards established by the Specific Plan and, for this reason, the Project will not result in an adverse effect on the scenic quality of the area.

Floor Area Ratio (FAR)

The maximum FAR permitted by the Crenshaw Corridor Specific Plan on lots designated Height District 2 in Subarea A is 3:1 for mixed-use projects. The proposed mixed-use Project contains approximately 380,112 sq. ft. of floor area and a FAR of 2.08:1, including approximately 339,116 sq. ft. for the residential uses and approximately 40,996 sq. ft. for the commercial uses and community spaces, which would include retail and restaurant uses, and a grocery store.

The proposed FAR for the Project does not conflict with the FAR standards established by the Specific Plan for mixed-use projects and, for this reason, the Project will not result in an adverse effect on the scenic quality of the area.

Setbacks

The Crenshaw Corridor Specific Plan requires 11-foot side yard setbacks in Subarea A for the residential parking and amenity deck uses along the south side on the West Site and 11-foot side yard setback for the residential parking and amenity deck uses along the east interior side on the West Site.

The Project requests relief of approximately 5.5 feet for the side yard setback for the residential parking and amenity deck uses along the south side on the West Site and relief of approximately 11 feet for the side yard setback for the residential parking and amenity deck uses along the east interior side on the West Site. This proposed reduction in side yard setbacks is being requested as a waiver of development standards per LAMC 12.22 A.25(g)(3) Waiver of Development Standards for Housing Development Projects that qualify for a Density Bonus and for which the applicant requests a waiver or modification of any development standard(s) not included on the Menu of Incentives.

With application of the incentives established by the LAMC, the proposed setbacks do not conflict with the height standards established by the Specific Plan and, for this reason, the Project will not result in an adverse effect on the scenic quality of the area.

Because the Project Site is an urbanized area and does not conflict with applicable zoning and other regulations governing scenic quality, Project will not result in any adverse effects on the scenic quality of the Project Site or the surrounding area.

Moreover, consistent with State and local regulations, SB 743 and ZI File No. 2452, aesthetic impacts as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

For Informational Purposes Only.

Less Than Significant Impact. Construction-related activity would be limited to the hours between 7:00 AM and 9:00 PM, Monday through Friday, and between 8:00 AM and 6:00 PM on Saturday. No construction activities would occur on Sundays or federal holidays. Additionally, lighting would be limited and temporary during the above days and hours. As such, Project construction would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area and would have a less than significant impact. Moreover, consistent with State and local regulations, SB 743 and ZI File No. 2452, impacts to the light and glare or other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

As a developed urban area, current sources of light and glare in the Project area include the surrounding commercial and residential uses, and from vehicles on streets, particularly Crenshaw Boulevard, Exposition Boulevard, and Obama Boulevard. Existing lighting in the area include interior and exterior building lighting, street lights and signals, illuminate signage, automobile headlights, and reflection of light from windows and other reflective surfaces on parked and passing vehicles, as well as from Metro's Expo/Crenshaw E Line Station and West Angeles Cathedral located directly north of the Project Site.

Once in operation, the Project's exterior night lighting would be installed in building entrances and common open space areas, largely to provide adequate night visibility for residents and visitors and to provide a measure of security. In addition to the exterior ground-level nighttime security lighting, interior lighting associated with the Project would provide an additional source of nighttime illumination. Overall, the level of light and glare associated with the Project is typical of the existing urban context.

Additionally, outdoor lighting would be designed and installed with shielding, such that lighting would be directed and focused on the Project Site and not on adjacent residential properties in accordance with LAMC lighting regulations which require that operational lighting will be directed downward or on the specific on-site feature to be lit or avoid direct glare onto exterior glazed windows or glass doors of existing and adjacent uses. Proposed signage and outdoor lighting would be subject to applicable regulations contained within the LAMC. Most notably, LAMC Section 93.0117(b) limits lighting intensity or direct glare

onto exterior glazed windows or glass doors on any property containing residential units; elevated habitable porch, deck, or balcony on any property containing residential units; or any ground surface intended for uses such as recreation, barbecue or lawn areas or any other property containing a residential unit or units.

LAMC Section 14.4.4 E requires that no sign shall be arranged and illuminated in a manner that would produce a light intensity of greater than three foot-candles above ambient lighting, as measured at the property line of the nearest residentially zoned property.

Therefore, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

Moreover, consistent with SB 743 and ZI File No. 2452, impacts to light and glare or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

Cumulative Impacts

The analysis of cumulative impacts is based on an assessment of reasonably foreseeable growth associated with a list of past, present, and anticipated future projects, as shown in **Table 2.0-2: Related Projects List** and **Figure 2.0-11: Related Projects** and the analysis contained in the West Adams-Baldwin Hills-Leimert Community Plan EIR Related projects include a shopping center Development of the Project in conjunction with related projects would result in an incremental intensification of land uses in an urbanized area of the City. Because of the area's dense urban fabric, public scenic views are generally available only through public street corridors and from public parks that have street corridor views or are set back from existing buildings.

Therefore, related projects in combination with existing buildings and the Project are located within designated urban lots planned for development and would not encroach upon public views through street corridors. Overall, cumulative aesthetics impacts would be less than significant.

Moreover, consistent with SB 743 and ZI File No. 2452, visual resources, aesthetic character, shade and shadow, light and glare, and scenic vistas or any other aesthetic impact as defined in the City's CEQA Threshold Guide shall not be considered a significant impact for infill projects within a TPA pursuant to CEQA.

Mitigation Measures

Incorporation of Prior Mitigation

SCAG 2020–2045 RTP/SCS Program EIR:

No aesthetics mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No aesthetics mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

No aesthetics mitigation measures were identified.

Project Mitigation

The Project meets the criteria for a project in a TPA governed by SB 743 and City's ZI No. 2452 and, as such, aesthetic impacts shall not be considered significant pursuant to PRC Section 21099(d)(1) and ZI No. 2452. Therefore, no project-specific mitigation measures are necessary.

Impacts After Mitigation

Pursuant to PRC Section 21099(d)(1) and ZI No. 2452, since the Project's impacts related to aesthetics would be less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the State's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

Would the project:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC section 12220(g)), timberland (as defined by PRC section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d. Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Impact Analysis

a. *Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?*

No Impact. A significant impact may occur if a Project were to result in the conversion of State-designated agricultural land from agricultural use to another nonagricultural use. The California Department of Conservation, Division of Land Protection, lists Prime Farmland, Unique Farmland, and Farmland of Statewide Importance under the general category of "Important Farmland" in California. The Project Site is located in an urbanized area of Los Angeles and is zoned C2-2D-SP, and the West Adams-Baldwin Hills-Leimert Community Plan land use designation for the Project Site is Community Commercial. Additionally, the West Site is currently fully developed with a building and surface parking and the East Site was also fully developed with buildings and surface parking lots, demolished by Metro for construction of the Crenshaw/LAX Line's Expo/Crenshaw Station and use of the remainder of the site as a construction staging area. Moreover, no farmland or agricultural activity exists in the vicinity of the Project Site. According to the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site and in the surrounding area are not a candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[3] Therefore, the Project has no impact on the conversion of farmland to nonagricultural uses.

b. *Conflict with existing zoning for agricultural use, or a Williamson Act contract?*

No Impact. A significant impact may occur if Project construction were to result in the conversion of land zoned for agricultural use or under a Williamson Act Contract from agricultural use to nonagricultural use. The Williamson Act of 1965 allows local governments to enter into contract agreements with local landowners with the purpose of trying to limit specific parcels of land to agricultural or other related open space use.[4] The Project Site is zoned C2-2D-SP. The C2 Commercial Zone permits a variety of uses, such as multiple dwelling residential; retail with limited manufacturing; service stations and garages; and office uses, hotels, and hospitals. The Project Site is not zoned for agricultural production, and no farmland activities exist on-site. Also, no Williamson Act Contracts are in effect for the Project Site.[5] Therefore, the Project has no impact with respect to land zoned for agricultural use or under a Williamson Act Contract will occur.

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3 California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed October 2019.

4 State of California Department of Conservation, Williamson Act Program, http://www.conservation.ca.gov/dlrp/lca/Pages/index.aspx, accessed January 2020.

5 California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed October 2019.

c. ***Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?***

No Impact. The Project Site is zoned C2-2D-SP. The C2 Commercial Zone permits a variety of uses, such as multiple dwelling residential; retail with limited manufacturing; service stations and garages; and office uses, hotels, and hospitals. The Project Site is not zoned as forestland or timberland and there is no timberland production at the Project Site. Therefore, no impact related to forest land or timberland will occur.

d. ***Result in the loss of forest land or conversion of forest land to non-forest use?***

No Impact. The Project Site is not zoned as forestland or timberland and there is no timberland production at the Project Site. As such, the Project would not result in the loss of forest land or conservation of forest land to non-forest use. Therefore, the Project would have no impact and would not result in the loss of forest land or conversion of forest land to non-forest use.

e. ***Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to nonagricultural use or conversion of forest land to non-forest use?***

No Impact. A significant impact may occur if a Project involves changes to the existing environment that could result in the conversion of farmland to another nonagricultural use or conversion of forest land to non-forest use. The Project Site is in an area of the City that is highly urbanized. Neither the Project nor surrounding parcels are utilized for agricultural uses or forest land and such uses are not in proximity to the Project Site. The Project Site is not classified in any "Farmland" category designated by the State of California. According to the California Department of Conservation, Division of Land Resource Protection, the soils at the Project Site and in the surrounding area are not a candidate for listing as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.[6] Therefore, the Project has no impact related to conversion of farmland to a nonagricultural use or conversion of forest land to non-forest use, and no impact will occur.

Cumulative Impacts

No Impact. Development of the Project in combination with the related projects indicated in **Table 2.0-2** and **Figure 2.0-11**, would not significantly impact any agricultural or forestry resources as no such land occurs in the vicinity of the Project Site or related projects due to the existing urban development. The Los Angeles County Important Farmland Map maintained by the California Division of Land Resource

6 California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed October 2019.

Protection indicates that the Project Site, the surrounding area, and the related projects are not included in the Important Farmland category.[7] The five related projects near the Project Site are on existing developed parcels and are not zoned for agricultural use, would not result in the loss of forest land, nor are they within the Williamson Act contract designated land. Therefore, no cumulative impacts regarding agricultural and forestry resources would occur.

Mitigation Measures

Incorporation of Prior Mitigation

SCAG 2020–2045 RTP/SCS Program EIR:

No agricultural and forestry resources mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No agricultural and forestry resources mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

No agricultural and forestry resources mitigation measures were identified.

Project Mitigation

No agricultural and forestry resources project-specific mitigation measures are necessary.

Impacts After Mitigation

No prior mitigation measures were identified, and no project specific mitigations are proposed for the Project.

7 California Department of Conservation, California Important Farmland Finder, https://maps.conservation.ca.gov/DLRP/CIFF/, accessed October 2019.

III. AIR QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?	☐	☒	☐	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Impact Analysis

Introduction

Criteria Air Pollutants

The State is divided into air quality jurisdictions; each jurisdiction is governed by a regional air district that oversees policy implementation, permitting of air pollution emission sources, and enforcement of regulatory requirements. Six criteria air pollutants (CAPs) are monitored at the federal, State, and regional levels. These six CAPs—ozone, particulate matter PM10 and PM2.5, nitrogen dioxide, carbon monoxide, lead, and sulfur dioxide—were identified based on a consensus of decades of research that concluded inhalation of each of the chemicals results in adverse health effects in humans. The six pollutants are described below:

- Ozone (O3) is a gas formed when volatile organic compounds (VOCs) and oxides of nitrogen (NOx), both byproducts of internal combustion engine exhaust and other sources, undergo slow photochemical reactions in the presence of sunlight. Ozone concentrations are generally highest during the summer months, when direct sunlight, light wind, and warm temperature conditions are favorable to the formation of this pollutant.
- VOCs are compounds comprised primarily of atoms of hydrogen and carbon. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons. Adverse effects on human health are not caused directly by VOCs, but rather by reactions of VOCs to form secondary air

pollutants, including ozone. VOCs themselves are not criteria pollutants; however, they contribute to the formation of ozone and are regulated under State policies.

- Respirable particulate matter (PM10) consists of extremely small, suspended particles or droplets 10 micrometers (µm) or smaller in diameter. Some sources of PM10, like pollen and windstorms, are naturally occurring. However, in populated areas, most PM10 is caused by road dust, diesel soot, combustion products, the abrasion of tires and brakes, and construction activities.
- PM2.5 refers to fine particulate matter that is 2.5 µm or smaller in size. Sources of PM2.5 include fuel combustion from automobiles, power plants, wood burning, industrial processes, and diesel-powered vehicles, such as buses and trucks. These fine particles are also formed in the atmosphere when gases, such as sulfur dioxide (SO2), NOx, and VOCs are transformed in the air by chemical reactions.
- Carbon monoxide (CO) is a colorless, odorless gas produced by the incomplete combustion of fuels. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels. Because CO is emitted directly from internal combustion engines, unlike ozone, and because motor vehicles operating at slow speeds are the primary source of CO in the South Coast Air Basin (Basin), the highest ambient CO concentrations are generally found near congested transportation corridors and intersections.
- Nitrogen dioxide (NO2) is a reddish-brown, highly reactive gas that is formed in the ambient air through the oxidation of nitric oxide (NO). NO2 is also a byproduct of fuel combustion. The principal form of NO2 produced by combustion is NO, but NO reacts quickly to form NO2, creating the mixture of NO and NO2 referred to as NOx. NO2 acts as an acute irritant and, in equal concentrations, is more injurious than NO. At atmospheric concentrations, however, NOx is only potentially irritating. NO2 absorbs blue light, the result of which is a brownish-red cast to the atmosphere and reduced visibility.
- Lead (Pb) occurs in the atmosphere as particulate matter. The combustion of leaded gasoline is the primary source of airborne lead in the Basin. The use of leaded gasoline is no longer permitted for on-road motor vehicles, so most such combustion emissions are associated with off-road vehicles, such as race cars, that use leaded gasoline. Other sources of Pb include the manufacturing and recycling of batteries; sanding or removal of lead-based paint; ink; ceramics; ammunition; and secondary lead smelters.
- SO2 is a colorless, extremely irritating gas or liquid. It enters the atmosphere as a pollutant mainly as a result of the burning of high-sulfur-content fuel oils and coal, as well as from chemical processes occurring at chemical plants and refineries. When SO2 oxidizes in the atmosphere, it forms sulfates (SO4).

Federal

The USEPA sets national vehicle and stationary source emission standards; oversees approval of all SIPs; provides research and guidance for air pollution programs; and sets National Ambient Air Quality Standards (NAAQS). The NAAQS for the six CAPs are shown in **Table 4.0-1: Ambient Air Quality Standards and Attainment Status** and were identified from provisions of the 1970 CAA. The sections of the CAA that

are most applicable to the Project include Title I: Nonattainment Provisions and Title II: Mobile Source Provisions.

Table 4.0-1
Ambient Air Quality Standards and Attainment Status

Pollutant	Averaging Period	California		Federal	
		Standards	Attainment Status	Standards	Attainment Status
Ozone (O3)	1-hour	0.09 ppm (180 µg/m^3)	Nonattainment	—	Nonattainment
	8-hour	0.070 ppm (137 µg/m^3)		0.070 ppm (137 µg/m^3)	
Nitrogen Dioxide (NO_2)	Annual Arithmetic mean	0.03 ppm (57 µg/m^3)	Attainment	0.053 ppm (100 µg/m^3)	Unclassified/ Attainment
	1-hour	0.18 ppm (339 µg/m^3)		0.100 ppm (188 µg/m^3)	
Carbon Monoxide (CO)	8 hours	9.0 ppm (10 mg/m^3)	Attainment	9 ppm (10 mg/m^3)	Unclassified/ Attainment
	1 hour	20 ppm (23 mg/m^3)		35 ppm (40 mg/m^3)	
Sulfur Dioxide (SO_2)	1 hour	0.25 ppm	Attainment	0.075 ppm	Attainment
	24 hours	0.04 ppm		—	
Lead (Pb)	30-day average	1.5 µg/m^3	Attainment	—	Nonattainment
	Rolling 3-month average	—		0.15 µg/m^3	
Respirable Particulate Matter (PM_{10})	24 hours	50 µg/m^3	Nonattainment	150 µg/m^3	Attainment
	Annual arithmetic mean	20 µg/m^3		—	
Fine Particulate Matter ($PM_{2.5}$)	24 hours	—	Nonattainment	35 µg/m^3	Nonattainment
	Annual arithmetic mean	12 µg/m^3		12 µg/m^3	

Source: CARB website at: CARB, "Area Designations Maps/State and National," http://www.arb.ca.gov/desig/adm/adm.htm (Accessed October 2020).
Note: ppm = parts per million; µg = micrometer; m^3 = cubic meter; mg = milligram.

The CAA and the promulgated standards have evolved as a living document over time as research into the effects of air pollution has enhanced regulatory understanding of the associated issues. The 1990 amendments to the CAA identify specific emission reduction goals for areas not meeting the NAAQS. These amendments require both a demonstration of reasonable further progress toward attainment and incorporation of additional sanctions for failure to attain or to meet interim milestones. On the national level, the USEPA designates regions as achieving "attainment" or suffering from "nonattainment" of the NAAQS based on air quality monitoring data. Regions that are designated as being in nonattainment are

responsible for devising localized strategies for reducing emissions of CAPs and achieving regional attainment within a predetermined timeframe set by the USEPA.

The NAAQS were further amended in July 1997 to include an 8-hour standard for ozone and to adopt a NAAQS for PM2.5. The NAAQS were amended again in September 2006 to include an established methodology for calculating PM2.5, as well as to revoke the annual PM10 threshold. Additional revisions to the AAQS may be implemented in the future as the science of air quality progresses.

State

California Air Resources Board

In addition to being subject to the requirements of the CAA, air quality in California is also governed by more stringent regulations under the California Clean Air Act (CCAA). The California Air Resources Board (CARB) became part of the California Environmental Protection Agency in 1991 and is responsible for administering the CCAA and establishing the California Ambient Air Quality Standards (CAAQS). The CCAA, as amended in 1992, requires all air districts in the State to achieve and maintain the CAAQS, which are generally more stringent than the federal standards and incorporate additional standards for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. CARB has broad authority to regulate mobile air pollution sources, such as motor vehicles. It is responsible for setting emission standards for vehicles sold in California and for other emission sources, such as consumer products and certain off-road equipment. CARB established passenger vehicle fuel specifications, which became effective in March 1996. CARB oversees the functions of local air pollution control districts and air quality management districts, which, in turn, administer air quality activities at the regional and county levels. The State standards are summarized in **Table 4.0-1**.

The CCAA requires CARB to designate areas within California as either attainment or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. Under the CCAA, areas are designated as nonattainment for a pollutant if air quality data shows that a State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a State standard and are not used as a basis for designating areas as nonattainment.

Local

South Coast Air Quality Management District

SCAQMD shares responsibility with CARB for ensuring that all State and federal AAQS are achieved and maintained over an area of approximately 10,743 square miles. This area includes the South Coast and

Salton Sea Air Basins, all of Orange County, and the non-desert portions of Los Angeles, Riverside, and San Bernardino Counties. It does not include the Antelope Valley or the non-desert portion of western San Bernardino County.

SCAQMD is responsible for controlling emissions, primarily from stationary sources. SCAQMD maintains air quality monitoring stations throughout the air basins. SCAQMD, in coordination with the Southern California Association of Governments (SCAG), is also responsible for developing, updating, and implementing the Air Quality Management Plan (AQMP) for the air basins. An AQMP is a plan prepared and implemented by an air pollution district for a county or region designated as being in nonattainment of the NAAQS or CAAQS. The term "nonattainment area" is used to refer to an air basin in which one or more AAQS are exceeded. SCAQMD also prepares the SIP for its jurisdiction and promulgates rules and regulations. The SIP includes strategies and tactics to be used to attain the federal ozone standards in the South Coast Air Basin. The SIP elements are taken from the most recent AQMP.

SCAQMD approved a Final 2016 AQMP on March 3, 2017.[8] The 2016 AQMP includes transportation control measures developed by SCAG from its *2016–2040 Regional Transportation Plan/Sustainable Communities Strategy,* as well as the integrated strategies and measures needed to meet the NAAQS. The 2016 AQMP demonstrates attainment of the 1-hour and 8-hour ozone NAAQS, as well as the latest 24-hour and annual PM2.5 standards.

SCAQMD is responsible for limiting the amount of emissions that can be generated throughout the air basins by various stationary, area, and mobile sources. Specific rules and regulations have been adopted by the SCAQMD Governing Board that limit the emissions that can be generated by various uses/activities and identifying specific pollution-reduction measures that must be implemented in association with various uses and activities. These rules regulate not only the emissions of the federal and State criteria pollutants, but also toxic air contaminants (TACs) and acutely hazardous materials. The rules are also subject to ongoing refinement by SCAQMD.

Among the SCAQMD rules applicable to the Project are Rule 403 (Fugitive Dust) and Rule 1113 (Architectural Coatings). Rule 403 requires the use of stringent best available control measures (BACMs) to minimize PM10 emissions during grading and construction activities. Rule 1113 limits the VOC content of coatings, with a VOC content limit for flat coatings of 50 grams per liter (g/L). Additional details regarding these rules and other potentially applicable rules are presented as follows.

8 South Coast Air Quality Management District (SCAQMD), "Final 2016 Air Quality Management Plan" (2016), accessed March 2020, https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf?sfvrsn=15.

Rule 402 (Nuisance): This rule states that a "person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or to the public, or which cause, or have a natural tendency to cause, injury or damage to business or property."

Rule 403 (Fugitive Dust). This rule requires fugitive dust sources to implement BACMs for all sources and prohibits all forms of visible particulate matter from crossing any property line. BACMs may include application of water or chemical stabilizers to disturbed soils covering haul vehicles; restricting vehicle speeds on unpaved roads to 15 miles per hour (mph); sweeping loose dirt from paved site-access roadways; cessation of construction activity when winds exceed 25 mph; and establishing a permanent ground cover on finished sites. SCAQMD Rule 403 is intended to reduce PM10 emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust (see also Rule 1186).

Rule 1113 (Architectural Coatings). This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce VOC emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

Rule 1186 (PM10 Emissions from Paved and Unpaved Roads, and Livestock Operations). This rule applies to owners and operators of paved and unpaved roads and livestock operations. The rule is intended to reduce PM10 emissions by requiring the cleanup of material deposited onto paved roads, use of certified street sweeping equipment, and treatment of high-use unpaved roads (see also Rule 403).

Stationary emissions sources subject to these rules are regulated through SCAQMD's permitting process. Through this permitting process, SCAQMD also monitors the amount of stationary emissions being generated and uses this information in developing AQMPs.

City of Los Angeles

Local jurisdictions, such as the City, have the authority and responsibility to reduce air pollution through its police power and decision-making authority. Specifically, the City is responsible for the assessment and mitigation of air emissions resulting from its land use decisions. The City is also responsible for the implementation of transportation control measures as outlined in the AQMP. Examples of such measures include bus turnouts, energy-efficient streetlights, and synchronized traffic signals. In accordance with CEQA requirements and the CEQA review process, the City assesses the air quality impacts of new related projects, requires mitigation of potentially significant air quality impacts by conditioning discretionary permits, and monitors and enforces implementation of such mitigation.

Air Pollution Climatology

The Project Site is located within the Los Angeles County non-desert portion of the Basin, which is in an area of high air pollution potential due to its climate and topography. The region lies in the semi-permanent high pressure zone of the eastern Pacific, resulting in a mild climate tempered by cool sea breezes with light average wind speeds. The Basin experiences warm summers, mild winters, infrequent rainfalls, light winds, and moderate humidity.

This usually mild climatological pattern is interrupted infrequently by periods of extremely hot weather, winter storms, or Santa Ana winds. The Basin is a coastal plain with connecting broad valleys and low hills, bounded by the Pacific Ocean to the west and high mountains around the rest of its perimeter. The mountains and hills within the area contribute to the variation of rainfall, temperature, and winds throughout the region.

The Basin experiences frequent temperature inversions that help to form smog. While temperature typically decreases with height, it actually increases under inversion conditions as altitude increases, thereby preventing air close to the ground from mixing with the air above. As a result, air pollutants are trapped near the ground. During the summer, air quality problems are created due to the interaction between the ocean surface and the lower layer of the atmosphere. This interaction creates a moist marine layer. An upper layer of warm air mass forms over the cool marine layer, preventing air pollutants from dispersing upward. Additionally, hydrocarbons and NO2 react under strong sunlight, creating smog. Light daytime winds, predominantly from the west, further aggravate the condition by driving air pollutants inland toward the mountains.

Air quality problems also occur during the fall and winter, when CO and NO2 emissions tend to be higher. CO concentrations are generally worse in the morning and late evening (around 10:00 PM) when temperatures are cooler. High CO levels during the late evenings result from stagnant atmospheric conditions trapping CO. Since CO emissions are produced almost entirely from automobiles; the highest CO concentrations in the Basin are associated with heavy traffic. NO2 concentrations are also generally higher during fall and winter days.

Air Monitoring Data

For evaluation purposes, the SCAQMD territory is divided into 38 source receptor areas (SRAs). These SRAs are designated to provide a general representation of the local meteorological, terrain, and air quality conditions within the particular geographical area.

The Project Site is within SRA 1, Central Los Angeles County.[9] The nearest air monitoring station SCAQMD operates is located at 1630 North Main Street.[10] This station monitors O3, NO2, PM10 and PM2.5. **Table 4.0-2: Air Quality Monitoring Summary** summarizes published monitoring data from 2016 through 2018, the most recent 3-year period available. The data show that during the past few years, the region has exceeded the O3, PM10 and PM2.5 standards.

Table 4.0-2
Air Quality Monitoring Summary

Air Pollutant	Average Time (Units)	2016	2017	2018
Ozone (O3)	State Max 1 hour (ppm)	0.103	0.116	0.098
	Days > CAAQS threshold (0.09 ppm)	2	6	2
	National Max 8 hour (ppm)	0.078	0.086	0.073
	Days > NAAQS threshold (0.075 ppm)	4	14	4
	State Max 8 hour (ppm)	0.078	0.086	0.074
	Days > CAAQS threshold (0.07 ppm)	4	16	4
Carbon monoxide (CO)		—	—	—
Nitrogen dioxide (NO2)	National Max 1 hour (ppm)	0.064	0.081	0.070
	Days > NAAQS threshold (0.100 ppm)	0	0	0
	State Max 1 hour (ppm)	0.064	0.080	0.070
	Days > CAAQS threshold (0.18 ppm)	0	0	0
Respirable particulate matter (PM10)	National Max (µg/m3)	64.0	64.6	68.2
	National Annual Average (µg/m3)	25.8	25.7	30.2
	Days > NAAQS threshold (150 µg/m3)	0	0	0
	State Max (µg/m3)	74.6	96.2	81.2
	State Annual Average (µg/m3)	—	—	34.0
	Days > CAAQS threshold (50 µg/m3)	21	40	31
Fine particulate matter (PM2.5)	National Max (µg/m3)	44.3	54.9	61.4
	National Annual Average (µg/m3)	11.7	12.0	12.8
	Days > NAAQS threshold (35 µg/m3)	2	6	6
	State Max (µg/m3)	49.4	61.7	65.3
	State Annual Average (µg/m3)	12.0	16.3	16.0

Source: CARB, iADAM: Air Quality Data Statistics.
Note: (—) = Data not available.

9 SCAQMD, General Forecast Areas and Air Monitoring Areas, map, accessed October 2019, http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf.

10 South Coast Air Quality Management District, Site Survey Report for Los Angeles (Central)–North Main Street, AQS ID 060371103, accessed October 2019, http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-monitoring-network-plan/aaqmnp-losangeles.pdf?sfvrsn=16.

Sensitive Receptors

The SCAQMD considers a sensitive receptor to be a person in the population who is particularly susceptible to health effects due to exposure to an air contaminant. Sensitive receptors are identified near sources of air pollution to determine the potential for health hazards. Individuals who are sensitive to air pollution include children, the elderly, and persons with preexisting respiratory or cardiovascular illness. Some individuals are considered more sensitive to air pollutants than others because of preexisting health problems, proximity to the emission sources, or duration of exposure to air pollutants. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential areas are also considered sensitive to poor air quality because people in residential areas are often at home for extended periods. Recreational land uses are moderately sensitive to air pollution because the vigorous exercise associated with recreation facilities put a high demand on respiratory system function.

a. *Conflict with or obstruct implementation of the applicable air quality plan?*

Less than Significant with Mitigation Incorporated. The South Coast Air Quality Management District (SCAQMD) adopted an updated air quality management plan (AQMP) in March 2017.[11] The Final 2016 AQMP was prepared to comply with the federal and State Clean Air Acts and amendments; accommodate growth; reduce pollutants in the Basin; meet federal and State air quality standards; and minimize the fiscal impact of pollution control measures on the local economy. It builds on approaches in the previous AQMP to achieve attainment of the federal ozone air quality standard. These planning efforts have substantially decreased exposure to unhealthy levels of pollutants, even while substantial population growth has occurred within the Basin. Projects that are considered to be consistent with the AQMP would not interfere with attainment because this growth is included in the projections utilized in the formulation of the AQMP. Therefore, projects, uses, and activities that are consistent with the applicable assumption used in the development of the AQMP would not jeopardize attainment of the air quality levels identified in the AQMP, even if they exceed the SCAQMD's recommended daily emissions thresholds.

SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. With respect to the determination of consistency with AQMP growth assumptions, the projections in the AQMP for achieving air quality goals are based on assumptions in SCAG's 2016–2040 RTP/SCS regarding population, housing, and growth trends. With regard to air quality

11 South Coast Air Quality Management District, Final 2016 Air Quality Management Plan, March 2017.

planning, SCAG has prepared and adopted the 2020–2045 RTP/SCS,[12] which includes a Sustainable Communities Strategy that addresses regional development and growth forecasts. Determining whether or not a project exceeds SCAG's growth forecasts involves the evaluation of the following: (1) consistency with applicable population, housing, and employment growth projections; (2) project mitigation measures; and (3) appropriate incorporation of AQMP land use planning strategies.

A project is consistent with the AQMP, in part, if it is consistent with the population, housing, and employment assumptions that were used in the development of the AQMP. As discussed in **Section XI**, the Project would conform to objectives outlined in the City of Los Angeles General Plan. Most notably, the Project Site is located in an urbanized area within a TPA in walking distance to numerous services, retail, and employment opportunities. The Project Site is well served by mass transit with frequency of service intervals of 15 minutes or less during peak commute periods. The Project would provide residents and visitors with convenient access to mass transit and opportunities for walking and biking, thus reducing vehicle trips and vehicle miles traveled.

The 2020 – 2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. These growth forecasts are based on local plans and policies applicable to the specific area. As discussed in **Section XIV: Population and Housing**, construction of 401 units would result in an increase of approximately 967 residents in the City. The current estimated City population as of 2018 is approximately 4,059,665 people.[13] Therefore, the Project would represent a nominal increase of far less than one percent of the City's current population. According to growth estimates from SCAG's 2020 –2045 RTP/SCS, the City had an estimated population of 3,933,800 people in 2016 and is projected to have a population of 4,771,300 in 2045.[14] The addition of approximately 967 people generated by the Project would be less than 1 percent of the SCAG's population forecasts for the City.

Additionally, the Basin is currently designated as nonattainment at the federal level for ozone and PM2.5; and at the State level for ozone, PM10, and PM2.5. SCAQMD developed regional emissions thresholds to determine whether a project would contribute to air pollutant violations. If a project exceeds the regional air pollutant thresholds, then it would significantly contribute to air quality violations in the Air Basin. As discussed further in **Table 4.3-1** below, temporary emissions associated with construction of the Project would exceed SCAQMD NOx thresholds for regional emissions. With implementation of **Mitigation Measure PMM AQ-1** from the SCAG 2020–2045 RTP/SCS, construction impacts would be reduced to less

12 Southern California Association of Governments (SCAG), Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, "Chapter 1," https://www.connectsocal.org/Pages/Connect-SoCal-Draft-Plan.aspx, Accessed on July 10, 2020.

13 SCAG, Profile of the City of Los Angeles, https://www.scag.ca.gov/Documents/LosAngeles.pdf

14 SCAG, "Demographics and Growth Forecast" (adopted April 2016), http://scagrtpscs.net/Documents/2016/final/f2016RTPSCS_DemographicsGrowthForecast.pdf.

than significant. Additionally, as discussed further in **Table 4.3-2** below, long-term emissions associated with operation would not exceed SCAQMD's emission thresholds. As such, the Project is consistent with the growth assumptions in the regional air plan and would not contribute to air quality violations in the Air Basin. Impacts would be less than significant with mitigation incorporated.

b. *Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?*

Less than Significant with Mitigation Incorporated. A significant impact could occur if the Project would add a considerable cumulative contribution to Federal or State nonattainment pollutants. The Basin is currently in State nonattainment for ozone, PM10, and PM2.5.[15] In regard to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple related projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that "projects that do not exceed the project-specific thresholds are generally not considered to be cumulatively significant."[16] Therefore, if a project generates less than significant construction or operational emissions, then the project would not generate a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment.

Construction

With respect to the Project's construction-period air quality emissions and cumulative Basin-wide conditions, the SCAQMD has developed strategies (e.g., SCAQMD Rule 403) to reduce criteria pollutant emissions outlined in the AQMP pursuant to National Ambient Air Quality Standards (NAAQS). As such, the Project would comply with SCAQMD Rule 403 requirements and implement all feasible mitigation measures to reduce potential impacts related to particulate matter and fugitive dust. In addition, the Project would comply with adopted AQMP emissions control measures as described below. Per SCAQMD rules and mandates as well as the CEQA requirement that significant impacts be mitigated to the extent feasible, these same requirements (i.e., SCAQMD Rule 403 compliance, the implementation of all feasible mitigation measures, and compliance with adopted AQMP emissions control measures) would also be imposed on construction projects Basin-wide, where applicable.

15 CARB, "Area Designation Maps/State and National," http://www.arb.ca.gov/desig/adm/adm.htm.

16 South Coast Air Quality Management District (SCAQMD), White Paper on Potential Control Strategies to Address Cumulative Impacts from Air Pollution (2003), Appendix A.

According to the SCAQMD, individual construction projects that exceed the SCAQMD's recommended daily thresholds for project-specific impacts would cause a cumulatively considerable increase in emissions for those pollutants for which the Basin is in nonattainment. Construction of the Project has the potential to create air quality impacts through the use of heavy-duty construction equipment and through vehicle trips generated from construction workers to and from the Project Site. In addition, fugitive dust emissions would result from demolition and construction activities. NOx emissions would result from the use of off-road construction equipment. Paving and the application of architectural coatings (e.g. paints) would potentially release VOCs.

Construction emissions were estimated according to the SCAQMD CEQA Air Quality Handbook and construction emission factors contained in the California Emissions Estimator Model (CalEEMod) (See **Appendix A**). The emission calculations assume the use of standard construction practices, such as compliance with SCAQMD Rule 403—Fugitive Dust, which requires all unpaved demolition and construction areas to be wetted at least three times a day during excavation and construction to minimize the generation of fugitive dust. In addition, SCAQMD Rule 1403 – Asbestos emissions from demolition/renovation activities, specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities.

Maximum daily emissions of air pollutants during construction of the Project were calculated using CalEEMod (See **Appendix A**). Construction of the Project would begin second quarter of 2021 and is expected to be completed by second quarter of 2023. Construction would occur over five phases: (1) demolition; (2) grading; (3) building construction; (4) paving; and (5) architectural coating. Each phase of construction would result in varying levels of intensity and a number of construction personnel. The construction workforce would consist of approximately 28 worker trips per day and 1,829 total hauling trips during demolition; 40 worker trips per day and 3,362 total hauling trips during grading; 302 worker trips per day and 50 vendor trips per day during building construction; 60 worker trips per day during architectural coating; and 50 worker trips per day during paving. **Table 4.3-1: Maximum Construction Emissions** identifies both unmitigated and mitigated daily emissions that are estimated for peak construction days for each construction year. Emissions calculations reflect the following emissions standards: 40 percent Tier 1, 25 percent Tier 2, 25 percent Tier 3, and 10 percent Tier 4. As shown in **Table 4.3-1**, construction emissions associated with the Project would exceed the SCAQMD threshold of significance for NOX and would result in a potentially significant impact. With implementation of **Mitigation Measure PMM AQ-1** from SCAG's 2020–2045 RTP/SCS, emissions associated with NOx would be reduced to emissions below SCAQMD's significance threshold. Therefore, impacts related to regional construction emissions would be less than significant with mitigation incorporated.

Table 4.3-1
Maximum Construction Emissions

Source	VOC	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Unmitigated Maximum	35	120	60	<1	14	4
SCAQMD Mass Daily Threshold	75	100	550	150	150	55
Threshold exceeded?	**No**	**Yes**	**No**	**No**	**No**	**No**
Mitigated Maximum	38	84	81	<1	10	5
SCAQMD Mass Daily Threshold	75	100	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod.
Notes:
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.
*Refer to **Appendix A: Air Quality Study***

Operation

SCAQMD's CalEEMod program was used to calculate regional area, energy, mobile source, and stationary emissions (See **Appendix A**). As discussed in **Section VIII: Greenhouse Gas Emissions**, the Project would incorporate features designed primarily to reduce greenhouse gas (GHG) emissions, that would also likely serve to reduce criteria air pollutants. These measures include achieving a high-performance building that would meet or be equal to or exceeding to the US Green Building Council's Leadership in Energy and Environmental Design (LEED) v4 Silver requirements and exceeds Title 24 Energy requirements by 20 percent. These include features such as Energy Star or more efficient appliances and tracking of energy performance with metering line with LEED v4.1 Recertification. In addition, the Project Site is served by multiple mass transit operators, specifically within the vicinity of the Project area, with networks connecting different communities within and outside of City boundaries. Metro and Los Angeles Department of Transportation (LADOT) operate fixed-route bus transit service throughout the City. Within the Project area, there are five Metro bus routes and three LADOT DASH routes that operate during weekdays (Monday through Friday) and limited service on weekends. Also, within the Project vicinity, there are two operated light rail lines, the Metro E Line and the soon-to-be-opened (2020) Metro Crenshaw/LAX Line.

Operational activities associated with the Project would result in long-term emissions from area, energy, and mobile sources. Area-source emissions are based on natural gas (building heating and water heaters), landscaping equipment, and consumer product (including paint) usage rates provided in CalEEMod. Natural gas usage factors in CalEEMod are based on the California Energy Commission (CEC)'s California

Commercial End Use Survey data set, which provides energy demand by building type and climate zone. Mobile source emissions are derived primarily from vehicle trips generated by the Project. The Project would add up to 3,881 daily trips as shown in the Transportation Assessment Study **(Appendix J.1)**. Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates. The emission estimates for travel on paved roads were calculated using the CalEEMod model. The results presented in **Table 4.3-2: Maximum Operational Emissions** are compared to the SCAQMD-established operational significance thresholds. As shown in **Table 4.3-2**, the operational emissions would not exceed the regional VOC, NOx, CO, SOx, PM10, and PM2.5 concentration thresholds. As shown in **Table 4.3-2**, operational emissions associated with the Project would not exceed the SCAQMD's emission thresholds and would therefore not result in a cumulatively considerable net increase of any criteria pollutant. As such, operational impacts would be less than significant.

Table 4.3-2
Maximum Operational Emissions

	VOC	NOx	CO	SOx	PM10	PM 2.5
Source			**pounds/day**			
Area	9	<1	33	<1	<1	<1
Energy	<1	1	<1	<1	<1	<1
Mobile	7	29	81	<1	27	8
Total	16	30	114	<1	27	8
SCAQMD Mass Daily Threshold	55	55	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

Source: CalEEMod.
Notes: Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxides; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; SOx = sulfur oxides; VOC = volatile organic compounds.
*Refer to **Appendix A.***

c. *Expose sensitive receptors to substantial pollutant concentrations?*

Less than Significant with Mitigation Incorporated. The SCAQMD devised the Localized Significance Threshold (LST) methodology[17] to assess the potential air quality impacts that would result in the near vicinity of the Project.

17 South Coast Air Quality Management District, Final Localized Threshold Methodology, July 2008. http://www.aqmd.gov/docs/default-source/ceqa/handbook/localized-significance-thresholds/final-lst-methodology-document.pdf?sfvrsn=2

Receptors sensitive to air pollution include, but are not limited to, residences, schools, hospitals, and convalescent facilities. The nearest sensitive receptors in the vicinity of the Project Site include the following (See **Appendix A**):

- Single-family houses approximately 30 feet to the west.
- Single-family houses approximately 35 feet to the east.
- Single-family houses approximately 100 feet to the southwest.
- Single-family houses approximately 155 feet to the north.
- Single-family houses approximately 200 feet to the southeast.

The LST methodology considers emissions generated from on-site sources and excludes emissions from off-site vehicular traffic. The SCAQMD provides mass rate lookup tables as a screening tool to determine the likelihood of localized impacts from Project construction and operation. Ambient conditions for Northwest Los Angeles County Coastal, as recorded in SRA 1 by the SCAQMD, were used for ambient conditions in determining appropriate threshold levels. Thresholds for each criteria pollutant for construction activity and Project operation were derived for a 4.19-acre Project Site. The LST mass rate look-up tables are applicable to NOx, CO, PM2.5 and PM10.

Construction

The results of the construction LST analysis is provided in **Table 4.3-3: Localized Construction Emissions**. It is important to note, construction would be required to comply with the SCAQMD's Rule 403 (Fugitive Dust), which requires watering of the Project Site during dust-generating construction activities, stabilizing disturbed areas with water or chemical stabilizers, and preventing track- out dust from construction vehicles, thus further reducing construction-related emissions. Additionally, these estimates assume the maximum area that would be disturbed during construction on any given day during Project buildout. As shown in **Table 4.3-3**, emissions would not exceed the localized significance thresholds for construction. As emissions would be below SCAQMD localized thresholds, impacts to the sensitive receptors identified above located near the Project Site from localized emissions during construction would be less than significant.

Project construction would result in short-term emissions of diesel particulate matter, which is a TAC. Diesel particulate matter poses a carcinogenic health risk that is generally measured using an exposure period of 30 years for sensitive residential receptors. Off-road heavy-duty diesel equipment would emit diesel particulate matter over the course of the construction period. Diesel particulate matter is a source of PM2.5 (diesel particles are typically 2.5 microns and smaller). As identified above, the nearest sensitive receptors are located 30 to 200 feet from the Project Site. As shown in **Table 4.3-3** localized diesel particulate matter would be below localized thresholds and there would be no significant impacts to the

sensitive receptors located around the Project Site. As mentioned previously, the Project would implement **Mitigation Measure PMM AQ-1** from SCAG's 2020–2045 RTP/SCS , which would reduce emissions associated with NOx. Therefore, construction impacts would be less than significant with implementation of this mitigation measure.

Table 4.3-3
Localized Construction Emissions

	NOx	CO	PM10	PM2.5
Source	**On-Site Emissions (pounds/day)**			
Total maximum emissions	47	45	10	3
LST threshold	147	1,641	14	7
Threshold Exceeded?	**No**	**No**	**No**	**No**

Notes:
Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.
*Refer to **Appendix A.***

Operation

Local emissions from Project operation would include area and energy sources. Area-source emissions are based on natural gas (building heating and water heaters), landscaping equipment, and consumer product (including paint) usage rates provided in CalEEMod. Natural gas usage factors in CalEEMod are based on the CEC's California Commercial End Use Survey data set, which provides energy demand by building type and climate zone. The results of the operational LST analysis are provided in **Table 4.3-4: Localized Operational Emissions**. As shown in **Table 4.3-4**, emissions would not exceed the localized significance thresholds for operation. Therefore, localized operational impacts to sensitive receptors located around the Project Site would be less than significant.

Table 4.3-4
Localized Operational Emissions

	NOx	CO	PM10	PM2.5
Source	**On-Site Emissions (pounds/day)**			
Project area/energy emissions	1	33	<1	<1
LST threshold	147	1,641	3	2
Threshold Exceeded?	**No**	**No**	**No**	**No**

Notes:
Totals in table may not appear to add exactly due to rounding in the computer model calculations.
CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.
*Refer to **Appendix A.***

d. *Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Less than Significant Impact. According to the SCAQMD, "while almost any source may emit objectionable odors, some land uses will be more likely to produce odors…because of their operation."[18] Land uses that are more likely to produce objectionable odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants.

Construction

During construction, activities associated with the operation of construction equipment, the application of asphalt, and the application of architectural coatings and other interior and exterior finishes may produce discernible odors typical of most construction sites. Although these odors could be a source of nuisance to adjacent residences, they are temporary and intermittent in nature. As construction-related emissions dissipate, the odors associated with these emissions would also decrease, dilute, and become unnoticeable. As such, construction impacts would be less than significant.

Operation

Operation of the Project includes a mixed-use residential development and would not contain any active manufacturing activities. Good housekeeping practices, such as the use of trash receptacles, would be sufficient to prevent nuisance odors. Therefore, operational impacts would be less than significant.

Cumulative Impacts

The discussion above for Threshold b. addresses the potential for cumulative impacts for criteria pollutants that are not in attainment with applicable federal or State standards.

As discussed above, the SCAQMD suggests that the emissions-based thresholds be used to determine if a project's contribution to regional cumulative emissions is cumulatively considerable. Individual projects that exceed SCAQMD-recommended daily thresholds for project-specific impacts would be considered to cause a cumulative considerable increase in emissions for those pollutants for which the Basin is in nonattainment. As discussed above in **Table 4.3-1** above, construction impacts would be reduced to less than significant with mitigation incorporated. As presented in **Table 4.3-2** above, long-term emissions associated with operation would not exceed SCAQMD's emission thresholds.

18 South Coast Air Quality Management District, Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning, May 2005, 2-2.

Additionally, as shown in **Tables 4.3-3** and **Table 4.3-4**, localized emissions from Project construction and operation would also not exceed SCAQMD thresholds. Moreover, the Project would not result in significant impacts with regard to odors during construction and operation. Therefore, the contribution of these emissions to air quality within the Air Basin is not considered to be cumulatively considerable and would be less than significant.

Mitigation Measures

Incorporation of Prior Mitigation

As discussed in Section 3.3 of this SCEA, PRC Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports (EIRs).

The following mitigation measures from prior applicable EIRs incorporated into the Project will lessen the significant impacts of the Project, but not to a less-than-significant level.

SCAG 2020–2045 RTP/SCS Program EIR:

PMM AQ-1 In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:

a. Minimize land disturbance.

b. Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.

c. Cover trucks when hauling dirt.

d. Stabilize the surface of dirt piles if not removed immediately.

e. Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.

f. Minimize unnecessary vehicular and machinery activities.

g. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.

h. Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.

j. Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the

applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet. Daily logging of the operating hours of the equipment should also be required.

k. Ensure that all construction equipment is properly tuned and maintained.

l. Minimize idling time to 5 minutes or beyond regulatory requirements —saves fuel and reduces emissions.

m. Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.

n. Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.

o. Develop a traffic plan to minimize community impacts as a result of traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites. Project sponsors should consider developing a goal for the minimization of community impacts.

p. As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the State or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.

q. Require projects to use Tier 4 Final equipment or better for all engines above 50 horsepower (hp). In the event that construction equipment cannot meet to Tier 4 Final engine certification, the Project representative or contractor must demonstrate through future study with written findings supported by substantial evidence that is approved by SCAG before using other technologies/strategies. Alternative applicable strategies may include, but would not be limited to, construction equipment with Tier 4 Interim or reduction in the number and/or horsepower rating of construction equipment and/or limiting the number of construction equipment operating at the same time. All equipment must be tuned and maintained in compliance with the manufacturer's recommended maintenance schedule and specifications. All maintenance records for each equipment and their contractor(s) should make available for inspection and remain on-site for a period of at least two years from completion of construction unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds. Project sponsors should also consider including ZE/ZNE technologies where appropriate and feasible.

r. Projects located within the South Coast Air Basin should consider applying for South Coast AQMD "SOON" funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.

s. Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.

t. Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.

u. Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).

- Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.
- The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:
  - Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
  - Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
  - Nonroad diesel engines on site shall be Tier 2 or higher.
  - Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp.
  - Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer.
  - Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less.

- The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:
    i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.
    ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.
    iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.
- The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.
- The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator on site, includes:
    i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.
    ii. Any problems with the equipment or emission controls.
    iii. Certified copies of fuel deliveries for the time period that identify:
        1. Source of supply
        2. Quantity of fuel
        3. Quantity of fuel, including sulfur content (percent by weight)

- Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency:
    - Install programmable thermostat timers
    - Obtain Third-party HVAC commissioning and verification of energy savings (to be grouped with exceedance of Title 24).

- Install energy efficient appliances (Typical reductions for energy-efficient appliances can be found in the Energy Star and Other Climate Protection Partnerships Annual Reports.)
- Install higher efficacy public street and area lighting
- Limit outdoor lighting requirements
- Replace traffic lights with LED traffic lights
- Establish on-site renewable or carbon neutral energy systems – generic, solar power and wind power
- Utilize a combined heat and power system
- Establish methane (CH4) recovery in Landfills and Wastewater Treatment Plants.
- Locate project near bike path/bike lane
- Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers.
- Provide traffic calming measures, such as:
    i. Marked crosswalks
    ii. Count-down signal timers
    iii. Curb extensions
    iv. Speed tables
    v. Raised crosswalks
    vi. Raised intersections
    vii. Median islands
    viii. Tight corner radii
    ix. Roundabouts or mini-circles
    x. On-street parking
    xi. Chicanes/chokers
- Create urban non-motorized zones
- Provide bike parking in non-residential and multi-unit residential projects
- Dedicate land for bike trails
- Limit parking supply through:

i. Elimination (or reduction) of minimum parking requirements

ii. Creation of maximum parking requirements

iii. Provision of shared parking

- Require residential area parking permit.
- Provide ride-sharing programs

i. Designate a certain percentage of parking spacing for ride sharing vehicles

ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles

iii. Providing a web site or messaging board for coordinating rides

iv. Permanent transportation management association membership and finding requirement.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

MM-AQ1 As a condition of approval for any Discretionary or "Active Change Area Project," the City shall require all contractors to include the following best management practices in contract specifications:

a. Use properly tuned and maintained equipment.

b. Contractors shall enforce the idling limit of five minutes as set forth in the California Code of Regulations.

c. Use diesel-fueled construction equipment to be retrofitted with after treatment products (e.g. engine catalysts) to the extent they are readily available and feasible.

d. Use heavy duty diesel-fueled equipment that uses low NOx diesel fuel to the extent it is readily available and feasible.

e. Use construction equipment that uses low polluting fuels (i.e. compressed natural gas, liquid petroleum gas, and unleaded gasoline) to the extent available and feasible.

f. Maintain construction equipment in good operating condition to minimize air pollutants.

g. All diesel-powered construction equipment shall meet US Environmental Protection Agency Tier 2 or higher emissions standards according to the following schedule:

- **January 1, 2012 to December 31, 2014:** All off-road diesel-powered construction equipment greater than 50 horsepower shall meet Tier 3 off-road emissions standards. In addition, all construction equipment shall be outfitted with Best Available Control Technology (BACT) devices certified by California Air Resource Board (CARB). Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could

be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

- **Post-January 1, 2015**: All off-road diesel-powered construction equipment greater than 50 horsepower shall meet the Tier 4 emission standards, where available. In addition, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations.

h. Construction contractors shall use electricity from power poles rather than temporary gasoline or diesel power generators, as feasible.

i. Use building materials, paints, sealants, mechanical equipment, and other materials that yield low air pollutants and are nontoxic.

j. Construction contractors shall utilize super-compliant architectural coatings as defined by the South Coast Air Quality Management District (VOC standard of less than ten grams per liter).

k. Construction contractors shall utilize materials that do not require painting, as feasible.

l. Construction contractors shall use pre-painted construction materials, as feasible.

Mid-City Redevelopment Plan EIR:

MM-A1 **Fugitive Dust Control**. Maintain a fugitive dust control program consistent with the provisions of SCAQMD Rule 403 for any grading or earthwork activity that may be required. Measures to be implemented shall include: Wetting. Water all active projects with multiple daily applications to assure proper dust control. Haul Trucks. Wash down the under carriage of all haul trucks leaving site. Install vehicle wheel-washers before the roadway entrance at construction sites. Require all trucks hauling dirt, sand, soil, or other loose substances and building materials to be covered, or to maintain a minimum freeboard of two feet between the top of the load and the top of the truck bed sides. Unpaved Areas. Use of soil binders or vegetation; on all undeveloped or nonbuilt areas of the site. Chemically treat unattended construction areas disturbed lands which have been or are expected to be unused for four or more consecutive days). Require paving; curbing; and vegetative stabilization of the unpaved areas adjacent to roadways on which vehicles could potentially drive (i.e., road shoulders). Driveways and Curbs. Pave all driveways and internal roadways as early as practicable in the site construction process. Install all curbs at the initial phase 1 of development within the proposed Recovery Program Area. Street Sweeping. Utilize street sweeping equipment on all adjacent streets used by haul trucks or vehicles that have been on-site. Barriers. Construct a temporary wall or barriers of

sufficient height along the perimeter of the site to restrict windblown dust from affecting adjacent residences. Open Stock Piles. Contractors will cover, enclose, or chemically stabilize any open stockpiles. of soil, sand and/ or other aggregate materials. Phasing. Require a phased schedule for construction activities to minimize daily emissions. Suspend grading -operations during first- and second stage smog alerts, and during high winds, i.e., greater than 25 miles per hour: Vehicle's -on Unpaved Surfaces. Prohibit parking on unpaved and untreated parking lots. Enforce low vehicle speeds on unpaved roads or surface areas.

MM-A2 **Equipment Emissions.** Construction equipment will be shut off to reduce idling when not in direct use. Diesel engines, motors, or equipment shall be located as far away as possible from existing residential areas. Low sulfur fuel should be used for construction equipment.

MM-A3 **Location of Staging Areas**. If required, haul truck staging areas shall be approved by the Department of Building and Safety. Haul trucks shall be staged in nonresidential areas.

MM-A6 **Amenities for Nonvehicular' Modes**. Provision of amenities that would encourage transit; pedestrian or bicycle access to developments within the proposed Recovery Program Area. Such amenities would include bus shelters, visible signage identifying transit routes and stops, bike racks/shower facilities, bicycle lanes, attractive pedestrian pathways and sidewalks, shuttle service to nearby activity centers or park and ride lots, free information on transit, services, free or subsidized transit passes, and guaranteed ride home programs. This measure shall also entail the establishment of additional bus or transit stops and services; where feasible.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

As explained above, emissions generated during construction of the Project would exceed regional NOx concentration thresholds without mitigation. The mitigation measures identified above will reduce this impact to less than significant.

IV. BIOLOGICAL RESOURCES

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

Impact Analysis

a. ***Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?***

Less Than Significant Impact. The Project Site is located in an urbanized area in the City and is improved with a one-story 22,401 square-foot office on the West Site, and the East Site is vacant and is currently used by Metro as a construction staging area for the construction of the Expo/Crenshaw Line and station. The East Site is fully graded and void of all vegetation with the exception of three sycamore trees in the northwest corner of the site. The Project Site is not located within a Significant Ecological Area.[19] In addition, according to the West Adams-Baldwin Hills-Leimert Community Plan EIR, the Project Site is not within a biological resource area. However, **Figure 4.4-2: California Natural Diversity Database Resources**, of the West Adams-Baldwin Hills-Leimert Community Plan EIR, does show the Project Site is within the range of California Natural Diversity Database (CNDDB) listed plant species: Santa Barbara morning-glory, Braunton's milk-vetch, Davidson's salt scale, marsh sandwort, San Bernardino aster, Gambel's watercress, Los Angeles sunflower. However, given the level of disturbance of both the East and West Sites from previous development and the current condition of both sites habitat for these species does not exist on the Project Site. The Project Site does not contain any other critical habitat or support any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

In addition, according to the Tree Report (**Appendix B: Tree Report**) prepared for the Project, vegetation on the Project Site 44 on-site trees (41 trees on the West Site and 3 trees on the East Site) and 11 street trees in the public right-of-way (ROW) adjacent to the West Site. The 3 trees on the East Site are sycamore trees, which are protected under the City's tree ordinance.[20] The Project will require the removal of 41 on-site trees on the West Site and 2 street trees in the public ROW adjacent to it, and the 3 protected sycamore trees on the East Site.

These trees could potentially provide nesting sites for migratory birds and, for this reason, the Project would be required to comply with the Migratory Bird Treaty Act (MBTA) (Title 33, United States Code, Section 703 et seq., see also Title 50, Code of Federal Regulation, Part 10) and Section 3503 of the

19 Biodiversity Atlas LA,https://biodiversityla.org/conservation/significant-ecological-areas/, accessed December 2, 2019.
20 Crenshaw Crossing Tree Report Exposition and S. Crenshaw Boulevards, Los Aneles, CA, Carlberg Associates, September 02, 2019.

California Department of Fish and Wildlife Code, which requires the following to ensure that significant impacts to migratory birds would not occur:

- Conduct vegetation removal associated with construction from September 1st through January 31st, when birds are not nesting. Initiate grading activities prior to the breeding season (which is generally February 1st through August 31st) and keep disturbance activities constant throughout the breeding season to prevent birds from establishing nests in surrounding habitat (in order to avoid possible nest abandonment); if there is a lapse in activities of more than five days, pre-construction surveys shall be necessary as described in the bullet below; or
- Conduct pre-construction surveys for nesting birds if vegetation removal or grading is initiated during the nesting season. A qualified wildlife biologist shall conduct weekly pre-construction bird surveys no more than 30 days prior to initiation of grading to provide confirmation on the presence or absence of active nests in the vicinity (at least 300 to 500 feet around the individual construction site, as access allows). The last survey should be conducted no more than three days prior to the initiation of clearance/construction work. If active nests are encountered, clearing and construction in the vicinity of the nests shall be deferred until the young birds have fledged and there is no evidence of a second attempt at nesting. A minimum buffer of 300 feet (500 feet for raptor nests) or as determined by a qualified biologist shall be maintained during construction depending on the species and location. The perimeter of the nest-setback zone shall be fenced or adequately demarcated with staked flagging at 20-foot intervals, and construction personnel and activities restricted from the area. Construction personnel should be instructed on the sensitivity of the area. A survey report by the qualified biologist documenting and verifying compliance with the mitigation and with applicable State and federal regulations protecting birds shall be submitted to the City and County, depending on within which jurisdiction the construction activity is occurring. The qualified biologist shall serve as a construction monitor during those periods when construction activities would occur near active nest areas to ensure that no inadvertent impacts on these nests would occur.

Compliance with these existing regulations would ensure impacts would be less than significant.

b. *Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?*

No Impact. The Project Site is within an urban, developed area. No riparian or other sensitive natural vegetation communities are located on or adjacent to the Project Site. As previously discussed, the Project Site is not within or near to any riparian habitat or other identified sensitive natural community. Therefore, implementation of the Project would not result in any adverse impacts to riparian habitat or other sensitive natural communities, and no impact would occur.

c. ***Have a substantial adverse effect on State or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

No impact. The Project Site is in an urbanized area, largely developed, and neither the Site nor the surrounding areas contains any wetlands or riparian habitat. Therefore, the Project Site does not support any riparian or wetland habitat, as defined by Section 404 of the Clean Water Act. As such, no impacts to riparian or wetland habitats would occur with implementation of the Project.

d. ***Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

No impact. The Project Site is located in an urbanized area of Los Angeles. Due to the urbanized surroundings, there are no wildlife corridors or native wildlife nursery sites on the Project Site or in the Project Site vicinity. Thus, the Project would not interfere with the movement of any residents or migratory fish or wildlife. As such, no impact would occur.

e. ***Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?***

Less Than Significant Impact. The City has adopted policies and ordinances for the protection of trees. The City's Tree Preservation Ordinance has been adopted for identifying, promoting awareness, maintaining, and protecting designated protected trees located within the City. A tree report was prepared for the Project in accordance with the City of Los Angeles Tree Preservation Ordinance No. 177.404 (Chapter IV, Article 6 of the LAMC) and the City's Planning Division requirements.

As discussed above, the Project Site contains 44 on-site trees (41 trees on the West Site and 3 trees on the East Site) and 11 street trees in the public ROW adjacent to the West Site. The 3 trees on the East Site are Sycamore trees, which are protected under the City's ordinance.[21] The Project will require the removal of 41 on-site trees from the East Site, 2 street trees in public ROW adjacent to the West Site, and 3 protected Sycamore trees on the East Site. Impacts to any trees that meet the City of Los Angeles Tree Preservation Ordinance No. 177.404 would be considered potentially significant.

Replacement of the on-site Sycamore trees will occur at a four-to-one (4:1) ratio, all street trees will be replaced at a two-to-one (2:1) ratio. Accordingly, in addition to the 12 replacement Sycamore trees and

21 Crenshaw Crossing Tree Report Exposition and S. Crenshaw Boulevards, Los Aneles, CA, Carlberg Associates, September 02, 2019.

the 4 replacement street trees, the Project is also required to provide an additional 101 new trees, one tree for every four new residential units, pursuant to LAMC Section 12.21 G, of which 57 trees are required for the West Site and 44 trees are required for the East Site. The Project, however, will provide 157 new trees on-site and within the Project's adjacent ROW, consisting of 78 trees on or adjacent to the West Site and 79 trees on or adjacent to the East Site. All replacement trees will be reflected in the landscape design for the Project in compliance with the City of Los Angeles Tree Preservation Ordinance No. 177.404. Therefore, the Project would not conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance and potential impacts would be less than significant.

f. *Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or State habitat conservation plan?*

No Impact. The City has no adopted Habitat Conservation Plans or Natural Community Conservation Plans. Additionally, there are no species identified within the West Adams-Baldwin Hills-Leimert Community Plan EIR that are protected by the Endangered Species Act. Therefore, the Project would not conflict with an adopted habitat conservation plan. As such, no impact would occur.

Cumulative Impacts

Less Than Significant Impact. The Project would have a less than significant impact upon biological resources with regulatory compliance. Development of the Project in combination with the related projects indicated in **Table 2.0-2** and **Figure 2.0-11**, would not significantly impact wildlife corridors or habitat for any candidate, sensitive, or special status species identified in local plans, policies, or regulations, or by the CDFG or the USFWS. No such habitat occurs in the vicinity of the Project Site or related projects due to the existing urban development. The five related projects near the Project Site are on existing developed parcels were with no valuable wildlife habitat, native or otherwise. However, development of any of the related projects would be subject to the City of Los Angeles Tree Preservation Ordinance. As mentioned previously, there are currently no habitat conservation plans or natural community conservation plans within the City. As such, no cumulative impacts regarding adopted habitat conservation plan would occur. Thus, cumulative impacts to biological resources would be less than significant during construction or operation.

Mitigation Measures

Incorporation of Prior Mitigation

As discussed in Section 3.3 of this SCEA, PRC Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports (EIRs).

The following mitigation measures from prior applicable EIRs incorporated into the Project will further reduce the less than significant impacts of the Project.

SCAG 2020–2045 RTP/SCS Program EIR:

No biological resources mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

MM-BR2 Any approval of a Discretionary project or "Active Change Area Project" shall ensure that during the final design phase of the proposed project, and prior to the start of the demolition/construction phase, the project applicant shall submit a final landscape plan to the City of Los Angeles for approval by the City's Chief Forester and the Director of the Bureau of Street Services. The final landscape plan shall include provisions to either protect in place the existing protected trees in or adjacent to the project site, per the requirements of the City of Los Angeles Tree Preservation Ordinance.

Mid-City Redevelopment Plan EIR:

No biological resources mitigation measures were identified.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

No prior mitigation measures were identified, and no project specific mitigations are proposed for the Project.

V. CULTURAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☒	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☐	☒	☐
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

Impact Analysis

a. *Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?*

Less Than Significant Impact. Section 15064.5 of the State CEQA Guidelines defines a historical resource as: (1) a resource listed in or determined to be eligible by the State Historical Resources Commission for listing in the California Register of Historical Resources; (2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain State guidelines; or (3) an object, building, structure, site, area, place, record, or manuscript 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 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.

Further, CEQA defines historically significant resources as "resources listed or eligible for listing in the California Register of Historical Resources (CRHR)" (PRC Section 5024.1). A cultural resource may be considered historically significant if the resource is 45 years old or older, possesses integrity of location, design, setting, materials, workmanship, feeling, and association, and meets any of the following criteria for listing on the CRHR:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
2. Is associated with the lives of persons important in our past
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or,
4. Has yielded, or may be likely to yield, information important in prehistory or history (PRC Section 5024.1).

The City of Los Angeles Cultural Heritage Ordinance, enacted in 1962, has made possible the designation of buildings and sites as individual local landmarks, called Historic-Cultural Monuments. Historic-Cultural Monument designation is reserved for those resources that have a special aesthetic, architectural, or engineering interest or value of a historic nature. The Cultural Heritage Ordinance (Section 22.171.7) establishes criteria for designation. A proposed Monument may be designated by the City Council, upon the recommendation of the Commission, if it meets at least one of these criteria:

1. Is identified with important events in the main currents of national, state or local history, or exemplifies significant contributions to the broad cultural, political, economic or social history of the nation, state, city, or community; or
2. Is associated with the lives of historic personages important to national, state, city, or local history; or
3. Embodies the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder or architect whose genius influenced his or her age; or possesses high artistic values; or
4. Has yielded, or has the potential to yield, information important to the pre-history or history of the nation, state, city or community.

In order to determine if the building constructed in 1973[22] located at 3606 W. Exposition Boulevard is historically significant, a *Historical Resource Assessment* was conducted for the Project (See **Appendix C.1**). This building, which is the only building remaining on the Project Site, is a one-story modern-style government building which features an irregular plan, flat roof with a short parapet, and stucco and brick siding. Additionally, metal signage reading "County of Los Angeles Department of Probation" is located along the roof line in the western portion of the property. This structure was evaluated by the *Historical Resource Assessment* for historical significance by applying the criteria of the CRHR and the City Register

22 City of Los Angeles Department of Building and Safety, Document Number 1973NJ00067, accessed December 31, 2019.

using information acquired through historical research and data gathered during a survey of the property. The following determinations were made for each criterion:

CRHR Criterion 1: 3606 W. Exposition Boulevard does not meet CRHR Criterion 1 for association with events that have made a significant contribution to the broad patterns of California's history and cultural heritage. The building located at 3606 W. Exposition Boulevard was developed as a county satellite building in 1973. The *Historical Resource Assessment* did not discover any information to suggest that the building is specifically associated with any important historical events. Therefore, 3606 W. Exposition Boulevard is not eligible for the CRHR under Criterion 1.

CRHR Criterion 2: 3606 W. Exposition Boulevard does not meet CRHR Criterion 2 for any direct associations with the productive lives of persons important in local, State, or national history. While many employees have worked in the building over its history and many people have utilized the building as part of their probation agreements, research has yielded no information to suggest that any person of historical significance is specifically associated with this building. Therefore, 3606 W. Exposition Boulevard is not eligible for the CRHR under Criterion 2.

CRHR Criterion 3: 3606 W. Exposition Boulevard does not meet CRHR Criterion 3 for embodying the distinctive characteristics of a type, period, and method of construction, or as the work of an important creative individual, or as having high artistic value. The building is a common and unremarkable example of modern-style architecture typical of government buildings during the 1970s. This is one of many government buildings constructed during the 1970s and does not convey any distinction in design. The architect and builder were not identified, however; it is unlikely that the building is the work of a master. Therefore, the 3606 W. Exposition Boulevard is not eligible for the CRHR under Criterion 3.

CRHR Criterion 4: 3606 W. Exposition Boulevard does not meet CRHR Criterion 4 since it is unlikely to yield information important to prehistory or history. It is unlikely that this property has the potential to broaden our understanding of California, 1970s building construction, or the history of Los Angeles. Therefore, 3606 W. Exposition Boulevard is not eligible for the CRHR under Criterion 4.

City Criterion 1: 3606 W. Exposition Boulevard does not meet City Criterion 1 for association with the main currents of national, State or local history, and for exemplifying significant contributions to the broad cultural, political, economic or social history of the nation, State, city, or community. The building located at 3606 W. Exposition Boulevard was developed as a county satellite building in the 1970s. The *Historical Resource Assessment* did not discover any information to suggest that the building is specifically associated with any important historical events. Therefore, 3606 W. Exposition Boulevard is not eligible for the City Register under Criterion 1.

City Criterion 2: 3606 W. Exposition Boulevard does not meet City Criterion 2 for association with the lives of historic personages important to national, State, city, or local history. While many employees have worked in the building over its history and many people have utilized the building as part of their probation agreements, research has yielded no information to suggest that any person of historical significance is specifically associated with this building. Therefore, 3606 W. Exposition Boulevard is not eligible for the City Register under Criterion 2.

City Criterion 3: 3606 W. Exposition Boulevard does not meet City Criterion 3 for embodying the distinctive characteristics of a style, type, period, or method of construction; or represents a notable work of a master designer, builder or architect whose genius influenced his or her age; or possesses high artistic values. The building is a common and unremarkable example of Modern-style architecture typical of government buildings during the 1970s. This is one of many government buildings constructed during the 1970s and does not convey any distinction in design. Therefore, 3606 W. Exposition Boulevard is not eligible for the City Register under Criterion 3.

City Criterion 4: 3606 W. Exposition Boulevard does not meet City Criterion 4 since it is unlikely to significant and important information regarding the prehistory or history of the nation, State, County, or community. It is unlikely that this property has the potential to broaden our understanding of California, 1970s building construction, or the history of Los Angeles. Therefore, 3606 W. Exposition Boulevard is not eligible for the City Register under Criterion 4.

In summary, it was determined that the on-site administrative building is not eligible for the CRHR or the City Register under any criteria. For these reasons, the existing building located at 3606 W. Exposition Boulevard on the West Site is not considered a historic resource.

The *Historical Resource Assessment* conducted a records search within a 0.25-mile radius study area around the Project Site to identify historic resources that could be affected by the Project. No California Points of Historical Interest, California Historical Landmark, or CRHR listed or eligible properties are within this 0.25-mile radius Study Area. No previously recorded historic built environment resources are within this 0.25-mile radius Study Area (see **Appendix C.1**).

Two buildings in the area were identified or as eligible for listing in the National or California Register of Historic Buildings or for local listing. Both buildings were determined to be eligible for featuring distinct architectural styling by notable architects. The building located at 3651 S. Crenshaw Boulevard, approximately 90-feet south of the Project Site on the southwest corner of Obama Boulevard and Crenshaw Boulevard, is notable for its Streamline Modern design. This building may not retain sufficient integrity for National Register eligibility due to previous storefront alterations. The building at 3683 S.

Crenshaw Boulevard, approximately 420-feet south of the Project Site, is notable for its Corporate International styling.

These buildings are located approximately 290-feet apart from each other along the west side of Crenshaw Boulevard. The buildings are not part of a larger historic district and are separated by six other commercial buildings not designated or eligible as historic. The West Site is approximately 90-feet north of 3651 S. Crenshaw Boulevard, separated by Obama Boulevard from the block containing these buildings. The Project would not adversely affect the visual prominence of these buildings due to the distance between the Project and these buildings and the streetscape design features of the Project. The Project would not result in an adverse change to the existing visual character of the Crenshaw Boulevard and, for this reason, would not have adverse effect on the existing setting for these buildings. Additionally, with respect to the potential for impacts on structures from construction of the Project, as analyzed in section **XII: Noise.** The Project would include piles that be drilled and not driven, and the use of vibratory rollers would be limited, to avoid any impacts from vibration.

b. ***Cause a substantial adverse change in the significance of an archaeological resource pursuant to section 15064.5?***

Less Than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a significant impact may occur if grading or excavation activities associated with Project construction would disturb archaeological resources. A *Cultural Resource Inventory* was conducted for the Project Site in September 2019 (refer to **Appendix C.2**). No prehistoric or historical archaeological resources were identified as a result of the records search. The Project Site is developed with one building and associated surface parking lot on the West Site and the East Site was previously developed and is currently being used as a construction staging area for the LAX/Crenshaw Line. Construction of the Project construction would include demolition of the existing building and site improvements on the West Site and grading on both the East and West Sites for development of the proposed mixed-use buildings. Grading would involve excavations of depths between 12 and 17 feet on the East Site for the proposed subterranean parking garage, whereas grading on the West Site would involve approximately 12 inches. Both sites would require piles to be drilled at a depth of at least 30 feet for foundation support.

The potential exists for the accidental discovery of archaeological materials during grading. If archaeological resources are discovered during excavation, grading, or construction activities, work will cease in the area of the find until a qualified archaeologist has evaluated the find in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Personnel of the Project will not collect or move any archaeological materials and associated materials. Construction activity may continue unimpeded on other portions of the Project Site. The found

deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Through compliance with the regulatory standards described above, potential Project construction impacts to human remains would be less than significant.

c. *Disturb any human remains, including those interred outside of dedicated cemeteries?*

Less Than Significant Impact. While the Project Site has been previously disturbed due to grading for previous development, the grading needed to construct the Project could result in a significant adverse effect due to potential disturbance of human remains. However, no human remains are known to exist at the Project Site. In accordance with the State's Health and Safety Code Section 7050.5, in the event of discovery or recognition of any human remains at the Project Site, no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Los Angeles County Coroner has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the PRC. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and if the coroner recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission. Through compliance with the regulatory standards described above, potential Project impacts to human remains would be less than significant.

Cumulative Impacts

Less than Significant Impact. The Project would have a less than significant impact upon cultural resources. Development of the Project in combination with the related projects indicated in **Table 2.0-2** and **Figure 2.0-11** would not significantly impact any cultural resources, as no California Points of Historical Interest, California Historical Landmark, or CRHR listed or eligible properties are on or within the vicinity of Project (see **Appendix C.1**). The five related projects near the Project Site are on existing developed sites and would be subject to the same regulatory measures applicable to discoveries of cultural and archeological resources and human remains. As such, no significant cumulative impacts cultural resources would result from the Project and related projects.

Mitigation Measures

Incorporation of Prior Mitigation

As discussed in Section 3.3 of this SCEA, PRC Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports (EIRs).

The following mitigation measures from prior applicable EIRs incorporated into the Project will further reduce the less than significant impacts of the Project.

SCAG 2020–2045 RTP/SCS Program EIR:

No cultural resources mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

MM-CR4 Any approval of a Discretionary project or "Active Change Area Project" shall ensure that prior to excavation and construction on a proposed project site, the project applicant shall perform a cultural resources literature and records search by an institution recognized and approved by the City of Los Angeles Planning Department to assess the potential for the proposed project site to contain sensitive protected cultural resources.

MM-CR5 Any approval of a Discretionary project or "Active Change Area Project" (defined in the West Adams-Baldwin Hills-Leimert Community Plan EIR as areas where active changes were made by the CPIO subdistrict and Specific Plan Amendment) shall ensure that prior to excavation and construction on a proposed project site, the prime construction contractor and any subcontractor(s) shall be cautioned on the legal and/or regulatory implications of knowingly destroying cultural resources or removing artifacts, human remains, bottles, and other cultural materials from the proposed project site. ("Active" change areas include intensifying development around transit stations within the TOD CPIO subdistricts. Projects in these areas are similarly referred to as "Active Change Area Projects.")[23]

MM-CR6 Any approval of a Discretionary project or "Active Change Area Project" shall ensure that if during any phase of project construction any cultural materials are encountered, construction activities within a 50-meter radius shall be halted immediately, and the

23 West Adams New Community Plan Draft EIR, https://planning.lacity.org/eir/WestAdams/DEIR/3.0%20Project%20Description.pdf, accessed June 29, 2020.

project applicant shall notify the City. A qualified prehistoric archaeologist (as approved by the City) shall be retained by the project applicant and shall be allowed to conduct a more detailed inspection and examination of the exposed cultural materials. During this time, excavation and construction would not be allowed in the immediate vicinity of the find. However, those activities could continue in other areas of the project site.

MM-CR7 Any approval of a Discretionary project or "Active Change Area Project" shall ensure that if any find were determined to be significant by the archaeologist, the City and the archaeologist would meet to determine the appropriate course of action.

MM-CR8 Any approval of a Discretionary project or "Active Change Area Project" shall ensure that all cultural materials recovered from the site would be subject to scientific analysis, professional museum curation, and a report prepared according to current professional standards.

Mid-City Redevelopment Plan EIR:

No cultural resources mitigation measures were identified.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

These mitigation measures from prior applicable EIRs incorporated into the Project will further reduce the less than significant impacts of the Project.

VI. ENERGY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The following plans and policies address energy efficiency.

U.S. Clean Power Plan

On October 23, 2015, the EPA issued the Clean Power Plan under Section 111(d) of the Clean Air Act. The Clean Power Plan is also known as the Carbon Pollution Emission Guidelines for Existing Stationary Sources: Electric Utility Generating Units rule. The goal of the Clean Power Plan is to reduce carbon dioxide (CO2) emissions from existing power plants 32 percent from 2005 levels by 2030, with incremental interim goals for years 2022 through 2029. The Clean Power Plan set a CO2 emission reduction target for each state and requires each state to develop a plan to achieve the target. At the same time EPA issued the Carbon Pollution Standards for New, Modified and Reconstructed Power Plants rule under Section 111(b) of the Clean Air Act, to limit CO2 emissions from new, modified, or reconstructed electricity generating units by implementing Best System of Emissions Reduction (BSER) for each type of generating unit. California's Proposed Compliance Plan for the Federal Clean Power Plan was adopted by CARB on July 27, 2017.

Assembly Bill 32

As discussed in **Section VIII: Greenhouse Gas Emissions**, the State passed the Global Warming Solutions Act of 2006, commonly referred to as Assembly Bill (AB) 32, which set the GHG emissions reduction goal for the State of California into law. As defined under AB 32, GHGs include CO2, CH4, nitrous oxide (N2O), sulfur hexafluoride (SF6), perfluorocarbons (PFCs), hydrofluorocarbons (HFCs), and water vapor (H2O). AB 32 requires CARB—the State agency charged with regulating Statewide air quality—to adopt rules and regulations that would achieve GHG emissions equivalent to Statewide levels in 1990 by 2020 by reducing GHG emissions from significant sources via regulation, market mechanisms, and other actions.

SB 375, passed in 2008, links transportation and land use planning with global warming. It requires CARB to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law,

if regions develop integrated land use, housing, and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA.

Senate Bill 1368

SB 1368, the California Greenhouse Gas Emissions Performance Standard Act, enacted in 2006, prohibits California utilities from entering into long-term financial commitments for base load generation, unless it complies with the GHG emissions performance standard. As this standard also applies to existing power plants for any long-term investments or contractual extensions, it affects Los Angeles Department of Water and Power (LADWP)'s coal-fired generation resources.

Senate Bill 2 (1X)

SB 2 (1X) was passed in April 2011 and became effective December 10, 2011, requires utilities to procure eligible renewable energy resources of 33 percent by 2020, including the following interim targets:

- Maintain at least an average of 20 percent renewables between 2011 and 2013.
- Achieve 25 percent renewables by 2016.
- Achieve 27 percent renewables by 2017.
- Achieve 29 percent renewables by 2018.
- Achieve 31 percent renewables by 2019.
- Achieve 33 percent renewables by 2020.

Senate Bill 350

SB 350, which was passed in September 2015 and became effective October 7, 2015, requires utilities to procure eligible renewable energy resources of 50 percent by 2030, including the following interim targets:

- Achieve 40 percent renewables by 2024.
- Achieve 45 percent renewables by 2027.
- Achieve 50 percent renewables by 2030 and maintain this level in all subsequent years.

SB 350 also requires a doubling of energy efficiency of buildings and conservation savings in electricity and natural gas end uses of retail energy by 2030. The law requires publicly owned utilities to establish annual targets for energy efficiency savings and demand reductions consistent with the Statewide goal. The Public Utilities Commission also must approve programs and investments by electrical corporations in transportation electrification, including electric vehicle charging infrastructure.

Senate Bill 32

SB 32, signed in 2016, updated AB 32 to include an emissions reduction goal for the year 2030. Specifically, SB 32 requires the State board to ensure that Statewide GHG emissions are reduced to 40 percent below the 1990 level by 2030. The new plan, outlined in SB 32, involves increasing renewable energy use, imposing tighter limits on the carbon content of gasoline and diesel fuel, putting more electric cars on the road, improving energy efficiency, and curbing emissions from key industries.

CEQA Guidelines Appendix F

In accordance with Appendices F and G of the CEQA Guidelines, and in order to ensure that energy implications are considered in project decisions, projects are required to include a discussion of the potential significant energy impacts, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy (PRC Section 21100(b)(3)). The 2020 update to Appendix G of the CEQA Guidelines now provides that if a project would result in potentially significant environmental effects due to wasteful, inefficient, or unnecessary consumption of energy resources, or conflict with or obstruct a State or local plan for renewable energy or energy efficiency, then an EIR shall be prepared for the project that includes mitigation measures for that energy use. The project's analysis should include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project's size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project as further described below under Appendix F of the CEQA Guidelines.

Appendix F of the CEQA Guidelines provides a list of energy-related topics that may be discussed in an EIR, where topics are applicable or relevant to the project, including:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal. If appropriate, the energy intensiveness of materials may be discussed;
2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;
3. The effects of the project on peak and base period demands for electricity and other forms of energy;
4. The degree to which the project complies with existing energy standards;
5. The effects of the project on energy resources;
6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

Impact Analysis

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. The following analysis estimates the Project's electricity, natural gas, and transportation fuel usage and evaluates whether the Project would result in wasteful, inefficient, or unnecessary consumption of energy. In accordance with Appendix F of the CEQA Guidelines, the analysis includes relevant information to address the energy implications of the Project.

LADWP provides electrical service throughout the City. LADWP generates power from a variety of energy sources, including hydropower, coal, gas, nuclear sources, and renewable resources, such as wind, solar, and geothermal sources. According to LADWP's 2017 Power Strategic Long-Term Resource Plan, LADWP has a net dependable generation capacity greater than 7,531 megawatts (MW).[24] In 2017, LADWP's power system experienced an instantaneous peak demand of 6,431 MW. Approximately 29 percent of LADWP's 2016 electricity purchases were from renewable sources, which is similar to the 25 percent Statewide percentage of electricity purchases from renewable resources.

According to the CEC, transportation accounts for nearly 40 percent of California's total energy consumption. In 2018, the most recent year of publicly available data, California consumed approximately 681,272,000 barrels (28,613,424,000 gallons, or 42 gallons per barrel) of petroleum for transportation.[25] Incentive programs, such as the CEC's Alternative and Renewable Fuel and Vehicle Technology Program (ARFVTP), are helping the State to reduce its dependency on gasoline. Several regulations adopted by California to reduce GHG emissions, such as SB 375, have the added benefit of reducing the State's demand on petroleum-based fuels by requiring reductions in vehicle miles traveled (VMT) and by reducing the carbon intensity of transportation fuels. The CEC predicts that the demand for gasoline will continue to decline over the upcoming years, and there will be an increase in the use of alternative fuels.[26]

The Project would comply with Title 24, Part 6 of the California Code of Regulations (CCR), also known as Building Energy Efficiency Standards, which regulates the design of building shells and building components. Moreover, by constructing and operating the Project to be comparable to LEED v4 Silver requirements, the Project would exceed Title 24 standards by 20 percent. The Title 24 standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency

24 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017

25 US Energy Information Administration, Independent Statistics & Analysis, Table F16: Total Petroleum Consumption Estimates, 2018, https://www.eia.gov/state/seds/data.php?incfile=/state/seds/sep_fuel/html/fuel_use_pa.html&sid=US, accessed June 2020.

26 CEC, Final 2019 Integrated Energy Policy Report, https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2019-integrated-energy-policy-report, accessed June 2020.

technologies and methods. The CEC adopted the 2019 Building Energy Efficiency Standards (2019 Building Standards), effective January 1, 2020.[27]

In addition to the CEC's efforts, in 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11 of Title 24), commonly referred to as CALGreen, establishes voluntary and mandatory standards pertaining to the planning and design of sustainable site development, energy efficiency, water conservation, material conservation, and interior air quality. CALGreen is periodically amended; the most recent 2019 standards became effective on January 1, 2020 and would apply to the Project. The Project would also be required to comply with the L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Compliance with these State and local codes and commitments to voluntary measures such as the commitment for the Project to meet energy efficiency standard comparable to LEED Silver, and measures identified in the approved Water Supply Assessment including the use of high efficiency toilets and showerheads, Energy Star washers, water-saving pool features, and drought tolerant landscaping would ensure the efficient use of energy resources during construction and operation of the Project.

Construction

During construction, energy would be directly consumed on a limited basis to power lights, and electronic equipment, and indirectly for the conveyance of water used for dust control during grading. As discussed below, construction activities, including the construction of new buildings, typically do not involve the consumption of natural gas. Construction would also consume energy in the form of petroleum-based fuels associated with the use of off-road construction vehicles and equipment within the Project Site, construction worker travel, haul trips, and delivery trips.

As shown in **Table 4.6-1: Summary of Energy Use During Construction** and additionally discussed below, a total of approximately 29,529 kilowatt-hours (kWh) of electricity, 283,965 gallons of diesel fuel, and 77,095 gallons of gasoline is estimated to be consumed during construction of the Project.

27 CEC, 2019 Building Energy Efficiency Standards, https://www.energy.ca.gov/title24/2019standards/, accessed June 2020.

Table 4.6-1
Summary of Energy Use During Construction

Fuel Type	Quantity
Electricity	
Lighting, Construction Equipment, Water Conveyance	29,529 kWh
Diesel	
On-Site Construction Equipment	188,424 gallons
Off-Site Motor Vehicles	95,541 gallons
Total	**283,965 gallons**
Gasoline	
On-Site Construction Equipment	0 gallons
Off-Site Motor Vehicles	77,095 gallons
Total	**77,095 gallons**

Source: Refer to **Appendix D** for detailed calculations.

Electricity

During construction, electricity would be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. Electricity would be supplied to the Project Site by LADWP distribution infrastructure and would be obtained from existing substations and electrical lines in and around the Project Site.

As shown in **Table 4.6-1** above, a total of approximately 29,529 kWh of electricity is anticipated to be consumed during construction. The electricity demand at any given time would vary throughout the construction period based on the construction activities being performed and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption.

Due to the relatively short duration of the construction process, and the fact that the extent of electricity consumption is inherent to construction projects of this size and nature, electricity consumption impacts would not be considered excessive or substantial with respect to regional supplies. The energy demands during construction would be typical of construction projects of this size and construction of the Project would not result in the wasteful, inefficient, or unnecessary consumption of electricity resources. Accordingly, electricity demands during construction would be less than significant.

Natural Gas

Construction activities do not typically involve the consumption of natural gas as construction equipment and staging rely heavily on electricity and transportation fuels. Accordingly, natural gas would likely not be needed to support construction activities; thus, there would be little to no demand generated by construction. As a result, the Project would not result in inefficient, or unnecessary consumption of natural gas during construction. Accordingly, natural gas demands during construction would be less than significant.

Transportation Energy

Project construction would consume energy in the form of petroleum-based fuels associated with use of off-road construction vehicles and equipment on the Project site, construction worker travel to and from the Project site, and delivery and haul truck trips (e.g., for deliveries of construction supplies and materials).

The petroleum-based fuel use summary provided in **Table 4.6-1** represents the amount of transportation energy that could potentially be consumed during construction based on a conservative set of assumptions. As shown, on- and off-road vehicles would consume an estimated 361,060 gallons of petroleum (77,095 gallons of gasoline and 283,965 gallons of diesel fuel) throughout the Project's construction period. For purposes of comparison, the Energy Information Administration (EIA) forecasts a national oil supply of 20.47 million barrels (mb) per day in 2021, which is the first year of construction for the Project.[28] This equates to approximately 7,472 mb per year or 313,805 million gallons (mg) per year. Construction of the Project would account for less than 0.01 percent of the projected annual oil supply in 2021.

Due to the relatively short duration of the construction process, and the fact that the extent of fuel consumption is inherent to construction projects of this size and nature, fuel consumption impacts would not be considered excessive or substantial with respect to regional fuel supplies. The energy demands during construction would be typical of construction projects of this size and would not necessitate additional energy facilities or distribution infrastructure. The Project will also comply with Sections 2485 in Title 13 of the California Code of Regulations, which requires the idling of all diesel fueled commercial vehicles be limited to five minutes at any location. As a result, the Project would not result in inefficient, or unnecessary consumption of transportation resources during construction. Accordingly, transportation resource demands during construction would be less than significant.

28 U.S. Energy Information Administration, Annual Energy Outlook 2020: Table 11. Petroleum and Other Liquids Supply and Disposition, https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2020&cases=ref2020&sourcekey=0, accessed June 2020.

Operation

During operation of the Project, energy would be consumed for multiple purposes associated with the proposed residential uses, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and machinery. Energy would also be consumed during operation of the Project in the form of water usage, solid waste disposal, and vehicle trips, among others. Consistent with the development requirements established by Metro for the Project, the Project would be constructed to meet LEED Silver standard or equivalent to create efficient green buildings. The Project would also implement voluntary measures included in the approved Water Supply Assessment including high efficiency toilets and showerheads, Energy Star washers, water-saving pool features, and drought tolerant landscaping. As shown in **Table 4.6-2: Summary of Annual Energy Use During Operation**, the Project's energy demand would be approximately 2,426,221 kWh of electricity per year and 3,402,044 kBTU per year.

Table 4.6-2
Summary of Annual Energy Use During Operation

Source	Units	Quantity
Electricity		
Residential	kWh/yr.	1,543,300
Retail	kWh/yr.	510,156
Water	kWh/yr.	372,765
Electricity Total	**kWh/yr.**	**2,426,221**
Natural Gas		
Residential	kBTU/yr.	3,344,240
Retail	kBTU/yr.	57,804
Natural Gas Total	**kBTU/yr.**	**3,402,044**
Transportation Energy		
Diesel	Gallons/yr.	56,896
Gasoline	Gallons/yr.	313,743
Fuel Total	**Gallons/yr.**	**370,639**

*Source: Refer to **Appendix D** for detailed calculations.*
Notes: kWh/yr. = kilowatt-hours per year; kBtu/yr. = thousand British Thermal Units per year.
Electricity and Natural Gas for the Project is total yearly operational usage. Mobile gasoline and diesel usage were calculated using CalEEMod output data

The proposed uses would consume 56,896 gallons of diesel fuel per year and 313,743 gallons of gasoline per year. These calculations incorporate regulatory requirements established by the California Building Code and the L.A. Green Building Code related to water and energy conservation, water quality, and green building practices. Additionally, the Project's landscape guidelines would incorporate sustainable site

design practices and focus on enhancing and improving landscaping features throughout the Project Site and would emphasize the use of native species and drought tolerant landscaping.

In accordance with the L.A. Green Building Code, the Project would be designed and constructed to incorporate environmentally sustainable design features that would be equivalent to the Silver level under the LEED green building program. LEED standards would be incorporated through measures that would reduce energy and water usage, and thus reduce associated GHG emissions. Thus, the Project would incorporate an environmentally sustainable design using green building technologies that involve more resource-efficient modes of construction through energy efficiency, water conservation, environmentally preferable building materials, and waste reduction. Sustainability features incorporated into the Project would include the following:

- 20% Improvement on Title 24- 2019 through use of cool roofing and phase change materials (PCMs) for insulation and reflectivity.
- Optimized façade design for maximum daylight and natural ventilation potential, minimum solar gain and heat loss.
- Lighting Power Densities at 15% below code or lower.
- Daylight and motion lighting controls which react to variables like such as heat or motion by turning lights on or off.
- Energy Star appliances.
- Building-Level Energy Metering.

Without the incorporation of the features described above, the Project would result in an on-site demand for electricity of 2,724,852 kWh per year.[29] As shown in **Table 4.6-2** above, with incorporation of the sustainability features identified above, and compliance with 2019 Title 24 standards and applicable CALGreen and L.A. Green Building Code requirements, buildout of the Project would result in a projected on-site demand for electricity, totaling 2,426,221 kWh per year. Incorporation of the Project's sustainability features would reduce operational electricity demand by 298,631 kWh per year. As a result, the Project would not result in inefficient, or unnecessary consumption of electricity during operation. Accordingly, electricity demand during operation would be less than significant.

Natural Gas

Without the incorporation of the sustainability features described above, the Project would result in an on-site demand for natural gas, totaling 3,763,223 kBTU per year.[30] As shown in **Table 4.6-2** above, with

29 Refer to **Appendix D** for detailed calculations.
30 Refer to **Appendix D** for detailed calculations.

compliance with the sustainability features, and Title 24 standards and applicable CALGreen and L.A. Green Building Code requirements, buildout of the Project is projected to generate an on-site demand for natural gas totaling 3,402,044 kBTU per year. As such, incorporation of the Project's sustainability features would reduce operational natural gas demand by 361,179 kBTU per year.

A will serve request letter was sent to the SoCal Gas to confirm there is sufficient capacity to serve the Project. Based on the response from SoCal Gas, there would be sufficient capacity to serve the Project.[31] As a result, the Project would not result in inefficient, or unnecessary consumption of natural gas during operation. Accordingly, natural gas demand during operation would be less than significant.

Transportation Energy

The Project Site is located in a City designated Transit-Oriented Development (TOD) Area, specifically Subarea A of the Crenshaw Corridor Specific Plan, which would decrease the Project's transportation energy use by offering transit opportunities for residents and employees which would reduce vehicle trips and the consumption of transportation-related resources. The Project Site is served by several bus lines and two adjacent Metro rail lines within walking distance. Further, the Project would facilitate the design of a pedestrian-oriented, walkable neighborhood to encourage walkability and minimize the necessity of automobile trips and would provide the code required number of bicycle spaces, all of which would promote the use of sustainable modes of transportation. These features would serve to reduce transportation fuel consumption.

Operation of the Project would generate vehicle trips associated with people driving to the Project Site for work or home and driving to and from work and other destinations throughout the region. Based on the trip generation rates provided in the Transportation Assessment Study **(Appendix J.1)** as well as the estimate of VMTs that will be generated by the Project, it is estimated that operation of the Project would result in approximately 9,058,935 VMT on an annual basis resulting in an estimated annual consumption of approximately 313,743 gallons of gasoline fuel and 56,896 gallons of diesel fuel, as shown in **Table 4.6-2** above.[32]

For purposes of comparison, the U.S. Energy Information Administration (EIA) forecasts a national oil supply of 20.34 mb per day in 2023, which is the opening year for the Project.[33] This equates to approximately 7,424 mb per year or 311,812 mg per year. Operation of the Project would account for less than 0.01 percent of the projected annual oil supply in 2023. The Project would not result in inefficient, or

31 KPFF, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, September 2019.
32 Nelson\Nygaard Consulting Associates, Draft Crenshaw Crossing Transportation Analysis, October 2019.
33 U.S. Energy Information Administration, Annual Energy Outlook 2020: Table 11. Petroleum and Other Liquids Supply and Disposition, https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2020&cases=ref2020&sourcekey=0, accessed June 2020.

unnecessary consumption of energy resources for transportation during operation and the impact of the Project would be less than significant.

b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Electricity

Less than Significant Impact. The 2017 Power Strategic Long-Term Resource Plan (SLTRP)[34] document serves as a comprehensive 20-year roadmap that guides the LADWP's Power System in its efforts to supply reliable electricity in an environmentally responsible and cost effective manner. The 2017 SLTRP re-examines and expands its analysis on the 2016 Final Power Integrated Resource Plan (IRP) recommended case with updates in line with latest regulatory framework, and updates to case scenario assumptions that include a 65 percent renewable portfolio standard by 2050.

The 2017 SLTRP provides detailed analysis and results of several new IRP resource cases which investigated the economic and environmental impact of increased local solar and various levels of transportation electrification. In analyzing the IRP cases and recommending a strategy to best meet the future electric needs of Los Angeles, the SLTRP uses system modeling tools to analyze and determine the long-term economic, environmental, and operational impact of alternative resource portfolios by simulating the integration of new resource alternatives within our existing mix of assets and providing the analytic results to inform the selection of a recommended case.

The SLTRP also includes a general assessment of the revenue requirements and rate impacts that support the recommended resource plan through 2037. While this assessment will not be as detailed and extensive as the financial analysis to be completed for the ongoing rate action for the 2018/19 fiscal year and beyond, the SLTRP clearly outlines the general requirements. As a long-term planning process, the SLTRP examines a 20-year horizon in order to secure adequate supplies of electricity. In that respect, it is LADWP's desire that the SLTRP contribute towards future rate actions by presenting and discussing the programs and projects required to fulfill the Los Angeles City Charter mandate of delivering reliable electric power to the City of Los Angeles.

Regulatory interpretations of primary regulations and State laws affecting the Power System, including AB 32, SB 1368, SB 1, SB 2 (1X), SB 350, SB 32, US EPA Rule 316(b), and the US Clean Power Plan as described above, continue to evolve particularly with certification requirements of existing renewable projects and their applicability towards meeting in-state or out-of-state qualifications. This year's SLTRP attempts to incorporate the latest interpretation of these major regulations and State laws.

34 LADWP, 2017 Power Strategic Long-Term Resource Plan, December 2017.

The Project would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code and the L.A. Green Building Code. The L.A. Green Building Code, effective January 1, 2017, requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. The L.A. Green Building Code contains both mandatory and voluntary green building measures to conserve energy. Therefore, compliance with Title 24 of the California Administrative Code and the L.A. Green Building Code would reduce the Project Sites energy consumption. Additionally, as discussed above, electric service is available and would be provided to the Project Site. The availability of electricity is dependent upon adequate generating capacity and adequate fuel supplies. The estimated power requirements for the Project Site is part of the total load growth forecast for the City of Los Angeles and has been taken into account in the planned growth of the City's power system.[35] Moreover, LADWP plans to increase renewable energy sources to meet the City's goals for a clean energy future. Specifically, the goals include supplying 55 percent of power retail sales from renewable energy resources by 2025, 80 percent by 2036, and 100 percent by 2045, as well as achieve a carbon neutral power system by 2050.[36]

As described above, the Project would be designed and constructed to incorporate environmentally sustainable design features that would be equivalent to the Silver level under the LEED green building program that would reduce energy and water usage. Specifically, the Project would include energy efficient lighting fixtures, ENERGY Star rated appliances for residential dwelling units, low-flow water features, and energy efficient mechanical heating and ventilation systems. All of these characteristics would serve to reduce the Project's consumption of electricity, consistent with State and local regulations and goals. As such, the Project's electricity usage would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Natural Gas

The *2018 California Gas Report*[37] presents a comprehensive outlook for natural gas requirements and supplies for California through the year 2035. This report is prepared in even-numbered years, followed by a supplemental report in odd-numbered years, in compliance with California Public Utilities Commission Decision D.95-01-039. The projections in the California Gas Report are for long-term planning and do not necessarily reflect the day-to-day operational plans of the utilities.

35 KPFF, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, September 2019

36 LADWP, Renewable Energy Program, https://www.ladwp.com/ladwp/faces/ladwp/aboutus/a-power/a-p-renewableenergy/a-p-re-renewableenergypolicy?_adf.ctrl-state=n5qya6spv_4&_afrLoop=100538317667626, accessed July 2020.

37 California Gas and Electric Utilities, 2018 California Gas Report, 2018.

California natural gas demand, including volumes not served by utility systems, is expected to decrease at a rate of 0.5 percent per year from 2018 to 2035. The forecast decline is a combination of moderate growth in the Natural Gas Vehicle (NGV) market and across-the-board declines in all other market segments: residential, commercial, electric generation, and industrial markets.

Residential gas demand is expected to decrease at an annual average rate of 1.4 percent. Demand in the commercial and industrial markets are expected to decline at an annual rate of 0.2 percent. Aggressive energy efficiency programs make a significant impact in managing growth in the residential, commercial, and industrial markets. For the purpose of load-following as well as backstopping intermittent renewable resource generation, gas-fired generation will continue to be the primary technology to meet the ever-growing demand for electric power.

As discussed above, the Project Site would be required to comply with energy conservation standards pursuant to Title 24 of the California Administrative Code. The Project would also be required to comply with the L.A. Green Building Code which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. Specifically, the addition of more electric based appliances, and implementation of energy efficient insulation features in buildings would reduce natural gas demand for the Project. As discussed above, natural gas service is available and would be provided to the Project Site. The availability of natural gas is dependent upon adequate supplies. The estimated natural gas demand for the Project Site is part of the total load growth forecast has been taken into account in projected growth by SoCal Gas.[38] As such, the Project's natural gas usage would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and impacts would be less than significant.

Transportation Energy

SCAG's 2016–2040 RTP/SCS focuses on creating viable communities with an emphasis on sustainability and integrated planning, and identifies mobility, economy, and sustainability as the three principles most crucial to the future of the region. The 2020–2045 RTP/SCS focuses on reducing fossil fuel use by decreasing VMT, reducing building energy use, and increasing use of renewable sources.

The Project would include several conservation measures to decrease reliance on fossil fuels. As discussed previously, the Project Site is located in a designated TOD Area, which further increases the Project's resiliency to fossil fuels. The roadways adjacent to the Project Site are served by several bus lines managed by multiple mass transit operators that include Metro and LADOT DASH. The Project Site is served by two adjacent Metro rail lines within walking distance: (1) The Metro E Line immediately north of the Project

38 KPFF, Utility Infrastructure Technical Report: Water, Wastewater, and Energy, September 2019.

Site; and (2) The soon-to-be-opened (2020) Metro Crenshaw/LAX Line at the Project's East Site. These stations also provide transfer opportunities to other Metro rail services, Amtrak, Metrolink, and numerous bus routes served by Metro, LADOT, and municipal bus operators. The bus lines within a reasonable walking distance (approximately one-half mile) of the Project include (Metro: 740, 210, 710, 705, and 38 DASH: Midtown, Leimert/Slauson, and Crenshaw Route). Due to its proximity to the bus stops and Metro stations aforementioned, the Project Site is easily accessible and highly connected with the City and the greater Los Angeles area. As such, the Project provides access to mass transit opportunities for residents and would encourage the use of efficient transportation modes and alternatives. Further, the Project would facilitate the design of a pedestrian-oriented, walkable neighborhood to encourage walkability and minimize the necessity of automobile trips and VMT and would provide the code required number of bicycle spaces, all of which would promote the use of sustainable modes of transportation. These features would serve to reduce VMT and associated transportation fuel consumption, consistent with the goals of the 2020–2045 RTP/SCS.

In addition, vehicles used during construction activities would be required to comply with CARB anti-idling regulations and the In-Use Off-Road Diesel Fleet regulations which indirect reduces the consumption of petroleum based fuels. During the operational lifetime of the Project, newer vehicles sold on the market would be required to comply with Corporate Average Fuel Economy (CAFE) fuel economy standards expected to incrementally take effect. Accordingly, fuel consumption is anticipated to decrease each year through implementation of regulation that require higher energy efficiencies and higher efficient and alternative fueled vehicles.

Conclusion

The Project would comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the *L.A. Green Building Code* which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. Moreover, the Project would be designed and constructed to incorporate environmentally sustainable design features that would be equivalent to the Silver level under the LEED green building program. Based on the discussion above, the Project would not conflict with or obstruct a State or local plan for renewable energy or energy efficiency, and, therefore, impacts would be less than significant.

Cumulative Impacts

Electricity

Buildout of the Project, related projects, and additional forecasted growth in LADWP's service area would cumulatively increase the demand for electricity supplies and infrastructure capacity. LADWP forecasts that its total energy sales in the 2023-2024 fiscal year (the project buildout year) will be 24,803 gigawatt-

hours (GWh) of electricity.[39] Based on the Project's estimated net new electrical consumption of 2,426,221 kWh (2.4 GWh/year), the Project would account for less than 0.01 percent of LADWP's projected sales for the Project's build-out year.

Although development of the Project would result in the use of electricity resources during construction and operation, which could limit future availability, the use of such resources would be on a relatively small scale when compared to regional consumption and would be reduced through compliance with the latest the L.A. Green Building Code requirements. Furthermore, as with the Project, during construction and operation, other future related projects would be expected to incorporate energy conservation features, comply with applicable regulations including the L.A. Green Building Code and State energy standards under Title 24, and incorporate energy design features, as necessary. Related projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Future developments would be reviewed by LADWP to identify necessary power facilities and service connections to meet the needs of their respective projects. Project applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. Therefore, the Project's contribution to cumulative impacts related to wasteful, inefficient, and unnecessary use of electricity would not be cumulatively considerable and, thus, cumulative electricity impacts would be less than significant.

Natural Gas

Buildout of the Project, related projects, and additional forecasted growth in SoCalGas service area would cumulatively increase the demand for natural gas supplies and infrastructure capacity. Based on the 2018 California Gas Report, the CEC estimates natural gas consumption within SoCal Gas' planning area will be approximately 3,775 million cubic feet/day (MMcf) in 2023.[40] The Project's energy demand would be approximately and 3,402,044 kBTU of natural gas per year or 8,988 cf (0.01 MMcf) per day.[41] The Project would account for less than 0.01 percent of the 2023 daily forecasted supply in SoCalGas' planning area.

Although development of the Project would result in the use of natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale, would be reduced by measures rendering the Project more energy efficient, consistent with regional and local growth expectations for SoCalGas service area. Furthermore, future related projects would be expected to incorporate energy conservation features, comply with applicable regulations including the L.A. Green Building Code and State energy standards under Title 24, and incorporate mitigation measures, as necessary. Natural gas infrastructure is typically expanded in response to increasing demand, and system

39 LADWP, 2015 Power Integrated Resource Plan, Appendix A, Table A-1.
40 California Gas and Electric Utilities, 2018 California Gas Report, p. 102.
41 The conversion of kBTU to cubic feet uses the factor of 1 cf to 1.037 kBTU. Based on 365 days per year.

expansion and improvements by SoCal Gas occur as needed. It is expected that SoCal Gas would continue to expand delivery capacity as necessary to meet demand increases within its service area. Related projects within its service area would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. As such, cumulative impacts with respect to natural gas infrastructure would not be cumulatively considerable and, thus, would be less than significant. Therefore, the Project's contribution to cumulative impacts related to wasteful, inefficient, and unnecessary use of natural gas would not be cumulatively considerable; thus, cumulative natural gas consumption impacts would be less than significant.

Transportation Energy

Buildout of the Project, the five related projects identified and described in Table 2.0-2 which include additional residential and commercial uses and forecasted growth would cumulatively increase the demand for transportation-related fuel in the State and region. The Project would consume an estimated 313,743 gallons of gasoline fuel and 56,896 gallons of diesel fuel during operation. The EIA forecasts a national oil supply of 20.34 mb per day in 2023, which is the opening year for the Project.[42] This equates to approximately 7,424 mb per year or 311,812 mg per year. Operation of the Project would account for less than 0.01 percent of the projected annual oil supply in 2023. Related projects in the Project vicinity include retail commercial uses, office space, and residential units located near other residential and commercial uses which would reduce distance travelled as well as consumption of transportation fuel. While it is speculative to assess transportation fuel usage from related projects, it is expected that cumulative transportation fuel usage resulting Project and related projects would be within annual fuel projections. Thus, the use of such resources would be on a relatively small scale when compared to regional consumption and the Project's contribution to cumulative impacts related to wasteful, inefficient, and unnecessary use of transportation fuel would not be cumulatively considerable and, thus, would be less than significant.

Consistency with Energy Plans

The Project and related projects would be required to comply with applicable regulatory requirements for the design of new buildings, including the provisions set forth in the L.A. Green Building Code which requires the use of numerous conservation measures, beyond those required by Title 24 of the California Administrative Code. Moreover, the Project would be designed and constructed to incorporate environmentally sustainable design features that would be equivalent to the Silver level under the LEED green building program. As such, the Project's contribution to cumulative impacts related to conflicts with

42 U.S. Energy Information Administration, Annual Energy Outlook 2020: Table 11. Petroleum and Other Liquids Supply and Disposition, https://www.eia.gov/outlooks/aeo/data/browser/#/?id=11-AEO2020&cases=ref2020&sourcekey=0, accessed June 2020.

or obstruction of a State or local plan for renewal energy or energy efficiency, would be less than significant.

Mitigation Measures

Incorporation of Prior Mitigation

SCAG 2020–2045 RTP/SCS Program EIR:

No energy mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No energy mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

No energy mitigation measures were identified.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

No prior mitigation measures were identified, and no project specific mitigations are proposed for the Project.

VII. GEOLOGY AND SOILS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault, caused in whole or in part by the project's exacerbation of the existing environmental conditions? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii. Strong seismic ground shaking caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iii. Seismic-related ground failure, including liquefaction, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
iv. Landslides, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c. Be located on a geologic unit that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property caused in whole or in part by the project's exacerbation of the existing environmental conditions?	☐	☐	☒	☐
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f. Directly or indirectly destroy a unique paleontological resource or site unique geologic feature?	☐	☒	☐	☐

Impact Analysis

The following analysis utilizes information provided in the Geotechnical Investigation, prepared by Geocon West Inc., September 13, 2019, the Natural History Museum Paleontological Records Search, prepared by Natural History Museum of Los Angeles County, July 22, 2019, and the Geotechnical Recommendation Review for CEQA, prepared by Group Delta Consultants Inc., October 4, 2019. The Geotechnical Investigation, Natural History Museum Paleontological Records Search, and the Geotechnical Recommendation Review for CEQA are available as **Appendix E.1**, **Appendix E.2**, and **Appendix E.3**, respectively.

a. Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less Than Significant Impact. The Project Site is located in the north-central portion of the Los Angeles Basin, a coastal plain bounded by the Santa Monica Mountains, the Elysian Hills and the Repetto Hills to the north and northeast, the Puente Hills and Whittier Fault to the east, the Palos Verdes Peninsula and Pacific Ocean to the west and south, and the Santa Ana Mountains and San Joaquin Hills to the southeast.

The basin is underlain by a deep structural depression which has been filled by both marine and continental sedimentary deposits. Regionally, the Project Site is located within the northern portion of the Peninsular Ranges geomorphic province that is characterized by northwest-trending geologic structures and physiographic features such as the Newport-Inglewood Fault Zone located approximately 1.2 miles west-southwest of the Project Site.

The entire Southern California area is considered a seismically active region. Seismic events present the most widespread threat of devastation to life and property. Since 1800, there have been approximately 60 damaging seismic events, or earthquakes, in the Los Angeles Region. Since 1933, there have been four moderate-size earthquakes which have caused numerous deaths and substantial property damage in the metropolitan Los Angeles area. These four events are identified by their location as the Long Beach (March 11, 1933; magnitude 6.3), San Fernando (February 9, 1971; magnitude 6.4), Whittier Narrows (October 1, 1987; magnitude 5.9), and Northridge (January 17, 1994; magnitude 6.7) earthquakes.

A fault is a fracture or line of weakness in the earth's crust, along which rocks on one side of the fault are offset relative to the same rocks on the other side of the fault. Based on criteria established by the California Geological Survey, faults may be categorized as active, potentially active, or inactive. Active faults are those that show evidence of surface displacement within the last 11,000 years (Holocene age). Potentially active faults are those that show evidence of displacement within the last 1.6 million years (Quaternary age). Faults showing no evidence of displacement within the last 1.6 million years may be considered inactive for most purposes, except for some critical structures.

Surface rupture occurs when movement on a fault deep within the earth breaks through to the surface. Not all earthquakes result in surface rupture. The Loma Prieta Earthquake of 1989 caused major damage in the San Francisco Bay Area but the movement deep in the earth did not break through to the surface. Fault rupture almost always follows preexisting faults, which are zones of weakness. Rupture may occur suddenly during an earthquake or slowly in the form of fault creep. Sudden displacements are more damaging to structures because they are accompanied by shaking.

The Project Site is not within a State-designated Alquist-Priolo Earthquake Fault Zone or a city-designated Preliminary Fault Rupture Study Area for surface fault rupture hazards.[43,44] No active or potentially active faults with the potential for surface fault rupture are known to pass directly beneath the Project Site. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site during the design life of the proposed development is considered low. However, the Project Site is located in the

43 California Department of Conservation, California Geological Survey, https://maps.conservation.ca.gov/cgs/gmc/App/, accessed June 23, 2020.

44 City of Los Angeles General Plan, Safety Element, Alquist-Priolo Special Study Zones & Fault Rupture Study Areas, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf. Accessed June 23, 2020.

seismically active Southern California region, and could be subjected to moderate to strong ground shaking in the event of an earthquake on one of the many active Southern California faults.

The nearest active fault to the Project Site is the Newport-Inglewood Fault Zone located approximately 1.2 miles to the west-southwest.[45] Other nearby active faults are the Santa Monica Fault, the Hollywood Fault, the Raymond Fault, the Verdugo Fault, and the Palos Verde Fault Zone (offshore segment) located approximately 4.9 miles north-northwest, 5.4 miles north, 8.8 miles northeast, 10.5 miles northeast, and 12 miles south-southwest of the site, respectively.[46] Additionally, the active San Andreas Fault Zone is located approximately 38 miles northeast of the Project Site.

As mentioned above, several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Coastal Plain at depth. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers. The October 1, 1987, Mw 5.9 Whittier Narrows earthquake and the January 17, 1994, Mw 6.7 Northridge earthquake were a result of movement on the Puente Hills Blind Thrust and the Northridge Thrust, respectively. These thrust faults and others in the Los Angeles area do not present a potential surface fault rupture hazard at the Project Site. However, these deep thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking at the Project Site.

The Project's *Geotechnical Investigation* (**Appendix E.1**) found no active or potentially active faults close enough to the Project Site to produce fault rupture or surface displacement at the Project Site. The nearest fault to the Project Site is the Newport-Inglewood-Rose Canyon Fault, which is located approximately 1.6 miles southwest of the Project Site.[47] Although the Project is not in close proximity to an active fault, the Project would be required to implement 2019 California Building Code standards which include seismic design criteria. Therefore, the potential for surface rupture due to faulting occurring beneath the Project Site is considered low and potential impacts during construction and operation of the Project would be less than significant.

ii. Strong seismic ground shaking?

Less than Significant Impact. The Project would have a significant impact related to geology and soils if the Project would expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving strong seismic ground shaking caused in whole or in part by the Project's exacerbation of the existing environmental conditions. The Project Site could be subjected to strong

45 California Department of Conservation, California Geological Survey, https://maps.conservation.ca.gov/cgs/gmc/App/, accessed June 23, 2020.

46 California Department of Conservation, California Geological Survey, https://maps.conservation.ca.gov/cgs/gmc/App/, accessed June 23, 2020.

47 City of Los Angeles, ZIMAS, Parcel Profile Report, http://zimas.lacity.org/reports/4307d41b4de740579a47ab3fe12144ab.pdf, accessed July 2020.

ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be lessened if the proposed structures are designed and constructed in conformance with current building codes and engineering practices.

The closest active fault to the Project Site is the Newport-Inglewood Fault Zone located approximately 1.2 miles to the west-southwest. Other nearby active faults are the Santa Monica Fault, the Hollywood Fault, the Raymond Fault, the Verdugo Fault, and the Palos Verde Fault Zone (offshore segment) located approximately 4.9 miles north-northwest, 5.4 miles north, 8.8 miles northeast, 10.5 miles northeast, and 12 miles south-southwest of the site, respectively. However, the Project Site is not located within a seismic hazard zone for land sliding or faulting, as delineated by the State of California, in accordance with the Seismic Hazards Mapping Act or the Alquist-Priolo Act.

The active San Andreas Fault Zone is located approximately 38 miles northeast of the site. Several buried thrust faults, commonly referred to as blind thrusts, underlie the Los Angeles Coastal Plain at depth. These faults are not exposed at the ground surface and are typically identified at depths greater than 3.0 kilometers. These thrust faults and others in the Los Angeles area do not present a potential surface fault rupture hazard at the Project Site. However, these deep thrust faults are considered active features capable of generating future earthquakes that could result in moderate to significant ground shaking at the Project Site.

Given the Project Site's location in a seismically active region, the Project Site could be subjected to strong ground shaking in the event of an earthquake. However, this hazard is common in Southern California and the effects of ground shaking can be lessened if the proposed structures are designed and constructed in conformance with current building codes and engineering practices. Moreover, according to the *Geotechnical Investigation*, neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the proposed development provided the recommendations presented herein are followed and implemented during design and construction. The Project would be required to comply with current engineering standards including the seismic safety requirements set forth in the Earthquake Regulation of the City of Los Angeles Building Code (LABC), the LAMC, and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project.

Therefore, with compliance with applicable regulations and implementation of the recommendations in the Geotechnical Investigation and the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project, construction and operation of the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to strong seismic ground shaking. As such, impacts associated with seismic ground shaking would be less than significant.

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Liquefaction is a seismic phenomenon in which loose, saturated, granular soils behave similarly to a fluid when subjected to high-intensity ground shaking. Liquefaction occurs when three general conditions exist: shallow groundwater; low-density, fine, clean, sandy soils; and strong ground motion. Effects of liquefaction can include sand boils, settlement, and bearing capacity failures below structural foundations.

The Project Site is in a designated liquefaction zone and additional analysis was performed by the *Geotechnical Investigation* to evaluate the potential for liquefaction for a Design Earthquake (DE) level and a Maximum Considered Earthquake (MCE) level. The analysis looked at the DE and MCE for the Project. According to the 2019 California Building Code and ASCE 7-16, the MCE is to be utilized for the evaluation of liquefaction, lateral spreading, seismic settlements, and is intended to maintain "Life Safety" during an MCE event. The DE is the level of ground motion that has a 10 percent chance of exceedance in 50 year/s, with a statistical return period of 475 years.

The results of liquefaction analyses were that the alluvial soils below the historic high groundwater depth could be prone to approximately 2.6 inches of liquefaction induced settlement during DE ground motion and MCE ground motion. Thus, based on the results of the liquefaction analyses, shallow foundations have been ruled out to avoid excessive settlement from an earthquake event if liquefaction is realized. The *Geotechnical Investigation* recommends three foundation options to address liquefaction concerns: Cast-In-Drilled-Hole (CIDH) concrete piles; Auger-Cast Pressure Grouted Displacement (APGD) piles; or Ground improvement methods, such as stone columns.[48] Moreover, the *Geotechnical Investigation* stated the three foundation solutions proposed are feasible and can protect against injury or death if properly designed and constructed for the final building configuration (see **Appendix E.1**).[49]

Based on the above, the Project would comply with the City's Building Code, which incorporates the Uniform Building Code and the California Building Code, to avoid potential impacts related to seismic-related ground failure, including liquefaction. The Project would also incorporate site-specific geotechnical recommendations contained in the *Geotechnical Investigation* completed for the Project and compliance with the conditions contained within the Department of Building and Safety's Geology and Soils Report Approval Letter for the Project. As a result, the Project would not exacerbate existing environmental conditions related to seismic related ground failure, including liquefaction or associated seismically-induced settlement, which would result in substantial damage to structures or infrastructure, or expose

48 Geocon West Inc. Geotechnical Investigation Crenshaw Mixed Use Development, September 3, 2019.
49 Group Delta, Geotechnical Recommendation Review for CEQA, October 4, 2019.

people to substantial risk of injury. Therefore, Project impacts associated with seismic-related ground failure including liquefaction will be less than significant during construction and operation of the Project.

iv. Landslides?

No Impact. Landslide potential is generally the greatest for areas with steep and/or high slopes, low sheer strength, and increased water pressure. Topography at the Project Site is relatively level. The Project Site is not located within a City of Los Angeles Hillside Ordinance Area or a Hillside Grading Area.[50] The Los Angeles Department of City Planning Hillside Area Map indicates the Project Site is not located within an area identified as a "Hillside Area." Additionally, the Los Angeles Bureau of Engineering indicates the Project Site is not located within a Special Grading Area. Based on the results of the *Geotechnical Investigation*, the Project Site is not located within an area identified as having a potential for seismic slope instability.[51] The closest slope to the Project Site is an ascending slope on the north side of the Baldwin Hills, located over 1 mile to the southwest. There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. As such, the probability of slope stability hazards affecting the Project Site is very low.[52] Therefore, Project construction would not directly or indirectly cause potential substantial impacts related to landslides. No impact would occur.

As mentioned, the Project Site is not located within an area identified as having a potential for seismic slope instability.[53] The closest slope to the Project Site is an ascending slope on the north side of the Baldwin Hills, located over 1 mile to the southwest. There are no known landslides near the Project Site, nor is the Project Site in the path of any known or potential landslides. As such, the probability of slope stability hazards affecting the Project Site is considered very low.[54] Moreover, Project operation would not involve activities that would exacerbate seismic slope instability. Therefore, Project operation would not directly or indirectly cause potential substantial impacts related to landslides. No impact would occur.

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

Less than Significant Impact. Although development of the Project has the potential to result in the erosion of soils during site preparation and grading/excavation activities, erosion would be reduced by implementation of stringent erosion controls imposed by the City through grading and building permit regulations. All grading activities require grading permits from the Department of Building and Safety, which include requirements and standards designed to limit potential impacts to acceptable levels. In addition, all on-site grading, excavation, and site preparation would comply with applicable provisions of

50 City of Los Angeles, NavigateLA, https://navigatela.lacity.org/navigatela/, accessed October 2019.
51 California Geological Survey, 2014, Earthquake Zones of Required Investigation, Hollywood Quadrangle, Los Angeles County, California, dated November 6, 2014.
52 Geocon West Inc., Geotechnical Investigation Crenshaw Mixed Use Development, September 3, 2019.
53 California Geological Survey, 2014, Earthquake Zones of Required Investigation, Hollywood Quadrangle, Los Angeles County, California, dated November 6, 2014.
54 Geocon West Inc. Geotechnical Investigation Crenshaw Mixed Use Development, September 3, 2019.

Chapter IX, Division 70 of the LAMC, which addresses grading, excavations, and fills. All grading activities require grading permits from the Department of Building and Safety.

Prior to issuance of a grading permit, construction activities would be performed in accordance with the requirements of the 2019 CBC and the Los Angeles Regional Water Quality Control Board (LARWQCB) through the City's Stormwater Management Division. The Project would be required to develop a Stormwater Pollution Prevention Plan (SWPPP) pursuant to NPDES permit requirements. The SWPPP will identify specific construction Best Management Practices (BMPs) to be implemented to ensure that soil erosion and sedimentation is minimized and to control the discharge of pollutants in stormwater runoff as a result of construction activities. The Applicant will be required to provide the Waste Discharge Identification Number to the City to demonstrate proof of coverage under the Construction General Permit. Compliance with these regulatory requirements would ensure a less than significant impact would occur with respect to erosion or loss of topsoil during Project construction.

Long-term operation of the Project would not result in substantial soil erosion or loss of topsoil as the majority of the Project Site would be covered by the proposed buildings and paving while the remaining portions of the Project Site would be covered with irrigated landscaping. In accordance with Los Angeles County MS4 Permit, Development Construction Program, requires permittees (which include the City) to enforce implementation of BMPs, including, but not limited to, approval of an Erosion and Sediment Control Plan for all construction activities within their jurisdiction.[55] Therefore, with implementation of the applicable grading and building requirements, impacts associated with soil erosion or loss of topsoil during operation would be less than significant.

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

Less than Significant Impact. A significant impact may occur if a project is built in an unstable area without proper site preparation or design features to provide adequate foundations for the project buildings, thus posing a hazard to life and property. Construction activities associated with the Project must comply with the City of Los Angeles Building Code, which is designed to assure safe construction, including building foundation requirements appropriate to site conditions.

The Project Site is in a designated liquefaction zone and additional analysis was performed by the *Geotechnical Investigation* to evaluate the potential for liquefaction. As previously discussed, the liquefaction analyses results were that the alluvial soils below the historic high groundwater depth could

55 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

be prone to approximately 2.6 inches of liquefaction induced settlement during DE ground motion and MCE ground motion. However, grading and foundation recommendations presented in the *Geotechnical Investigation* completed for the Project would reduce the potential effects of settlement on the proposed improvements.

The *Geotechnical Investigation* identifies three foundation designs to address the potential for liquefaction: Cast-In-Drilled-Hole (CIDH) concrete piles; Auger-Cast Pressure Grouted Displacement (APGD) piles; or Ground improvement methods, such as stone columns. These three foundation solutions are feasible and will avoid the potential for impacts from liquefaction (See **Appendix E.3: Geotechnical Recommendation Review for CEQA**).

As recommended by the *Geotechnical Recommendation Review for CEQA*, the APGD pile is the most optimal. APGD piles would result in less noise, minimized vibrations, generate less soil cutting, and would require pile load testing that would further validate the nominal capacity of the piles. All foundation designs would require drilling into the ground at least 30-feet below the proposed foundations.

According to the Los Angeles General Plan Safety Element, the Project Site is not located within a designated Landslide Inventory & Hillside Areas.[56] The closest hillside to the Project Site is an ascending slope on the north side of the Baldwin Hills, located over 1 mile to the southwest. There are no known landslides near the Project Site, nor is the Site in the path of any known or potential landslides. Therefore, the probability of slope stability hazards affecting the Project Site was determined to be very low (**Appendix E.1**).

Lateral spreading results from earthquake-induced liquefaction, causing landslides associated with gentle slopes that flow laterally, like water.[57] Topography at the Project Site is relatively level. The Project Site is not located within a City of Los Angeles Hillside Ordinance Area or a Hillside Grading Area.[58] The Los Angeles Department of City Planning Hillside Area Map indicates the Project Site is not located within an area identified as a "Hillside Area." Additionally, the Los Angeles Bureau of Engineering indicates the Project Site is not located within a Special Grading Area. Based on the results of the *Geotechnical Investigation*, the Project Site is not located within an area identified as having a potential for seismic slope instability. Therefore, considering the relatively flat topography and low potential for liquefaction with implementation of one of the recommended foundation options at the Project Site, the potential for lateral spreading at the Project Site would also be low.

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56 Los Angeles General Plan, Safety Element, Landslide Inventory & Hillside Areas, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed June 23, 2020.

57 U.S. Geological Survey (USGS), "About Liquefaction," https://geomaps.wr.usgs.gov/sfgeo/liquefaction/aboutliq.html, accessed October 2019.

58 City of Los Angeles, NavigateLA, https://navigatela.lacity.org/navigatela/, accessed October 2019.

Land subsidence occurs when a large portion of land is displaced vertically, usually due to the withdrawal of groundwater, oil, or natural gas. Soils that are particularly subject to subsidence include those with high silt or clay content. The Project Site is not located within an area of known ground subsidence. No known large-scale extraction of groundwater, gas, oil, or geothermal energy is occurring or planned at the site or in the general site vicinity. Therefore, the potential for ground subsidence due to withdrawal of fluids or gases at the site is considered low.[59]

The *Geotechnical Investigation* concluded that neither soil nor geologic conditions were encountered during the investigation that would preclude the construction of the proposed development with incorporation of the recommendations in the study. These recommendations address the effects of settlement on proposed improvements and suitability of proposed foundations or slabs. The design and construction of the Project will conform to the California Building Code seismic standards as approved by the Department of Building and Safety, which would ensure impacts associated with unstable geologic unit or soils remain less than significant. As such, the Project would not have the potential to exacerbate current environmental conditions that would create a significant hazard with respect to landslides, lateral spreading, subsidence, liquefaction, or collapse. With the implementation of Building Code requirements and regulatory compliance measures, above, there would be less than significant impacts with respect to risks associated with landslide, lateral spreading, subsidence, liquefaction, or collapse.

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

Less than Significant Impact. Expansive soils are typically associated with fine-grained clayey soils that have the potential to shrink and swell with repeated cycles of wetting and drying. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors and may result in unacceptable settlement or heave of structures or concrete slabs to support on grade. Based on the results of the *Geotechnical Investigation* (**Appendix E.1**), the upper 5 feet of site soils on the Project Site have a “low to medium” expansive potential. Soils below this depth are not expansive. Construction of the Project would be required to comply with the City of Los Angeles Uniform Building Code, LAMC, and other applicable building codes, which include building foundation requirements that address expansive soils.

The Project would comply with the recommendations and conditions in the *Geotechnical Investigation*. This would ensure that the Project is constructed to address any potential impacts associated with expansive soils on the Project Site. Impacts related to substantial risk to life or property that could

59 Geocon West Inc., Geotechnical Investigation Crenshaw Mixed Use Development, September 3, 2019.

potentially cause direct or indirect adverse effects as a result of expansive soils would be less than significant.

e. Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The Project Site is located in an urbanized area, where wastewater infrastructure is currently in place. Project construction would connect to existing sewer lines that serve the Project Site and would not use septic tanks or alternative waste disposal systems. Therefore, the Project would not have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater and there would be no impacts.

f. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. The analysis of paleontological resources is based on a review of the *Geotechnical Investigation* and a paleontological records search that was commissioned through the Natural History Museum of Los Angeles County (NHMLAC) on July 22, 2019 (see **Appendix E.2: Natural History Museum Paleontological Records Search**). The records search covered a 1.5-mile radius from the Project Site.

The existing vacant lot on the East Site of the Project Site is currently being used for construction staging purposes. The search did not result in any vertebrate fossil localities that lie directly within the Project Site. However, there are localities nearby, the closest being approximately 0.2 miles to the west, from similar sedimentary deposits that occur subsurface in the Project area.[60] The search found that surface deposits on the Project Site consist of younger Quaternary Alluvium, derived as alluvial fan deposits from the slightly more elevated terrain to the northeast. These younger Quaternary deposits typically do not contain significant vertebrate fossil remains in the uppermost layers, but they are underlain by older Quaternary sediments at relatively shallow depth that do contain significant vertebrate fossils, as discussed below.

Fossils have been encountered in similar sedimentary deposits within a 1.5 mile radius of the Project Site The closest fossil vertebrate locality from these deposits is LACM 1159, immediately west of the Project area west of Crenshaw Boulevard near the intersection of Obama Boulevard and Buckingham Road, that contained remains of fossil human, Homo sapiens, at a depth of 19-23 feet below the surface.

60 Natural History Museum of Los Angeles County, Paleontological Resources for the Proposed Crenshaw Crossing Project, August 5, 2019.

Vertebrate fossils have also been identified further west along Obama Boulevard including LACM 3369, at Sycamore Avenue and Obama Boulevard, including a specimen of fossil horse, Equus, at a depth of only six feet below the surface. Just west of this location are localities LACM 3367 and 3370 also along Obama Boulevard. These localities produced fossil mastodon, Mammut, at unknown depth, and a fossil sabertooth cat, Smilodon, at unknown depth. Just north of those location is locality LACM 3366, which is slightly northwest of the Project area along the Southern Pacific Railway, that produced a specimen of fossil camel, Camelops, at unknown depth.

Northeast of the Project Site, in a cut for the Santa Monica Freeway (I-10) just east of Gramercy Place, is older Quaternary locality LACM 1893, which produced fossil specimens of mammoth, Mammuthus, and bison, Bison antiquus. Almost due north of the Project Site, near the intersection of Venice Boulevard and Vineyard Avenue, is locality LACM 7137 these deposits produced fossil specimens of mastodon, Mammutidae, camel, Camelidae, and bison, Bison antiquus, at a depth of about forty feet below the surface during excavations for storm sewers. West of locality LACM 7137, on the western side of La Brea Avenue from Venice Boulevard immediately north of San Vicente Boulevard, is localities LACM 1226, 1272, and 1783, that produced fossil specimens of ground sloth, Paramylodon, mammoth, Mammuthus, horse, Equus, camel, Camelops, bison, Bison antiguus, at depths between 9 and 23 feet below the surface. To the southeast of the Project Site, near the intersection of 46th Street and Western Avenue, is the older Quaternary locality LACM 7758, which produced fossil specimens of three-spine stickleback, Gasterosteus aculeatus, meadow vole, Microtus, deer mouse, Peromyscus, pocket gopher, Thomomys, and pocket mouse, Perognathus, at a depth of 16 feet below the surface.

Surface grading or very shallow excavations in the younger Quaternary Alluvium present on the Project Site are unlikely to encounter significant fossil vertebrate remains. Substantial grading and excavations that may extend down into older Quaternary deposits may encounter vertebrate fossils (see **Appendix E.2: Natural History Museum Paleontological Records Search**). The Project would include excavation at depths between 12 and 17 feet below grade to construct the subterranean parking structure on the East Site. Excavations at these depths may extend into the older Quaternary sediments where fossils have been encountered. Grading and excavation on the West Site would involve approximately 12 inches of this site. Both sites would require drilling into the ground at least 30-feet below the proposed foundations. With implementation of Project **Mitigation Measure MM-PALEO-1**, impacts from the inadvertent discovery of unknown paleontological resources during substantial excavation and grading would be reduced to less than significant.

Cumulative Impacts

Less than Significant Impact. Geotechnical hazards are site-specific and there is little, if any, cumulative geological relationship between the Project and any of the five related projects, indicated in **Table 2.0-2**

and **Figure 2.0-11.** Similar to the Project, potential impacts related to geology, soil, and paleontological resources would be assessed on a case-by-case basis and, if necessary, each of the five related projects would be required to implement appropriate mitigation measures and compliance through the City's Building Code, which incorporates the Uniform Building Code and the California Building Code. Furthermore, the analysis of the Project's geology and soils impacts concluded that, through the implementation of the regulatory compliance measures recommended above and implementation of project specific **Mitigation Measure MM-PALEO-1**, Project impacts would be reduced to less than significant levels. Therefore, the Project would not make a cumulatively considerable contribution to any potential cumulative impacts, and cumulative geology, soil, and paleontological resources impacts would be less than significant.

Mitigation Measures

Incorporation of Prior Mitigation

As discussed in Section 3.3 of this SCEA, PRC Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports (EIRs).

The following mitigation measures from prior applicable EIRs incorporated into the Project will lessen the significant impacts of the Project, but not to a less-than-significant level.

SCAG 2020–2045 RTP/SCS Program EIR:

No geology and soils mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No geology and soils mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

MM-GS1 Geotechnical investigations should be performed before final design of any project facilities and recommendations provided in these investigations should be implemented, as appropriate.

MM-GS2 Settlement. Areas of potential settlement should be identified during the geotechnical investigations for project facilities. Proper mitigation is dependent on the planned facilities and the amount of anticipated settlement.

MM-GS3 Soils. The impacts of corrosive soils should be mitigated by use of a sulfate resistant cement in foundations. Soils should be assessed to determine their potential for development on an individual project basis.

MM-GS4 Ground Shaking. The impacts of strong ground shaking on structures may be mitigated by designing the facilities in accordance with the Uniform Building Code' s earthquake design criteria which provide a certain level of protection to life and property.

MM-GS5 Liquefaction/Subsidence. If moderate to high liquefaction potential in portions of the proposed Recovery Program Area or earthquake induced subsidence potential is confirmed by geotechnical analyses, then mitigation should be implemented. Appropriate mitigation, which could include the use of soil improvement techniques such as stone columns, dynamic compaction or use of deep foundations is dependent on site- specific conditions, which should be identified by the geotechnical investigations for individual projects.

Project Mitigation

MM-PALEO-1 Construction monitoring by a qualified paleontological monitor shall be implemented during all ground-disturbing activities that affect previously undisturbed native soils in areas located five feet below the ground surface or farther and have the potential to contact older Quaternary Alluvium. Should a potentially unique paleontological resource be encountered, ground-disturbing activities within 100 feet shall cease until a qualified paleontologist assesses the find.

If fossil localities are discovered, the paleontologist shall assess the find and proceed accordingly. This includes the controlled collection of fossil and geologic samples for processing.

Impacts After Mitigation

As explained above, the Project would include excavation to depths of 12 to 17 feet below grade on both the East and West Sites. Excavations at these depths may extend into the older Quaternary sediments where fossils have been encountered. The mitigation measure identified above will reduce this impact to less than significant.

VIII. GREENHOUSE GAS EMISSIONS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Impact Analysis

Introduction

GHG and Global Climate Change Background

Gases that trap heat in the atmosphere are called GHGs, since they have effects that are analogous to the way in which a greenhouse retains heat. GHGs are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere regulates the earth's temperature. The State of California has undertaken initiatives designed to address the effects of GHGs, and to establish targets and emission reduction strategies for GHG emissions in California.

The principal GHGs are CO2, CH4, N2O, SF6, PFCs, HFCs, and H2O. CO2 is the reference gas for climate change because it is the predominant GHG emitted. To account for the varying warming potential of different GHGs, GHG emissions are often quantified and reported as CO2 equivalents (CO2e).

California has enacted several pieces of legislation that relate to GHG emissions and climate change, much of which sets aggressive goals for GHG reductions within the State. Per SB 97, the California Natural Resources Agency adopted amendments to the CEQA Guidelines, which address the specific obligations of public agencies when analyzing GHG emissions under CEQA to determine a project's effects on the environment. However, neither a threshold of significance nor any specific mitigation measures are included or provided in these CEQA Guideline amendments.

Assembly Bill 32 (Statewide GHG Reductions)

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the GHG emissions reduction goal for the State of California into law. As defined under AB 32, GHGs

include CO2, CH4, N2O, SF6, PFCs, HFCs, and H2O. CO2 is the reference gas for climate change because it is the predominant GHG emitted. AB 32 requires the CARB—the State agency charged with regulating Statewide air quality—to adopt rules and regulations that would achieve GHG emissions equivalent to Statewide levels in 1990 by 2020 by reducing GHG emissions from significant sources via regulation, market mechanisms, and other actions.

SB 375, passed in 2008, links transportation and land use planning with global warming. It requires CARB to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing, and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA.

Executive Order S-3-05

Executive Order S-3-05, issued in June 2005, proclaimed that California is vulnerable to the impacts of climate change. It declared that increased temperatures could reduce the Sierra snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established the following total GHG emission targets:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020, reduce GHG emissions to 1990 levels; and
- By 2050, reduce GHG emissions to 80 percent below 1990 levels.

Executive Order B-30-15

In April 2015, Governor Brown signed Executive Order B-30-15, which established a new interim Statewide reduction target to reduce GHG emissions to 40 percent below 1990 levels by 2030. This Executive Order also directed all State agencies with jurisdiction over GHG-emitting sources to implement measures designed to achieve the new interim 2030 target, as well as the pre-existing, long-term 2050 target identified in Executive Order S-3-05. Additionally, the Executive Order directed CARB to update its Scoping Plan to address the 2030 target. These reductions are to come from a variety of sectors, including energy, transportation, high-global warming potential sources, waste, and the State's cap-and-trade emissions program. Nearly all reductions are to come from sources that are controlled at the Statewide level by State agencies, including the CARB, Public Utilities Commission, High Speed Rail Authority, and CEC. EO B-30-15 does not require local agencies to take any action to meet the new interim GHG reduction target.

Executive Order B-55-18

Executive Order B-55-18, issued by Governor Brown in September 2018, establishes a new Statewide goal to achieve carbon neutrality as soon as possible, but no later than 2045, and achieve and maintain net negative emissions thereafter. Executive Order B-55-18 directs CARB to would work with relevant State agencies to develop a framework for implementation and accounting that tracks progress toward this goal as well as ensuring future scoping plans identify and recommend measures to achieve the carbon neutrality goal.

Climate Change Scoping Plan

CARB approved a Climate Change Scoping Plan (Scoping Plan) on December 11, 2008, as required by AB 32. The Scoping Plan proposed a "comprehensive set of actions designed to reduce overall carbon GHG emissions in California, improve our environment, reduce our dependence on oil, diversify our energy sources, save energy, create new jobs, and enhance public health."[61] The Scoping Plan had a range of GHG reduction actions, including direct regulations; alternative compliance mechanisms; monetary and nonmonetary incentives; voluntary actions; market-based mechanisms, such as a cap-and-trade system; and an AB 32 implementation regulation to fund the program.

The Scoping Plan called for a "coordinated set of strategies" to address all major categories of GHG emissions.[62] Transportation emissions were to be addressed through a combination of higher standards for vehicle fuel economy, implementation of the Low Carbon Fuel Standard, and greater consideration to reducing trip length and generation through land use planning and transit-oriented development. Buildings, land use, and industrial operations were encouraged and, sometimes, required to implement energy efficiency practices. Utility energy supplies will change to include more renewable energy sources through implementation of the Renewables Portfolio Standard. Established in 2002 under SB 1078, the California Renewables Portfolio Standards (RPS) were accelerated in 2006 under SB 107, which required that, by 2010, at least 20 percent of electricity retail sales come from renewable sources. In April 2016, the CEC updated the RPS pursuant to SB 350, intended to set the new target 50 percent renewables by 2030.[63] This will be complemented with emphasis on local generation, including rooftop photovoltaics and solar hot water installations. Additionally, the Scoping Plan emphasized opportunities for households and businesses to save energy and money through increasing energy efficiency. It indicated that

61 CARB, Climate Change Scoping Plan: A Framework for Change, Accessed April 2020, https://www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf.
62 CARB, Climate Change Scoping Plan, p. ES-7.
63 CEC, Enforcement Procedures for the Renewables Portfolio Standards for Local Publicly Owned Electric Utilities: Amended Regulations, Accessed April 2020, http://www.energy.ca.gov/2016publications/CEC-300-2016-002/CEC-300-2016-002-CMF.pdf.

substantial savings of electricity and natural gas would be accomplished through improving energy efficiency.

Subsequent to the adoption of the Scoping Plan, a lawsuit was filed challenging CARB's approval of the Scoping Plan Functional Equivalent Document (Supplemental FED). On May 20, 2011 (Case No. CPF-09-509562), the court found that the environmental analysis of the alternatives in the Supplemental FED to the Scoping Plan was not sufficient under CEQA. CARB staff prepared a revised and expanded environmental analysis of the alternatives, and the Supplemental FED to the Scoping Plan was approved on August 24, 2011. The Supplemental FED to the Scoping Plan indicated that the potential exists for adverse environmental impacts associated with implementation of the various GHG emission reduction measures recommended in the Scoping Plan.

CARB updated the Scoping Plan in May 2014 (2014 Scoping Plan). The 2014 Scoping Plan[64] adjusted the 1990 GHG emissions levels to 431 million metric tons of CO2 equivalents (MMTCO2e); the updated 2020 GHG emissions forecast is 509 MMTCO2e, which credited for certain GHG emission reduction measures already in place (e.g., the RPS). The 2014 Scoping Plan also recommended a 40 percent reduction in GH emissions from 1990 levels by 2030, and a 60 percent reduction in GHG emissions from 1990 levels by 2040.

The 2017 Scoping Plan,[65] approved on December 14, 2017, builds on previous programs and addresses the 2030 target established by the 2016 SB 32 (Pavley), which is further discussed below. The 2017 Scoping Plan outlines options to meet California's aggressive goals to reduce GHGs by 40 percent below 1990 levels by 2030. In addition, the plan incorporates the State's updated RPS requiring utilities to procure 50 percent of their electricity from renewable energy sources by 2030. It also raises the State's Low Carbon Fuel Standard and aims to reduce emissions of CH4 and hydrofluorocarbons by 40 percent from 2013 levels by 2030 and emissions of black carbon by 50 percent from 2013 levels.

Cap-and-Trade Program

The AB 32 Scoping Plan identifies a cap-and-trade program as one of the strategies California will employ to reduce the GHG emissions that cause climate change. This program will help put California on the path to meet its goal of reducing GHG emissions to 1990 levels by the year 2020, and ultimately achieving an 80% reduction from 1990 levels by 2050. Under cap-and-trade, an overall limit on GHG emissions from capped sectors will be established by the cap-and-trade program and facilities subject to the cap will be

64 CARB, First Update to the Climate Change Scoping Plan: Building on the Framework (May 2014).
65 CARB, California's 2017 Climate Change Scoping Plan, Accessed April 2020, https://www.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

able to trade permits (allowances) to emit GHGs. Cap-and-trade is a market-based regulation that is designed to reduce GHGs from multiple sources.

Cap-and-trade sets a firm limit or cap on GHGs and minimizes the compliance costs of achieving AB 32 goals. The cap will decline approximately 3 percent each year beginning in 2013. Trading creates incentives to reduce GHGs below allowable levels through investments in clean technologies. With a carbon market, a price on carbon is established for GHGs. Market forces spur technological innovation and investments in clean energy. The Proposed Project would be exempt from the Cap-and-Trade program since it only proposes residential and commercial uses and does not propose any industrial or high-emitting land uses. On July 2018, CARB recently announced that GHG pollution in California fell below 1990 levels, which was the 2020 GHG goal passed by AB 32.[66]

California Senate Bills 1078, 107, and 2; Renewables Portfolio Standard

Established in 2002 under California SB1078 and accelerated in 2006 under California SB 107, California's RPS requires retail suppliers of electric services to increase procurement from eligible renewable energy resources by at least 1 percent of their retail sales annually, until they reach 20 percent by 2010. On April 2, 2011, Governor Jerry Brown signed California SB 2 to increase California's RPS to 33 percent by 2020. This new standard also requires regulated sellers of electricity to procure 25 percent of their energy supply from certified renewable resources by 2016.

Low Carbon Fuel Standard

California Executive Order S-01-07 (January 18, 2007) requires a 10 percent or greater reduction in the average carbon intensity for transportation fuels in California regulated by CARB. CARB identified the Low Carbon Fuel Standard (LCFS) as a Discrete Early Action item under AB 32, and the final resolution (09-31) was issued on April 23, 2009.

Senate Bill 375

SB 375, signed into law in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations.[67] The act requires metropolitan planning organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy

66 CARB, Climate Pollutants Fall Below 1990 Levels for First Time, https://ww2.arb.ca.gov/news/climate-pollutants-fall-below-1990-levels-first-time, accessed August 2018.

67 California Legislative Information, Senate Bill No. 375, Accessed April 2020, https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=200720080SB375.

(APS) that prescribes land use allocation in that MPO's regional transportation plan (RTP). CARB, in consultation with MPOs, provided regional reduction targets for GHGs for the years 2020 and 2035.

Sustainable Communities Strategy

The County is a member agency of SCAG. SCAG is the MPO for Los Angeles, Orange, Ventura, Riverside, San Bernardino, and Imperial Counties and serves as a forum for the discussion of regional issues related to transportation, the economy, community development, and the environment. As the federally-designated MPO for the Southern California region, SCAG is mandated by the federal government to research and develop plans for transportation, hazardous waste management, and air quality. Pursuant to California Health and Safety Code Section 40460(b),[68] SCAG has the responsibility for preparing and approving the portions of the AQMP relating to regional demographic projections and integrated regional land use, housing, employment, and transportation programs, measures, and strategies. SCAG is also responsible under the CAA for determining conformity of transportation projects, plans, and programs with applicable air quality plans.

With regard to GHG emissions, SCAG has prepared and adopted the 2020–2045 RTP/SCS,[69] which includes a Sustainable Communities Strategy that addresses regional development and growth forecasts. The SCAG 2020–2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level.

SCAQMD

SCAQMD has released draft guidance regarding interim CEQA GHG significance thresholds. In October 2008, SCAQMD proposed the use of a percent emission reduction target to determine significance for commercial/residential projects that emit greater than 3,000 metric tons of CO2e per year. On December 5, 2008, the SCAQMD Governing Board adopted the staff proposal for an interim GHG significance threshold for stationary source/industrial projects where SCAQMD is lead agency. However, SCAQMD has yet to formally adopt a GHG significance threshold for land use development projects (e.g.,

68 California Health and Safety Code, *Division 26. Air Resources, PART 3. Air Pollution Control Districts, Chapter 5.5. South Coast Air Quality Management District, ARTICLE 5. Plan, Section 40460(b).* https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=40460.&lawCode=HSC.

69 Southern California Association of Governments (SCAG), Connect SoCal: 2020–2045 Regional Transportation Plan/Sustainable Communities Strategies Draft, "Chapter 1," https://www.connectsocal.org/Pages/Connect-SoCal-Draft-Plan.aspx, Accessed on July 10, 2020.

residential/commercial projects) and has formed a GHG Significance Threshold Working Group to further evaluate potential GHG significance thresholds.

City of Los Angeles Sustainable City pLAn/L.A.'s Green New Deal

The City began addressing the issue of global climate change by pushing Green L.A., *An Action Plan to Lead the Nation in Fighting Global Warming* (L.A. Green Plan/ClimateLA) in 2007. This document outlines the goals and actions the City has established to reduce the generation and emission of GHGs from both public and private activities. In 2008, the City released an implementation program for the L.A. Green Plan/ClimateLA, which provides detailed information about each action item discussed in the L.A. Green Plan/ClimateLA framework. Action items range from harnessing wind power for electricity production and energy efficiency retrofits in City buildings, to converting the City's fleet vehicles to cleaner and more efficient model and reducing water consumption.

On April 8, 2015, Mayor Eric Garcetti released the Los Angeles' first ever Sustainable City pLAn (The pLAn). The pLAn sets the course for a cleaner environment and a stronger economy, with commitment to equity as its foundation. The pLAn is made up of short term (by 2017) and long-term (2025 and 2035) targets. The pLAn set out an ambitious vision for cutting GHG emissions, reducing the impact of climate change and building support for national and global initiatives. Los Angeles has moved to the forefront of climate innovation and leadership through bold actions on energy efficiency and electric vehicle as well as renewable energy and GHG accounting. L.A. has already reduced its GHG emissions by 20% below 1990 levels as of 2013, nearly halfway to the goal of 45% below by 2025. The City has been working to increase the generation of renewable energy, improve energy conservation and efficiency, and change transportation and land use patterns to reduce dependence on automobiles.

Since 2015, Mayor Garcetti has released an expanded vision for the Sustainable City pLAn, called L.A.'s Green New Deal. Released in 2019, the update to the Sustainable City pLAn sets new energy efficiency and sustainability goals that will transition the City of Los Angeles to a more resilient, sustainable, and equitable energy future. Actionable goals include increasing the green building standard for new construction, create benchmarking policies for building energy use, develop "blue, green, and black" waste bin infrastructure, reduce water use by 20 percent, and require LEED Silver or better for new construction. That future will be realized, in part, by the 2050 targets that are spelled out in the plan that include goals for: renewable energy, local water, clean and healthy buildings, housing and development, mobility and mass transit, zero emission vehicles, industrial emissions and air quality monitoring, waste and resource recovery, food systems, urban ecosystems and resilience, environmental justice, prosperity and green jobs, and lead by example.

In 2019, the first four-year update to the 2015 Sustainable City pLAn was released. Although not a formally adopted plan or policy, but rather a mayoral initiative, the updated document, known as L.A.'s Green New Deal, expands upon the City's vision for a sustainable future and provides accelerated targets and new goals.[70] L.A.'s Green New Deal has established targets such as 100 percent renewable energy by 2045, diversion of 100 percent of waste by 2050, and recycling 100 percent of wastewater by 2035.

L.A. Green Building Code

The City of Los Angeles L.A. Green Building Code (Ordinance No. 181,480), which incorporates applicable provisions of the CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects in the City of Los Angeles is consistent with Statewide goals and policies in place for the reduction of GHG emissions, including SB 32 and the corresponding Scoping Plan. Among the many GHG reduction measures, the L.A. Green Building Code requires new development projects to incorporate infrastructure to support future electric vehicle supply equipment (EVSE), exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code by 20 percent, meet the requirements of the California Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC. New related projects are required to comply with the L.A. Green Building Code, and therefore are generally considered consistent with Statewide GHG-reduction goals and policies, including SB 32.

GHG Significance Threshold

CEQA Guidelines section 15064.4 states that lead agencies shall have discretion to determine, in the context of a particular project, whether: (1) to use a model or methodology to quantify a project's GHG emissions; and/or (2) to rely on a qualitative analysis or performance-based standards. Section 15064.4 further states that a lead agency should consider specific factors, among others, when assessing the significance of GHG emission on the environment, including: (a) the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; (b) whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and (c) the extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHGs. CEQA Guidelines section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds.

70 City of Los Angeles, L.A.'s Green New Deal, Sustainable City pLAn, 2019.

CEQA Guidelines Section 15130(f) clarifies that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis. Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project will comply with an approved plan or mitigation program that provides specific requirements to avoid or substantially lessen the cumulative problem within the geographic area of the project. Examples of such programs include "plans or regulations for the reduction of greenhouse gas emissions."

In the absence of any adopted, numeric threshold, the City evaluated the significance of the Project's potential GHG emissions consistent with CEQA Guidelines section 15064.4(b)(2). As such, a significant impact would occur if the Project conflicts with the applicable policies and/or regulations outlined in the LA Green Building Code, L.A. Green Plan/ClimateLA, Sustainable City pLAn/L.A.'s Green New Deal, and SCAG's 2020–2045 RTP/SCS.

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

Construction

Less than Significant Impact. Construction activity impacts are relatively short in duration, and they contribute a relatively small portion of the total lifetime GHG emissions of a project. Due to the complex physical, chemical, and atmospheric mechanisms involved in global climate change, no basis exists for concluding that the Project's very small and essentially temporary (primarily from construction) increase in emissions could cause a measurable increase in global GHG emissions necessary to force global climate change. In addition, GHG emissions-reduction measures for construction equipment are relatively limited.[71] Therefore, in its *Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Thresholds*,[72] the SCAQMD recommends that construction emissions be amortized over a 30-year project lifetime so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. That method is used in this analysis.

GHG emissions were quantified from construction and operation of the Project using SCAQMD's CalEEMod model. CalEEMod is based on outputs from the CARB off-road emissions model (OFFROAD) and the CARB on-road vehicle emissions model (EMFAC), which are emissions estimation models developed by CARB and used to calculate emissions from construction activities, including on- and off-road vehicles (refer to **Appendix A** for construction equipment inventory list).

71 SCAQMD, Draft Guidance Document – Interim CEQA Greenhouse Gas (GHG) Significance Threshold, October 2008.
72 SCAQMD, Greenhouse Gases (GHG), Accessed June 2020, http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook/ghg-significance-thresholds/page/2.

The forecasting of construction-related GHG emissions requires assumptions regarding the timing of construction as the emission factors for some of the Project's construction-related GHG emission sources decline over time. As shown in **Table 4.8-1: Construction GHG Emissions**, total construction emissions would be 3,663 MTCO2e. One-time, short-term emissions are converted to average annual emissions by amortizing them over the service life of a building. For buildings in general, it is reasonable to look at a 30-year time frame because this is a typical interval before a new building requires its first major renovation.[73] As shown in **Table 4.8-1**, when amortized over an average 30-year Project lifetime, average annual construction emissions from the Project would be 122 MTCO2e per year.

Table 4.8-1
Construction GHG Emissions

Construction Phase	MTCO2e/Year
2021	1,773
2022	1,515
2023	375
Overall Total	**3,663**
30-Year Annual Amortized Rate	**122**

*Source: Refer to **Appendix A.***
Notes: GHG = greenhouse gas; MTCO2e = metric tons of CO2

Operation

Operation of the Project has the potential to generate criteria pollutant emissions through vehicle trips traveling to and from the Project Site. In addition, emissions would result from area sources on site, such as natural gas combustion, landscaping equipment, and use of consumer products. Emissions from mobile and area sources and indirect emissions from energy and water use, wastewater, as well as waste management would occur every year after full development of the uses allowed by the Project. Operational Project emissions from area sources, energy sources, mobile sources, solid waste, and water and wastewater conveyance are discussed in more detail below.

At this current stage of design, the Project has identified 47 Yes and 16 Probable LEED points, equivalent to LEED v4 Silver. The Project would comply with all of the CALGreen 2019 Mandatory Requirements. These requirements are divided into five categories: (1) Planning and Design; (2), Energy Efficiency; (3) Water Efficiency and Conservation; (4) Material Conservation and Resource Efficiency; and (5) Environmental Quality. CALGreen incorporates and overlaps with many LEED strategies, with several applicable LEED v4 credits satisfying the requirements for CALGreen mandatory requirements. The Project would also be required to comply with the L.A. Green Building Code which incorporates applicable provisions of the

73 International Energy Agency (IEA), Energy Efficiency Requirements in Building Codes, Energy Efficiency Policies for New Buildings, IEA Information Paper (2008).

CALGreen Code, and in many cases outlines more stringent GHG reduction measures available to development projects.

Area Sources

The area source GHG emissions included in this analysis result primarily from natural gas fireplaces with additional emissions from landscaping-related fuel combustion sources, such as lawnmowers. GHG emission due to natural gas combustion in buildings other than from fireplaces are excluded from area sources since they are included in the emissions associated with building energy use.

Consumer products are various solvents used in nonindustrial applications which emit Reactive Organic Gases (ROGs) during their product use. Consumer products include cleaning supplies, kitchen aerosols, cosmetics, and toiletries. All land use buildings are assumed to be repainted at a rate of 10 percent of area per year. This is based on the assumptions used by SCAQMD.[74] However, CalEEMod does not consider architectural coatings and consumer products to be sources of GHG.

The Project would utilize low volatile organic compound emitting paints, sealants, fabrics, insulation, and flooring as required by CALGreen compliance and would be incorporated into the materials framework. Outdoor air monitoring equipment and MERV 13 filters would be installed on every Air Handling Unit.

The GHG emissions for the Project were calculated using CalEEMod. All fireplaces were assumed to be natural gas burning, based on SCAQMD Rule 445. CalEEMod defaults were used for landscape maintenance emissions. Area source emissions are shown in **Table 4.8-2: Area Source Greenhouse Gas Emissions**.

Table 4.8-2
Area Source Greenhouse Gas Emissions

Source	No Regulatory Compliance Features MTCO2e per year	With Regulatory Compliance Features MTCO2e per year
Architectural Coating	0	0
Consumer Products	0	0
Hearth	0	0
Landscaping	7	5
Total	**7**	**5**

*Source: Refer to **Appendix A** for GHG Annual Outputs.*

74 SCAQMD, Advisory Notice: Important Notice to All Manufacturers, Suppliers and Users of Rust Preventative Coatings Sold in Small Containers: Administrative Correction to the Sell-Through Provision in SCAQMD Rule 1113 – Architectural Coatings, February 2016.

As shown in **Table 4.8-2**, SCAQMD regulatory compliance features would result in a reduction of 2 MTCO2e per year.

Energy Sources

GHGs are emitted as a result of activities in buildings when electricity and natural gas are used as energy sources. Combustion of any type of fuel emits CO_2 and other GHGs directly into the atmosphere; when this occurs in a building, it is a direct emission source associated with that building. GHGs are also emitted during the generation of electricity from fossil fuels. When electricity is used in a building, the electricity generation typically takes place off-site at the power plant; electricity use in a building generally causes emission in an indirect manner.

Estimated emissions from the combustion of natural gas and other fuels from the implementation of the Project are calculated using the CalEEMod emissions inventory model, which multiplies an estimate of the energy usage by applicable emissions factors chosen by the utility company. GHG emissions from electricity use are directly dependent on the electricity utility provider. In this case, GHG intensity factors for Southern California Edison were selected in CalEEMod. Energy use in buildings is divided into energy consumed by the built environment and energy consumed by uses that are independent of the construction of the building, such as plug-in appliances. CalEEMod calculates energy use from systems covered by Title 24 (e.g., heating, ventilation, and air conditioning [HVAC] system, water heating system, and lighting system); energy use from lighting; and energy use from office equipment, appliances, plug-ins, and other sources not covered by Title 24 or lighting.

Table 4.8-3
Energy Source Greenhouse Gas Emissions

	Electricity		Natural Gas	
Land Use	**Without LEED Features MTCO2e per year**	**With LEED Features MTCO2e per year**	**Without LEED Features MTCO2e per year**	**With LEED Features MTCO2e per year**
Apartments	886	861	198	180
Retail	309	285	4	3
Total	**1,195**	**1,146**	**202**	**183**

*Source: Refer to **Appendix A: Air Quality Study,** for GHG Annual Outputs.*

Energy source emissions are shown in **Table 4.8-3: Energy Source Greenhouse Gas Emissions**. The Project would combine passive design features with energy efficient equipment and strategies such as airside economizers and intelligent controls that provide a pathway to achieving a high-performance building that meets LEED v4 requirements and exceeds Title 24 Energy 2019 Standard by 20 percent. These include

features such as Energy Star or better appliances, tracking of energy performance with metering in line with LEED v4.1 Recertification. As shown in **Table 4.8-3**, implementation of LEED features would result in reductions to electricity and natural gas consumption by 49 and 19 MTCO2e per year, respectively.

Mobile Sources

Vehicle trips generated by growth within the Project area would result in operational emissions through the combustion of fossil fuels. The VMT estimate takes into account internal and external trips. Household VMT per capita is the total home-based VMT productions divided by the population of the Project. Work VMT per employee is the total home-based work attractions divided by the employment of the Project. The City is served by multiple mass transit operators, specifically within the vicinity of the Project area, with networks connecting different communities within and outside of City boundaries. Metro operates fixed-route bus transit service. Within the Project vicinity, there are five bus routes that operate during weekday (Monday through Friday) and limited service on weekends. Also, within the Project vicinity, there are two operated light rail lines, the Metro E Line and the soon-to-be-opened (2020) Crenshaw/LAX Line. As discussed in **Appendix J.1**, the Project would implement additional transit reduction measures recommended by CAPCOA, resulting in a VMT reduction of 12.2 percent. These CAPCOA Measures include **LUT-1** (Increase Density), **LUT-3** (Increase Diversity of Urban and Suburban Developments), and **SDT-1** (Provide Pedestrian Network Improvements). The household VMT per capita and work VMT per employee is measured against the threshold for the area planning commission (APC) in which the project is located to determine if the project has a significant household or work impact. The Project Site is located within the boundaries of the South LA Area Planning Commission. The per capita VMT estimated for the Project would be 6.0, which would not exceed the VMT impact threshold of 6.0 and workforce threshold of 11.6 (See **Appendix J.1**). VMT per capita of 6.0 would be 15 percent less than the current average for the area and is less than significant for this reason.

Solid Waste Emissions

Emissions of GHGs associated with solid waste disposal under the Project's proposed land uses are calculated using the CalEEMod which calculates solid waste emissions based on the size of the proposed land uses, the waste disposal rate for the land uses, the waste diversion rate, the GHG emission factors for solid waste decomposition, and the global warming potential (GWP) values for the GHGs emitted. Disposal of organic waste in landfills can lead to the generation of CH4, a potent GHG. By generating solid waste, the Project would contribute to the emission of fugitive CH4 from landfills, as well as CO2 and NO2 from the operation of trash collection vehicles.

The Project would implement a construction and demolition waste diversion plan with a certified diversion rate of at least 75 percent. As such, less waste would be transported to landfills which would reduce

fugitive CH4 emissions. Moreover, reducing transportation of solid waste would minimize CO2 and NO2 emissions from the operation of trash collection vehicles. In addition, the Project would track waste performance by waste audits in line with LEED v4.1 Recertification. As shown in **Table 4.8-4: Solid Waste Source Greenhouse Gas Emissions,** implementation of LEED features would result in a 97 MTCO2e per year reduction.

Table 4.8-4
Solid Waste Source Greenhouse Gas Emissions

Land Use	Without LEED Features MTCO2e per year	With LEED Features MTCO2e per year
Residential	93	23
Retail	22	5
Total	**115**	**18**

*Source: Refer to **Appendix A** for GHG Annual Outputs.*

Water Consumption and Wastewater Emissions

California's water conveyance system is energy intensive, with electricity used to pump and treat water. The Project will result in indirect GHG emissions due to water consumption and wastewater generation. Water consumption and wastewater generation, and their associated emissions, are calculated based on the square footage of the Project area, using CalEEMod data.

The Project would include high efficiency water fixtures. Low Flow fixtures would meet WaterSense Guidelines by achieving 30 percent reduction. In addition, water consumption would be tracked by metering in line with LEED v4.1 Recertification. In addition, the Project would incorporate native and/or adaptive and drought resistant planting. As shown in **Table 4.8-5: Water Source Greenhouse Gas Emissions**, LEED features would reduce emissions by 135 MTCO2e per year.

Table 4.8-5
Water Source Greenhouse Gas Emissions

Land Use	Without LEED Features MTCO2e per year	With LEED Features MTCO2e per year
Residential	328	207
Retail	38	24
Total	**366**	**231**

*Source: Refer to **Appendix A** for GHG Annual Outputs.*

Total Emissions

When taking into consideration the LEED features and the CalGreen and L.A. Green Building Code requirements explained above, the result would be a 21 percent reduction in GHG emissions, as shown in **Table 4.8-6: Total Greenhouse Gas Emissions**.

Table 4.8-6
Total Greenhouse Gas Emissions

Source	Without LEED Feature MTCO2e per year	With LEED Features MTCO2e per year	Percent Reduction
Construction (amortized)	122	122	0
Area	7	5	29%
Energy	1,397	1,329	5%
Mobile	6,116	4,701	23%
Waste	114	29	75%
Water	365	231	37%
Total	**8,121**	**6,417**	**21%**
Estimated Service Population (Residents and Employees)	1,115	1,115	—
GHG Efficiency MTCO2e/yr./SP	7.3	5.8	—

*Source: Refer to **Appendix A** for GHG Annual Outputs.*

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

- **Stationary and Area Sources**: Emissions from small on-site sources are subject to specific emission reduction mandates and/or are included in the State's Cap and Trade program.
- **Energy:** Both construction and operational activities associated with the Project would generate energy-related emissions that are covered by the State's renewable portfolio mandates, including SB 350, which requires that at least 50 percent of electricity generated and sold to retail customers from renewable energy sources by December 31, 2030.
- **Transportation**: Both construction and operational activities associated with the Project would generate transportation-related emissions from combustion of fossil fuels that are covered in the State's Cap and Trade program.

- **Building Structures:** Operational efficiencies would be incorporated into the Project that reduce energy use and waste, as mandated by the City's Green Building Code, such as use of energy efficient windows and construction materials.
- **Water and Wastewater use**: The Project would be subject to drought-related water conservation emergency orders and related State Water Quality Control Board restrictions.
- **Major appliances:** The Project would include major appliances that are regulated by CEC requirements for energy efficiency.
- **Solid Waste Management:** The Project would be subject to solid waste diversion policies that reduce GHG emissions, such as the City's recycling program.

The Project adheres to regulatory compliance measures and LEED features that would reduce the Project's GHG emissions profile. The reduction in the GHG emissions shows that the Project would not conflict with applicable plans including the Los Angeles Green Building Code, L.A. Green Plan/ClimateLA, and the SCAG 2020–2045 RTP/SCS. In addition, the mixed-use nature of the Project and its proximity to mass transit would not exceed thresholds of emissions and would further reduce what emissions are produced through the above regulations and applicable air quality plans so that the Project would have a less than significant direct or indirect impact on the environment.

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

Less than Significant Impact. Below is a discussion of the Project's consistency with relevant plans and policies that govern climate change that would demonstrate how the Project would not conflict with any applicable plans, policies, or regulations to further reduce GHG.

Consistency with Los Angeles Green Building Code

The Project would comply with the Los Angeles Green Building Code. Through this compliance the Project's GHG emissions would be reduced by increasing energy efficiency, reducing indoor and outdoor water demand, installing energy-efficient equipment, and complying with 2019 California Title 24 Building Energy Efficiency Standards. The Project would also meet the 2019 mandatory measures of the CALGreen Code and the L.A. Green Building Code by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The HVAC system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. CalGreen incorporates and overlap with many LEED strategies, with several applicable LEED v4 credits satisfying the requirements for CALGreen mandatory requirements. Therefore, the Project would not conflict with the City's Green Building Code.

Consistency with Los Angeles L.A. Green Plan/ClimateLA Plan

The Project would not conflict with the intent of the L.A. Green Plan/ClimateLA to reduce and recycle trash (including construction waste). The Project would promote this goal by complying with waste reduction measures mandated by CALGreen and City's Green Building Code, as well as solid waste diversion policies administered by CalRecycle that in turn reduce GHG emissions. A waste management plan for the construction and demolition waste would be prepared to comply with both LEED and CalGreen requirements to achieve a 75 percent diversion rate. The Project would accommodate adequate infrastructure for waste management which include recycling infrastructure, electrical waste, and composting.

The Project would also not conflict with the intent of the L.A. Green Plan/ClimateLA to reduce energy consumption and improve water efficiency. The Project would also combine daylight with multiple shading strategies to reduce glare, provide a restorative environment, and improve the buildings' energy efficiency through passive design. The Project would combine passive design features with energy efficient equipment and strategies such as airside economizers and intelligent controls to achieve high-performance buildings that meet the LEED v4 requirements and exceeds Title 24 Energy 2019 Standard by 20 percent. The Project would achieve more than 30 percent reductions by instituting building water use reduction, or stormwater that would be collected and reused for both indoor fixture and outdoor irrigation needs. Low Flow fixtures would meet WaterSense Guidelines by achieving 30 percent reduction.

Sustainable City pLAn/L.A.'s Green New Deal

The L.A. Green Building Code contains both mandatory and voluntary green building measures for the reduction of GHG emissions through energy conservation. The Project would comply with the L.A. Green Building Code which requires new development projects to incorporate infrastructure to support future EVSE, exceed the prescriptive water conservation plumbing fixture requirements of Sections 4.303.1.1 through 4.303.1.4.4 of the California Plumbing Code by 20 percent, meet the requirements of the California Building Energy Efficiency Standards, and comply with the construction and demolition solid waste handling and diversion requirements mandated in Section 66.32 of the LAMC. The Project would also meet the 2019 mandatory measures of the CALGreen Code and the L.A. Green Building Code by incorporating strategies such as low-flow toilets, low-flow faucets, low-flow showers, and other energy and resource conservation measures. The HVAC system would be sized and designed in compliance with the CALGreen Code to maximize energy efficiency caused by heat loss and heat gain. CalGreen incorporates and overlap with many LEED strategies, with several applicable LEED v4 credits satisfying the requirements for CALGreen mandatory requirements. Therefore, the Project would not conflict with the Sustainable City pLAn/L.A.'s Green New Deal.

Consistency with SCAG's RTP/SCS

SCAG's 2020–2045 RTP/SCS is a long-range visioning plan that balances future mobility and housing needs with economic, environmental, and public health goals, with a specific goal of achieving an 8 percent reduction in passenger vehicle GHG emissions on a per capita basis by 2020, 19 percent reduction by 2035, and 21 percent reduction by 2040 compared to the 2005 level. In addition to demonstrating the region's ability to attain and exceed the GHG emission-reduction targets set forth by CARB, the 2020-2045 RTP/SCS outlines a series of actions and strategies for integrating the transportation network with an overall land use pattern that responds to projected growth, housing needs, changing demographics, and transportation demands. Thus, successful implementation of the 2020-2045 RTP/SCS would result in more complete communities with a variety of transportation and housing choices, while reducing automobile use. With regard to individual developments, such as the Project, strategies and policies set forth in the 2020-2045 RTP/SCS can be grouped into the following two categories: (1) integrated growth forecast; and (2) reduction of vehicle trips and VMT.

Integrated Growth Forecast

The 2020–2045 RTP/SCS provides socioeconomic forecast projections of regional population growth. The population, housing, and employment forecasts, which are adopted by SCAG's Regional Council, are based on the local plans and policies applicable to the specific area; these are used by SCAG in all phases of implementation and review. According to the SCAG estimates, the 2016 population within the City was 3,933,800 residents and 1,848,300 employment opportunities. Based on the current draft forecasts, the population and employment projection for year 2045 is 4,771,300 and 2,135,900, respectively. The Project would result in an increase of 967 residences and 145 employees. This would result in less than 0.1 percent of the anticipated increase for both population and employment. As such, the impact of growth associated with the Project would be less than significant.

Consistency with VMT Reduction Strategies and Policies

The SCS's goals and policies to reduce VMT focus on transportation and land use planning that include building mixed-use projects, locating residents closer to where they work and play, and designing communities so there is access to high quality mass transit service. The SCS identifies transportation network actions and strategies that are outside the City's jurisdiction and control, such as expanding the use of transit modes in sub-regions (e.g., bus rapid transit (BRT), rail, limited-stop service, and point-to-point express service utilizing the high-occupancy vehicle (HOV) and high-occupancy toll (HOT) lane networks). In areas without quality mass transit, the SCS identifies land use strategies to promote development patterns that result in fewer vehicles miles traveled and thus lower GHG emissions. Such land use strategies including local government adoption of updated zoning codes, General Plans, and other

regulatory policies that promote neighborhood-oriented development, suburban villages, and revitalized main streets consistent with the 2020–2045 RTP/SCS.

OPR issued proposed changes to the CEQA Guidelines.[75] These changes state that projects within one-half mile of either an existing major transit stop or a stop along an existing high-quality transit corridor (HQTC) generally may be considered to have a less than significant transportation impact. The Project Site is located within a HQTC or Major Transit Stop. The Project Site is well served by mass transit with frequency of service intervals of 15 minutes or less during peak commute periods. It is important to note, future rail and bus network in the immediate Project vicinity and the Los Angeles region as a whole would be drastically altered as multiple Metro projects are under construction or funded and in progress. More specifically, the future Crenshaw/LAX Line will terminate at the existing Metro E line adjacent to the Project Site.

The VMT that would be generated by the Project was assessed using the LADOT VMT calculator, which considers the proximity of a proposed project to active light rail lines in the City. As the Metro E Line is currently in operation the VMT calculator considers proximity to the Metro E Line in estimating the VMT the Project would generate. Because the Metro K Line is not currently in operation, the VMT calculator does not take into account proximity to the Metro K Line in estimating the VMT the Project would generate and, for this reason, additional transit reductions were applied to the Project, see *Transit Reduction Memo* (**Appendix J.2**). The Project location is unique for its proximity to both the existing Metro E Line as well as being directly above the Expo/Crenshaw station currently under construction as part of the Metro K Line and includes direct access to the station within the Project Site. The location of the Metro K Line adjacent to the Project Site warrants an additional reduction in the VMT estimate for the Project.

With consideration of the additional VMT reduction that will result from the characteristics of the Project and the Metro K Line, the household per capita VMT for the Project is below the VMT impact threshold. Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). As such, impacts would be less than significant.

As such, the Project would not conflict with VMT reduction strategies and policies and impacts would be less than significant.

75 California Office of Planning and Research (OPR), Revised Proposal on Updates to CEQA Guidelines on Evaluating Transportation Impacts in CEQA (January 20, 2016), http://www.opr.ca.gov/docs/Revised_VMT_CEQA_Guidelines_Proposal_January_20_2016.pdf.

Cumulative Impacts

To achieve Statewide goals, CARB is in the process of establishing and implementing regulations to reduce Statewide GHG emissions. Currently, there is no generally accepted methodology that exists to determine whether GHG emissions associated with a specific project represent new emissions or existing and/or displaced emissions. Therefore, consistent with CEQA Guidelines Section 15064h (3), the City as a lead agency, has determined that the Project's contribution to cumulative GHG emission and global climate change would be less than significant if the Project is consistent with the applicable regulatory plans and polices to reduce GHG emissions. Accordingly, the analysis above considered the potential for the Project to contribute to the cumulative impact of global climate change. As stated above, the Project with compliance with regulatory measures and implementation of CALGreen Building Standards and achieving LEED v4 Silver Certification, the Project would not conflict with applicable plans including the Los Angeles Green Building Code, L.A. Green Plan/ClimateLA, and the SCAG 2020–2045 RTP/SCS. As such, cumulative impacts would be less than significant during construction and operation.

Mitigation Measures

Incorporation of Prior Mitigation

As discussed in Section 3.3 of this SCEA, PRC Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports (EIRs).

The following mitigation measures from prior applicable EIRs incorporated into the Project will further reduce the less than significant impacts of the Project.

SCAG 2020–2045 RTP/SCS Program EIR:

PMM GHG-1 In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to greenhouse gas emissions, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a. Integrate green building measures consistent with CALGreen (California Building Code Title 24), local building codes and other applicable laws, into project design including:

- Use energy efficient materials in building design, construction, rehabilitation, and retrofit.
- Install energy-efficient lighting, heating, and cooling systems (cogeneration); water heaters; appliances; equipment; and control systems.

- Reduce lighting, heating, and cooling needs by taking advantage of light-colored roofs, trees for shade, and sunlight.
- Incorporate passive environmental control systems that account for the characteristics of the natural environment.
- Use high-efficiency lighting and cooking devices.
- Incorporate passive solar design.
- Use high-reflectivity building materials and multiple glazing.
- Prohibit gas-powered landscape maintenance equipment.
- Install electric vehicle charging stations.
- Reduce wood burning stoves or fireplaces.
- Provide bike lanes accessibility and parking at residential developments.

b. Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.

c. Include off-site measures to mitigate a project's emissions.

d. Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:

- Use energy and fuel-efficient vehicles and equipment;
- Deployment of zero- and/or near zero emission technologies;
- Use lighting systems that are energy efficient, such as LED technology;
- Use the minimum feasible amount of GHG-emitting construction materials;
- Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
- Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
- Incorporate design measures to reduce energy consumption and increase use of renewable energy;
- Incorporate design measures to reduce water consumption;
- Use lighter-colored pavement where feasible;
- Recycle construction debris to maximum extent feasible;
- Plant shade trees in or near construction projects where feasible; and

- Solicit bids that include concepts listed above.

e. Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:

- Promote transit-active transportation coordinated strategies;
- Increase bicycle carrying capacity on transit and rail vehicles;
- Improve or increase access to transit;
- Increase access to common goods and services, such as groceries, schools, and day care;
- Incorporate affordable housing into the project;
- Incorporate the neighborhood electric vehicle network;
- Orient the project toward transit, bicycle and pedestrian facilities;
- Improve pedestrian or bicycle networks, or transit service;
- Provide traffic calming measures;
- Provide bicycle parking;
- Limit or eliminate park supply through:
  - Elimination (or reduction) of minimum parking requirements
  - Creation of maximum parking requirements
  - Provision of shared parking.
- Unbundle parking costs;
- Provide parking cash-out programs;
- Implement or provide access to commute reduction program;

f. Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;

g. Improving transit access to rail and bus routes by incentives for construction of transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and

h. Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:

i. Provide car-sharing, bike sharing, and ride-sharing programs;

- Provide transit passes;
- Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;
- Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle;
- Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;
- Provide employee transportation coordinators at employment sites;
- Provide a guaranteed ride home service to users of non-auto modes.
  - Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;

j. Land use siting and design measures that reduce GHG emissions, including:

- Developing on infill and brownfields sites;
- Building compact and mixed-use developments near transit;
- Retaining on-site mature trees and vegetation, and planting new canopy trees;
- Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and
- Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling, composting, and reuse.

k. Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.

l. Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in.

m. Encourage telecommuting and alternative work schedules, such as:

- Staggered starting times
- Flexible schedules
- Compressed work weeks

n. Implement commute trip reduction marketing, such as:

- New employee orientation of trip reduction and alternative mode options
- Event promotions
- Publications

o. Implement preferential parking permit program

p. Implement school pool and bus programs

q. Price workplace parking, such as:

- Explicitly charging for parking for its employees;
- Implementing above market rate pricing;
- Validating parking only for invited guests;
- Not providing employee parking and transportation allowances; and
- Educating employees about available alternatives.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No GHG mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

No GHG mitigation measures were identified.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

The mitigation measures incorporated into the Project will further reduce the less than significant impacts of the Project.

IX. HAZARDS AND HAZARDOUS MATERIALS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment caused in whole or in part from the project's exacerbation of existing environmental conditions?	☐	☐	☐	☒
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the Project area?	☐	☐	☐	☒
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

Impact Analysis

a. *Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Less than Significant Impact. A significant impact may occur if a project would involve the use or disposal of hazardous materials as part of its routine operations or would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Construction

The Project would include the demolition of the existing building and site improvements on the West Site and construction of mixed-use buildings with residential and retail commercial uses on both the East and West Sites. Construction of the Project would involve the routine handling of small quantities of hazardous or potentially hazardous materials, such as gasoline, diesel fuel, lubricants, and other petroleum-based products used to operate and maintain construction equipment and vehicles on the Project Site. This handling of hazardous materials would be a temporary activity and coincide with the short-term construction phase of the Project. The transport, use, and storage of hazardous materials during the construction and operation of the Project would be conducted in accordance with applicable State and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, the California Hazardous Material Management Act, and the California Code of Regulations, Title 22. Through compliance with these regulatory requirements, no significant hazards to the public or environment would result in connection with the construction of the Project.

The existing structure on the West Site was built in 1973, prior to the current asbestos and lead regulations, and thus could contain asbestos-containing materials (ACMs) and lead-based paint (LBP). Pursuant to SCAQMD Rule 1403, prior to the issuance of any demolition and/or alteration permits, the Project Applicant shall provide a letter to the City of Los Angeles Department of Building and Safety from a qualified asbestos abatement consultant indicating that no ACMs are present on the Project Site. If ACMs are discovered on site, during demolition or construction proper abatement regulations shall be followed. Because the Project would be required to comply with the SCAQMD Rule 1403, which regulates the removal of ACMs to ensure that asbestos fibers are not released into the air during demolition and/or renovation activities, as well as other applicable State and federal regulations, impacts from ACMs would be less than significant. Additionally, demolition and removal of the existing buildings would be required to comply with CCR, Title 8, Section 1532 et seq., which requires that all LBP be abated and removed by a licensed lead contractor. Standard handling and disposal practice shall be implemented pursuant to CALOSHA regulations. Prior to issuance of a demolition permit, an LBP survey shall be performed and approved by the City of Los Angeles Department of Building and Safety. Thus, construction of the Project

would not result in a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

Operation

The Project involves the operation of a new mixed-use building consisting of residential and commercial uses. The types and amounts of hazardous materials that would be used during operation of the Project would be typical of those in a mixed-use project (e.g., cleaning solvents, pesticides for landscaping, painting supplies). Likewise, the proposed commercial uses could involve the use of commercial-grade cleaning solvents, waxes, dyes, toners, paints, bleach, grease, and petroleum products that are typically associated with commercial land uses. In other words, the Project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development. All potentially hazardous materials would be used and stored in accordance with the manufacturers' instructions and handled in accordance with all applicable federal, State, and local regulations, including but not limited to those set forth by the Federal and State Occupational Safety and Health Acts. This includes City review of plans to ensure proper storage of hazardous substances, accident response plans, inspections, and monitoring by the Los Angeles City Fire Department (LAFD) to minimize hazards to an acceptable level. Such requirements include obtaining material safety data sheets from chemical manufacturers; making these data sheets available to employees; labeling chemical containers in the workplace; developing and maintaining a written hazard communication program; and developing and implementing programs to train employees about hazardous materials. As such, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials and impacts would be less than significant.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less than Significant Impact. A project would normally have a significant impact from hazards and hazardous materials if: (a) the project involved a risk of accidental explosion or release of hazardous substances (including, but not limited to oil, pesticides, chemicals, or radiation); or (b) the project is involved in the creation of any health hazard or potential health hazard.

According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the regulatory framework for the health hazard; (b) the probable frequency and severity of consequences to people or property as a result of a potential accidental release or explosion of a hazardous substance; (c) the degree to which project design will reduce the frequency or severity of a potential accidental release or explosion of a hazardous substance; (d) the

probable frequency and severity of consequences to people from exposure to the health hazard; and (e) the degree to which project design would reduce the frequency of exposure or severity of consequences to exposure to the health hazard.

Construction

As discussed above, compliance with federal, State, and local laws and regulations relating to transport, storage, disposal, and sale of hazardous materials would minimize any potential for accidental release or upset of hazardous materials. A *Phase I Environmental Site Assessment* (ESA) and a *Report of Phase II Subsurface Investigation* (refer to **Appendix G.1** and **Appendix G.2**) were prepared for the Project Site.

The findings in those reports state that a review of historical records indicated that chemically intensive historical operations were conducted at the East Site. These former site operations may have included the use of petroleum products, solvents, paints, adhesives, and/or other chemicals. Additionally, a number of underground storage tanks (USTs) were formerly known to be present in the southwestern quadrant of the West Site.

As identified by a 2012 Phase I ESA,[76] soil and soil gas sampling were conducted at five parcels that comprise the East Site (5044-002-901 to 5044-002-905) and groundwater sampling were taken on the 5044-002-901 and 5044-002-903 parcels. Of the two groundwater samples collected, the groundwater sample collected on the 5044-002-903 parcel indicated that the presence of fuel constituents as well as volatile organic compounds (VOCs), such as trichloroethene (TCE) and benzene detected at concentrations exceeding their respective California Maximum Containment Levels (MCLs). The soil and soil gas investigations conducted on the 5044-002-904 and 5044-002-905 parcels did not indicate any significant contamination, but soil and soil gas sampling conducted on the 5044-002-901 and 5044-002-903 parcels indicated the presence of fuel constituents and petroleum fuel-related VOCs above their respective residential screening levels. This condition has been attributed to release of a solvent from the dry-cleaning facility adjacent to the East Site. Based on the Phase I ESA, potential contamination was identified at the East Site.

Additional investigations were conducted on the East Site to evaluate the potential presence of petroleum hydrocarbons and VOCs in soil and soil vapor as a result of the historical use of the Property and surrounding properties. (Appendix G.2 *Report of Phase II Subsurface Investigation*) This additional investigation included sampling and analysis of soil vapor at various locations across the East Site. The results indicated that fuel constituents and VOCs in soil and soil vapor are below levels exceeding

76 Phase I Environmental Site Assessment Crenshaw/Rodeo Properties; Parcel Numbers CR-40305, CR-4504, CR-4505 and CR-4506; 3630, 3642, 2644 and 3646 S. Crenshaw Boulevard, 3515 Rodeo Road and 3510 W. Exposition Boulevard Los Angeles, California 90018, prepared by Tetra Tech, Inc., dated June 2012

applicable regulatory thresholds and human health risk criteria. Additionally, TCE in soil vapor samples were also below levels exceeding applicable regulatory thresholds and human health risk criteria. With the exception of a concentration of the chlorinated solvent known as tetrachloroethylene (PCE) at the eastern portion of the East Site. This elevated PCE concentration appears to be relatively anomalous and not indicative of any significant soil vapor impacts on the East Site. No source of soil vapor impacts were identified, and for this reason, the source is likely off-site, such as PCE present in groundwater migrating in from adjacent properties.

The *Report of Phase II Subsurface Investigation* recommends no further action or investigation regarding the presence of PCE and no further action or investigation regarding the environmental condition of the Project Site. The *Report of Phase II Subsurface Investigation* recommended that a soil management plan be prepared and implemented as part of grading and construction activities in the event that unknown contamination is encountered during construction Preparation and implementation of the soil management plan would mitigate potential impacts during construction to less than significant.

Construction of the Project would involve the demolition of the existing office building on the West Site, which, due to its age, may contain asbestos and lead-based paints and materials. Given the date of construction of this building, it is possible that Asbestos Containing Materials (ACMs) are present in building materials. Asbestos abatement activities were previously conducted on this building and a 2012 Asbestos Air Sampling report issued following these activities, did not identify any health hazards from airborne asbestos fibers following the abatement activities. I Because this building was built in the early seventies, there lead-based paint may also be present. However, there is no evidence that lead-based paint is present and the existing paint is in good condition. The removal of any asbestos-containing materials would comply with all applicable existing rules and regulations, including SCAQMD Rule 1403 (Asbestos Demolition and Renovation Activities) and removal of lead would be conducted in accordance with Cal/OSHA regulations regarding lead-based paint. Compliance with these regulations and requirements would ensure that the Project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of ACMs and lead-based paints into the environment. Therefore, impacts related to the removal of ACMs and lead-based paints during construction would be less than significant.

Operation

As discussed above, operation of the Project would use limited quantities of potentially hazardous materials typical of those used in commercial, office, and residential uses, including cleaning agents, paints, pesticides, and other materials used for landscaping. Since the Project does not propose any industrial uses, these materials present a low risk for hazards exposure. Additionally, as with Project

construction, all hazardous materials on the Project Site would be acquired, handled, used, stored, and disposed of in accordance with all applicable federal, State, and local requirements. As with any business in California, tenants and vendors are subject to all applicable OSHA training and informational requirements regarding hazardous materials. Therefore, with implementation of appropriate hazardous materials management protocols during Project operation and compliance with all applicable local, State, and federal laws and regulations relating to environmental protection and the management of hazardous materials, as well as adherence to manufacturer's instructions for the safe handling and disposal of hazardous materials, the Project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials during operation of the Project. As such, impacts would be less than significant.

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

Less than Significant Impact. The nearest school to the Project Site is the Celerity Nascent Charter School, located approximately 0.25 miles northeast of the Project Site.

As discussed previously, the existing structure on the West Site was built in 1973 and could contain ACMs and LBP. Prior to the issuance of any demolition and/or alteration permits, the Project Applicant shall provide a letter to the City of Los Angeles Department of Building and Safety from a qualified asbestos abatement consultant indicating that no ACMs are present on the Project Site. If ACMs are discovered on site during demolition or construction, proper abatement regulations shall be followed. Because the Project would be required to comply with SCAQMD Rule 1403, which regulates the removal of ACMs to ensure that asbestos fibers are not released into the air during demolition and/or renovation activities, as well as other applicable State and federal regulations, impacts from ACMs would be less than significant. Further, demolition and removal of the existing buildings would be required to comply with CCR, Title 8, Section 1532 et seq., which requires that all LBP be abated and removed by a licensed lead contractor. In addition, standard handling and disposal practice shall be implemented pursuant to CALOSHA regulations. Prior to issuance of a demolition permit, an LBP survey would be performed and approved by the Department of Building and Safety.

With regard to emitting hazardous emissions, the *Report of Phase II Subsurface Investigation* indicated that VOCs and TCE levels in soil vapor are below levels exceeding applicable regulatory thresholds and human health risk criteria (see **Appendix G.2**). The *Report of Phase II Subsurface Investigation* recommended that a soil management plan be prepared and implemented as part of grading and construction activities in the event that unknown contamination is encountered during construction

Preparation and implementation of the soil management plan would mitigate potential impacts during construction to less than significant.

Therefore, given that construction and operational activities would be required to comply with local, State, and federal policies for handling any minor hazardous materials and criteria pollutant emissions would be below SCAQMD threshold levels, impacts associated with potential hazardous emissions during construction and operation would be less than significant.

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would exacerbate the current environmental conditions so as to create a significant hazard to the public or the environment?

No Impact. California Government Code Section 65962.5 requires various State agencies, including but not limited to, the Department of Toxic Substances Control (DTSC) and the State Water Resources Control Board (SWRCB), to compile lists of hazardous waste disposal facilities, unauthorized releases from underground storage tanks, contaminated drinking water wells and solid waste facilities where there is known migration of hazardous waste and submit such information to the Secretary for Environmental Protection on at least an annual basis. The Project Site is not included on any list compiled pursuant to Government Code Section 65962.5.[77,78] Therefore, no impact would occur.

e. For a project located within an airport land use plan or, where such plan has not been adopted, within 2 miles of a public airport or public use airport, would the Project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. A significant project-related impact may occur if the Project were placed within a public airport land use plan area, or within two miles of a public airport, and subject to a safety hazard.

The Project Site is not located within an airport land use plan. The closest public airport to the Project Site is the Santa Monica Municipal Airport located approximately 6.5 miles west of the Site. As such, the Project Site is not located within an airport hazard area. In addition, given that the Project Site is not with 2 miles of a public airport or public use airport, construction of the Project would not have the potential to result in a safety hazard or excessive noise. Therefore, no impact would occur.

77 Department of Toxic Substances Control, Envirostor, http://www.envirostor.dtsc.ca.gov/, June 2020.
78 State Water Resources Control Board, GeoTracker, http://geotracker.waterboards.ca.gov/,June 2020.

f. Would the project impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan?

Less than Significant Impact. The City's General Plan Safety Element (Safety Element) addresses public protection from unreasonable risks associated with natural disasters (e.g., fires, floods, earthquakes) and sets forth guidance for emergency response. Specifically, the Safety Element includes Exhibit H, Critical Facilities and Lifeline Systems, which identifies emergency evacuation routes, along with the location of selected emergency facilities. According to the Safety Element, the Project Site is located along a designated disaster route.[79] The closest disaster routes include (Upper) Exposition Boulevard, which runs in an east-west direction, located to the north of the Project Site and Crenshaw Boulevard, which runs north-south direction, between the West and East Site.

Construction

Development of the Project Site may require temporary and/or partial street closures due to construction activities. In accordance with LADOT requirements, a Temporary Traffic Control Plan (TTCP) would be prepared if the public ROW will be affected by project construction. If temporary street, lane, and sidewalk closures will be needed for the duration of 72 hours or longer a B-Permit is required from the Bureau of Street Services (BSS). Through this review and permit process LADOT ensures compliance with Federal and State principles and standards and the safe and efficient movement through and around construction zones. As such, the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans during construction and impacts would be less than significant.

Operation

Operation of the Project would not impede access or travel on public rights-of-way such as Crenshaw Avenue or Exposition Boulevard and would not interfere with any adopted emergency response plan or emergency evacuation plan. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. Project Site access and circulation plans would be subject to review and approval by the LAFD. As such, the Project would not impair implementation or physically interfere with adopted emergency response or emergency evacuation plans during the operation period. Impacts would be less than significant.

79 City of Los Angeles General Plan, Safety Element, https://planning.lacity.org/odocument/31b07c9a-7eea-4694-9899-f00265b2dc0d/Safety_Element.pdf, accessed June 2020.

g. *Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

No Impact. The Project Site is located in an urbanized area of Los Angeles and does not include wildlands or high fire hazard terrain or vegetation. The Project Site is not located in a Very High Fire Hazard Severity Zone (VHFHSZ).[80] Therefore, Project construction and would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Thus, no impacts related to wildland fire issues would occur.

Cumulative Impacts

Less than Significant Impact. Development of the Project in combination with the related projects could increase, to some degree, the risks associated with the use and potential accidental release of hazardous materials in the City. With respect to the related projects, the potential presence of hazardous substances would require evaluation on a case-by-case basis, in combination with the development proposals for each of those properties. However, the Project's impact would be less than significant, and for this reason, the Project would not contribute to a cumulative impact. As mentioned previously, the types and amounts of hazardous materials used during construction and operation of the mixed-use building containing residential and commercial uses would be typical of such developments and would include cleaning solvents, pesticides for landscaping, painting supplies, and batteries. All potentially hazardous materials used during construction and operation of the Project would be contained, stored, and used in accordance with manufacturers' instructions, and handled in compliance with incorporated applicable federal, State, and local regulations. Related projects would also be required to comply with applicable federal, State, and local regulations including the preparation and implementation of a LADOT approved TTCP to avoid any cumulative impact on emergency access and evacuation. Therefore, development of the Project in combination with the related projects indicated in **Table 2.0-2** and **Figure 2.0-11** would not result in any significant hazards or hazardous materials impacts.

Mitigation Measures

Incorporation of Prior Mitigation

As discussed in Section 3.3 of this SCEA, PRC Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports (EIRs).

80 City of Los Angeles, Department of City Planning, City of Los Angeles Zoning Information and Map Access System (ZIMAS), Parcel Profile Report, website: www.zimas.lacity.org, Accessed October 2019.

The following mitigation measures from prior applicable EIRs incorporated into the Project will further reduce the less than significant impacts of the Project.

SCAG 2020–2045 RTP/SCS Program EIR:

PMM HAZ-1 In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to the routine transport, use, or disposal of hazardous materials, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a. Where the construction or operation of projects involves the transport of hazardous material, provide a written plan of proposed routes of travel demonstrating use of roadways designated for the transport of such materials.

b. Specify Project requirements for interim storage and disposal of hazardous materials during construction and operation. Storage and disposal strategies must be consistent with applicable federal, State, and local statutes and regulations. Specify the appropriate procedures for interim storage and disposal of hazardous materials, anticipated to be required in support of operations and maintenance activities, in conformance with applicable federal, State, and local statutes and regulations, in the business plan for projects as applicable and appropriate.

c. Submit a Hazardous Materials Business/Operations Plan for review and approval by the appropriate local agency. Once approved, keep the plan on file with the Lead Agency (or other appropriate government agency) and update, as applicable. The purpose of the Hazardous Materials Business/Operations Plan is to ensure that employees are adequately trained to handle the materials and provides information to the local fire protection agency should emergency response be required. The Hazardous Materials Business/Operations Plan should include the following:

    - The types of hazardous materials or chemicals stored and/or used on-site, such as petroleum fuel products, lubricants, solvents, and cleaning fluids.
    - The location of such hazardous materials.
    - An emergency response plan including employee training information.
    - A plan that describes the way these materials are handled, transported and disposed.

d. Follow manufacturer's recommendations on use, storage, and disposal of chemical products used in construction.

e. Avoid overtopping construction equipment fuel gas tanks.

f. Properly contain and remove grease and oils during routine maintenance of construction equipment.

g. Properly dispose of discarded containers of fuels and other chemicals.

h. Prior to shipment remove the most volatile elements, including flammable natural gas liquids, as feasible.

i. Identify and implement more stringent tank car safety standards.

j. Improve rail transportation route analysis, and modification of routes based on that analysis.

k. Use the best available inspection equipment and protocols and implement positive train control.

l. Reduce train car speeds to 40 miles per hour when passing through urbanized areas of any size.

m. Limit storage of crude oil tank cars in urbanized areas of any size and provide appropriate security in storage yards for all shipments.

n. Notify in advance county and city emergency operations offices of all crude oil shipments, including a contact number that can provide real-time information in the event of an oil train derailment or accident.

o. Report quarterly hazardous commodity flow information, including classification and characterization of materials being transported, to all first response agencies (49 Code Fed. Regs. 15.5) along the mainline rail routes used by trains carrying crude oil identified.

p. Fund training and outfitting emergency response crews that includes the cost of backfilling personnel while in training.

q. Undertake annual emergency responses scenario/field based training including Emergency Operations Center Training activations with local emergency response agencies.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

MM-HM1 Any approval of a Discretionary project or "Active Change Area Project" that involves new construction that will involve soil disturbance shall ensure that a Phase I Environmental Site Assessment (ESA) is prepared. The assessment shall be prepared by a Registered Environmental Assessor (REA) in accordance with State standards/guidelines to evaluate whether the site or the surrounding area is contaminated with hazardous substances from the potential past and current uses including storage, transport, generation, and disposal of toxic and hazardous waste or materials. Depending on the results of this study, further investigation and remediation may be required in accordance with local, State, and federal

regulations and policies. Any further study found necessary by an REA or relevant federal, state or local agency shall be performed prior to project approval and any remediation found necessary by the REA or any relevant federal, state or local agency shall be performed prior to project approval or made a condition on the project if that is found to be adequate for remediation by an REA or the relevant federal, state or local agency.

Mid-City Redevelopment Plan EIR:

MM-S1 Projects involving hazardous materials shall be reviewed for proper handling procedures and safe operating practices. A detailed engineering analysis should be conducted to include a review of spill containment procedures and waste minimization appraisal.

MM-S2 The project sponsor shall obtain all necessary, regulatory, agency permits prior to commencing the project. A hazardous material inventory business plan shall be registered with the Fire Department's Hazardous Material Unit.

MM-S3 If the evidence of soil contamination or the presence of an underground storage tank is revealed, excavation shall be conducted to remove the tank and/or remediate contaminated soils and groundwater. The procedure' shall be performed by a qualified environmental professional in conformance with applicable City, State and Federal Standards.

MM-S4 Projects involving hazardous waste shall only use properly trained and qualified hazardous waste handlers to address hazardous waste disposal needs.

MM-S5 Site specific Phase I: Environmental Assessments are recommended for proposed development within the proposed Recovery Program Area. Where applicable, asbestos and/ or lead-based paint investigation shall be conducted on structures to be demolished or rehabilitated.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

The mitigation measures incorporated into the Project will further reduce the less than significant impacts of the Project.

X. HYDROLOGY AND WATER QUALITY

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i. Result in substantial erosion or siltation on or off-site?	☐	☐	☒	☐
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv. Impede or redirect flood flows?	☐	☐	☐	☒

Impact Analysis

a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

Less than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would 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 National Pollution Discharge Elimination System (NPDES) stormwater permit or Water Quality Control Plan for the receiving body of water. A significant impact may occur if a project would discharge water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into stormwater drainage systems. Significant impacts would also occur if a project does not comply with all applicable regulations with regard to surface water quality as governed by the SWRCB through its nine Regional Boards. The Project Site lies within the LARWQCB. Applicable regulations include compliance with NPDES permitting system, LAMC Article 4.4, and the low impact development requirements, which reduces potential water quality impacts during the construction and operation of a project.

The Project Site is also located within the Ballona Creek Watershed (Watershed) in the Los Angeles Basin. The Watershed covers approximately 130 square miles in the coastal plain of the Los Angeles Basin. The watershed includes the cities of Beverly Hills, West Hollywood, portions of the cities of Los Angeles, Culver City, Inglewood and Santa Monica, unincorporated areas of Los Angeles County, and areas under the jurisdiction of Caltrans. The watershed is highly developed and predominately made up of the following land uses: 59 percent residential, 17 percent vacant/open space, and 14 percent commercial. Overall, 49 percent of the watershed is covered by roads, rooftops, and other impervious surfaces.

Construction

Ballona Creek flows as an open channel for just under 10 miles from mid-Los Angeles (south of Hancock Park) through Culver City, reaching the Pacific Ocean at Playa del Rey (Marina del Rey Harbor). The Watershed flows generally southwest, ultimately discharging into the Pacific Ocean at the Santa Monica Bay. Ballona Creek is designed to discharge to Santa Monica Bay up to approximately 71,400 cubic feet of stormwater per second from a 50-year frequency storm event.[81]

Constituents of concern listed for Ballona Creek under California's Clean Water Act Section 303(d) List include cadmium (sediment), chlordane (tissue & sediment), coliform bacteria, copper (dissolved), cyanide, DDT, lead, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), selenium,

81 LADPW, http://www.ladpw.org/wmd/watershed/bc/, Accessed January 2020.

sediment toxicity, Shellfish Harvesting Advisory, silver, toxicity, trash, viruses (Enteric), and zinc.[82] No Total Maximum Daily Loads (TMDL) data have been recorded by EPA for this waterbody.[83]

Construction activities such as earth moving, maintenance of construction equipment, handling of construction materials, and dewatering have the potential to contribute to pollutant loading in stormwater runoff. Construction associated with the Project would be subject to the requirements of LARWQCB Order No. R4-2012-0175, National Pollution Discharge Elimination System (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 Control Plan (ESCP) for all construction activities within their jurisdiction.[84] ESCPs are required to include the elements of a Stormwater Pollution Prevention Plan (SWPPP). 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.

Construction of the Project would include excavating down to depths between 12 and 17 feet on the East Site for the proposed subterranean parking garage. Groundwater was encountered during substructure investigations, which was recorded between 11-feet and 20-feet below ground surface (See **Appendix E.1: Geotechnical Investigation**). Temporary dewatering is, therefore, likely during construction on the East Site. Construction on the West Site will not involve excavations to this depth as no subterranean parking garage is proposed on the West Site. Any temporary dewatering during construction will be conducted in accordance with all State and local regulations regarding the discharge of this groundwater. If groundwater

82 EPA, Waterbody Quality Assessment Report, https://iaspub.epa.gov/waters10/attains_waterbody.control?p_au_id=CAR4051501019990202085021&p_list_id=CAR4051501019990202085021&p_cycle=2016 accessed June 23, 2020.

83 EPA, Waterbody Quality Assessment Report, https://iaspub.epa.gov/waters10/attains_waterbody.control?p_au_id=CAR4051501019990202085021&p_list_id=CAR4051501019990202085021&p_cycle=2016 accessed June 23, 2020.

84 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.

is encountered during construction, temporary pumps and filtration would be utilized in compliance with the NPDES permit. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Therefore, temporary dewatering activities will not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. As such, impacts would be less than significant during construction.

Operation

The Project will meet the requirements of the City's Low Impact Development (LID) standards.[85] Under section 3.1.3. of the LID Manual, post-construction stormwater runoff from a new development must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for at least the volume of water produced by the greater of the 85th percentile storm or the 0.75-inch storm event. The LID Manual prioritized the selection of BMPs used to comply with stormwater mitigation requirement. The order of priority is:

1. Infiltration Systems
2. Stormwater Capture and Use
3. High Efficiency Biofiltration/Bioretention Systems
4. Combination of Any of the Above

Feasibility screening defined in the LID manual is applied to determine which BMP will best suit the Project. Specifically, LID guidelines require that infiltration systems maintain at least 10 feet of clearance to the groundwater, property line, and any building structure. According to the *Hydrology & Water Resources Technical Report* (**Appendix H**), the historic high groundwater level is recorded at 10 feet below the ground surface and in-situ depths were recorded at 11-20 feet below ground surface.[86] If infiltration is confirmed infeasible, and stormwater capture is deemed infeasible due to current site conditions, High Efficiency Biofiltration/Bioretention Systems will likely be required.

Projects that have demonstrated they cannot manage 100% of the water quality design volume on site through infiltration and/or capture and use BMPs may manage the remaining volume through the use of a high removal efficiency biofiltration/biotreatment BMP. A high removal efficiency biofiltration/biotreatment BMP will be sized to adequately capture 1.5-times the runoff generated from the greater of the 85th percentile storm and the 0.75-inch storm event at a minimum.

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85 The Development Best Management Practices Handbook, Part B Planning Activities, 5th edition was adopted by the City of Los Angeles, Board of Public Works on July 1, 2011 to reflect Low Impact Development (LID) requirements that took effect May 12, 2012.

86 KPFF, Hydrology & Water Resources Technical Report, Mixed Use Development, September 2019.

Biofiltration BMPs are landscaped facilities that capture and treat stormwater runoff through a variety of physical and biological treatment processes. Facilities normally consist of a ponding area, mulch layer, planting soils, plants, and in some cases, an underdrain. Runoff that passes through a biofiltration system is treated by the natural adsorption and filtration characteristics of the plants, soils, and microbes with which the water contacts. Biofiltration BMPs include vegetated swales, filter strips, planter boxes, high flow biotreatment units, bioinfiltration facilities, and bioretention facilities with underdrains. Biofiltration can provide multiple benefits, including pollutant removal, peak flow control, and low amounts of volume reduction through infiltration and evapotranspiration.

The Project will develop hardscape and structures that cover approximately 90% of the Project Site with impervious surfaces, assuming 90% proposed site imperviousness, the storage volume of 70,977 gallons is required for the West Site and 82,781 gallons for the East Site for treating the runoff stormwater before being released into the City's storm drain system. To treat this volume, approximately 5,839-sq. ft. for the West Site and 6,810-sq. ft. for the East Site of biofiltration planter box area will be required to attain 100% of the water quality design volume on site through infiltration and/or capture through the use of appropriate BMPs. With the implementation of the required LID BMPs, infiltration impacts will be less than significant.

As stated above, post-construction stormwater runoff from new projects must be infiltrated, evapotranspirated, captured and used, and/or treated through high efficiency BMPs on site for the volume of water produced by the 85th percentile storm event. The Project will implement either, infiltration, Capture and Use System, or Biofiltration Planters for managing stormwater runoff in accordance with current LID requirements. Under section 3.1.3. of the LID Manual, operation of the Project would not result in discharges that would cause: (1) pollution which would alter the quality of the waters of the State (i.e., Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the waters of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes (**Appendix H**).

As is typical of most urban developments, stormwater runoff from the Project Site has the potential to introduce pollutants into the stormwater system. Anticipated and potential pollutants generated by the Project include sediment, nutrients, pesticides, metals, pathogens, and oil and grease. The pollutants listed above would be mitigated through the implementation of approved LID BMPs.

Furthermore, operation of the Project would not result in discharges that would cause regulatory standards to be violated. A portion of the Project Site will be allocated to stormwater mitigation, in

compliance with LID BMP requirements, to control and treat stormwater runoff to mitigate the 85th percentile storm event. The installed BMP systems will be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. Implementation of LID BMPs will mitigate operational impacts on surface water quality. Therefore, the Project would not result in any substantial increase in concentrations of items listed as constituents of concern for the Watershed and impacts on surface water quality would be less than significant (**Appendix H**).

The Project would also be subject to the BMP requirements of the Standard Urban Storm Water Mitigation Plan (SUSMP) adopted by LARWQCB. As a permittee, the City is responsible for implementing the requirements of the County-wide SUSMP within its boundaries. 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.

The installed BMP systems will be designed with an internal bypass overflow system to prevent upstream flooding during major storm events. Implementation of LID BMPs will mitigate operational impacts on surface water quality. Therefore, the Project would not result in any violations to any water quality standards or waste discharge requirements and would not cause a substantial increase in concentrations of items listed as constituents of concern for the Ballona Creek Watershed and impacts on surface water quality and groundwater quality would be less than significant. As such, impacts would be less than significant during operation.

b. *Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Less than Significant Impact. Based upon the criteria established in the *L.A. CEQA Thresholds Guide*, a project would normally have a significant impact on groundwater level if it would change potable water levels sufficiently to: (a) reduce the ability of a water utility to use the groundwater basin for public water supplies, conjunctive use purposes, storage of imported water, summer/winter peaking, or respond to emergencies and drought; (b) reduce yields of adjacent wells or well fields (public or private); (c) adversely change the rate or direction of flow of groundwater; or (d) result in demonstrable and sustained reduction in groundwater recharge capacity.

As discussed above, temporary dewatering on the East Site is considered likely during construction of the proposed subterranean parking garage given the existing depth to groundwater. Any temporary dewatering during construction will be conducted in accordance with all State and local regulations regarding the discharge of this groundwater. If groundwater is encountered during construction, temporary pumps and filtration would be utilized in compliance with the NPDES permit. The temporary system would comply with all relevant NPDES requirements related to construction and discharges from dewatering operations. Therefore, temporary dewatering activities will not substantially decrease groundwater supplies or interfere substantially with groundwater recharge and therefore the Project's impact would be less than significant.

Moreover, the Project will develop hardscape and structures that cover approximately 90% of the Project Site with impervious surfaces and would not have any impact on the groundwater recharge potential. Additionally, the stormwater which bypasses the BMP systems would discharge to an approved discharge point in the public right-of-way and not result in infiltration of a large amount of rainfall that would affect groundwater hydrology, including the direction of groundwater flow. Therefore, the Project's potential impact on groundwater recharge is less than significant during operation.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. ***result in substantial erosion or siltation on or off site;***

Less than Significant Impact. The Project Site is located in an urbanized area of the City, and no streams or river courses are located on or within the Project vicinity that could be affected by the construction or operation of the Project in a manner that would result in substantial erosion or siltation on or off site.

In addition to the Project Site being located in an urbanized area of the City with no streams or river courses located on the Project Site or within the Project vicinity, the West Site is currently developed and the East Site was previously developed. The West Site is currently developed with an office building and surface parking lot that cover this site with impervious surfaces. The East Site was also previously fully developed with building and parking areas that covered this site with impervious surfaces. The buildings, parking areas and other site improvements on the East Site were removed by Metro to build the new Expo/Crenshaw Line station for the Crenshaw Line and to use the remainder of this site as a construction staging area. The development of the Project will increase the amount of impervious surfaces on the East Site compared to existing conditions, but not when compared to the previous developed conditions. With regard to the West Site, development of the Project imperviousness is comparable to current conditions, as the West Site is fully developed. For these reasons, the increase in impervious surfaces on the East Site

will not result in any substantial erosion or siltation on or off-site no significant impacts will result from construction and operation of the Project.

ii. *substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;*

Less than Significant Impact. A significant impact may occur if a project results in increased runoff volumes during construction or operation of the project that would result in flooding conditions affecting the Project Site or nearby properties.

The West Site is currently covered with impervious surfaces that will be demolished and removed from the site. The East Site was previously developed with impervious surfaces which were demolished and removed by Metro for construction of the Expo/Crenshaw light rail station and for use of the remainder of the East Site for construction staging. Construction of the Project on both the West and East Sites will not result in a substantial increase in the rate or amount of surface runoff as the total amount of impervious surfaces will be reduced when compared to existing conditions. The implementation of the required SWPPP, as discussed above, including BMPs designed to control erosion during construction will also control storm runoff generated during construction. Construction of the Project will not, therefore, result in flooding on or off the site.

Existing drainage stormwater runoff calculations below show existing volume of runoff from the Project Site during a 50-year storm event **Table 4.10-1: Existing Drainage Stormwater Runoff Calculations**.

Table 4.10-2: Proposed Drainage Stormwater Runoff Calculations below shows the proposed peak flow rates stormwater runoff calculations for the 50-year frequency design storm event. **Table 4.10-3: Existing and Proposed Conditions Comparison** compares the results in **Table 4.10-2** to the existing conditions shown in **Table 4.10-1**. As shown in **Table 4.10-3: Existing and Proposed Conditions Comparison**, the Project will not significantly increase the amount of runoff from the Project Site.[87]

City of Los Angeles Ordinance No. 181,899 expanded the applicability of the existing Standard Urban Stormwater Mitigation Plan (SUSMP) requirements by imposing rainwater LID strategies on projects that require building permits. LID is a stormwater management strategy with goals to mitigate the impacts of increased runoff and stormwater pollution as close to its source as possible. LID promotes the use of natural infiltration systems, evapotranspiration, and the reuse of stormwater.

87 KPFF, Hydrology & Water Resources Technical Report, Mixed Use Development, September 2019.

Table 4.10-1
Existing Drainage Stormwater Runoff Calculations

Drainage Area	Area (Acres)	Q50 (cfs) (volumetric flow rate measured in cubic feet per second)
West Site	1.93	5.18
West Site Total	**1.93**	**5.18**
East Site (Subarea 1)	1.24	2.91
East Site (Subarea 2)	1.01	2.37
East Site Total	**2.25**	**5.28**
Project Total	**4.18**	**10.46**

*Source: Refer to **Appendix H.***
Note: Proposed Hydrology Calculations to be updated pending final site plan.

4.10-2
Proposed Drainage Stormwater Runoff Calculations

Drainage Area	Area (Acres)	Q50 (cfs) (volumetric flow rate measured in cubic feet per second)
West Site	1.93	4.82
West Site Total	**1.93**	**4.82**
East Site (Subarea 1)	1.09	2.56
East Site (Subarea 2)	1.16	3.39
East Site Total	**2.25**	**5.95**
Project Total	**4.18**	**10.77**

*Source: Refer to **Appendix H.***
Note: Proposed Hydrology Calculations to be updated pending final site plan.

4.10-3
Existing and Proposed Conditions Comparison

Drainage Area	Area (Acres)		Q50 (cfs) (volumetric flow rate measured in cubic feet per second)		
	Existing	Proposed	Existing	Proposed	Delta
West Site	1.93	1.93	5.18	4.82	-0.36
East Site	2.25	2.25	5.28	5.95	+0.67
Project Total	**4.18**	**4.18**	**10.46**	**10.77**	**+0.31**

*Source: Refer to **Appendix H.***
Note: Proposed Hydrology Calculations to be updated pending final site plan.

The goal of these LID practices is to remove nutrients, bacteria, and metals from stormwater while also reducing the quantity and intensity of stormwater flows. Through the use of various infiltration strategies, LID is aimed at minimizing impervious surface area. Where infiltration is not feasible, the use of bioretention, rain gardens, green roofs, and rain barrels that will store, evaporate, detain, and/or treat runoff may be used. The City's LID Manual prioritizes the selection of BMPs for incorporation into projects as follows: 1. Infiltration Systems, 2. Stormwater Capture and Use, 3. High Efficiency Biofiltration/Bioretention Systems, or 4. Combination of Any of the Above.

The historic groundwater level is recorded at 10 feet below the ground surface and existing depths were recorded at 11-20 feet below ground surface (**Appendix E.1**). These levels result in Infiltration Systems not being feasible for the Project as LID guidelines require that infiltration systems maintain at least 10 feet of clearance to the groundwater. The amount of landscaping and overall design of the Project also limits the ability to capture and reuse stormwater and, for this reason, the Project will incorporate a High Efficiency Biofiltration/Bioretention System. The small increase in runoff from the Project during a 50-year storm event, combined with the retention of runoff generated by the Project to meet the LID standards, will result in the Project not increasing the rate or amount of surface runoff from the Project Site in a manner which would result in flooding on- or off-site. As such, the Project's impact would be less than significant during construction and operation.

iii. ***create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;***

Less than Significant Impact. 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. A significant impact may occur if the volume of stormwater runoff from the Project Site were to increase to a level which exceeds the capacity of the storm drain system serving the Project Site. A significant adverse effect would also occur if a project substantially increased the probability that polluted runoff would reach the storm drain system.

Construction

Construction activities such as earth moving, maintenance of construction equipment, handling of construction materials, and dewatering can contribute to pollutant loading in stormwater runoff.

However, as previously discussed, the Project Applicants would prepare and implement the required SWPPP including BMPs that would include but not be limited to erosion control, sediment control, nonstormwater management, and materials management BMPs.

With implementation of the Erosion Control Plan, site-specific BMPs would reduce or eliminate the discharge of potential pollutants from stormwater runoff. In addition, the Project Applicant would be required to comply with City grading permit regulations and inspections to reduce sedimentation and erosion. Consequently, construction of the Project would not result in discharge that would cause: (1) pollution which would alter the quality of the water of the State (i.e., Ballona Creek) to a degree which unreasonably affects beneficial uses of the waters; (2) contamination of the quality of the water of the State by waste to a degree which creates a hazard to the public health through poisoning or through the spread of diseases; or (3) nuisance that would be injurious to health; affect an entire community or neighborhood, or any considerable number of persons; and occurs during or as a result of the treatment or disposal of wastes. Furthermore, construction of the Project would not result in discharges that would cause regulatory standards to be violated in the Ballona Creek.

As shown in **Table 14.10-2** and **Table 14.10-3**, runoff would change with an overall increase of 0.31 cubic feet per second (cfs) from 10.46 cfs to 10.77 cfs which is equivalent to approximately less than 0.001% of the total capacity of the Ballona Creek. Construction activities are temporary and flow directions and runoff volumes during construction will be controlled. The Project would comply with all applicable City grading permit regulations, plans, and inspections to further reduce runoff. Thus, through compliance with NPDES General Construction Permit requirements, implementation of BMPs, and compliance with applicable City grading regulations, Project construction would not create or contribute to runoff water, which would exceed capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Potential impacts to surface water quality would be less than significant.

Operation

Once developed, the Project will result in a slight decrease in the total amount of impervious surfaces on the West Site and an increase on the East Site compared to the current vacant undeveloped condition. The amount of impervious surfaces on the East Site after development will be comparable to the previous developed condition for this site. As shown in **Table 14.10-2** and **Table 14.10-3**, the peak runoff volume would increase from 10.46 cfs for the existing condition to 10.77 cfs for the proposed condition. The Project will not, therefore, result in a significant increase the amount of runoff from the Project Site and the amount of runoff from the Project Site will not exceed the capacity of the existing stormwater drainage system serving the Site. As discussed above, the Project will incorporate a High Efficiency

Biofiltration/Bioretention System to capture and treat runoff from the Project Site. With the incorporation of this BMP into the Project, the Project will not be an additional source of polluted runoff and thus its impact would be less than significant during operation.

iv. impede or redirect flood flows?

No Impact. The Project Site is located in a Federal Emergency Management Agency (FEMA) designated flood Zone X, meaning that it is in an area of minimal flood hazard and outside of any 100-year flood hazard areas. According to the *Geotechnical Investigation* (**Appendix E.1**), the Project Site is within an area identified by FEMA to be subject to a 0.2% chance of annual flooding, which is equivalent to a 500-year recurrence interval. Regarding flood flows, the Project would not impede or redirect any such flows because the Project Site is not located in an area designated as a flood hazard zone.[88] Thus, the Project would not impede or redirect floodwater flows and would have no impact.

d. *In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

Construction

Less than Significant Impact. The Project Site is not located in a coastal area; therefore, tsunamis are not considered a hazard at the Site. Seiches are large waves generated in enclosed bodies of water in response to ground shaking. According to the *Geotechnical Investigation* (**Appendix E.1**), no major water-retaining structures are located immediately up gradient from the Project Site. Therefore, flooding from a seismically induced seiche is considered unlikely. Earthquake-induced flooding is inundation caused by failure of dams or other water-retaining structures due to earthquakes. The City of Los Angeles Safety Element indicates that the Project Site is located within an inundation area.[89] However, this reservoir, as well as others in California, are continually monitored by various governmental agencies (such as the State of California Division of Safety of Dams and the U.S. Army Corps of Engineers) to guard against the threat of dam failure. Current design, construction practices, and ongoing programs of review, modification, or total reconstruction of existing dams are intended to ensure that all dams are capable of withstanding the MCE for the Project Site. As referenced in the *Geotechnical Investigation* and *Hydrology & Water Resources Technical Report* (**Appendix E.1** and **H**), the potential for inundation at the Project Site as a result of an earthquake-induced dam failure is low. The Project Site is not located in an area designated by FEMA as a flood hazard zone.[90] As such, flooding is not a significant hazard to the Project Site. Therefore, the risk of

88 FEMA, National Flood Hazard Layer (NFHL), https://msc.fema.gov/, Accessed October 2019.
89 City of Los Angeles General Plan, Safety Element Exhibit G, Inundation & Tsunami Hazard Areas, March 1994.
90 FEMA, National Flood Hazard Layer (NFHL), https://msc.fema.gov/, Accessed October 2019.

flooding from construction and operation of the Project is low and the impacts would be less than significant.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. Under the California Water Code, the State of California is divided into nine regional water quality control boards (RWQCBs), which govern the implementation and enforcement of the California Water Code and the Clean Water Act. As previously stated, the Project Site is located within RLARWQCB's region. The LARWQCB Water Quality Control Plan: Los Angeles Region Basin Plan for the Coastal Watersheds of Los Angeles and Ventura Counties, September 11, 2014, (Basin Plan) is designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Specifically, the Basin Plan (i) designates beneficial uses for surface and ground waters, (ii) sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's antidegradation policy, and (iii) describes implementation programs to protect all waters in the Region. In addition, the Basin Plan incorporates all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations.

Under the NPDES permit enforced by the LARWQCB, all existing and future municipal and industrial discharges to surface waters within the City are subject to applicable local, State and/or federal regulations. The Project would comply with all provisions of the NPDES program and other applicable waste discharge requirements (WDRs), as enforced by the LARWQCB.

The Project would comply with and not obstruct implementation of the LARWQCB's Basin Plan. As described earlier, the Project would comply with the LARWQCB's Waste Discharge Requirements for Discharges of Groundwater from Construction and Project Dewatering to Surface Waters in Coastal Watersheds of Los Angeles and Ventura Counties. This permit specifies groundwater discharge prohibitions, receiving water limitations, monitoring, and reporting program requirements, and general compliance determination criteria for groundwater discharges. The Project would comply with applicable NPDES and City requirements, which would include the use of BMPs during construction of the Project as detailed in a SWPPP and in the City's LID ordinance. Project construction would occur in accordance with City Building Code Chapter IX, which requires necessary permits, plans, plan checks, and inspections to avoid or reduce the effects of sedimentation and erosion. In addition, the Project would require approval of an erosion control plan and would be required to prepare a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the NPDES permit. The SWPPP incorporates best-management practices (BMPs) in accordance with the City of Los Angeles' Best Management Practices Handbook, Part A Construction Activities to control erosion including grading and dust control measures. Therefore, Project

construction would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts from construction would be less than significant.

After construction, the operation of the Project would also be required to comply with applicable NPDES and City requirements, which would include BMPs as detailed in the SWPP and in the LID ordinance. As discussed above, the Project will incorporate a High Efficiency Biofiltration/Bioretention System to capture and treat runoff from the Site. With the incorporation of this BMP into the Project, the Project would not conflict or obstruct implementation of a water quality control plan or sustainable groundwater management plan and impacts from operation of the Project would be less than significant.

Cumulative Impacts

Surface Water Hydrology

The geographic context for the cumulative impact analysis on surface water hydrology is the Ballona Creek Watershed. In accordance with City requirements, the Project and the five related projects would be required to implement BMPs to manage stormwater runoff in accordance with LID guidelines. Furthermore, the City of Los Angeles Department of Public Works reviews projects on a case-by-case basis to ensure sufficient local and regional infrastructure is available to accommodate stormwater runoff. As required by current regulations, the related projects will not result in any substantial increase in runoff volumes and, for this reason, no cumulative impact on the capacity of existing and planned stormwater drainage systems will result from construction of operation of the Project and related projects.

Surface Water Quality

Future growth in the Ballona Creek Watershed would be subject to NPDES requirements relating to water quality for both construction and operation. The Project Site and related projects are located in an urbanized area and future related projects, such as the five related projects, would also be subject to current LID requirements. Neither the Project nor the related projects would, therefore, be sources of polluted runoff and, as a result, cumulative impacts to surface water quality would be less than significant during construction or operation.

Groundwater Hydrology

The geographic context for the cumulative impact analysis on groundwater level is the Central Subbasin (Subbasin). The Project Site lies on the northeast side of the Subbasin. The Subbasin is bounded by impermeable rocks of the Santa Monica Mountains on the north and by the Ballona escarpment on the west. The Subbasin extends from the Pacific Hollywood Subbasin to the north and to the Inglewood fault

on the southwest. Ballona Creek and the LA River are the dominant hydrologic features that drains surface waters to the Pacific Ocean.[91]

Groundwater enters the Central Basin through surface and subsurface flow and by direct percolation of precipitation, stream flow, and applied water; and replenishes the aquifers dominantly in the forebay areas where permeable sediments are exposed at ground surface.[92] Natural replenishment of the groundwater supply in the subbasin is largely from surface inflow through Whittier Narrows (and some underflow) from the San Gabriel Valley. Percolation into the Los Angeles Forebay Area is restricted due to paving and development of the surface of the forebay. Imported water purchased from Metropolitan Water District and recycled water from Whittier and San Jose Treatment Plants are used for artificial recharge in the Montebello Forebay at the Rio Hondo and San Gabriel River spreading grounds. Saltwater intrusion is a problem in areas where recent or active river systems have eroded through the Newport Inglewood uplift. A mound of water to form a barrier is formed by injection of water in wells along the Alamitos Gap.[93]

No water supply wells, spreading grounds, or injection wells are located within a one-mile radius of the Project Site and as discussed above, the Project would not have an adverse impact on groundwater levels. Since the related projects are all located within one-half mile of the Project Site, they are also not proximate to any water supply wells, spreading grounds, or injection wells, and, therefore, they would not result in adverse impact on groundwater levels Thus, neither the Project nor the related projects would result in adverse impacts on groundwater levels individually or cumulatively and, therefore, no significant cumulative impact to groundwater levels would occur.

Groundwater Quality

Future growth in the Central Subbasin would be subject to LARWQCB requirements relating to groundwater quality. The Project would not expand any potential areas of contamination, increasing the level of contamination, or cause regulatory water quality standard violations, as defined in the California Code of Regulations, Title 22, Division 4, Chapter 15, and the Safe Drinking Water Act. The Project and the five related projects would be subject to the LID requirements and compliance procedures, operational water quality impacts would be less than significant with code compliance. Therefore, the Project's contribution to cumulative impacts to groundwater water quality would be less than significant during construction and operation.

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91 California department of Water Resources, https://water.ca.gov/groundwater/bulletin118/basindescriptions/4-11.04.pdf.

92 California Department of Water Resources (DWR). 1961. Planned Utilization of the Ground Water Basins of the Coastal Plain of Los Angeles County. Bulletin No. 104

93 California Department of Water Resources (DWR). Southern District. 1999. Watermaster Service in the Central Basin, Los Angeles County, July 1, 1998 – June 30, 1999.

Mitigation Measures

Incorporation of Prior Mitigation

As discussed in Section 3.3 of this SCEA, PRC Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports (EIRs).

The following mitigation measures from prior applicable EIRs incorporated into the Project will further reduce the less than significant impacts of the Project.

SCAG 2020–2045 RTP/SCS Program EIR:

No hydrology and water quality mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No hydrology and water quality mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

MM-H2 Groundwater A hydrological assessment shall be prepared for all proposed Recovery Program projects in areas with a high groundwater table. This assessment shall include effects on associated aquifers as well as pumping and dewatering requirements.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

No prior mitigation measures were identified, and no project specific mitigations are proposed for the Project.

XI. LAND USE AND PLANNING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Physically divide an established community?	☐	☐	☐	☒
b. Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

Impact Analysis

a. Physically divide an established community?

No Impact. A significant impact may occur if the project would be sufficiently large enough or otherwise configured in such a way as to create a physical barrier within an established community. According to the *L.A. CEQA Thresholds Guide*, the determination of significance shall be made on a case-by-case basis considering the following factors: (a) the extent of the area that would be impacted, the nature and degree of impacts, and the types of land uses within that area; (b) the extent to which existing neighborhoods, communities, or land uses would be disrupted, divided, or isolated, and the duration of the disruptions; and (c) the number, degree, and type of secondary impacts to surrounding land uses that could result from implementation of the Project.

Project involves the demolition of the existing building and associated parking lot, and the construction of two 8-story, mixed-use residential buildings on the Project Site. No operational or structural changes are proposed that would divide the surrounding land uses, nor are any linear features, new roads or other barriers to movement proposed.

The Project proposes vehicular ingress/egress access points into the shared parking garage for the West Site's commercial and residential uses on Victoria Avenue, and on Bronson Avenue for the East Site. No operational or structural changes are proposed that would divide the surrounding land uses, nor are any linear features, new roads or other barriers to movement proposed. In fact, the Project would merge portions of Lower Exposition Boulevard into its respective West and East Sites that would remove the existing physical divide of the road between the Project Site and the Metro E Line and Upper Exposition Boulevard. Therefore, the Project would not physically divide an established community and no impact would occur.

b. *Cause a significant environmental impact due to conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Less than Significant Impact. A significant impact could occur if a project is inconsistent or in conflict with planning or zoning designations currently applicable to the Project Site. The Project Site is located within the jurisdiction of the City and is therefore subject to the designations and regulations of several local and regional land use and zoning plans, as summarized below.

SCAG 2020–2045 RTP/SCS

The Project Site is located within the six-county region that comprises the Southern California Association of Governments (SCAG) planning area. SCAG prepared the 2008 Regional Comprehensive Plan (2008 RCP) in response to SCAG Regional Council directive in its 2002 Strategic Plan to define solutions to interrelated housing, traffic, water, air quality, and other regional challenges. The 2008 RCP is an advisory document that describes future conditions if current trends continue, defines a vision for a healthier region, and recommends an Action Plan with a target year of 2035. The 2008 RCP may be voluntarily used by local jurisdictions in developing local plans and addressing local issues of regional significance. The plan includes nine chapters addressing land use and housing, transportation, air quality, energy, open space, water, solid waste, economy, and security and emergency preparedness. The action plans contained therein provide a series of recommended near-term policies that developers and key stakeholders should consider for implementation, as well as potential policies for consideration by local jurisdictions and agencies when conducting project review.

The 2008 RCP replaced the Regional Comprehensive Plan and Guide (RCPG) for use in SCAG's Intergovernmental Review (IGR) process. SCAG's Community, Economic and Human Development Committee and the Regional Council took action to accept the 2008 RCP, which now serves as an advisory document for local governments in the SCAG region for their information and voluntary use in developing local plans and addressing local issues of regional significance. However, as indicated by SCAG, because of its advisory nature, the 2008 RCP is not used in SCAG's IGR process. Rather, SCAG reviews new projects based on consistency with the 2020–2045 RTP/SCS. As the 2020–2045 RTP/SCS encompasses and builds upon the previous 2016–2040 RTP/SCS, many of the goals and strategies from the previous plan are incorporated and have been updated or expanded upon. The 2020–2045 RTP/SCS aims 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

Based on the analysis presented in **Table 4.11-1: Consistency Analysis 2020–2045 RTP/SCS** (see **Appendix L: Land Use Plan Policy Consistency Tables**), the Project would not be in conflict and would be consistent

with applicable 2020–2045 RTP/SCS goals. The Project would be well-served by mass transit, including two adjacent light rail lines and multiple nearby bus lines provided by Metro and is located in both a TPA and HQTA. The Project would include bicycle parking facilities within the plaza area and throughout the Project Site and would create a pedestrian-friendly environment by providing a landscaped, publicly accessible, pedestrian promenade and plaza adjacent to the Project's commercial uses and along the Metro E Line. The Project would provide Metro mass transit riders and the public at-large direct access into the Project Site, including the portal to the below-grade Crenshaw/LAX Line, and bus stops along the perimeter. In addition to these mass transit options, the Project Site is located adjacent to a mature network of streets that include vehicular, pedestrian and bicycle facilities. Development of an infill mixed-use transit-oriented development Project within this established community would promote a variety of travel choices and would create new employment and housing opportunities in the area.

As shown in **Table 4.11-1** (see **Appendix L**), the Project would not be in conflict and would be consistent with the 2020–2045 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.

The Project would be consistent with policies set forth in the 2020–2045 RTP/SCS because it would redevelop an underdeveloped site within an existing urban setting. The Project would include 401 residential units, 61 units reserved for Very-Low Income households (approximately 15 percent of the total number of proposed units), and 20 units reserved for a range of Very-Low to Low-Income households (approximately 5 percent of the total number of proposed units), and commercial uses, and would be located in an urban area well-served by mass transit provided by Metro. Furthermore, the Project would place residents, employees, and visitors in proximity to corridors well-served by mass transit. The integration of land uses on the Project Site would produce multimodal travel options to and from the Project Site that would help the region accommodate growth and meet the goals of the RTP/SCS that minimize per capita GHG emissions and would therefore not conflict with the goals of the 2020–2045 RTP/SCS. Therefore, the Project would result in a less than significant impact as it would not conflict with the 2020–2045 RTP/SCS.

Land Use Tools

The SCAG 2020–2045 RTP/SCS outlines various land use tools to assist agencies in implementing sustainable community strategies.

Center Focused Placemaking

The goal of center focused placemaking is to create connected built environments that support multimodal mobility, reduced reliance on single-occupancy vehicles, and reduced GHG emissions. Center focused placemaking is prioritized in urban and suburban infill sites in the SCAG region. As discussed above, the Project is an infill development within a HQTA and a TPA and is within a major employment center. The location of the Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. In addition, the Project would comply with the California Green Building Standards Code (CALGreen), and would incorporate eco-friendly building materials, systems, and high-performance building envelopment. Additionally, the Project would be designed and constructed to incorporate environmentally sustainable design features that would be equivalent to the Silver level under the LEED green building program. As such, the Project would be consistent with the principle of center focused placemaking.

Priority Growth Areas

Currently only four percent of the SCAG region's total land area account for Priority Growth Areas (PGAs); however, implementation of SCAG's recommended growth strategies will help increase both household growth and employment growth in these areas. PGA's aim to reduce travel distances, increase mobility options, and improve access to workplaces as a compact form of regional development. As discussed above, the Project is an infill development within a HQTA and a TPA and is within a major employment center. The location of the Project promotes the use of a variety of transportation options, which includes walking, biking, and the use of public transportation. In addition, the Project will provide a variety of dwelling units sizes including studio units, one-bedroom units, and two-bedroom units. The Project is dedicating approximately 20 percent of proposed units to be restricted as affordable housing, providing equitable housing opportunities to the community. As such, the Project would be consistent with the strategy of Priority Growth Areas.

Job Centers

Job Centers are areas with denser employment than their surroundings, representing areas with local employment peaks rather than places with the most jobs. When growth is concentrated in Job Centers, the length of vehicle trips for residents can be reduced. As discussed above, the Project Site is located in a HQTA and a TPA as defined by CEQA. Additionally, the Project would develop new residential and commercial uses within walking distance to numerous employment opportunities. Additionally, the Project Site is located adjacent to the Metro E Line, future Crenshaw/LAX Line, and within one-half mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Project encourages a variety of transportation options, such as walking and biking. Thus, the Project would

reduce VMT and promote alternatives to driving. As such, the Project would be consistent with the growth concentrated in Job Centers across the SCAG region.

Transit Priority Areas

TPAs are Priority Growth Areas that are within one-half mile of existing or planned 'major' transit stops in the region. A 'major' transit stop is defined as a site containing an existing or planned rail or bus rapid 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. As discussed above, the Project Site is located adjacent to the Metro E Line and within one-half mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Project encourages a variety of transportation options, such as walking and biking. Thus, the Project would reduce VMT and promote alternatives to driving. As such, the Project's location in a TPA would be consistent with SCAG's strategy to focus infill development in established communities with access to high-quality transportation.

High Quality Transit Areas

HQTAs are corridor-focused Priority Growth Areas within one-half mile of an existing or planned 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. As discussed above, the Project Site is located in a HQTA and a TPA as defined by CEQA. Additionally, the Project would develop new residential and commercial uses within walking distance to numerous services, retail, and employment opportunities. Additionally, the Project Site is located adjacent to the Metro E Line and within one-half mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The location of the Project encourages a variety of transportation options, such as walking and biking. Thus, the Project would reduce VMT, promote alternatives to driving, and aim to improve air quality. The Project would also provide approximately 316 bicycle parking spaces. As such, the Project would be consistent with SCAG's HQTA strategy.

Neighborhood Mobility Areas

Neighborhood mobility area (NMAs) focus on creating, improving, restoring, and enhancing safe and convenient connections to surrounding community land uses. NMAs are Priority Growth Areas with 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. As discussed above, the Project Site's location near mass transit, walking distance to services, retail stores, employment opportunities, and the availability of bike parking located on the Project Site would promote a variety of transportation options, allowing residents to connect to

surrounding destinations. As such, the Project would be consistent with the strategy of Neighborhood Mobility Areas by creating more walkability within the Project Site and surrounding area.

Livable Corridors

The Livable Corridor strategy encourages local jurisdictions to plan and zone for increased density at nodes along key corridors, and to "redevelop" single-story under-performing retail with well-designed, higher density housing and employment centers. The Livable Corridors strategy aims to encourage density through transit improvements, active transportation improvements, and land use policies such as mixed-use zoning. As discussed above, the Project's mixed-use design and location encourages the use of alternative transportation, including walking and bicycling opportunities. The Project Site is located adjacent to the Metro E Line, future Crenshaw/LAX Line, and within one-half mile of numerous bus routes with peak commute service intervals of 15 minutes or less. The Project Site is located in the Crenshaw area of the City surrounded by single-family, multifamily, and community commercial uses. As such, the Project would be consistent with the strategy of Livable Corridors.

Spheres of Influence

A Sphere of Influence (SOI) is a planning boundary outside of a local agency's legal boundary, such as the city limit line, that designates the agency's future boundary and service area. The intent of an SOI is to promote the efficient, effective, and equitable delivery of local and regional services for existing and future residents and to encourage a collaborative process between agencies. SOI discourages urban sprawl and promotes growth in an efficient manner that limits sprawl and leapfrog development.

This strategy is directed toward SCAG and the City. Nonetheless, the Project is an infill mixed-use development that would add 401 new housing units and employment as well as increase the utilization of the Project Site, which is currently used as an administrative building and its associated surface parking lot on the West Site and a vacant construction staging area on the East Site. Additionally, The Project would include Very-Low Income and Low-Income affordable housing units. As such, the Project would be consistent in developing a mixed-use building that fits within SCAG's Spheres of Influence strategy.

City of Los Angeles General Plan

The Project would conform to objectives outlined in the City of Los Angeles General Plan (General Plan). The General Plan is a comprehensive, long-range declaration of purposes, policies, and programs for the development of the City. The General Plan is a dynamic document consisting of 11 elements: Framework Element, Air Quality Element, Conservation Element, Housing Element, Noise Element, Open Space Element, Service Systems Element/Public Recreation Plan, Safety Element, Mobility Element, a Plan for a

Healthy Los Angeles, and the Land Use Element. The Land Uses Element is comprised of 35 community plans.

The elements that would be most applicable to the Project are the Framework Element, Housing Element, and the Mobility Plan. The consistency of the Project with applicable objectives and policies in the General Plan is presented in **Table 4.11-2: City of Los Angeles Applicable General Plan – Consistency with Applicable Policies** (see **Appendix L**).

Framework Element

Based on the analysis presented in **Table 4.11-2** (see **Appendix L**), the Project would be consistent with the applicable objectives and policies in the Framework Element. The Project would be consistent with the policy and objectives of the Land Use Chapter by support the needs of the City's existing and future residents, businesses, and visitors by providing live/work units and commercial uses, including general commercial, restaurant, retail, office, and art production-related uses. In addition, development of the Project in an area with convenient access to mass transit and opportunities for walking and biking would promote an improved quality of life by facilitating a reduction of vehicle trips, vehicle miles traveled, and air pollution while supporting the City's objective to encourage commercial uses along primary transit corridors/boulevards and in designated Community Centers areas.

The Project would be consistent with the policy and objective of the Housing Chapter by providing a range of new housing units near existing mass transit. The scale and character of the Project is consistent with the surrounding urbanized area. The Project would be consistent with the goal, objectives and policies of the Urban Form and Neighborhood Design Chapter by providing new residential, office, commercial uses and open space available to the public and streetscape improvements that would enhance pedestrian activity.

The Project would be consistent with the Open Space and Conservation Chapter by providing minimum of approximately 36,890 square feet of on-site open space. The Project's various amenities would include a swimming pool and viewing deck, fitness center, conference facilities, multipurpose rooms, lounge areas, and outdoor amenity space. Open space for the proposed residential uses would also include indoor and outdoor residential common spaces on higher floors, including common outdoor amenity decks. The Project would provide publicly accessible outdoor common space located between the Metro E Line and along the north frontage of the ground floor and promenades along the Metro E Line, and along Crenshaw and Obama Boulevards. This area would be made up of the merger areas that would provide a wide landscaped pedestrian promenade and plaza that would provide a passive open space area available for community events.

The Project would be consistent with the Economic Development Chapter by bringing new economic investment an area well served by existing mass transit. Furthermore, the Project would contribute to the establishment of a 24-hour community that would benefit existing businesses of the area.

The Project would be consistent with the Transportation Chapter by supporting an area targeted for high-density and a focal point of region commerce identity and activity through the provision of additional housing, office and commercial uses and employment opportunities for the Project area. The Project would augment the streetscape with publicly accessible open space areas to enhance and beautify the streetscape while providing shading and circulation enhancement for pedestrians.

The Project would be consistent with the Infrastructure and Public Services Chapter by reducing the amount of hazardous substances and the total amount of flow entering the wastewater system through implementation of Stormwater Pollution Prevent Plan (SWPPP) and Best Management Practices (BMPs). The Project would not exceed the available capacity within the distribution infrastructure that would serve the Project Site and its water demands will be met by the LADWP.

Therefore, the Project would result in a less than significant impact as it would not conflict with the General Plan Framework Element.

Housing Element

Based on the analysis presented in **Table 4.11-2** (see **Appendix L**), the Project would be consistent with the applicable objectives and policies in the Housing Element. The Project would provide 401 new residential units that would add to the citywide housing supply. The Project would be a mixed-use development that would include new jobs associated with grocery store, retail and restaurant uses that is accessible to the Metro E Line, portal to the below-grade Crenshaw/LAX Line, and bus stops along the perimeter. In addition, The Project would promote and facilitate reduction of water consumption through the use of water saving and energy saving devices such as low-flow toilets. Finally, the Project would be an infill, urban-scale transit oriented development that would be reflective of the expected visual character of the area as it develops in accordance with adopted land use plans, including the West Adams – Baldwin Hills – Leimert Community Plan. Therefore, the Project would result in a less than significant impact as it would not conflict with the Los Angeles General Plan Housing Element.

Mobility Plan

Based on the analysis presented in **Table 4.11-2** (see **Appendix L**), the Project would be consistent with the applicable objectives and policies in the Mobility Plan. Specifically, the Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing a construction management plan that would identify the location of any temporary lane and sidewalk closures and

provide for measures to maintain both directions of travel. Also, by contributing a wider range of land uses and providing much needed housing to an area adequately served by mass transit, most errands could be accomplished without the need of a single-passenger vehicle, thus reducing VMT. The Project Site is adjacent to the Metro E Line, includes a portal to the below-grade Crenshaw/LAX Line and provides bus stops along the perimeter, all of which would provide residents, employees, and guests with various public transportation opportunities that would reduce vehicle miles. In addition, 30 percent of the Project's required parking spaces would be electric-vehicle ready, and ten percent of its required parking spaces would provide chargers for electric vehicles within the parking structure on the Project Site, thereby further reducing consumption of petroleum-based fuels. The Project would provide enhancements to ensure a quality pedestrian environment along Crenshaw Boulevard and Exposition Boulevard with new and additional street trees and landscaping and sidewalk paving elements. In addition, the Project would contribute to the City's policy to provide safe and convenient bicycle facilities by providing on-site short-term and long-term bicycle spaces. Additionally, given the location of the Project Site in close proximity to mass transit, the Project would provide residents, visitors, patrons, and employees convenient access to mass transit services. Therefore, the Project would not conflict with the applicable policies that support the goals and objectives set forth in the Mobility Plan and impacts would be less than significant.

West Adams - Baldwin Hills – Leimert Community Plan

Based on the analysis presented in **Table 4.11-3: Applicable Community Plan Consistency** (see **Appendix L**), the Project would be consistent with the applicable objectives and policies in the West Adams - Baldwin Hills – Leimert Community Plan. The Project Site is located within an urbanized portion of the West Adams - Baldwin Hills – Leimert Plan area. The Community Plan goals and policies address residential, commercial, and industrial development identifies implementation strategies and programs relative to commercial revitalization, health, and sustainability as well as historic preservation and the conservation of neighborhood character. The Community Plan designates the Project Site for Community Commercial. Community Commercial areas are intended to encourage a mix of uses that are compatible with the needs of local residents and accommodate viable existing neighborhood businesses.

The Project would provide a mix of uses in South Los Angeles along Crenshaw Boulevard, the Community Plan's distinctive main street, and would promote pedestrian activity on Crenshaw Boulevard while providing a mix of market-rate and affordable housing units in close proximity to mass transit. The Project would provide grocery store, retail, and restaurant uses to serve the existing community, regenerate neighborhood character, and establish connectivity to nearby low-density residential areas. The scale of the Project would not conflict with existing neighborhood character and identity by including low-scale three-story residential units along Victoria Avenue to provide appropriate transition between the Project

and nearby residential uses. As such, the Project would not conflict with the applicable policies in the West Adams - Baldwin Hills – Leimert Community Plan and impacts would be less than significant.

Crenshaw Corridor Specific Plan

Based on the analysis presented in **Table 4.11-4 Crenshaw Corridor Specific Plan Consistency** (see **Appendix L**), the Project would be consistent with the applicable objectives and policies in the Crenshaw Corridor Specific Plan. In order to regulate the use of property as provided in this Specific Plan, the Specific Plan is divided into the following eight subareas: Subareas A, B, C, D, E, F, G, and H. The Project Site is located within Subarea A, which focuses along Crenshaw Boulevard from the I-10 Freeway to Coliseum Street. The Project Site is also located within Subarea A's Expo/Crenshaw Transit Oriented Development (TOD) Area, which is bounded by 30th and Coliseum Street along Crenshaw Boulevard. TOD Areas promote neighborhood serving uses, which encourage pedestrian activity and promote reduced traffic generation.

The Project Site is located within a one-half mile radius of a major transit stop less than 500 feet south of the Metro E Line Expo/Crenshaw Station and includes the portal entrance to the Crenshaw/LAX Line. The Project includes a mix of uses providing jobs, housing, goods, and services, all within walking distance to various Exposition and LAX Transit Corridor stations. The Project would increase the utilization of the Project Site by replacing an existing administrative building, a surface parking lot and a vacant construction staging area with housing, retail, and open space to better serve the existing neighborhood. As discussed above, the scale of the Project would not conflict with existing neighborhood character and identity by including low-scale three-story residential units along Victoria Avenue to provide appropriate transition between the Project and nearby residential uses.

The Project development would utilize high quality construction materials, add residential units above ground floor commercial uses to have more eyes on the street and orient ground floor commercial uses along the Crenshaw Boulevard street frontage to activate the pedestrian character of the street. As discussed above, the scale of the Project would not conflict with existing neighborhood character and identity by including low-scale three-story residential units along Victoria Avenue to provide appropriate transition between the Project and nearby residential uses. The Project would be consistent with established neighborhood character by designing the Project in compliance with Crenshaw Corridor Specific Plan design standards. The Project would continue to conserve, enhance, and regenerate the character of Crenshaw Boulevard. For these reasons, the Project would not conflict with applicable policies in the Crenshaw Corridor Specific Plan and impacts would be less than significant.

Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from

the Framework Element and Community Plans. The Citywide Design Guidelines were updated in October 2019 and include guidelines pertaining to pedestrian-first design which serves to reduce VMT. An analysis of the Project's consistency with the applicable guidelines can be found in **Appendix L**. The Project is not in conflict with the Citywide Design Guidelines.

Cumulative Impacts

Less than Significant Impact. Development of the Project in conjunction with the related projects indicated in **Table 2.0-2** and **Figure 2.0-11** would result in an intensification of existing prevailing land uses in an already urbanized area of Los Angeles. With regard to land use plans, regional and citywide projects under consideration would implement and support important local and regional planning goals and policies. Like the Project, each related project would be subject to a discretionary land use approval process, including CEQA review, and would incorporate any mitigation measures necessary to reduce potential land use impacts such that no significant impacts with regard to adopted land use plans would occur. Also, upon approval of the requested actions, development of the Project together with future forecasted growth, would not conflict with the intent of the General Plan, the West Adams-Baldwin Hills-Leimert Community Plan, the Crenshaw Corridor Specific Plan or with other applicable land use plans. Therefore, development of the Project together with the related projects would not be expected to result in cumulatively considerable impacts with respect to incorporated applicable land use plans and regulations.

With regard to physical land use, it should be noted that all of the related projects are subject to local zoning and land use designations for each of the related project sites. These requirements would regulate future land uses and provide development standards for such land uses that would further preclude potential land use compatibility impacts.

As the Project would not combine with the related projects to change the existing relationship substantially or adversely with off-site communities, the Project would not result in cumulatively considerable physical land impacts.

Mitigation Measures

Incorporation of Prior Mitigation

SCAG 2020–2045 RTP/SCS Program EIR:

No land use and planning mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No land use and planning mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

No land use and planning mitigation measures were identified.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

No prior mitigation measures were identified, and no project specific mitigations are proposed for the Project.

XII. MINERAL RESOURCES

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?	☐	☐	☐	☒
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Impact Analysis

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State?

No Impact. A significant impact could occur if the Project Site were located in an area used or available for extraction of a regionally important mineral resource, or if Project development would convert an existing or future regionally important mineral extraction use to another use, or if Project development would affect access to a site used or potentially available for regionally important mineral resource extraction. The Project Site is not within an oil drilling district, State-designated oil field, or surface mining district.[94] There are no known oil wells at or near the Project Site, nor is the Site located within a Mineral Resource Zone 2 (MRZ-2) Area.[95] No mineral resources are known to exist beneath the Project Site. As such, construction and operation of the Project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the State and no impacts would result.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The Project Site is not located within a Mineral Resource Zone 2 (MRZ-2) Area. The Project Site is not designated as a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. Thus, there would be no impacts from construction or operation of the Project to the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan and no impacts would result.

94 City of Los Angeles General Plan, "Conservation Element" (2001), Mineral Resources Exhibit A, January 2001.
95 City of Los Angeles, Department of City Planning, Environmental and Public Facilities Map, September 1996.

Cumulative Impacts

As discussed above, the Project would have no impact on mineral resources. It is not known if any of the five related projects, indicated in **Table 2.0-2** and **Figure 2.0-11**, would result in the loss of availability of known mineral resources. Each related project would be required to comply with the *L.A. CEQA Thresholds Guide* and execute required Project Site studies. Nevertheless, the Project would have no incremental contribution to the potential cumulative impact on mineral resources and would have a less than significant cumulative impact on mineral resources.

Mitigation Measures

Incorporation of Prior Mitigation

SCAG 2020–2045 RTP/SCS Program EIR:

No mineral resources mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No mineral resources mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

No mineral resources mitigation measures were identified.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

No prior mitigation measures were identified, and no project specific mitigations are proposed for the Project.

XIII. NOISE

Would the project result in:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Impact Analysis

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?*

Less than Significant with Mitigation Incorporated. The City has adopted local guidelines based in part on the community noise compatibility guidelines established by the State Department of Health Services for use in assessing the compatibility of various land use types with a range of noise levels. These guidelines are set forth in the *L.A. CEQA Thresholds Guide* in terms of the CNEL. CNEL guidelines for specific land uses are classified into four categories: (1) normally acceptable; (2) conditionally acceptable; (3) normally unacceptable; and (4) clearly unacceptable.

The *L.A. CEQA Thresholds Guide*[96] defines the following significance thresholds for construction activities lasting more than 10 days in a 3-month period or occurring during the hours of 9:00 PM and 7:00 AM Monday through Friday, before 8:00 AM or after 6:00 PM on Saturday, or anytime on Sunday:

96 City of Los Angeles, L.A. CEQA Threshold Guide (2006).

- On-site Project construction activities cause the exterior ambient noise level to increase by 5 dBA or more at a noise-sensitive use, as measured at the property line of any sensitive use.
- Off-site Project construction traffic causes the exterior ambient noise level to increase by 5 dBA CNEL or more at a noise-sensitive use, as measured at the property line of any sensitive use.

Operational noise impacts are evaluated for Project-related off-site roadway traffic noise impacts and on-site stationary source noise from on-site activities and equipment.

- The Project would cause any ambient noise levels to increase by 5 dBA CNEL or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either "normally acceptable" or "conditionally acceptable" (See **Appendix I: Noise Study** for a description of these categories); or cause ambient noise levels to increase by 3 dBA CNEL or more and the resulting noise falls on a noise-sensitive land use within an area categorized as either "normally acceptable" or "clearly unacceptable."
- Project-related operational (i.e., non-roadway) noise sources such as outdoor activities, building mechanical/electrical equipment, etc., increase ambient noise level by 5 dBA, causing a violation of the City Noise Ordinance.

The City has not adopted a significance threshold to assess vibration impacts during construction. Thus, the Caltrans *Transportation and Construction Vibration Guidance Manual*[97] is used as a screening tool to assess the potential for adverse vibration effects related to structural damage.

- **Potential Building Damage.** Project construction activities cause ground-borne vibration levels to exceed 0.5 inches per second (ips) PPV at the nearest off-site residential buildings.

The LAMC indicates that in cases where the actual ambient conditions are not known, the City's presumed daytime (7:00 AM to 10:00 PM) and nighttime (10:00 PM to 7:00 AM) minimum ambient noise levels as defined in Section 111.02 of the LAMC should be used. The presumed ambient noise levels for these areas set forth in the LAMC Sections 111.02 and 112.05 are provided in **Table 4.13-1: City of Los Angeles Presumed Ambient Noise Levels**.

Section 41.40 of the LAMC regulates noise from demolition and construction activities. More specifically, Section 41.40 prohibits construction activity and repair work where the use of any power tool, device, or equipment would disturb persons occupying sleeping quarters in any dwelling hotel, apartment, or other place of residence between the hours of 9:00 PM to 7:00 AM Monday through Friday, and between 6:00 PM and 8:00 AM on Saturday. All such activities are prohibited on Sundays and all federal holidays.

97 Caltrans, Transportation and Construction Vibration Guidance Manual (September 2013), accessed October 2019, https://cityofdavis.org/home/showdocument?id=4521.

Table 4.13-1
City of Los Angeles Presumed Ambient Noise Levels

Zone	Daytime Hours (7:00 AM to 10:00 PM) dBA (Leq)	Nighttime Hours (10:00 PM to 7:00 AM) dBA (Leq)
Residential	50	40
Commercial	60	55
Manufacturing (M1, MR1, and MR2)	60	55
Heavy Manufacturing (M2 and M3)	65	65

Source: Los Angeles Municipal Code, sec. 111.03.

Section 112.05 of the LAMC also specifies the maximum noise level of construction machinery that can be generated in any residential zone of the City or within 500 feet thereof. Specifically, any construction machinery may not generate a maximum noise level exceeding 75 dBA at 50 feet from the equipment. However, the above noise limitation does not apply where compliance is technically infeasible. LAMC Section 112.05 defines technical infeasibility to mean that "said noise limitations cannot be complied with despite the use of mufflers, shields, sound barriers and/or other noise reduction device or techniques during the operation of the equipment."

Short-term sound monitoring was conducted at seven (7) locations to measure the ambient sound environment in the Project vicinity. Locations 2, 4, 5, 6, and 7 are located near residential uses which are considered sensitive receptors. Measurements were taken over 15-minute intervals at each location during the AM peak hour on September 12, 2019, as indicated in **Table 4.13-2: Ambient Noise Measurements**. **Figure 4.0-1** depicts locations where ambient noise measurements were conducted. As shown in **Table 4.13-2**, ambient noise levels ranged from a low of 55.7 dBA along Victoria Avenue, between Exposition Boulevard and Obama Boulevard (Location 2) to a high of 70.1 dBA northeast corner of Crenshaw Boulevard and Exposition Boulevard (Location 3).

Construction

Construction activities that would occur during the construction phases (demolition, grading, building construction, architectural coating, and paving) would generate both steady-state and episodic noise that would be heard both on and off the Project Site. Each phase involves the use of different types of construction equipment and, therefore, has its own distinct noise characteristics. The Project would be constructed using typical construction techniques; no blasting, impact pile driving, or jackhammers would be required.

Table 4.13-2
Ambient Noise Measurements

Location Number/Description	Nearest Use	Distance from Project Site	Presumed Ambient Noise Level	Measured Ambient Noise Level, dBA Leq
1. Southwest corner of Crenshaw Boulevard and Exposition Boulevard	Commercial	Adjacent[a]	60	67.2
2. Along Victoria Avenue, between Exposition Boulevard and Obama Boulevard	Residential	30 feet	50	55.7
3. Northeast corner of Crenshaw Boulevard and Exposition Boulevard	Commercial	160 feet	60	70.1
4. Corner of Rodeo Road and Victoria Avenue	Residential	100 feet	50	66.7
5. Corner of Bronson Avenue and Rodeo Road	Residential	35 feet	50	61.0
6. Along Rodeo Road between Crenshaw Boulevard and Norton Avenue	Residential	200 feet	50	68.4
7. Corner of Victoria Avenue and Exposition Boulevard	Residential	155 feet	50	66.9

*Source: Refer to **Appendix I** for noise monitoring data sheets.*
Notes: dBA = A-weighted decibels; Leq = average equivalent sound level.
[a] Location 1 is located on the north frontage of the Project Site.

The potential noise impact generated during construction depends on the phase of construction and the percentage of time the equipment operates over the workday. However, construction noise estimates used for the analysis are representative of worst-case conditions because it is unlikely that all the equipment contained on site would operate simultaneously. As would be the case for construction of most land use development projects, construction of the Project would require the use of heavy-duty equipment with the potential to generate audible noise above the ambient background noise level. The Project's construction noise levels at the nearest sensitive receptors to the Project Site are shown in **Table 4.13-3: Construction Maximum Noise Estimates**. It is important to note, Location 1 was measured at the Project boundary and therefore was not included in the analysis below. Additionally, Location 3 is not within the proximity of a sensitive receptor and therefore was not included in the analysis below. As shown, construction noise levels would result in a maximum increase of 21.3 dBA above the significance threshold of 75 dBA without implementation of any noise reduction measures.

Table 4.13-3
Construction Maximum Noise Estimates

Location Number	Distance from Project Site (feet)	Construction Noise Levels (dBA)	Ambient Noise Leq (dBA)	Significance Threshold (dBA)	Maximum Increase over Significance Threshold without Mitigation Measures (dBA)
2	30	96.3	55.7	60.7	+35.6
4	100	85.9	66.7	71.7	+14.2
5	35	95.7	61.0	66.0	+29.7
6	200	82.6	68.4	73.4	+9.2
7	155	90.6	66.9	71.9	+18.7

Source: FHWA, RCNM, version. 1.1.
*Refer to **Appendix I** for the Noise Study.*

Pursuant to Section 41.40 of the LAMC, construction would be limited to the hours between 7:00 AM and 9:00 PM, Monday through Friday, and between 8:00 AM and 6:00 PM on Saturday. No construction activities would occur on Sundays or federal holidays. All construction related noise would be required to comply with the provisions of Section 112.05 of the LAMC. Pursuant to Section 112.05, the operation of any powered equipment or powered hand tool that produces a maximum noise level exceeding 75 dBA at a distance of 50 feet from the source of the noise between the hours of 7:00 AM to 10:00 PM when the source is located within 500 feet of a residential zone is prohibited. Compliance with Section 112.05 of the LAMC includes the use of mufflers, shields, sound barriers, and/or other noise reduction devices or techniques. **Mitigation Measure MM-N1** from the West Adams-Baldwin Hills-Leimert Community Plan EIR and Project **Mitigation Measure MM-NOI-1** would include implementation of noise reduction techniques for all construction equipment, fixed or mobile, will be equipped with properly operating and maintained mufflers and other noise attenuation devices; identify the maximum distance between construction equipment staging areas and occupied residential areas; and require the use of electric air compressors and similar power tools. Optimal muffler systems for all equipment would reduce construction noise levels by approximately 10 dB or more.[98] Limiting construction equipment generating noise levels in excess of 87 dBA operating simultaneously with other pieces of equipment generating noise levels below 87 dBA would reduce construction noise levels by 5 dBA. Limiting the number of noise-generating heavy-duty off-road construction equipment (e.g., dozers, excavators, loaders, etc.) to one third of the anticipated

98 FHWA, Special Report—Measurement, Prediction, and Mitigation, updated June 2017, accessed October 2019, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm.

equipment fleet[99] operated simultaneously on the Project Site within 75 feet of off-site noise sensitive receptors would reduce construction noise levels by approximately 14 dBA.

Temporary abatement techniques include the use of temporary and/or movable shielding for both specific and nonspecific operations. A temporary noise barrier can achieve a 5 dB noise level reduction when it is tall enough to break the line-of-sight to the receiver. After it breaks the line-of-sight, it can achieve approximately 1.5 dB of additional noise level reduction for each one (1) meter (3.3 feet) of barrier height.[100] Therefore, an approximately 15-foot tall construction temporary noise barrier would reduce construction noise levels by a minimum 7 dB. With compliance with Section 112.05, construction noise levels would be reduced by a minimum of 36 dB, dependent on the construction activity and height of the temporary noise barrier used.

The Project would comply with the City's Noise Ordinance as it relates to construction equipment by limiting activities to occur between 7:00 AM to 7:00 PM. A sign, legible at a distance of 50 feet, will be posted at the Project construction site providing a contact name and a telephone number where residents can inquire about the construction process and register complaints. This sign will indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator will be identified to address construction noise concerns received. The contact name and the telephone number for the noise disturbance coordinator will be posted on the sign. The coordinator will be responsible for responding to any local complaints about construction noise and will notify the City to determine the cause and implement reasonable measures to the complaint, as deemed acceptable by the City. Compliance with the City's Noise Ordinance and implementation of **Mitigation Measures MM-N1** from the West Adams-Baldwin Hills-Leimert Community Plan EIR and Project **Mitigation Measure MM-NOI-1** would ensure construction noise levels would be reduced to the extent feasible; and reduce construction noise levels to be less than significant.

Operation

<u>On-Site Operational Noise</u>

The Project would introduce various stationary noise sources, including heating, ventilation, and air conditioning systems, which would be located either on the roof, the side of a structure, or on the ground. All Project mechanical equipment would be required to be designed with appropriate noise-control devices, such as sound attenuators, acoustics louvers, or sound screens/parapet walls, to comply with noise-limitation requirements provided in LAMC Section 112.02, which prohibits the

99 Demolition = 11 pieces of equipment; Grading/Excavation = 18 pieces of equipment; Building Construction = 26 pieces of equipment; Paving = 20 pieces of equipment.

100 FHWA, Special Report – Measurement, Prediction, and Mitigation, updated June 2017, accessed October 2019, https://www.fhwa.dot.gov/Environment/noise/construction_noise/special_report/hcn04.cfm.

noise from such equipment from causing an increase in the ambient noise level of more than 5 dB. Therefore, operation of mechanical equipment on the Project Site would not exceed the City's threshold of significance.

Off-Site Operational Roadway Noise

Traffic noise levels were modeled using the FHWA Noise Prediction Model (FHWA-RD-77-108). This model calculates the average noise level in dB(A) CNEL along a given roadway segment based on traffic volumes, vehicle mix, posted speed limits, roadway geometry, and site conditions. The model calculates noise associated with a specific line source and the results characterize noise generated by motor vehicle traffic along the specific roadway segment. According to data collected by Caltrans, California automobile noise is 0.8 to 1.0 dB(A) louder than national levels, while medium and heavy truck noise is 0.3 to 3.0 dB(A) quieter than national levels.[101] Noise levels were evaluated with respect to the following modeled traffic scenarios:

- Existing Conditions
- Future (2023) Conditions
- Future (2023) plus Project Conditions

Table 4.13-4: Future Year (2023) plus Project shows the change in CNEL from future traffic volumes and from traffic generated by the Project. As shown in **Table 4.13-4**, the maximum roadway noise level increase along existing roadways would be 4.5 dBA CNEL along Victoria Avenue north of Obama Boulevard (Intersection 4) during the afternoon (PM) peak hour, resulting in exterior noise levels of 50.9 dBA CNEL. Normally acceptable noise levels for single-family residences ranges from 50 – 60 dBA CNEL. As such, roadway noise levels along Intersection 4 would be within the land use compatibility guidelines for single-family residences. In addition, increases to all other intersections would be below the perceptible level of 3.0 dBA CNEL. Therefore, impacts related to roadway noise would be less than significant.

101 Rudolf W. Hendriks, California Vehicle Noise Emission Levels, NTIS, FHWA/CA/TL-87/03 (1987).

Table 4.13-4
Future Year (2023) plus Project

Intersection	Roadway Segment	Time Period	Future (2023)	Future (2023) plus Project	Difference
Crenshaw Boulevard					
1	North of Upper Exposition Boulevard	AM	66.6	66.7	+0.1
		PM	66.2	66.3	+0.1
	South of Upper Exposition Boulevard	AM	66.4	66.5	+0.1
		PM	66.2	66.4	+0.2
2	North of Obama Boulevard	AM	66.4	66.5	+0.1
		PM	66.5	66.6	+0.1
	South of Obama Boulevard	AM	65.2	65.3	+0.1
		PM	65.9	66.1	+0.2
Victoria Ave					
3	North of Lower Exposition Boulevard	AM	39.6	N/A	N/A
		PM	42.8	N/A	N/A
	South of Lower Exposition Boulevard	AM	47.2	47.9	+0.7
		PM	44.2	47.1	+2.9
4	North of Obama Boulevard	AM	47.3	50.2	+2.9
		PM	46.4	50.9	+4.5
	South of Obama Boulevard	AM	50.5	50.5	0.0
		PM	50.2	50.2	0.0
Upper Exposition Boulevard					
1	East of Crenshaw Boulevard	AM	57.7	57.7	0.0
		PM	58.1	58.1	0.0
	West of Crenshaw Boulevard	AM	56.9	57.0	+0.1
		PM	57.8	57.8	0.0
Obama Boulevard					
2	East of Crenshaw Boulevard	AM	62.6	62.8	+0.2
		PM	61.5	62.2	+0.7
	West of Crenshaw Boulevard	AM	61.6	61.9	+0.3
		PM	61.8	62.3	+0.5
Lower Exposition Boulevard					
3	East of Victoria Avenue	AM	46.2	N/A	N/A
		PM	46.0	N/A	N/A
	West of Victoria Avenue	AM	45.3	47.9	+2.6
		PM	46.0	47.1	+2.9
Obama Boulevard					
4	East of Victoria Avenue	AM	63.0	63.3	+0.3
		PM	63.5	63.9	+0.4
	West of Victoria Avenue	AM	63.0	63.1	+0.1
		PM	63.3	63.4	+0.1

*Source: Refer to **Appendix I** for roadway noise worksheets.*

b. Generation of excessive groundborne vibration or groundborne noise levels?

Construction

Less than Significant with Mitigation Incorporated. Construction machinery and operations can generate varying degrees of ground vibration, depending on the construction procedures and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The effect on buildings located in the vicinity of a construction site often varies depending on soil type, ground strata, and construction characteristics of the receptor buildings. The results from vibration impacts can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at its highest levels. Ground-borne vibration from construction activities rarely reaches the levels that damage structures. Potential building damage occurs when construction activities cause ground-borne vibration levels to exceed 0.5 inches-per second peak particle velocity (PPV) at the nearest off-site sensitive receptors. **Table 4.13-5: Construction Vibration Levels Estimates—Building Damage** present construction vibration impacts associated with on-site construction in terms of building damage.

Table 4.13-5
Construction Vibration Levels Estimates—Building Damage

Location	Estimated Vibration Velocity Levels at the Nearest Off-Site Structures from the Project Construction Equipment							Significance Threshold (PPV ips)	Significant Impact without Mitigation?	Significant Impact with Mitigation?
	Pile Driver (impact)	Vibratory Roller	Large Bulldozer	Caisson Drilling	Loaded Trucks	Jack-hammer	Small bulldozer			
FTA Reference Vibration Levels at 25 feet										
	0.644	*0.210*	*0.089*	*0.089*	*0.076*	*0.035*	*0.003*	—		
2	0.490	0.160	0.068	0.068	0.058	0.027	0.001	0.12	**Yes**	No
4	0.081	0.026	0.011	0.011	0.010	0.004	0.000	0.12	No	No
5	0.389	0.127	0.054	0.054	0.046	0.021	0.002	0.12	**Yes**	No
6	0.028	0.009	0.004	0.004	0.003	0.002	0.000	0.12	No	No
7	0.042	0.014	0.006	0.006	0.005	0.002	0.000	0.12	No	No

Source: US Department of Transportation, Federal Transportation Authority, Transit Noise and Vibration Impact Assessment
*Refer to **Appendix I** for Noise Study*

As shown in **Table 4.13-5** the forecasted vibration levels due to on-site construction activities would exceed the building damage significance threshold of 0.12 ppv at Location 2 and 5 due to the use of pile drivers and vibratory rollers. With implementation of Project **Mitigation Measure MM-NOI-2**, pile drivers would not be utilized during construction. In addition, **Mitigation Measure MM-N2** from the West Adams-Baldwin Hills-Leimert Community Plan EIR would limit the use of vibratory rollers to a minimum of 40 feet

from the nearest sensitive receptor, which would reduce vibration levels to below the significance threshold of 0.12 PPV ips. As such, construction vibration impacts would be less than significant with mitigation incorporated.

Operation

Operation of the Project would include typical commercial-grade stationary mechanical and electrical equipment, such as air handling units, condenser units, and exhaust fans, which could produce vibration. Ground-borne vibration generated by each of the above-mentioned activities would generate approximately up to 0.005 inches per second PPV adjacent to the Project Site.[102] As such, vibration levels at other sensitive receptors would result in vibration levels below perceptible levels of human annoyance. As a result, the Project's operational vibration impacts would be less than significant.

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?***

No Impact. The Project Site is not within the vicinity of a private airstrip or an airport land use plan. The closest public airport to the Project Site is the Santa Monica Municipal Airport located approximately 6.5 miles west of the Project Site. Therefore, the Project is not within two miles of a public airport or public use airport that would expose people residing or working in the project area to excessive noise levels. Consequently, no impacts associated with noise would result from the Project.

Cumulative Impacts

For purposes of this analysis, development of the related projects would be considered to contribute to cumulative noise impacts. Noise, by definition, is a localized phenomenon and drastically reduces as distance from the source increases. As a result, only related projects and growth in the general area of the Project Site would contribute to cumulative noise impacts. Cumulative construction-noise impacts have the potential to occur when multiple construction projects in the local area generate noise within the same time frame and contribute to the local ambient noise environment. As shown in **Table 4.13-2** above, sensitive receptors are located approximately 30 and 35 feet (Location 2 and 5) from the Project site. With implementation of **Mitigation Measure MM-N1** from the West Adams-Baldwin Hills-Leimert Community Plan EIR and project specific **Mitigation Measure MM-NOI-2**, construction impacts would be reduced to less than significant. The closest related project is located approximately 56 feet to the south across

102 FTA, Transit Noise and Vibration Impact Assessment Manual, September 2018, , https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf, Accessed January 2020.

Obama Boulevard, further than the two nearest sensitive receptors identified. However, this Project has not been approved by the City and there are no plans to begin construction within the timeframe of Project's construction schedule. It is expected that, as with the Project, the related projects would implement best management practices, which would minimize any noise-related nuisances during construction. Therefore, the combined construction-noise impacts of the related projects and the Project's contribution would be less than significant.

With regard to stationary sources, cumulative significant noise impacts may result from cumulative development. Stationary sources of noise that could be introduced in the area by cumulative projects could include mechanical equipment, loading docks, and parking lots. Given that the related projects would be required to adhere to the City's noise standards, all stationary sources would be required to have shielding or other noise-abatement measures so as not to cause a substantial increase in ambient noise levels. Moreover, due to differing construction schedules, it is unlikely that noise from multiple cumulative projects would interact to create a significant combined noise impact. As such, the cumulative noise impacts would be less than significant.

With regard to ground-borne vibration, cumulative significant noise impacts could result if construction were occurring on the Project Site and nearby related project site concurrently. As shown in **Table 4.13-5** above, the forecasted vibration levels due to on-site construction activities would exceed the building damage significance threshold of 0.12 ppv at Location 2 and 5 due to the use of pile drivers and vibratory rollers. With implementation of project specific **Mitigation Measure MM-NOI-2**, pile drivers would not be utilized during construction. In addition, **Mitigation Measure MM-N2** from the West Adams-Baldwin Hills-Leimert Community Plan EIR would limit the use of vibratory rollers to a minimum of 40 feet from the nearest sensitive receptor, which would reduce vibration levels to below the significance threshold of 0.12 PPV ips. As such, construction vibration impacts would be reduced to less than significant. As discussed above, the closest related project is located approximately 56 feet to the south across Obama Boulevard, further than the two nearest sensitive receptors identified. However, this Project has not been approved by the City and there are no plans to begin construction within the timeframe of Project's construction schedule. It is expected that, as with the Project, related projects would implement best management practices, which would minimize any ground-borne vibration during construction. Therefore, the combined construction-vibration impacts of the related projects and the Project's contribution would be less than significant.

Mitigation Measures

Incorporation of Prior Mitigation

As discussed in Section 3.3 of this SCEA, PRC Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports (EIRs).

The following mitigation measures from prior applicable EIRs incorporated into the Project will lessen the significant impacts of the Project, but not to a less-than-significant level. Implementation of Project-specific mitigation measures would further reduce impacts to less than significant and are listed further below.

SCAG 2020–2045 RTP/SCS Program EIR:

PMM NOISE-1 In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects that expose people to excessive noise levels, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a. Install temporary noise barriers during construction.

b. Include permanent noise barriers and sound-attenuating features as part of the project design. Barriers could be in the form of outdoor barriers, sound walls, buildings, or earth berms to attenuate noise at adjacent sensitive uses.

c. Schedule construction activities consistent with the allowable hours pursuant to applicable general plan noise element or noise ordinance

d. Post procedures and phone numbers at the construction site for notifying the Lead Agency staff, local Police Department, and construction contractor (during regular construction hours and off-hours), along with permitted construction days and hours, complaint procedures, and who to notify in the event of a problem.

e. Notify neighbors and occupants within 300 feet of the project construction area at least 30 days in advance of anticipated times when noise levels are expected to exceed limits established in the noise element of the general plan or noise ordinance.

f. Designate an on-site construction complaint and enforcement manager for the project.

g. Ensure that construction equipment are properly maintained per manufacturers' specifications and fitted with the best available noise suppression devices (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds silencers, wraps). All intake and exhaust ports on power equipment shall be muffled or shielded.

h. Use hydraulically or electrically powered tools (e.g., jack hammers, pavement breakers, and rock drills) for project construction to avoid noise associated with compressed air exhaust from pneumatically powered tools. However, where use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust should be used; this muffler can lower noise levels from the exhaust by up to about 10 dBA. External jackets on the tools themselves should be used, if such jackets are commercially available, and this could achieve a further reduction of 5 dBA. Quieter procedures should be used, such as drills rather than impact equipment, whenever such procedures are available and consistent with construction procedures.

i. Where feasible, design projects so that they are depressed below the grade of the existing noise-sensitive receptor, creating an effective barrier between the roadway and sensitive receptors.

j. Where feasible, improve the acoustical insulation of dwelling units where setbacks and sound barriers do not provide sufficient noise reduction.

k. Using rubberized asphalt or "quiet pavement" to reduce road noise for new roadway segments, roadways in which widening or other modifications require re-pavement, or normal reconstruction of roadways where re-pavement is planned

l. Projects that require pile driving or other construction noise above 90 dBA in proximity to sensitive receptors, should reduce potential pier drilling, pile driving and/or other extreme noise generating construction impacts greater than 90 dBA; a set of site-specific noise attenuation measures should be completed under the supervision of a qualified acoustical consultant.

m. Use land use planning measures, such as zoning, restrictions on development, site design, and buffers to ensure that future development is compatible with adjacent transportation facilities and land uses;

n. Monitor the effectiveness of noise reduction measures by taking noise measurements and installing adaptive mitigation measures to achieve the standards for ambient noise levels established by the noise element of the general plan or noise ordinance.

o. Use equipment and trucks with the best available noise control techniques (e.g., improved mufflers, equipment redesign, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds, wherever feasible) for project construction.

p. Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.

q. Use of portable barriers in the vicinity of sensitive receptors during construction.

r. Implement noise control at the receivers by temporarily improving the noise reduction capability of adjacent buildings (for instance by the use of sound blankets), and implement if such measures are feasible and would noticeably reduce noise impacts.

s. Monitor the effectiveness of noise attenuation measures by taking noise measurements.

t. Maximize the distance between noise-sensitive land uses and new roadway lanes, roadways, rail lines, transit centers, park-and-ride lots, and other new noise-generating facilities.

u. Construct sound reducing barriers between noise sources and noise-sensitive land uses.

v) Stationary noise sources can and should be located as far from adjacent sensitive receptors as possible and they should be muffled and enclosed within temporary sheds, incorporate insulation barriers, or use other measures as determined by the Lead Agency (or other appropriate government agency) to provide equivalent noise reduction.

w. Use techniques such as grade separation, buffer zones, landscaped berms, dense plantings, sound walls, reduced-noise paving materials, and traffic calming measures.

x. Locate transit-related passenger stations, central maintenance facilities, decentralized maintenance facilities, and electric substations away from sensitive receptors to the maximum extent feasible.

y. Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.

PMM NOISE-2 In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the State CEQA Guidelines, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to temporary construction noise, as applicable and feasible. Such measures may include the following or other comparable measures identified by the Lead Agency:

a. For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the potential vibration impacts to the structural integrity of the adjacent buildings within 50 feet of pile driving locations.

b. For projects that require pile driving or other construction techniques that result in excessive vibration, such as blasting, determine the threshold levels of vibration and cracking that could damage adjacent historic or other structure, and design means and construction methods to not exceed the thresholds.

c. For projects where pile driving would be necessary for construction due to geological conditions, utilize quiet pile driving techniques such as predrilling the piles to the maximum feasible depth, where feasible. Predrilling pile holes will reduce the number

of blows required to completely seat the pile and will concentrate the pile driving activity closer to the ground where pile driving noise can be shielded more effectively by a noise barrier/curtain.

d. Restrict construction activities to permitted hours in accordance with local jurisdiction regulation.

e. Properly maintain construction equipment and outfit construction equipment with the best available noise suppression devices (e.g., mufflers, silences, wraps).

f. Prohibit idling of construction equipment for extended periods of time in the vicinity of sensitive receptors.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

MM-N1 As a condition of approval for any Discretionary or "Active Change Area Project," as defined in Section 3.4 of the Project Description, the City shall require all contractors to include the following best management practices in contract specifications:

a. Construction haul truck and materials delivery traffic shall avoid residential areas whenever feasible. If no alternatives are available, truck traffic shall be routed on streets with the fewest residences.

b. The construction contractor shall locate construction staging areas away from sensitive uses.

c. When construction activities are located in close proximity to noise-sensitive land uses, noise barriers (e.g., temporary walls or piles of excavated material) shall be construction between activities and noise sensitive uses.

d. Impact pile drivers shall be avoided where possible in noise-sensitive areas. Drilled piles or the use of a sonic vibratory pile driver are quieter alternatives that shall be utilized where geological conditions permit their use. Noise shrouds shall be used when necessary to reduce noise of pile drilling/driving.

e. Construction equipment shall be equipped with mufflers that comply with manufacturers' requirements.

f. The construction contractor shall use on-site electrical sources to power equipment rather than diesel generators where feasible.

MM-N2 **Ground Vibration**

As a condition of approval for any Discretionary or "Active Change Area Project," as defined in Section 3.4 of the Project Description, the City shall require project proponents to consider potential vibration impacts to historic buildings. The project proponents shall coordinate with the City to identify historic buildings located within 20 feet of general construction activity or 76 feet of pile driving activity. Projects with construction activity within these distances from historic buildings shall develop a Vibration Control Plan to mitigate potential impacts. The Vibration Control Plan shall be completed by a qualified

structural engineer and include a pre-construction survey letter establishing baseline conditions at potentially affected buildings. The survey shall provide a shoring design to protect the identified land uses from potential damage. The structural engineer may recommend alternative procedures that produce lower vibration levels such as sonic pile driving or caisson drilling instead of impact pile driving. At the conclusion of vibration causing activities, the qualified structural engineer shall issue a follow-on letter describing damage, if any, to impacted buildings. The letter shall include recommendations for any repair, as may be necessary, in conformance with the Secretary of the Interior Standards. Repairs shall be undertaken and completed in conformance with all applicable codes including the California Historical Building Code (Part 8 of Title 24).

Mid-City Redevelopment Plan EIR:

MM-NO1 Construction (which could include demolition of existing uses) shall comply with applicable City noise regulations.

MM-NO2 A procedure shall be established to notify adjacent property owners and tenants, particularly residences, and other sensitive land uses such as schools of time periods when there would be noisy construction activities.

MM-NO3 During construction (which could include demolition of existing uses), the contractors for projects within the proposed Recovery Program Area shall muffle and shield intakes and exhaust, shroud and shield impact tools, and use electric-powered rather than diesel-powered construction equipment, as feasible.

MM-NO4 During construction of projects within the proposed Recovery Program Area truck haul routes (demolition waste, dirt excavation, cement, materials delivery) shall be designated and approved.

MM-NO5 As projects are designed and developed within the proposed Recovery Program Area, truck loading and trash pickup areas shall be located as far away as possible from adjacent residences. These facilities shall utilize screening walls or be enclosed.

Project Mitigation

MM-NOI-1 Noise Attenuation Techniques

Implementation of the following noise reduction techniques would further reduce construction noise levels:

a. All equipment be equipped with optimal muffler systems.

b. Limit construction equipment generating noise levels in excess of 87 dBA operating simultaneously with other pieces of equipment generating noise levels below 87 dBA.

c. Limit the number of pieces of noise generating heavy-duty off-road construction equipment (e.g., dozers, excavators, loaders, etc.) to one third of the anticipated equipment fleet operated simultaneously on the Project Site within 75 feet of off-site noise sensitive receptors.

d. Use of temporary and/or movable shielding for both specific and nonspecific operations. Specifically, an approximately 15-foot tall construction noise barrier will be installed where needed to reduce construction noise levels by a minimum 7 dB.

e. A sign, legible at a distance of 50 feet, shall be posted at the project construction site providing a contact name and a telephone number where residents can inquire about the construction process and register complaints. This sign will indicate the dates and duration of construction activities. In conjunction with this required posting, a noise disturbance coordinator will be identified to address construction noise concerns received. The contact name and the telephone number for the noise disturbance coordinator will be posted on the sign. The coordinator will be responsible for responding to any local complaints about construction noise and will notify the City to determine the cause and implement reasonable measures to the complaint, as deemed acceptable by the City.

MM-NOI-2 Construction Vibration

a. Limit the use of vibratory rollers to a minimum of 40 feet from the nearest sensitive receptor.

Impacts After Mitigation

As explained above, construction noise levels would result in a maximum increase of 21.3 dBA above the significance threshold of 75 dBA without implementation of any noise reduction measures. Compliance with Section 112.05 of the LAMC and a combination of prior mitigation from the SCAG 2020–2045 RTP/SCS Program EIR (**PMM NOISE-1** and **PMM NOISE-2**), West Adams-Baldwin Hills-Leimert Community Plan EIR (**MM-N1** through **MM-N2**), the Mid-City Redevelopment Plan EIR (**MM-NO1** through **MM-NO5**) and Project Mitigation (**MM-NOI-1** through **MM-NOI-2**) would reduce construction noise levels.

A combination of the methods identified in these mitigation measure would be used to reduce construction noise levels by a minimum of 21.3 dBA including implementation of **Mitigation Measure PMM NOISE-1** from the SCAG 2020–2045 RTP/SCS Program EIR requiring the use of external jackets to achieve noise reduction of 5 dB; and Project **Mitigation Measure MM-NOI-1** requiring the use of optimal muffler systems to reduce construction noise levels by approximately 10 dB or more and limiting the number of noise-generating heavy-duty off-road construction equipment operating simultaneously to one third of the anticipated equipment fleet to reduce construction levels by approximately 14 dBA, resulting in a reduction 29 dBA. Construction impacts would be less than significant with implementation of these mitigation measures.

As explained above, the forecasted vibration levels due to on-site construction activities would exceed the building damage significance threshold of 0.12 ppv at Location 2 and 5 without implementation of any vibration-reduction measures. A combination of mitigation from the West Adams-Baldwin Hills-Leimert Community Plan EIR (**MM-N2**) and Project Mitigation (**MM-NOI-2**) would reduce construction vibration levels to less than significant.

A combination of methods identified in these mitigation measures would be used to reduce construction vibration impacts to a less than significant level including implementation of **Mitigation Measure MM-N2** from the West Adams-Baldwin Hills-Leimert Community Plan EIR limiting the use of vibratory rollers to a minimum of 40 feet from the nearest sensitive receptor; and Project **Mitigation Measure MM-NOI-2** restricting the utilization of pile drivers during construction, resulting in a reduction of vibration levels to below the significance threshold of 0.12 PPV ips. Construction impacts would be less than significant with implementation of these mitigation measures.

XIV. POPULATION AND HOUSING

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

SCAG Regional Transportation Plan Sustainable Communities Strategy. As part of its comprehensive planning process for the Southern California region, SCAG, the MPO for Southern California with exception to San Diego County, has divided its jurisdiction into 14 subregions. The Project Site is located within the City of Los Angeles subregion, which includes all areas within the boundaries of the City of Los Angeles, the City of San Fernando, and a portion of unincorporated Los Angeles County. However, the numbers discussed herein pertain only to the City of Los Angeles. Based on the regional growth projections in the 2020–2045 RTP/SCS, the City of Los Angeles had an estimated permanent population of approximately 3,933,800 residents, 1,367,000 total housing units, and 1,848,300 employees. Moreover, SCAG estimates the population of the City will increase to 4,771,300 residents, 1,793,000 housing units, and 2,135,900 employees by 2045, an increase of 837,500 residents, 426,000 housing units, and 287,600 employees by 2045.

Impact Analysis

a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. A significant impact could occur if the Project would locate new development such as homes, businesses, and/or infrastructure, with the effect of substantially inducing growth in the proposed area that would otherwise not have occurred as rapidly or in as great a magnitude.

The State of California requires that cities plan for changes in population and attend to housing and employment needs; if growth is projected, each city must accommodate a share of the region's anticipated growth. These projections are provided to the City by SCAG. The City must then demonstrate that it has

accommodated, or created the "capacity" for, these projected levels of population, housing, and employment through its Community Plans. This section describes the Community Plan Area's population, housing, and employment projections and capacity estimates as provided by the West Adams-Baldwin Hills-Leimert Community Plan.

West Adams-Baldwin Hills-Leimert Community Plan. SCAG forecasts population and job growth of the cities and counties in the six county Southern California Region. The Department of City Planning refines the City's allocation so that projected growth is directed to centers and districts that are located near mass transit, consistent with the Framework Element and other City policies. Directing growth this way protects other areas, such as single-family neighborhoods, historic districts, hillside, and other residential neighborhoods. Population, housing, and employment capacity for Year 2030 in the West Adams–Baldwin Hills-Leimert Community Plan area is shown in **Table 4.14-1: Population, Housing and Employment Capacity for the West Adams-Baldwin Hills-Leimert CPA**.

Table 4.14-1
Population, Housing and Employment Capacity for the West Adams-Baldwin Hills-Leimert CPA

Type	2030 Projected Capacity
Population	214,012
Dwelling Units	84,257
Employment	53,556

Source: West Adams-Baldwin Hills-Leimert Community Plan

Based on the amount of remaining capacity for population, dwelling units, and employment in the West Adams–Baldwin Hills-Leimert Community Plan Area, the Project would not create unplanned population growth that would exceed the area's capacity.

Construction

The work requirements of most construction projects are highly specialized so that construction workers remain at a job site only for the timeframe in which their specific skills are needed to complete a particular phase of the construction process. Construction workers would likely be supplied from the region's large labor pool. Construction workers would not be likely to relocate their household as a consequence of working on the Project on a short-term basis, and for this reason, significant housing or population impacts will not result from construction of the Project.

Operation

Direct Growth

Based on the City's current household demographics, an average of 2.41 persons per household, the construction of 401 dwelling units would result in an increase of approximately 970 residents in the West Adams-Baldwin Hills-Leimert Community.[103] Further, the Project would include approximately 40,966 square feet of ground floor commercial and community spaces generating on-site employment. The Project would generate the need for approximately 145 employees which represents less than 0.04 percent of the estimated population in the West Adams-Baldwin Hills-Leimert Community by 2030.[104] While the commercial space would provide new employment opportunities, the proposed use is not considered a unique use or regional destination that would draw substantial new residents to the area to fulfill jobs. The addition of 970 residents represents less than 0.07 percent of the estimated population in the West Adams-Baldwin Hills-Leimert Community by 2030. The addition of 401 residential units represents less than 0.05 percent of the estimated housing supply in the West Adams-Baldwin Hills-Leimert Community by 2030.

Indirect Growth

The Project is an infill development in the West Adams-Baldwin Hills-Leimert Community Plan area, which is already developed with utility and roadway infrastructure. The Project would be served by existing infrastructure and would not require or include the development of any new utility or roadway infrastructure. Thus, the Project would not indirectly induce substantial population growth, and no impacts related to indirect population growth would occur as a result of the Project.

For the reasons discussed above, the Project would not indirectly or directly induce substantial population growth. Therefore, Project impacts related to population and housing would be less than significant.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. A significant impact may occur if the Project would result in the displacement of existing housing units, necessitating the construction of replacement housing elsewhere. The Project Site is developed with a vacant administrative building and its associated surface parking lot on the West Site while the East Site is vacant and is currently used by Metro as a construction staging area. There are no residential units or residents on the Project Site. Moreover, the construction of 401 dwelling units would result in an increase of approximately 970 net permanent residents in the City. As such, the Project would

103 City of Los Angeles, Department of City Planning, Jack Tsao, Data Analyst II, July 31, 2019.

104 One employee would occupy approximately 588 square feet of retail space. Source: Green Building Council, Building Area Per Employee by Business Type, accessed June 2020.

not displace any existing housing. Therefore, the Project would not displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere, and no impact would occur.

Cumulative Impacts

Development of the Project would result in an increase of approximately 970 net permanent residents, 401 dwelling units, and approximately 145 employees in the West Adams–Baldwin Hills-Leimert Community Plan area. The related projects indicated in **Table 2.0-2** and **Figure 2.0-11** would result in an increase of approximately 1,834 new residents, 761 dwellings units, and 820 employees to the West Adams–Baldwin Hills-Leimert Community Plan area.[105,106] Based on the West Adams–Baldwin Hills-Leimert Community Plan growth projections, the community has an estimated permanent population of approximately 199,734 persons, approximately 76,147 dwelling units, and 49,566 employees for 2020. By the year 2030, West Adams–Baldwin Hills-Leimert Community Plan forecasts that the West Adams–Baldwin Hills-Leimert Community will increase to 214,012 persons, approximately 84,257 dwelling units, and 53,556 employees. The population, dwelling units, and employment that would be generated by the Project and related projects represents an increase of less than 0.20 percent, 0.15 percent, and 0.24 percent, respectively. As such, the Project and the related projects would be within West Adams–Baldwin Hills-Leimert Community Plan projections. Therefore, the Project and the related project would not exceed the growth projections of West Adams–Baldwin Hills-Leimert Community Plan. Because population growth which would be generated by the Project and the related projects have already been anticipated in the West Adams–Baldwin Hills-Leimert Community Plan projections, the Project's population growth would not be cumulatively considerable. Therefore, the Project's contribution to cumulative impacts to population and housing would be less than significant.

Mitigation Measures

Incorporation of Prior Mitigation

SCAG 2020–2045 RTP/SCS Program EIR:

No population and housing mitigation measures were identified.

105 City of Los Angeles, Department of City Planning, Jack Tsao, Data Analyst II, July 31, 2019. Based on 761 units x 2.41 persons per household.

106 One employee would occupy approximately 588 square feet of retail space. One employee would occupy approximately 228 square feet of office space. One employee would occupy approximately 317 square feet of bank space. Source: Green Building Council, Building Area Per Employee by Business Type, accessed October 2019.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No population and housing mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

No population and housing mitigation measures were identified.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

No prior mitigation measures were identified, and no project specific mitigations are proposed for the Project.

XV. PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Fire protection?	☐	☐	☒	☐
b. Police protection?	☐	☐	☒	☐
c. Schools?	☐	☐	☒	☐
d. Parks?	☐	☐	☒	☐
e. Other public facilities?	☐	☐	☒	☐

Impact Analysis

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

a. Fire Protection

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee*

of California State University (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[107]

LAFD has not established response times standards for emergency response, nor adopted the National Fire Protection Association (NFPA) standard of 5 minutes for EMS response and 5 minutes, 20 seconds for fire suppression response.[108] Roadway congestion, intersection level of service (LOS), weather conditions, and construction traffic along a response route can affect response time. Generally, multilane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, the LAFD, in collaboration with LADOT, has developed a Fire Preemption System (FPS), a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.[109] The City of Los Angeles has over 205 miles of major arterial routes that are equipped with FPS.[110]

According to the LAFD, although response time is considered to assess the adequacy of fire protection services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board Trustee of California State University* ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection and emergency medical services.

The LAFD has recently taken a number of steps to improve processes and practices, which in turn serve to reduce response times. Upgrades recently completed or pending include installation of automated vehicle locating systems on all LAFD apparatus; replacement of fire station alerting systems that control fire station dispatch audio, signal lights, and other fire station alerting hardware and software; and development of a new computer-aided dispatch system to manage fire and emergency medical service incidents from initial report to conclusion of an incident.[111]

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107 City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847

108 NFPA, NFPA 1710 – Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments, 2016 Edition. Response time is turnout time plus travel time for EMS and fire suppression incidents.

109 LADOT, Los Angeles Signal Synchronization Fact Sheet, accessed June 3, 2018. http://ladot.lacity.org/sites/g/files/wph266/f/LADOT%20ATSAC%20%26%20Signals%20_%20Fact%20Sheet%202-14-2016.pdf

110 LAFD, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulleting No. 133, October 2008.

111 Los Angeles Fire Department, A Safer City Strategic Plan, https://issuu.com/lafd/docs/strategic_plan_final_2018.02.09?e=17034503/59029441, accessed June 2020.

Less than Significant Impact. A project would normally have a significant impact on fire protection if it required the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service. Section 15382 of the CEQA guidelines defines significant effect on the environment as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment. A social or economic change related to a physical change may be considered in determining whether the physical change is significant." Thus, the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility to maintain service would only be considered significant if such activities result in a physical adverse impact upon the environment.[112]

Additionally, the City has passed propositions and measures to alleviate any future impacts to public services. The City Fire Facilities Bond (Proposition F), allocated $378.6 million to build 19 new or replacement neighborhood fire/paramedic stations.[113] Proposition Q, the Citywide Public Safety Bond Measure, involves the spending of $600 million to renovate, improve, expand, and construct police, fire, 911, and paramedic facilities.[114] Measure J is a Charter amendment and ordinance that involves technical changes to Proposition F. Under Proposition F, the construction of new regional fire stations to provide training and other facilities at or near standard fire stations was required to take place on single sites of at least 2 acres. Measure J allows new regional fire stations funded by Proposition F and located in densely developed areas to be designed and built on one or more properties equaling less than 2 acres.

The Los Angeles Fire Department Strategic Plan 2018-2020, A Safer City 2.0, is a collaborative effort between LAFD staff, city leaders, and community members to accomplish the LAFD's organizational vision. As provided in the Strategic Plan 2018-2020, five goals will guide the LAFD for the next three years: (1) Provide exceptional public safety and emergency service; (2) Embrace a healthy, safe, and productive work environment; (3) Implement and capitalize on advanced technology; (4) Enhance LAFD sustainability and community resiliency; and (5) Increase opportunities for personal growth and professional development.

The City of Los Angeles Fire Department (LAFD) considers fire protection services for a project adequate if a project is within the maximum response distance and has the minimum fire flow required for the land use proposed. Pursuant to Section 57.507.3.3, Table 507.3.3, of the 2017 City of Los Angeles Fire Code, the maximum response distance between commercial land uses and a LAFD fire station that houses an

112 City of Hayward et al. v. Board of Trustees of the California State University (2015).
113 City of Los Angeles Department of Public Works, Bureau of Engineering, Proposition F, Facilities Bond, www.eng.lacity.org/fire_bond, accessed September 26, 2017.
114 City Administrative Officer Miguel A. Santana to the Mayor and Council, June 30, 2016, City of Los Angeles Inter-Departmental Correspondence: SB 165 Annual Report Requirements for Fiscal Year 2013-2014 Proposition Q Program, Attachment B, Citywide Public Safety Bond Program Annual Report 2014.

engine company or truck company is one mile or 1.5 miles, respectively. If either of these distances were exceeded, all structures located in the applicable residential or commercial area would be required to install automatic fire sprinkler systems. With such systems installed, fire protection would be considered adequate even if the project were located beyond the maximum response distance.

Construction

Construction of the Project would increase the potential for accidental on-site fires from the operation of construction equipment and the use of flammable construction materials. The implementation of best management practices (BMPs) for the operation of mechanical equipment and the use of flammable construction materials by construction contractors and work crews would minimize fire hazards associated with the construction of the Project. The BMPs that would be implemented during construction of the Project would include keeping mechanical equipment in good operating condition, and as required by law, carefully storing flammable materials in appropriate containers, and the immediate and complete cleanup of spills of flammable materials when they occur.

Construction activities also have the potential to affect fire protection services, such as emergency vehicle response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. In accordance with LADOT requirements, a TTCP would be prepared if the public ROW would be affected by Project construction. If temporary street, lane, and sidewalk closures will be needed for the duration of 72 hours or longer a B-Permit is required from the BSS. Through this review and permit process LADOT ensures compliance with federal and State principles and standards and the safe and efficient movement through and around construction zones. Project construction would not require the addition of a new fire station or the expansion, consolidation, or relocation of an existing facility in order to maintain adequate levels of service. Therefore, impacts to fire protection and emergency medical services during Project construction would be less than significant.

Operation

The analysis of the Project's potential operational impacts on fire protection and emergency medical services addresses potential impacts associated with LAFD facilities and equipment, response distances, access, and the ability of the fire water infrastructure system to provide the necessary fire flows. Additional or expanded fire stations have not yet been identified as planned projects in the Project area. However, in the event that the LAFD determines that a new or expanded fire station is warranted, or that fire stations need to be consolidated or relocated, the environmental effects that may result from such endeavors would be subject to the City's environmental review process. In the case of the Project area, land parcels for future fire stations would likely be comprised of infill lots with existing land uses that would be replaced

by the fire station. Due to the relatively small size and limited function, or land use, of fire stations (i.e., fire stations are generally one to two stories in height, as compared to multilevel and mixed-use projects), it is unlikely that development of a fire station would result in significant and unavoidable impacts. However, if such an impact were identified, the fire station project would be required to implement mitigation measures, as necessary, to avoid or minimize adverse impacts.

The Project would include up to 401 dwelling units and up to 40,966 sq. ft. of ground floor commercial and community spaces and would generate approximately 970 new residents and 145 employees. The Project would increase the utilization of the Project Site, which is currently a vacant administrative building and its associated surface parking lot on the West Site and an undeveloped construction staging area on the East Site and would potentially increase the demand for LAFD services. The first due-in LAFD station is LAFD Station 94 located at 4470 Coliseum Street, 0.64 miles southwest of the Project Site. LAFD Station 34 is also in close proximity located at 3661 7th Avenue, 0.62 miles east of the Project Site.

Pursuant to LAMC Section 57.507.3.3, the maximum response distance between a commercial land use and a LAFD station that houses an engine is 1 mile and 1.5 miles for a truck company. If this distance is exceeded, all structures shall be constructed with automatic fire sprinkler systems. As discussed above, Fire Station 94, which is the first due-in station with a Truck Company, is located 0.64 miles from the Project Site. Fire Station 34, the closest station with an Engine Company is located 0.62 miles from the Project Site.

Furthermore, based on response metrics from January to April 2020, Fire Station No. 94 had an average response time 6 minutes and 46 seconds for non-EMS calls of, and 6 minutes and 50 seconds for EMS calls.[115] Additionally, based on response metrics from January to April 2020, Fire Station No. 34 had an average response time 6 minutes and 5 seconds for non-EMS calls of, and 6 minutes and 49 seconds for EMS calls.[116]

These response times are provided for informational purposes since the LAFD has not established response time standards for emergency response. Roadway congestion, intersection LOS, weather conditions, and construction traffic along a response route can affect response time. Generally, multilane arterial roadways allow emergency vehicles to travel at higher rates of speed and permit other traffic to maneuver out of a path of an emergency vehicle. Additionally, as previously discussed, the LAFD, in collaboration with LADOT, has developed the FPS, a system that automatically turns traffic lights to green for emergency vehicles traveling along designated City streets to aid in emergency response.[117] The City

115 Los Angeles Fire Department, FireStatLA, https://www.lafd.org/fsla/stations-map?st=741&address=3606%20exposition&year=2020, accessed June 2020.
116 Los Angeles Fire Department, FireStatLA, https://www.lafd.org/fsla/stations-map?st=461&year=2020, accessed June 2020.
117 Los Angeles Department of Transportation, Los Angeles Signal Synchronization Fact Sheet, February 14, 2016.

has over 205 miles of major arterial routes that are equipped with FPS.[118] FPS systems adjacent to the Project are located along Obama Boulevard between Martin Luther King Jr. Boulevard and La Cienega Boulevard, and along Crenshaw Boulevard between Wilshire Boulevard and 76th Street.[119]

According to the LAFD, although response time is considered to assess the adequacy of fire protection services, it is one factor among several that LAFD utilizes in considering its ability to respond to fires and life and health safety emergencies, including required fire flow, response distance from existing fire stations, and the LAFD's judgement for needs in an area. If the number of incidents in a given area increases, it is the LAFD's responsibility to assign new staff and equipment, and potentially build new or expanded facilities, as necessary, to maintain adequate levels of service. In conformance with the California Constitution Article XIII, Section 35(a)(2) and the *City of Hayward v. Board of Trustees of California State University* ruling, the City has and will continue to meet its legal obligations to provide adequate public safety services, including fire protection.

Based on the response distance criteria specified in LAMC 57.507.3.3 and the relatively short distance from LAFD Stations 34 and 94 to the Project Site, fire protection response would be adequate without the need of construction of additional or expanded facilities. Additionally, 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 LAMC Section 57.118, and which are required prior to the issuance of a building permit. As part of the normal building permit process, the Project Applicant would submit a plot plan for review and approval by the LAFD either prior to the approval of a building permit. The plot plan shall include the following minimum design features: fire lanes, where required, shall be a minimum of 20 feet in width; all structures must be within 300 feet of an approved fire hydrant. Thus, compliance with regulatory compliance measures regarding fire protection and safety would ensure that that fire protection services are adequate within the proposed building and around the Project Site. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for fire protection and impacts of the Project would be less than significant.

118 Los Angeles Fire Department, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

119 Los Angeles Fire Department, Training Bulletin: Traffic Signal Preemption System for Emergency Vehicles, Bulletin No. 133, October 2008.

b. Police Protection

Section 35 of Article XIII of the California Constitution at subdivision (a)(2) provides: "The protection of public safety is the first responsibility of local government and local officials have an obligation to give priority to the provision of adequate public safety services." Section 35 of Article XIII of the California Constitution was adopted by the voters in 1993 under Proposition 172. Proposition 172 directed the proceeds of a 0.50-percent sales tax to be expended exclusively on local public safety services. California Government Code Sections 30051-30056 provide rules to implement Proposition 172. Public safety services include fire protection. Section 30056 mandates that cities are not allowed to spend less of their own financial resources on their combined public safety services in any given year compared to the 1992-93 fiscal year. Therefore, an agency is required to use Proposition 172 to supplement its local funds used on fire protection services, as well as other public safety services. In *City of Hayward v. Board of Trustee of California State University* (2015) 242 Cal. App. 4th 833, the court found that Section 35 of Article XIII of the California Constitution requires local agencies to provide public safety services, including fire protection and emergency medical services, and that it is reasonable to conclude that the city will comply with that provision to ensure that public safety services are provided.[120]

Less Than Significant Impact. The Project Site is located in the Los Angeles Police Department (LAPD) South Bureau. The Project Site is served by the South West Community Police Station, located at 1546 West Martin Luther King Boulevard 1.93 miles southeast of the Project Site. The Project Site is located in Reporting District 353.

Response time represents the period of time elapsed from the initiation of an assistance call to the appearance of a police unit at the scene. Calls for police assistance are prioritized based on the nature of the call. Unlike fire protection services, police units are most often in a mobile state; hence, actual distance between a headquarters facility and a given Project Site is of little relevance. Instead, the number of police officers out on the street is more directly related to the realized response time.

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 security lighting and guards and 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

120 City of Hayward v. Board Trustee of California State University (2015) 242 Cal. App. 4th 833, 847

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.

Construction activities also have the potential to affect police response times, by adding construction traffic to the street network and potentially requiring partial lane closures during street improvements and utility installations. Thus, construction could have the potential to adversely affect fire access. In accordance with LADOT requirements, a TTCP would be prepared if the public ROW would be affected by Project construction. If temporary street, lane, and sidewalk closures will be needed for the duration of 72 hours or longer a B-Permit is required from the BSS. Through this review and permit process LADOT ensures compliance with federal and State principles and standards and the safe and efficient movement through and around construction zones. Therefore, impacts to police protection response time during Project construction would be less than significant.

The Project would include up to 401 dwelling units and up to 40,966 sq. ft. of ground floor commercial and community spaces and would generate approximately 970 new residents and 145 new employees. The Project would increase the utilization of the Project Site, which is currently used as an administrative building and its associated surface parking lot on the West Site and a construction staging area on the East Site. Through construction safety features including security lighting and guards, and erecting temporary fencing, demand for LAPD services would be limited.

The development of the Project would result in an increase of on-site residents, visitors, patrons, and employees to the Project Site, thereby generating a potential increase in the number of service calls from the Project Site. Responses to thefts, vehicle burglaries, vehicle damage, traffic-related incidents, and crimes against persons may escalate 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 functional and security 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 crime prevention features, such as nighttime security lighting and secure parking facilities. In addition, the continuous visible and nonvisible presence of residents at all times of the day would provide a sense of security during evening and early morning hours. The Project would also include security cameras for the residential and commercial components. As Metro facilities will be part of the Project Site, Metro would also have their security equipment and staff in publicly accessible spaces and Metro facilities. These preventative and proactive security measures would decrease the amount of service calls that LAPD would otherwise receive.

Although the LAPD does not maintain minimum officer-to-population ratio objectives, the data are a useful metric for gauging the effect a project might have on service levels and response times. The current officer-

to-resident ratio in the Southwest Community is 1 officer per 469 residents.[121] The Project would result in approximately 970 residents at the Project Site, requiring approximately two additional officers to maintain the same ratio. The addition of two officers to maintain the existing ratio represents an a less than one percent increase over existing staffing levels. This change would not require the construction of additional police facilities. However, in the event that the LAPD determines that a new or expanded police station is warranted, or that police stations need to be consolidated or relocated, the environmental effects that may result from such endeavors would be subject to the City's environmental review process. In the case of the Project area, land parcels for future police stations would likely be comprised of infill lots with existing land uses that would be replaced by the police station. Due to the size and limited function, or land use, of police stations, it is unlikely that development of a police station would result in significant and unavoidable impacts. However, if such an impact were identified, the police station project would be required to implement mitigation measures, as necessary, to avoid or minimize adverse impacts. As such, the Project's direct population increase and associated demand for police services, along with the provision of on-site security features, coordination with LAPD, and incorporation of crime prevention features, would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for police protection and impacts of the Project would be less than significant.

c. Schools

Less than Significant Impact. The Los Angeles Unified School District (LAUSD) provides public school services to City residents for grades kindergarten through 12. There are currently 21 existing public schools within the West Adams-Baldwin Hills-Leimert Community Plan Area. The Susan Miller Dorsey High School, SEA Charter School, Celerity Nascent Charter School, and Coliseum Street Elementary are all within a mile of the Project Site. The Project would include up to 401 dwelling units and up to 40,966 sq. ft. of ground floor commercial and community spaces and would generate approximately 970 new residents and 145 new employees.

The remaining LAUSD student capacity for elementary schools, middle school schools, and high schools throughout the district? is 9,829, 1,496, and 4,294, respectively, as shown in **Table 4.15-1: Remaining LAUSD Student Capacity**. As shown in **Table 4.15-2: Project Estimated Student Generation**, the Project would generate an estimated total of 116 elementary school students, approximately less than 0.01 percent of remaining capacity, 32 middle school students, approximately less than 0.02 percent of

121 Los Angeles Police Department, About Southwest, http://www.lapdonline.org/southwest_community_police_station/content_basic_view/1639, accessed June 2020.

remaining capacity, and 66 high school students, approximately less than 0.02 percent of remaining capacity.

Table 4.15-1
Remaining LAUSD Student Capacity

School Facility	Remaining Student Capacity
Elementary School Students	9,829
Middle School Students	1,496
High School Students	4,294

Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, Los Angeles School District (March 2018).

Table 4.15-2
Project Estimated Student Generation

Land Use	Size	Elementary School Students	Middle School Students	High School Students	Total
Multifamily Residential[a]	401 du	91	25	52	168
Commercial[b]	40,966 sq. ft.	25	7	14	46
	Total	**116**	**32**	**66**	**214**

Source: Los Angeles Unified School District, 2018 Developer Fee Justification Study, Los Angeles School District (March 2018).
Notes: du = dwelling unit; sq. ft. = square feet
[a] *Student generation rates are as follows for residential uses: 0.2269 elementary, 0.0611 middle, and 0.1296 high school students per unit.*
[b] *Student generation rates for commercial uses are 0.2249 students per employee. The estimated number of employees is approximately 0.00271 employees per average square foot. It was assumed that the ratio of elementary, middle school, and high school students is similar to the residential generation rates.*

California Education Code Section 17620(a)(1) states that the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirements against any construction within the boundaries of the district, for the purposes of funding the construction or reconstruction of school facilities. The LAUSD School Facilities Fee Plan has been prepared to support the school district's levy of the fees authorized by California Education Code Section 17620. The Leroy F. Greene School Facilities Act of 1998 (SB 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities. The maximum fees authorized under SB 50 apply to zone changes, general plan amendments, zoning permits and subdivisions. The provisions of SB 50 are deemed to provide full and complete mitigation of school facilities impacts, notwithstanding any contrary provisions in CEQA, or

other State or local law (Government Code Section 65996). Furthermore, per Government Code Section 65995.5-7, LAUSD has imposed developer fees for commercial/industrial and residential space. Overall, the payment of school fees in compliance with SB 50 would be mandatory and would provide full and complete mitigation of school impacts for the purposes of CEQA. Therefore, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for schools; and impacts of the Project would be less than significant.

d. Parks

Less than Significant Impact. Construction workers employed to work on the Project would be temporary; that is, they would only work at the Project Site during the months of construction of the Project and their work days will vary depending on the skill set during each phase of construction. Moreover, their lunch times tend to be short and, therefore, not conducive to leaving the site. As a result, construction workers are more likely to utilize recreational facilities closer to their homes. Therefore, due to their small numbers, limited work times, and temporary nature of their employment at the Project Site, Project construction workers would not produce any significant demand for park and recreational facilities in the vicinity of the Project Site, nor is the construction of the Project expected to impair access to nearby parks.

Accordingly, Project construction would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, nor would Project construction interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. Thus, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities during construction such that substantial physical deterioration of the facilities would occur or be accelerated.

The Project would include up to 401 dwelling units and up to 40,966 sq. ft. of ground floor commercial and community spaces and would generate approximately 970 new residents and 145 new employees. According to the Community Plan, there are 19 parks and recreational facilities in the Community Plan Area, and 432 acres of land dedicated to parks and open space. The Project would include approximately 44,464 sq. ft. of publicly accessible open space and recreational amenities. The amenities would include a yoga room, fitness center, conference facilities, multipurpose rooms, lounges areas, and outdoor amenity space including a viewing deck and a pool deck. Publicly accessible open space would be provided as landscaped plaza space between the ground floor commercial uses and the Metro E Line. The availability of these on-site recreation amenities and opportunities would serve to reduce the demand for off-site park services, and accordingly the Project would not substantially increase the use of existing

neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

In addition, the Project Applicant would be required to pay the Quimby Act Fees or, if applicable, fees in accordance with the Parks Dedication and Fee Update ordinance (Ordinance No. 184,505), which would be used to provide additional park facilities in the Project area. Therefore, due to the Project's open space and amenities and the Applicant's payment of required fees, the Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities, need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for parks and impacts of the Project would be less than significant.

e. Other Public Facilities

Less than Significant Impact. Los Angeles Public Library (LAPL) provides library services to the City. **Table 4.15-3: Libraries Serving the Project Area**, lists the libraries identified by LAPL as available to serve the Project:

Table 4.15-3
Libraries Serving the Project Area

Library Name	Location	Approximate Distance to the Project Site (miles)	Service Radius (miles)
Baldwin Hills Library	2906 S. La Brea Avenue	1.3	
Jefferson - Vassie D. Wright Memorial Library	2211 W. Jefferson Boulevard	1.3	
Washington Irving Library	4117 W. Washington Boulevard	1.5	2.0

Source: Los Angeles Public Library, Locations and Hours, website: http://www.lapl.org/branches, accessed July 2020.

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. Beginning in fiscal year 2014-2015 and thereafter, LAPL was to be responsible for payment of all of its direct and indirect costs.[122]

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, impacts to library facilities would be less than significant.

Cumulative Impacts

i. Fire Protection

With respect to fire services, the Project, in combination with the five related projects indicated in **Table 2.0-2** and **Figure 2.0-11**, could increase the demand for fire protection services in the LAFD service area. Specifically, there could be increased demands for additional LAFD staffing, equipment, and facilities over time. 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 LOS. To the extent cumulative development causes the need for additional fire stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new fire stations would be subject to further CEQA review and evaluated on a case-by-case basis.

Consistent with *City of Hayward v. Board Trustees of California State University* (2015) 242 Cal.App.4th 833, ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate fire protection services is the responsibility of the City. LAFD would continue to monitor population growth and land development in the City and identify additional resource needs including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction that may become necessary to achieve the required LOS. Through the City's regular budgeting efforts, LAFD's resource needs would be identified and allocated according to the priorities at the time. Further analysis, including a specific location, would be speculative and beyond the scope of this document. However, as the LAFD does not currently have any plans for new fire stations to be developed in proximity to the Project Site, cumulative impacts upon LAFD services would be less than significant.

122 Los Angeles Office of the City Clerk, Interdepartmental Correspondence and Attachments Regarding Measure L, website: http://clkrep.lacity.org/onlinedocs/2011/11-1100-S2_rpt_cao_11-16-10.pdf, accessed July 2020.

ii. Police Protection

Development of the Project would result in an increase of approximately 970 net permanent residents and approximately 145 employees in the City. The related projects indicated in **Table 2.0-2** and **Figure 2.0-11** would result in an increase of approximately 1,842 new residents and 820 new employees to the Community Plan Area. This increase in population could increase the demand for police protection services in the Project area. Specifically, there would be an increased demand for additional LAPD staffing, equipment, and facilities over time. This need would be funded via existing mechanisms (e.g., sales taxes, government funding, and developer fees), to which the Project and related projects would contribute. In addition, each of the related projects would be individually subject to LAPD review and would be required to comply with all applicable safety requirements of the LAPD and the City in order to adequately address police protection service demands. To the extent the Project and related projects causes the need for additional police stations to be built throughout the City, the development of such stations would be on small infill lots within existing developed areas and would not likely cause a significant impact upon the environment. Nevertheless, the siting and development of any new police stations would be subject to further CEQA review and evaluated on a case-by-case basis. However, as the LAPD does not currently have any plans for new police stations to be developed in proximity to the Project Site. No impacts are currently anticipated to occur. On this basis, the Project would not make a cumulatively considerable impact to police protection services, and cumulative impacts on police protection would be less than significant.

Additionally, consistent with the *City of Hayward v. Board of Trustees of the California State University* ruling and the requirements stated in the California Constitution Article XIII, Section 35(a)(2), the obligation to provide adequate police protection services is the responsibility of the City. LAPD will continue to monitor population growth and land development in the City and identify additional resource needs, including staffing, equipment, basic cars, other special apparatuses, and possibly station expansions or new station construction needs that may become necessary to achieve the required LOS. Through the City's regular budgeting efforts, LAPD's resource needs will be identified and allocated according to the priorities at the time. At this time, LAPD has not identified any new station construction in the area impacted by this Project either because of this Project or other projects in the service area. If LAPD determines that new facilities are necessary at some point in the future, such facilities: (1) would occur where allowed under the designated land use; (2) would be located on parcels that are infill opportunities on lots that are between 0.5 and 1 acre in size; and (3) could qualify for a categorical exemption or Mitigated Negative Declaration under CEQA Guidelines Section 15301 or 15332 and would not be expected to result in significant impacts. Further analysis, including identification of a specific location for such potential facilities, would be speculative and beyond the scope of this document.

iii. Schools

Development of the Project would result in an increase of approximately 970 net permanent residents and approximately 145 employees in the City. The related projects indicated in **Table 2.0-2** and **Figure 2.0-11** would result in an increase of approximately 1,842 new residents and 820 new employees to the Community Plan Area. This increase in population could increase the demand for school services. These related projects would have the potential to generate students that would attend the same schools as the Project. However, each of the new housing units would be responsible for paying mandatory school fees to mitigate the increased demand for school services. Cumulative impacts on schools would be less than significant.

iv. Parks

Development of the Project would result in an increase of approximately 970 net permanent residents and approximately 145 employees in the City. The related projects indicated in **Table 2.0-2** and **Figure 2.0-11** would result in an increase of approximately 1,842 new residents and 820 new employees to the Community Plan Area. This increase in population could increase the demand for park and recreation facilities in the area. Additional cumulative development would contribute to lowering the City' s existing parkland to population ratio, which is currently below the preferred standard. However, each of the residential related projects are required to comply with payment of all applicable fees pursuant to the City's Parks Dedication and Fee Update Ordinance (Ordinance No. 184,505). Each residential related project would also be required to comply with the on-site open space requirements of the LAMC. Therefore, with payment of the applicable park fees on a project-by-project basis, the Project would not make a cumulatively considerable impact to parks and recreational facilities, and cumulative impacts would be less than significant.

v. Other Public Facilities

Development of the Project would result in an increase of approximately 970 net permanent residents and approximately 145 employees in the City of Los Angeles. The related projects indicated in **Table 2.0-2** and **Figure 2.0-11** would result in an increase of approximately 1,842 new residents and 820 new employees to the Community Plan Area. This increase in population would likely generate additional demands upon library services and other public services. This increase in resident population, combined with the 970 additional residents generated by the Project, would result in a cumulative impact increase demands upon public library services. To meet the increased demands upon the City's Public Library system, Los Angeles voters passed a Library Bond Issue for $178.3 million to improve, renovate, expand, and construct 32 branch libraries. Since the Program's inception in 1998, the Library Department and the Department of Public Works, Bureau of Engineering have made considerable progress in the design and construction of the branch library facilities. Based on the growth forecasts utilized in the 2015-2020

Strategic Plan, much of this growth has already been accounted for in planning new and expanded library facilities. The LAPL is committed to increase the number of people who use the library services, to increase the number of library cardholders and actively promote the robustly market programs and services to increase residents' overall engagement with the libraries.[123] Assuming all 1,842 new residents utilized the Baldwin Hills Branch Library, cumulative development would further cause this library to exceed its target population based on its size criteria. However, it is unlikely that these residents from the related projects would attend only the Baldwin Hills Branch Library as there are numerous branch libraries throughout the cumulative project locations that are within proximity to these projects, including the Jefferson - Vassie D. Wright Memorial Library and the Washington Irving Library. Thus, the additional population generated by the Project and the related projects would not make a cumulatively considerable impact upon the City's library system.

Mitigation Measures

Incorporation of Prior Mitigation

As discussed in Section 3.3 of this SCEA, PRC Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports (EIRs).

The following mitigation measures from prior applicable EIRs incorporated into the Project will further reduce the less than significant impacts of the Project.

SCAG 2020–2045 RTP/SCS Program EIR:

No public services mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

MM-P1 Discretionary projects in the CPIO or the Crenshaw Corridor Specific Plan shall be reviewed at the discretion of the LAPD. Per department standards, the LAPD will determine if any additional crime prevention and security features would be available that are consistent with the development standards as applied to the design of the project. Any additional design features identified by the LAPD shall be incorporated into the project's final design and to the satisfaction of LAPD, prior to issuance of a Certificate of Occupancy for the project.

123 Los Angeles Public Library Strategic Plan 2015-2020, June 2015.

Mid-City Redevelopment Plan EIR:

MM-PS1 Fire-flows shall be closely monitored to ensure that they do not fall below the minimum requirements. Any necessary improvements to the water system in the area shall be made to maintain minimum fire flow requirements.

MM-PS3 Security plans should be prepared in consultation with the LAPD crime prevention unit prior to approval for site specific developments within the proposed Recovery Program Area. The security plans should include consideration of such issues as on-site security officers for new development, security lighting and surveillance equipment for interior and exterior building areas.

MM-PS11 Contractors must guarantee that safe and convenient school pedestrian routes are maintained. Pedestrian route maps for each school will be furnished by LAUSD upon request.

MM-PS12 Contractors must maintain on-going communication with administrators at impacted school sites providing sufficient notice to forewarn children and parents when currently existing school pedestrian routes will be impacted. Alternate pedestrian route maps must be provided for parents and students.

MM-PS13 Appropriate traffic controls (signs and signals) must be installed as needed to ensure pedestrian/vehicular safety. Sufficient prior notice of intent for modification must be given.

MM-PS14 Construction scheduling should be sequenced to minimize conflicts with pedestrians, school buses and cars. This would pertain to the arrival and dismissal times of each school's day.

MM-PS15 Funding for crossing guards to be provided when the safety of children will be compromised by construction-related activities at impacted crossings. Intersections to be determined by joint consultation between LAUSD and contractors.

MM-PS16 Funding for a flag person to be provided as needed where construction-related activities compromise the safety of pedestrians and/or motorists while traveling to and from school.

MM-PS17 Barriers must be constructed as needed to minimize trespassing, vandalism and short- cut attractions.

MM-PS18 Security patrols should be funded and provided to minimize trespassing and short-cut attractions.

MM-PS20 In addition to the Quimby fees collected from developers of residential and mixed-use projects, commercial developers should be encouraged to provide their buildings' occupants with some basic park features in certain portions of their landscaped areas. Large mixed-use projects should incorporate an area of open space.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

The mitigation measures incorporated into the Project will further reduce the less than significant impacts of the Project.

XVI. RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Impact Analysis

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less than Significant Impact. A significant impact may occur if a project would include substantial employment or population growth, which would increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated. The determination of whether the project results in a significant impact on recreation and parks is made considering the following factors: (a) the net population increase resulting from the project; (b) the demand for recreation and park services anticipated at the time of project buildout compared to the expected LOS available, considering, as applicable, scheduled improvements to recreation and park services (renovation, expansion, or addition) and the project's proportional contribution to the demand; and (c) whether the project includes features that would reduce the demand for park services.

Construction workers employed to work on the Project would be temporary; that is, they would only work at the Project Site during the months of construction of the Project and their work days will vary depending on the skill set during each phase of construction. Moreover, their lunch times tend to be short and, therefore, not conducive to leaving the site. As a result, construction workers are more likely to utilize recreational facilities closer to their homes. In total, construction of the Project is expected to generate 302 construction workers (see **Appendix A**: **Air Quality Study**), not all of which would be at the Project Site at the same time or during the entire duration of the construction schedule. Therefore, due to their small numbers, limited work times, and temporary nature of their employment at the Project Site, Project

construction workers would not produce any significant demand for park and recreational facilities in the vicinity of the Project Site, nor is the construction of the Project expected to impair access to nearby parks. Accordingly, Project construction would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, nor would Project construction interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. Thus, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities during construction such that substantial physical deterioration of the facilities would occur or be accelerated. Therefore, Project construction impacts on these facilities would be less than significant.

As stated above, a significant impact may occur if the Project after completion of construction would include substantial employment or population growth, which would increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated.

It is reasonable to assume that the future occupants of the Project would utilize recreation and park facilities in the surrounding area. According to the Community Plan, there are 19 parks and recreational facilities in the area, and 432 acres of land dedicated to parks and open space within the Community Plan area. Of those 19 parks and recreational facilities, eight are located within two-mile radius of the Project Site.[124]

As previously stated, the Project would generate approximately 970 residents and 145 employees and include approximately 44,464 sq. ft. of publicly accessible open space and recreational amenities. The amenities would include a yoga room, fitness center, conference facilities, multipurpose rooms, lounges areas, and outdoor amenity space including a viewing deck and a pool deck. Publicly accessible open space would be provided as landscaped plaza space between the ground floor commercial uses and the Metro E Line. Notwithstanding the availability of on-site recreational amenities and open space areas, it is reasonable to assume that the future occupants of the Project would utilize recreation and park facilities in the surrounding area. As noted above, there are eight parks within an approximate 2-mile radius of the Project Site that are available to serve the future residents, guests, and visitors to the Project Site. However, the availability of these on-site recreation amenities and opportunities would be more convenient to Project occupants and, therefore, would serve to reduce the demand for off-site park services. Accordingly, the Project would not substantially increase the use of existing neighborhood and

124 City of Los Angeles, Department of Recreation and Parks, Facility Map Locator, https://www.laparks.org/maplocator?cat_id=45&geo[radius]=2&geo[latitude]=34.0222109&geo[longitude]=-118.3355106&address=3606%20W%20Exposition%20Blvd,%20Los%20Angeles,%20CA%2090016,%20USA, accessed July 2020.

regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

In addition, the Project Applicant would be required to pay the Quimby Act Fees or, if applicable, fees in accordance with the Parks Dedication and Fee Update ordinance (Ordinance No. 184,505), which would be used to provide additional park facilities or provide improvements to existing parks in the Project area. Therefore, the payment of applicable fees combined with the recreational amenities for residents included in the Project would reduce the impact of the Project to parks and recreational facilities. As a result, Project impacts would not be so substantial as to cause or accelerate physical deterioration of the existing park and recreational facilities and, therefore, Project impacts would be less than significant.

b. ***Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

Less than Significant Impact. A significant impact may occur if a project includes or requires the expansion of park facilities and such construction would have a significant adverse effect on the environment. As mentioned, construction workers employed for the Project are not anticipated to produce any significant demand for park and recreational facilities in the vicinity of the Project Site, nor is the construction of the Project expected to impair access to nearby parks. Accordingly, Project construction would not generate a demand for park or recreational facilities that cannot be adequately accommodated by existing or planned facilities and services, nor would Project construction interfere with existing park usage in a manner that would substantially reduce the service quality of the existing parks in the Project vicinity. Thus, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities during construction such that substantial physical deterioration of the facilities would occur or be accelerated.

As noted above, there are 19 existing, new, or recently improved parks within the Project Area totaling more than 432 acres that are available to serve the future residents and retail visitors to the Project Site. The Project would also provide approximately 46,823 sq. ft. of publicly accessible open space and recreational amenities on-site. Citywide park standards are Citywide goals and are not intended to be requirements for individual development projects. The Public Recreation Element of the City's General Plan also recognizes that the achievement of such goals is not the responsibility of individual development projects and that such goals will be met by seeking federal, State, and private funds to implement acquisition and development of parks and recreational facilities. The Project itself does not include the expansion of park facilities and does not require the construction or expansion of recreational facilities that might have an adverse impact on the environment. Therefore, a less than significant impact would occur.

Cumulative Impacts

Less than Significant Impact. The Project in combination with the related projects would be expected to increase the cumulative demand for parks and recreational facilities in the Project area. Similar to the Project's requirement to pay fees to improve recreation and park facilities, the related projects that include residential units would be required to pay park mitigation fees or applicable Quimby fees to mitigate impacts upon park and recreational facilities and to provide additional funds to meet Citywide park goals. Additionally, each related project would be subject to the provisions of the LAMC Section 12.33 for providing on-site open space, which is proportionately based on the amount of new development. For these reasons, no significant cumulative impact to recreation facilities will result from the Project and related projects.

Mitigation Measures

Incorporation of Prior Mitigation

SCAG 2020–2045 RTP/SCS Program EIR:

No recreation mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No recreation mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

No recreation mitigation measures were identified.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

No prior mitigation measures were identified, and no project specific mitigations are proposed for the Project.

XVII. TRANSPORTATION

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d. Result in inadequate emergency access?	☐	☐	☒	☐

Impact Analysis

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less than Significant Impact. Table 2.1-2 in the Transportation Assessment Guidelines provides screening questions to determine which plans, policies, and programs apply to a project. Based on those questions, the following apply to the Project: LAMC Section 12.37; Mobility Plan 2035; Mobility Plan Transit Enhanced Network, Pedestrian Enhanced Network, and Bicycle Enhanced Network Programs; Mobility Plan programs; Transit Oriented Community Guidelines; Vision Zero; and Citywide Design Guideline.[125] The Project's potential to conflict with these programs, plans, ordinances, and policies are analyzed below.

Los Angeles Municipal Code

LAMC Section 12.37 states that no building or structure shall be erected or enlarged, and no building permit shall be issued therefore, on any lot in an R3 or less restrictive zone; or in any lot in the RD1.5, RD2, or RD3 zones; if the lot abuts a major or secondary highway or collector street unless one half of the street has been dedicated and improved to the full width to meet the standards for a highway or collector street as provided in the LAMC.

125 Table 2.1-2 of the Transportation Assessment Guidelines specifically references Citywide Design Guidelines 4.1.01 and 4.1.02. However, the Citywide Design Guidelines were updated in October 2019 and these designations no longer apply. Guidelines 4.1.01 and 4.1.02 are now incorporated into Guideline 2.

According to Table 2.1-2 of the Transportation Assessment Guidelines, LAMC Section 12.37 also applies to streets designated Boulevard I, Boulevard II, Avenue I, Avenue II, and Avenue III in the Mobility Plan. Crenshaw Boulevard is designated as Avenue I and Obama Boulevard is designated as Avenue II Modified in the Mobility Plan. Per the Mobility Plan, a typical Avenue I street designation is recommended to have a 35-foot half-width roadway within a 50-foot half-width right-of-way. But since it is adjacent to Metro's Crenshaw/LAX terminal station, the ROW is subject to Metro's design standards in order to serve the Crenshaw Station purposes and Metro's bus turnouts along Crenshaw Boulevard. As a part of the Crenshaw/LAX Line Project, Metro is currently constructing the 50-foot half ROW on the west side to consist a 40-foot roadway and 10-foot sidewalk that would narrow for the bus turnout, and the 50-foot half ROW on the east side would consist of a 38-foot half roadway and 12-foot sidewalk and also narrow for the bus turnout. The Project does not propose any changes to this condition.

A typical Avenue II is recommended to have a 28-foot half-width roadway within a 40-foot half-width right of way. But since Obama Boulevard adjacent to the Project Site is a Modified street designation, its current condition has an 85-foot ROW on both sides of Crenshaw Boulevard. The 45-foot half ROW west of Crenshaw Boulevard has a 35-foot roadway and 10-foot sidewalk, and the 45-foot half ROW east of Crenshaw Boulevard has a 28-foot roadway and 17-foot sidewalk. Because the Project does not propose any changes to the existing conditions of the Modified Avenue I and Avenue II adjacent to its Project Site, the Project would not conflict with LAMC Section 12.37.

Mobility Plan 2035

In August 2015, the City Council initially adopted Mobility Plan 2035 (Mobility Plan), which is an update to the General Plan's Transportation Element. The City Council has adopted several amendments to the Mobility Plan since its adoption, including the most recent amendment on September 7, 2016. The Mobility Plan incorporates “complete streets” principles and lays the policy foundation for how the City’s residents interact with their streets. The Mobility Plan includes five main goals that define the City’s high-level mobility priorities:

1. Safety First;
2. World Class Infrastructure;
3. Access for All Angelenos;
4. Collaboration, Communication, and Informed Choices; and
5. Clean Environments and Healthy Communities.

Each of the goals contains objectives and policies to support the achievement of those goals. Accordingly, the goals of the Transportation Chapter of the Framework Element are now implemented through the

Mobility Plan. Applicable goals and policies are identified below in **Table 4.17-1: Mobility Plan 2035 Consistency Analysis**

The Mobility Plan also includes the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network. The Transit Enhanced Network is a network of streets prioritized for transit with the accompanying objective of ensuring 90 percent of households have access within one mile of the network by 2035. The Mobility Plan proposes to design and implement by 2035 Pedestrian Enhanced Districts within the City's diverse neighborhoods and regional centers around schools, parks, community and regional gathering destinations, and employment centers with a prioritization of census tracts designated as disadvantaged communities and the highest concentration of pedestrian fatalities and severe injuries. The Bicycle Enhanced Network is comprised of protected bicycle lanes and bicycle paths to provide bikeways for a variety of users with the goal of providing a low-stress network and higher level of comfort than traditional striped bicycle lanes.

Table 4.17-1
Mobility Plan 2035 Consistency Analysis

Plan Objectives	Project Consistency
Mobility Plan 2035	
Policy	
Policy 2.1 Design, plan, and operate streets to serve multiple purposes and provide flexibility in design to adapt to future demands.	**No Conflict.** The Project would encourage improved access and mobility by providing both residential and commercial uses on a single development. The on-site commercial uses would provide employment and patronage opportunities within walking distance of on-site residents and the nearby multifamily residential developments. The Project would also provide approximately 316 bicycle parking spaces as well as a pedestrian promenade and plaza areas adjacent to the Project's commercial uses and along the Metro E Line thereby providing Metro mass transit riders and the public-at-large direct access into the Project Site.
Policy 2.3 Recognize walking as a component of every trip, and ensure high-quality pedestrian access in all site planning and public right-of-way modifications to provide a safe and comfortable walking environment.	**No Conflict.** The primary vehicular access for residential and commercial uses would be provided via full-access driveways along Victoria Avenue for the West Site and along Bronson Avenue or the East Site. This would provide connection to the parking amenities. Pedestrian facilities included as part of the Project include improved pedestrian crossings at the intersection of Crenshaw Boulevard and Obama Boulevard, a pedestrian scramble south of the Metro E Line connecting the East and West entrances to the new LAX/Crenshaw Line, improved sidewalk facilities and shade trees along Crenshaw Boulevard, and street dedications of Lower Exposition Boulevard adjacent to the East and West Sites. The Project supports pedestrian

Plan Objectives	Project Consistency
	activity for the neighborhood by providing amenities to make walking safer and more comfortable, such as on-site landscaping and the creation of pedestrian-friendly conditions along the Crenshaw Corridor. Driveway access will be located along Victoria Avenue and Bronson Avenue, away from major commercial areas to minimize pedestrian/vehicular conflicts at driveways. As such, the Project would enhance roadway safety by improving pedestrian facilities by including pedestrian lighting, reduced vehicular traffic generation, and neighborhood serving infrastructure and uses emphasized in both the Project's design and uses.
Policy 2.5 Improve the performance and reliability of existing and future bus service.	**No Conflict.** The design of the East and West Sites integrates a bus turnout and stop facing Crenshaw Boulevard, which are a part of Metro's Crenshaw/LAX Line improvements currently under construction, which the Project would maintain.
Policy 2.6 Provide safe, convenient, and comfortable local and regional bicycling facilities for people of all types and abilities.	**No Conflict.** There are several planned bike routes near the Project Site identified in Los Angeles County's 2012 Bicycle Master Plan,[126] slated for implementation by 2032. Notably, there are planned Class II bike lanes along Crenshaw Boulevard, which will serve the Project Site directly. The Project will support biking by providing various bike parking locations including long-term bike parking for residents and short-term bike parking for commercial uses. The short-term bike parking will be located in areas with high pedestrian traffic and pedestrian scale lighting for safety and will be conveniently accessible to the commercial and residential entrances. Long-term bike parking would be located on multiple levels of the parking structure accessed via lobby elevators on the ground floor. Additionally, the Project would provide long-term bike storage for Metro mass transit riders.
Policy 3.5 Support "first-mile, last-mile solutions" such as multimodal transportation services, organizations, and activities in the areas around transit stations and major bus stops (transit stops) to maximize multimodal connectivity and access for transit riders.	**No Conflict.** The Project would develop 401 residential units with approximately 316 bicycle parking spaces as well as a pedestrian promenade and plaza areas adjacent to the Project's commercial uses and along the Metro E Line thereby providing Metro mass transit riders and the public-at-large direct access into the Project Site.
Policy 3.8 Provide bicyclists with convenient, secure and well-maintained bicycle parking facilities.	**No Conflict.** The Project would support biking by providing various bike parking locations including long-term bike parking for residents and short-term bike parking for commercial uses. The short-term bike parking will be located in areas with high pedestrian traffic and pedestrian scale lighting for safety and will be conveniently accessible

126 Los Angeles County Bicycle Master Plan (2012) and LA City Bicycle Plan 2010. https://dpw.lacounty.gov/pdd/bike/docs/bmp/FINAL%20Bicycle%20Master%20Plan.pdf and http://clkrep.lacity.org/onlinedocs/2010/10-2385-s2_misc_2-3-2011a.pdf

Plan Objectives	Project Consistency
	to the commercial and residential entrances. Long-term bike parking would be located on multiple levels of the parking structure accessed via lobby elevators on the ground floor. Additionally, the Project would provide long-term bike storage for Metro mass transit riders.
Policy 4.13 Balance on-street and off-street parking supply with other transportation and land use objectives.	**No Conflict.** The Project would provide approximately 502 vehicle parking spaces, consisting of 232 spaces on Site A and 270 spaces on Site B. Due to the Project's uniqueness as a Metro and County Joint Development Program Project, which provides an added layer of development standards, the Project's site constraints in part due to the extensive Metro infrastructure as part of the Crenshaw/LAX Line, the need to comply with the ENA's requirements, and to comply with the Crenshaw Corridor Specific Plan's maximum parking requirement, the Project would provide residential parking consistent with the City's Density Ordinance Parking Option 1, while seeking a Density Bonus Waiver of Development Standards to allow for a reduced residential parking requirement from the Density Bonus Parking Option 1 by approximately 28 percent (28%) on the West Site and by approximately 16 percent (16%) on the East Site. The Project would provide commercial parking consistent with the Los Angeles State Enterprise Zone requirements. The East Site will contain an off-street parking garage with a supermarket, restaurant and retail uses at ground-level and residential uses above. Vehicular access to the parking garage would be provided from a two-way driveway along Bronson Ave, south of Exposition Pl. The East Site would also include an entrance to the subterranean Metro Crenshaw/LAX Line station along Crenshaw Boulevard. The West Site, between Crenshaw Boulevard and Victoria Ave, would include an off-street parking garage wrapped by ground-level restaurant, retail and community uses, along with low-rise residential units situated along Victoria Ave. The presence of on-street parking, street trees, and parkways throughout much of the area neighborhood streets allows for additional separation between moving vehicles and pedestrians, furthering the balance of on- and off-street parking supply with other transportation and land use objectives.

Transit Enhanced Network, Pedestrian Enhanced Districts, and Bicycle Enhanced Network

As discussed above in the analysis for Policy 2.5, the Project would not conflict with Mobility Plan policies related to transit networks.

Pedestrian Network

Pedestrian facilities generally include sidewalks, crosswalks, curb ramps, pedestrian signals, and streetscape/landscape amenities (e.g., tree-lined buffers, planters, street lighting, etc.). Most streets within the study area include continuous, raised, concrete sidewalks and curb cuts (ramps) at intersection corners. Most intersections do not have pedestrian crosswalks and such safety treatments are only located at major intersections, such as Crenshaw Boulevard and Obama Boulevard, and the intersection of Crenshaw Boulevard and the Metro E Line Crossing. All major intersections along Crenshaw Boulevard within the study area feature crosswalks. The presence of on-street parking, street trees, and parkways throughout much of the study area neighborhood streets allows for additional separation between moving vehicles and pedestrians. Intersection movements (autos, bicyclists, and pedestrians) are generally controlled by STOP signs at unsignalized intersections, or a signal, which allow for safer pedestrian crossings; however, not all intersection approaches include STOP signs, therefore, requiring moving vehicles to yield to pedestrians making a crossing movement whether there is a marked crosswalk or not. Marked north-south pedestrian crossing along Obama Boulevard are only facilitated at major intersections which can be up to a half-mile apart. **Table 4.17-2**: **Sidewalk Inventory** below presents the sidewalk inventory for streets in proximity to the Project Site.

Pedestrian facilities planned by Metro include improved pedestrian crossings at the intersection of Crenshaw Boulevard and Obama Boulevard, bus turnouts on both sides of Crenshaw Boulevard, which are a part of Metro's Crenshaw/LAX Line improvements currently under construction. The Project includes the proposed merger of segments of Lower Exposition Boulevard and the northern portion of Bronson Avenue between Lower Exposition Boulevard and Exposition Place adjacent to the Project that will create publicly accessible nonmotorized access to Crenshaw Boulevard, the portal to the Crenshaw/LAX Line and the Metro E station entrances. The Crenshaw Corridor Specific Plan emphasizes the importance of improving pedestrian safety in Transit Oriented Development (TOD) areas, of which this Project would be a part. The Project would emphasize pedestrian lighting, reduced vehicular traffic generation, and neighborhood serving infrastructure and uses.

The Project would provide on-site landscaping with shade trees that would improve pedestrian comfort. The segment of Lower Exposition Boulevard between Victoria Avenue and Crenshaw Boulevard would be closed off to vehicles and incorporated into the Project and maintained as a pedestrian paseo to provide pedestrian connection between the surrounding neighborhood and mass transit facilities. The segment of Lower Exposition Boulevard between Crenshaw Boulevard and Bronson Avenue, and segment of Bronson Avenue between Exposition Boulevard and Exposition Place would also be closed off to vehicles, incorporated into the Project, and provide a publicly accessible landscaped plaza for additional pedestrian linkages into and throughout the Project. The merging of these ROW portions would eliminate a street

crossing across Lower Exposition Boulevard for mass transit users and create a more direct pedestrian access between the Metro E Line and the future Crenshaw/LAX Line and various bus lines serviced at those stops along Crenshaw Boulevard, thus improving mass transit connections and pedestrian safety.

Table 4.17-2
Sidewalk Inventory

Street	Sidewalk Inventory
Crenshaw Boulevard	Sidewalks on both sides
Upper Exposition Boulevard	Sidewalks on both sides
Lower Exposition Boulevard	Sidewalks on both sides from West to Crenshaw Boulevard. East of Crenshaw has no sidewalks.[a]
Obama Boulevard	Sidewalks on both sides
Victoria Avenue	Sidewalks on both sides
36th Street	Sidewalks on both sides
Bronson Avenue	Sidewalks on both sides[b]
Exposition Place	No Sidewalks
Norton Avenue	Sidewalks on both sides
Somerset Avenue	Sidewalks on both sides

Source: Mobility Plan 2035, Figure 6-6 and site observations; Nelson\Nygaard, 2017.
a: Segments directly adjacent to the Project Site will be merged and produce publicly accessible nonmotorized access to Crenshaw Boulevard and all Metro Rail stations.
b: The segment of Bronson Avenue between Lower Exposition Boulevard and Exposition Place will be merged with the Project Site and produce publicly accessible nonmotorized access to Crenshaw Boulevard and all Metro Rail stations.

The Project will have ground floor storefronts to provide pedestrian-oriented street frontages along with wide sidewalks and landscaping. Driveway access will be located along Victoria Avenue and Bronson Avenue, away from major commercial areas to minimize pedestrian/vehicular conflicts at driveways.

The Project will result in increased pedestrian activity from the proposed commercial and residential development. However, the Project does not propose removing or narrowing existing pedestrian facilities, but instead widening and enhancing them to accommodate the increased pedestrian volume and improve the pedestrian experience. For all these reasons, the Project will not result in the degradation of pedestrian facilities.

Bicycle Network

According to the Mobility Plan 2035, bikeways are classified as Class I (bicycle paths separated from roads), Class II (striped bicycle lanes within the paved areas of roadways), or Class III (signed bike routes that allow cyclists to share streets with vehicles). Within the study area, there are Class II bike lanes situated along the entirety of Upper Exposition Boulevard the bike lanes continue east to the University of Southern California. West, the Class II bike lane continues along Upper Exposition Boulevard and jogs the north to the Jefferson Boulevard alignment at the intersection of La Brea and Upper Exposition Boulevard. A Class II bike lane also exists along Martin Luther King Jr. Boulevard to the south of the Project Site, from Obama Boulevard to Marlton Avenue. Also, in the study area is a Class III bike route that runs along 39th Street from its western terminus at Buckingham Road and to the east where it terminates at Exposition Park and the Los Angeles Memorial Coliseum.

There are several planned bike routes near the Project Site according to the County's 2012 Bike Master Plan, slated for implementation through 2032; all the routes near the study area are proposed by other planning authorities according to Metro data.[127] Notably, there are planned Class II bike lanes along Crenshaw Boulevard, which will serve the Project Site directly. Other bicycle infrastructure planned for the study area include Class II bike lanes along Jefferson Boulevard, Arlington Avenue extension of the Martin Luther King Jr. Boulevard bike lanes to the south, Obama Boulevard west of W. Martin Luther King Boulevard as well as east of Arlington Avenue, and extension of the Exposition Boulevard bike lanes to the west. Class III bike routes are planned along the following roadways in the study area: Buckingham Road, 30th Street, 10th Avenue, 7th Avenue, Coliseum Street, Roxton/4th Avenue (south of Exposition Boulevard), Santa Rosalia Drive, Santo Tomas Drive, Harcourt Avenue and Hickory Street.

The Project will support bicycling by providing various bike parking locations including short- and long-term bike parking for residents and commercial uses consistent with applicable City requirements. The short-term bike parking will be in areas with high pedestrian traffic and pedestrian scale lighting for safety. They will be conveniently accessible to the commercial and residential entrances. Long-term bike parking would be located on multiple levels of the parking structure accessed via lobby elevators on the ground floor. Additionally, Metro would provide long-term, secured bike storage for its mass transit riders near the ground floor commercial uses on the West Site.

The Project will likely result in increased bicycle activity from the proposed development. However, the Project does not propose removing any existing bike infrastructure and provides enhanced bike access and

127 Source: LA County Bicycle Master Plan (2012) and LA City Bicycle Plan (2010) via dpw.lacounty.gov/pdd/bike/map.cfm.

storage for future residents, Metro mass transit riders, and patrons. For these reasons, the Project will not result in the degradation of bicycle facilities.

Therefore, the Project would not conflict with Mobility Plan policies related to the Transit Enhanced Network, Pedestrian Enhanced Districts, and the Bicycle Enhanced Network.

Vision Zero

LADOT is implementing a program called Vision Zero. Vision Zero Los Angeles represents a citywide effort to eliminate traffic deaths in the City by 2025. Vision Zero has two goals: a 20-percent reduction in traffic deaths by 2017 and zero traffic deaths by 2025. In order to achieve these goals, LADOT identified a network of streets, called the High Injury Network, which has a higher incidence of severe and fatal collisions. The High Injury Network is comprised of 386 corridors that represent 6 percent of the City's street miles. Approximately 65 percent of all deaths and severe injuries involving people walking and biking occur on these 6 percent of streets. Crenshaw Boulevard, adjacent to the Project Site, has been identified in the High Injury Network.[128]

Citywide Design Guidelines

The Citywide Design Guidelines serve to implement the Framework Element's urban design principles and are intended to be used by City of Los Angeles Department of City Planning staff, developers, architects, engineers, and community members in evaluating project applications, along with relevant policies from the Framework Element and Community Plans. The Citywide Design Guidelines were updated in October 2019 and include guidelines pertaining to pedestrian-first design which serves to reduce VMT.

Citywide Design Guideline 2 recommends incorporating vehicular access such that it does not discourage and/or inhibit the pedestrian experience. Specifically, Guideline 2 calls for prioritizing pedestrian access first and automobile access second; orienting parking and driveways toward the rear or side of buildings and away from the public right of way; and on corner lots, orienting parking as far from the corner as possible. The proposed buildings are pedestrian- and mass transit-oriented by including pedestrian promenades toward the north and the mass transit connections along Crenshaw Boulevard. Vehicular access is limited to one access point each for the East and West site to minimize the effects on pedestrians. Vehicular access for commercial and residential uses on the West Site is located via Victoria Avenue. Loading and passenger drop-off is located at the elbow of Victoria Avenue and Exposition Boulevard. Vehicular access for commercial and residential uses on the East Site is located via Bronson Avenue. Loading and passenger drop-off is located at the elbow of Bronson Avenue and Exposition Place. Both Sites

128 City of Los Angeles, Vision Zero, High Injury Network, http://geohub.lacity.org/datasets/ladot::high-injury-network-2018, accessed June 26, 2020.

would have secured parking garages that clearly delineate vehicular and pedestrian paths of travel with signs and wayfinding.

The intention of the design and programming is to connect residents, patrons, and passengers to the residential lobbies, commercial uses, and mass transit options through the pedestrian promenade. By orienting the Project's front doors toward the various mass transit modes via the publicly accessible open space areas toward Crenshaw and Exposition Boulevards, and by locating vehicular access along Victoria and Bronson Avenues, the Project would improve pedestrian and passenger safety and experience, while limiting interaction between vehicles and pedestrians and avoid disruption of mass transit services.

The Project is also designed to delineate and provide safe connections for bicyclists to the Project Site. In addition to the numerous short-term bicycle parking conveniently located around the ground floor uses and the long-term parking located in the parking garages, the Project also includes the Metro bicycle storage facility that would offer secure storage for mass transit riders that would be located within the ground floor retail on the West Site fronting the promenade and the Metro E Line. Therefore, the Project would not conflict with Citywide Design Guideline 2.

Crenshaw Corridor Specific Plan

The Crenshaw Corridor Specific Plan provides a detailed vision, guiding plan area principles (purposes), guidelines and policies for the corridor. Because the Project Site is located within this Plan Area, all regulations and policies set forth in the Specific Plan would be applicable. Transportation related goals and policies applicable to the Project are identified below in **Table 4.17-3: Crenshaw Corridor Specific Plan Consistency Analysis**. The Project would have no conflict with the purposes set forth in the Crenshaw Corridor Specific Plan because it would redevelop an underdeveloped site within an existing urban setting. Further, the Project would place residents, employees, and visitors in proximity to corridors well-served by mass transit.

Other Programs, Plans, Ordinances, and Policies

The Project would not conflict with the Plan for a Healthy Los Angeles, West Adams-Baldwin Hills-Leimert Community Plan, or Walkability Checklist. Specifically, the Project would support the Plan for a Healthy Los Angeles by locating housing and jobs near mass transit, as well as enhancing the pedestrian environment and providing bicycle parking. As discussed in detail in **Section XI**, the Project would not conflict with West Adams-Baldwin Hills-Leimert Community Plan or Walkability Checklist policies related to encouraging pedestrian activity and reducing VMT.

Table 4.17-3
Crenshaw Corridor Specific Plan Consistency Analysis

Plan Objectives	Project Consistency
City of Los Angeles – Crenshaw Corridor Specific Plan	
Purpose	
Purpose-E To promote a high level of pedestrian activity in areas identified as Pedestrian-Oriented Areas and TOD Areas by promoting neighborhood serving uses, which encourage pedestrian activity and promote reduced traffic generation.	**No Conflict.** As stated above, the Project includes the development of a mixed-use project, which would provide residents close to employment and patronage opportunities. Further, the Project is within walking distance of services, retail stores, and employment opportunities. The commercial uses on-site would further support the pedestrian activity in the community by providing ground-floor commercial uses. The Project Site is also located adjacent to the Metro E Line and within a ½ mile of numerous bus routes with peak commute service intervals of 15 minutes or less.
Purpose-F To promote an attractive pedestrian environment in the areas designated as Pedestrian-Oriented Areas and TOD Areas by regulating the design and placement of buildings and structures which accommodate outdoor dining and other ground level retail activity.	**No Conflict.** As stated above in **Purpose-E**, the Project would have ground floor storefronts to provide pedestrian-oriented street frontages along with wide sidewalks and landscaping.
Purpose-H To encourage the creation of pedestrian-friendly TOD Areas consistent with the goals and policies of the Community Plan that promote health and sustainability by encouraging a mix of uses providing jobs, housing, goods and services, as well as access to open space, all within walking distance of the Mid City/Exposition and Crenshaw/LAX Light Rail Transit Corridor stations.	**No Conflict.** The Project includes the development of a mixed-use project, which would provide residents in close proximity to employment and patronage opportunities. Further, the Project Site is within walking distance of services, retail stores, and employment opportunities. The commercial uses on-site would further support the pedestrian activity in the community by providing ground-floor commercial uses. As such, the Project would be consistent with this objective.

Moreover, *LADOT Assessment Letter* (**Appendix J.3**) determined that the Project would not have a significant transportation impact under this CEQA threshold. Therefore, the Project would not conflict with these programs, plans, ordinances, and policies. As such, impacts would be less than significant.

b. Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less Than Significant Impact. On September 27, 2013, Governor Jerry Brown signed into law SB743 which tasked the Office of Planning and Research (OPR) with developing alternative methods of measuring transportation impacts pursuant to CEQA. On December 30, 2013, OPR released a technical memo which

identified objectives for developing alternative criteria in support of the State's goals for GHG reduction by encouraging higher density, mixed-use development in urban areas served by mass transit and more diverse travel options.

In August 2014, OPR proposed to replace LOS, as measured by roadway capacity and vehicle delay, with VMT, an estimate of the amount and distance people drive by vehicle to reach a destination. Subsequently, City of Los Angeles Councilmember Mike Bonin introduced a motion directing DCP and LADOT to "begin specific tasks in anticipation of the State's adoption of the amended CEQA Guidelines implementing SB 743" (CF 14-1169).

In January 2016, OPR released for public review a revised proposal for changes to the CEQA Guidelines which reinforced VMT as the primary metric for transportation performance and included new threshold recommendations that are better aligned with California's long-term GHG emission reduction goals.

In November 2017, OPR released proposed updates to the CEQA guidelines in support of the goals to develop a transportation performance metric that would help promote: the reduction of GHG emissions, the development of multimodal networks, and a diversity of land uses. The proposed updates stated that once the new transportation guidelines are adopted, automobile delay (LOS) generally will no longer be considered to be an environmental impact under CEQA. The guidelines established VMT as the primary metric for evaluating a project's environmental impacts on the transportation system. The guidelines also required that the environmental assessment for a project consider whether the project may conflict with plans or policies addressing the circulation system and removed language regarding conflicting with a congestion management program (CMP), including LOS standards for roads or highways.

OPR granted agencies a phase-in period of two years. All California cities must update their transportation impact analysis metrics to evaluate transportation impacts with a VMT-based metric prior to July 1, 2020. Agencies ready for the change may implement immediately.

In December 2018, after over five years of stakeholder-driven development through multiple stakeholder meetings, public convenings, and other outreach events, the California Natural Resources Agency certified and adopted the CEQA Guidelines update package including the Guidelines section implementing SB 743.The final text, final statement of reasons, and related materials are posted at the California Natural Resource Agency. The changes have been approved by the Office of the Administrative Law and are now in effect.

The City's new local trip generation rates were collected from affordable housing, market-rate housing, office, and mixed-use projects. The City's Travel Demand Forecasting (TDF) model was updated to include the most robust data sources available, including cell-phone and navigation based location services. The

TDF model was validated using vehicle counts collected from on-street loop detectors. The City project team developed an analysis program, referred to as the VMT Calculator, which is a customized sketch model tool used to estimate VMT and vehicle trips for development projects. The project team also developed new screening and significance criteria and drafted updates to the City's Transportation Section of the CEQA Threshold Guide in accordance with State guidelines. To complement the new guidance under CEQA, LADOT updated their guidelines, now referred to as the Transportation Assessment Guidelines (TAG) to include the VMT analysis and introduced a non CEQA analysis section that evaluates the operational and safety needs around a project site. LADOT updated their website with project information relevant to practitioners, consultants, and the general public to house program materials and analysis tools.

Project VMT analysis consists of determining whether there would be an increase or decrease in VMT per person when compared to the average for Area Planning Commission area a Project is located in.

VMT Methodology

The City of Los Angeles VMT analysis requires use of the City's VMT Calculator. The calculator uses land use type and area for inputs and provides the following outputs:

- Daily vehicle trips;
- Daily VMT;
- Household VMT per capita: this is the total home-based VMT productions divided by the population of the project;
- Work VMT per employee: this is the total home-based work attractions divided by the employment of the project;
- Household significance threshold: the household VMT per capita is measured against threshold for the area planning commission (APC) in which the project is located to determine if the project has a significant household impact; and
- Work significance threshold: the work VMT per employee is measured against the APC threshold to determine if the project has a significant work impact.[129]

The tool also allows entry of transportation demand management (TDM) strategies that result in a decrease of VMT beyond the baseline calculations. These calculations are conducted both for TDM strategies that are part of a proposed project and those that have been added as part of a particular mitigation measure.

129 LADOT, TAG, https://ladot.lacity.org/sites/default/files/documents/ta_guidelines_-20190731_0.pdf, accessed June 29, 2020.

For development projects, the City defines a project as having a potential impact if:

- For residential projects, the project would generate household VMT per capita exceeding 15% below the existing average household VMT per capita for the Area Planning Commission (APC) area in which the project is located, see **Table 4-4: Impact Criteria (15% Below APC Average).**
- For office projects, the project would generate work VMT per employee exceeding 15% below the existing average work VMT per employee for the APC in which the project is located, see **Table 4.17-4**.
- For regional serving retail projects, the project would result in a net increase in VMT.
- For other land use types, measure VMT impacts for the work trip element using the criteria for office projects above, see **Table 4.17-4**.[130]

Table 4.17-4
Impact Criteria (15% Below APC Average)

Area Planning Commission	Daily Household VMT per Capita	Daily Work VMT per Employee
Central	6.0	7.6
East LA	7.2	12.7
Harbor	9.2	12.3
North Valley	9.2	15.0
South LA	6.0	11.6
South Valley	9.4	11.6
West LA	7.4	11.1

Source: LADOT Transportation Assessment Guidelines

As the Project is located within the South LA APC, the Project will be considered to have a significant impact to VMT if it exceeds the following thresholds:

- Daily Household VMT per capita of 6.0; or
- Daily Work VMT per employee of 11.6.

TDM Mitigation

TDM strategies provide methods to reduce vehicular trips. Strategies have accompanying reduction rates based on the intensity of the method applied. Strategies are grouped into the following categories:

130 LADOT, TAG, https://ladot.lacity.org/sites/default/files/documents/ta_guidelines_-20190731_0.pdf, accessed June 29, 2020.

- Parking
- Transit
- Education & Encouragement
- Commute Trip Reductions
- Shared Mobility
- Bicycle Infrastructure
- Neighborhood Enhancement

Reduction rates can be applied to the model to produce two outputs: TDM measures incorporated as part of the "Project" (without mitigation strategies), and TDM measures proposed as "With Mitigation." For this Project, all TDM measures fall under "Project," meaning they would be incorporated as a strategy without mitigation.

VMT Analysis

The LADOT VMT calculator considers the proximity of a proposed project to active light rail lines in the City. As the Metro E Line is currently in operation the VMT calculator considers proximity to the Metro E Line in estimating the VMT the Project would generate. Because the Metro K Line is not currently in operation, the VMT calculator does not take into account proximity to the K Line in estimating the VMT the Project would generate and additional transit reductions were applied to the Project, see *Transit Reduction Memo* (**Appendix J.2**). The Project location is unique for its proximity to both the existing Metro E Line as well as being directly above the Expo/Crenshaw station currently under construction as part of the Metro K Line and includes direct access to the station within the Project Site. The location of the Metro K Line adjacent to the Project Site warrants an additional reduction in the VMT estimate for the Project.

With consideration of the additional VMT reduction that will result from the characteristics of the Project and the Metro K Line, the household per capita VMT for the Project is below the VMT impact threshold. Moreover, *LADOT Assessment Letter* (**Appendix J.3**) determined that the Project would not have a significant transportation impact under this CEQA threshold. Therefore, the Project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). As such, impacts would be less than significant.

c. *Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

Less Than Significant Impact. The Project does not include hazardous geometric design features and the Project design would be reviewed by the Los Angeles Department of Building and Safety and the LAFD

during the City's plan review process to ensure all applicable safety requirements are met. The roadways adjacent to the Project Site are part of the existing urban roadway network and contain no sharp curves or dangerous intersections. Additionally, no new driveways are proposed along Crenshaw Boulevard or Obama Boulevard.

Construction

While some temporary construction closures of pedestrian, bicycle, mass transit, or individual vehicular lanes may be required, the Project will not require major in-street construction and therefore will not have negative, long-term effects on existing pedestrian, bicycle, mass transit, or vehicle circulation.[131] The Project would support the City's policy to provide for safe passage of all modes of travel during construction by preparing and implementing a construction management plan that would identify the location of any temporary lane and sidewalk closures and ensure safe and adequate pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase. The Project Site will also be fenced, secured, and monitored by security patrols to minimize trespassing and the attractiveness of the site as a short-cut route for pedestrians to promote pedestrian safety. Based on consultation with LAUSD, this plan would include funding for crossing guards to be provided when the safety of children could be compromised by construction-related activities at any street-crossings and flag persons where construction-related activities could compromise the safety of pedestrians and/or motorists while traveling to and from schools.

Additionally, Project access clearly separates vehicular driveways and pedestrian and bicycle circulation, resulting in limited vehicle/pedestrian, vehicle/bicycle, and vehicle/vehicle conflicts. Furthermore, the design and implementation of new driveways would comply with the City's applicable requirements, including emergency access requirements set forth by the Los Angeles Fire Department (LAFD). The Project design would also be reviewed by the Los Angeles Department of Building and Safety and the LAFD during the City's plan review process to ensure all applicable requirements are met. Therefore, no impact with respect to hazardous design features would occur, and no further analysis is required.

Operation

The West Site includes 3606 & 3633 W. Exposition Boulevard and the portion of Exposition Boulevard between Victoria Avenue and Crenshaw Boulevard to be merged into Project Site as part of the Project. Vehicular access for the West Site is along Victoria Avenue for entering and existing the parking garage. Victoria Avenue is a low volume, low speed neighborhood street which will result in limited vehicle-to-vehicle interactions at the driveway access for the West Site. This driveway crosses a sidewalk, but not bike facilities. Pedestrian access to the retail and restaurant uses is on the east side of the West Site along

131 Crenshaw Crossing Transportation Assessment Study, Section 5.

Crenshaw Boulevard and the north side of the West Site facing the Metro E Line ROW. Tenant access for the proposed residences is along the north side of the West Site facing the Metro E Line ROW and the south side of the West Site facing Obama Boulevard. Mass transit connections from the Crenshaw/LAX Line and bus routes are along Crenshaw Boulevard, the east side of the West Site.

West Site access clearly separates vehicular driveways and pedestrian and bicycle circulation along Victoria. As a result, the design of the West Site creates limited vehicle/pedestrian, vehicle/bicycle, and vehicle/vehicle conflicts. The East Site includes 3630 S. Crenshaw Boulevard, 3502 & 3510 W. Exposition Boulevard, 3631 & 3633 S. Bronson Avenue, 3515 & 3519 W. Obama Boulevard, 3642-3646 S. Crenshaw Boulevard, 3505 W. Obama Boulevard, 3635, 3639, & 3645 S. Bronson Avenue, 3501 W. Obama Boulevard, a portion of Exposition Boulevard between Crenshaw Boulevard and Bronson Avenue, and a portion of Bronson Avenue between Exposition Boulevard and Exposition Place to be merged into Project Site as part of the Project. Vehicular access for the East Site is along Bronson Avenue for entering and exiting the parking garage. Bronson Avenue is a low volume, low speed neighborhood street which will result in limited vehicle-to-vehicle interactions at the driveway access for the East Site. This driveway crosses a sidewalk, but not bike facilities. Pedestrian access to the grocery, retail, and restaurant uses is on the north side of the East Site, facing the Metro E Line ROW and south side of the East Site, facing Obama Boulevard. Tenant access for the proposed residences is at the northeast corner facing the existing LADWP Equipment Yard and at the southwest corner facing Crenshaw Boulevard.

East Site access clearly separates vehicular driveways and pedestrian and bicycle circulation. As a result, the design of the East Site creates limited vehicle/pedestrian, vehicle/bicycle, and vehicle/vehicle conflicts.

The Project is located along Crenshaw Boulevard which is included in the High Injury Network. No vehicular access points are proposed along Crenshaw Boulevard as part of the Project. In addition, improved pedestrian and bicycle facilities will enhance the experience for nonvehicular users along Crenshaw Boulevard. Due to the Project's clear separation of bike and pedestrian circulation and access points and vehicular driveways, the Project would not substantially increase hazards for vehicles, pedestrians, and bicyclists accessing the Project Site due to a geometric design feature.

Moreover, *LADOT Assessment Letter* (**Appendix J.3**) determined that the Project would not have a significant transportation impact under this CEQA threshold. Therefore, no impact with respect to hazardous design features would occur, and The Project would not substantially increase hazards due to a geometric design feature. As such, impacts would be less than significant.

d. *Result in inadequate emergency access?*

Less Than Significant Impact. The Project Site is located in an established urban area that is well served by a roadway network. While it is expected that the majority of construction activities for the Project would be confined on-site, construction activities may temporarily affect access on portions of adjacent streets during certain periods of the day. In accordance with LADOT requirements, a TTCP would be prepared if the public ROW would be affected by Project construction. If temporary street, lane, and sidewalk closures will be needed for the duration of 72 hours or longer a B-Permit is required from the BSS. Through this review and permit process LADOT ensures compliance with federal and State principles and standards and the safe and efficient movement through and around construction zones. Therefore, construction is not expected to result in inadequate emergency access and impacts would be less than significant.

Long-term emergency access would continue to be provided under existing conditions. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and potential residents. Project Site access and circulation plans would be subject to review and approval by the LAFD. As such, impacts related to inadequate emergency access would be less than significant.

Cumulative Impacts

Development of the Project in conjunction with the five related projects indicated in **Table 2.0-2** and **Figure 2.0-11** would result in an intensification of existing traffic in an already urbanized area of Los Angeles. With regard to transportation plans, regional and citywide projects under consideration would implement and support important local and regional planning goals and policies. Like the Project, each related project would be subject to the LADOT approval process, including CEQA review, and would incorporate any mitigation measures necessary to reduce potential traffic impacts such that no significant impacts with regard to traffic would occur. As discussed above the Project will not result in an increase in VMT per capita. As such, according to the TAG, projects that do not demonstrate a project impact by applying an efficiency-based impact threshold (i.e. VMT per capita or VMT per employee) in the project impact analysis, a less than significant project impact conclusion is sufficient in demonstrating there is no cumulative VMT impact. Therefore, the Project will not contribute to any significant cumulative transportation impacts when considered with related projects.

Mitigation Measures

Incorporation of Prior Mitigation

SCAG 2020–2045 RTP/SCS Program EIR:

No transportation mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No transportation mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

No transportation mitigation measures were identified.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

No prior mitigation measures were identified, and no project specific mitigations are proposed for the Project.

XVIII. TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	**Potentially Significant Impact**	**Less Than Significant with Mitigation Incorporated**	**Less Than Significant Impact**	**No Impact**
a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or	☐	☐	☒	☐
b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Impact Analysis

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)

Less Than Significant Impact. Tribal Cultural Resources (TCR) includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. PRC Section 21084.2 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment." A project would cause a substantial adverse change in the significance of a TCR with cultural value to a California Native American tribe if such resource is listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources

Code section 5020.1(k), or if such resource is determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. PRC 5024.1(c) states that "[a] resource may be listed as an historical resource in the California Register if it meets any of the following National Register of Historic Places criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. Is associated with the lives of persons important in our past.
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
4. Has yielded, or may be likely to yield, information important in prehistory or history.

As mentioned in **V. Cultural Resources**, because the presence or absence of such materials cannot be determined until the site is excavated, as a precautionary measure, a *Cultural Resource Inventory* (**Appendix C.2**) was prepared for the Project in September 2019. In addition, a confidential search of the CHRIS records at the South Central Coastal Information Center (SCCIC) was conducted on the campus of California State University, Fullerton. The CHRIS records search did not identify any known TRCs in the Project Site. However, several lines of evidence, including the Sacred Lands File search, indicate that the potential exists for unrecorded TRCs in the form of buried features or artifacts, as well as Native American burials in the Project area. While no prehistoric or historical archaeological resources were identified as a result of the records search, the Sacred Lands File search conducted by the Native American Heritage Commission (NAHC) in September 2019, on behalf of the Project, yielded positive results. Although the Project Site is located in a highly urbanized area of the West Adams-Baldwin Hills-Leimert Community Plan area of the City, and has been disturbed by past development activities, the Project includes subgrade preparation that would involve the excavation and grading to depths between 12 and 17 feet deep on the East Site, whereas the West Site would involve approximately 12 inches. Both sites would require piles to be drilled at a depth of at least 30 feet for foundation support. Thus, the potential exists for the unanticipated discovery of archaeological materials.

Further, the Project would require removal of all paved surfaces and structures within the Project Site. Because there is a potential for previously unknown TCRs to be present in the Project area, the Project Applicant would be required to implement the City's Condition of Approval related to the inadvertent discovery of TCRs. In the event that objects or artifacts that could be TCRs are encountered during the

course of any ground disturbance activities, all such activities shall temporarily cease on the Project Site until the potential TCRs are properly assessed and addressed pursuant to the process set forth below.[132]

Upon a discovery of a potential TCRs, the Project Permittee shall immediately stop all ground disturbance activities and contact the following: (1) all California Native American tribes that have informed the City they are traditionally and culturally affiliated with the geographic area of the proposed project; (2) and the Department of City Planning at (213) 473-9723.

If the City determines, pursuant to PRC Section 21074 (a)(2), that the object or artifact appears to be TCRs, the City shall provide any effected tribe a reasonable period of time, not less than 14 days, to conduct a site visit and make recommendations to the Project Permittee and the City regarding the monitoring of future ground disturbance activities, as well as the treatment and disposition of any discovered TCRs.

The Project Permittee shall implement the tribe's recommendations if a qualified archaeologist, retained by the City and paid for by the project Permittee, reasonably concludes that the tribe's recommendations are reasonable and feasible.

The Project Permittee shall submit a TCR monitoring plan to the City that includes all recommendations from the City and any effected tribes that have been reviewed and determined by the qualified archaeologist to be reasonable and feasible. The Project Permittee shall not be allowed to recommence ground disturbance activities until this plan is approved by the City.

If the Project Permittee does not accept a particular recommendation determined to be reasonable and feasible by the qualified archaeologist, the project Permittee may request mediation by a mediator agreed to by the Permittee and the City who has the requisite professional qualifications and experience to mediate such a dispute. The Project Permittee shall pay any costs associated with the mediation.

The Project Permittee may recommence ground disturbance activities outside of a specified radius of the discovery site, so long as this radius has been reviewed by the qualified archaeologist and determined to be reasonable and appropriate.

Copies of any subsequent prehistoric archaeological study, TCRs study or report, detailing the nature of any significant TCR resources, remedial actions taken, and disposition of any significant TCRs shall be submitted to the SCCIC at California State University, Fullerton.

132 Ground disturbance activities shall include the following: excavating, digging, trenching, plowing, drilling, tunneling, quarrying, grading, leveling, removing peat, clearing, pounding posts, augering, backfilling, blasting, stripping topsoil or a similar activity.

Notwithstanding the above, any information determined to be confidential in nature, by the City Attorney's office, shall be excluded from submission to the SCCIC or the general public under the applicable provisions of the California Public Records Act, PRC, and shall comply with the City's AB 52 Confidentiality Protocols. As such, impacts would be less than significant.

b. Compliance with this Condition of Approval would ensure that Project impacts related to unknown Tribal Cultural resources would be less than significant. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact. PRC Section 21074 provides a definition of a TCR. In order to be considered a TCR, a resource must be either: 1) listed, or determined to be eligible for listing, on the national, State, or local register of historic resources, or 2) a resource that the lead agency chooses, in its discretion supported by substantial evidence, to treat as a TCR. In the latter instance, the lead agency must determine that the resource meets the criteria for listing in the State register of historic resources or City Designated Cultural Resource. As mentioned above, a TCR includes sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. A substantial adverse change to a TCR is a significant effect on the environment under CEQA. In applying those criteria, a lead agency shall consider the value of the resource to the tribe.

As previously discussed under **Section V**, while no prehistoric or historical archaeological resources were identified as a result of the records search, the Sacred Lands File search conducted by the NAHC in September 2019 yielded positive results. While the Project Site is located in an urbanized area and has been disturbed by past development activities, the Project includes subgrade preparation that would involve the excavation and grading to depths between 12 and 17 feet deep on the East Site, whereas the West Site would involve approximately 12 inches. Both sites would require piles to be drilled at a depth of at least 30 feet for foundation support. As such, the potential exists for the accidental discovery of archaeological materials. Because the presence or absence of such materials cannot be determined until the Project Site is excavated, compliance with the above Conditions of Approval would ensure that Project impacts related to unknown TCRs would be less than significant.

Cumulative Impacts

As discussed above, the Project would have less than significant impact on TCRs. It is not known if any of the five related projects, indicated in **Table 2.0-2** and **Figure 2.0-11**, would result in significant impact to TCRs. Development of the Project, in combination with the five related projects in the Project Site vicinity, would result in the continued redevelopment and revitalization of the surrounding area. Impacts to TCRs tend to be site-specific and are assessed on a site-by-site basis. It is unknown whether any other related project contains identified sites, features, places, or cultural landscapes that have been geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe. Further, related project sites would be required to comply with PRC Section 21074, which governs TCRs. As the Project would fully comply to all applicable regulatory requirements, cumulative impacts would not be considerable, and impacts would be less than significant.

Mitigation Measures

Incorporation of Prior Mitigation

SCAG 2020–2045 RTP/SCS Program EIR:

No TCR mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No TCR mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

No TCR mitigation measures were identified.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

No prior mitigation measures were identified, and no project specific mitigations are proposed for the Project.

XIX. UTILITIES AND SERVICE SYSTEMS

Would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water, drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b. Have sufficient water supplies available to serve the project and reasonable foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e. Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Impact Analysis

a. *Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water, drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

Less than Significant Impact. A significant impact may occur if a project would increase water consumption or wastewater generation to such a degree that the capacity of facilities currently serving the Project Site would be exceeded. The determination of whether a project results in a significant impact on water shall

be made considering the following factors: (a) the total estimated water demand for the project; (b) whether sufficient capacity exists in the water infrastructure that would serve the project, taking into account the anticipated conditions at project buildout; (c) the amount by which the project would cause the projected growth in population, housing or employment for the Community Plan Area to be exceeded in the year of the project completion; and (d) the degree to which scheduled water infrastructure improvements or project design features would reduce or offset service impacts.

Water Treatment Facilities and Existing Infrastructure

Water in the City is supplied by the LADWP to the Project area.[133] LADWP ensures the reliability and quality of its water supply through an extensive distribution system that includes more than 7,100 miles of pipes, more than 100 storage tanks and reservoirs within the City, and eight storage reservoirs along the Los Angeles Aqueducts. Water entering the Los Angeles Aqueduct Filtration Plant (LAAFP) undergoes treatment and disinfection before being distributed throughout the LADWP's water service area. The LAAFP has the capacity to treat approximately 600 million gallons per day (mgd).[134] The average plant flow is approximately 450 mgd during the nonsummer months and 550 mgd during the summer months and operates at between 75 and 90 percent capacity. Therefore, the LAAFP has a remaining capacity of treating approximately 50 to 150 mgd, depending on the season.[135]

Additionally, LADWP maintains water infrastructure to the Project Site. Based on available record data provided by LADWP, there is a 24-inch water main in Crenshaw Boulevard and an 8-inch water main in Exposition Boulevard. There two water lines branching off of the 24-inch in Obama Boulevard: a 12-inch continuing west and an 8-inch continuing east. The Project, the West Site and the East Site will consist of connections to Crenshaw Boulevard to serve the proposed buildings.

The West Site consists of approximately three-fourths of the city block, with an existing one-story 19,900 square-foot brick building in the northeast corner and an existing asphalt paved parking lot to the west. The total area of the West Site is approximately 84,251-sq.ft. (1.9-acres). It is expected that new connections will be installed to meet all Fire Department and Department of Building and Safety regulations to serve the proposed building. There are four additional fire hydrants in the greater vicinity of the Project Site.

The East Site consists of an open semi-paved parking lot and storage area covering the whole city block, currently being used for construction staging. The approximate area of the East Site is 98,188-sq.ft. (2.25-

133 Los Angeles County, Department of Public Works, Service Locator, https://pw.lacounty.gov/general/servicelocator/, accessed October 2019.

134 U.S. Department of Energy, website: https://betterbuildingssolutioncenter.energy.gov/showcaseprojects/ los-angeles-aqueduct-filtration-plant-modernization-–-oxygen-plant-replacement, accessed June 25, 2020.

135 Los Angeles Department of Water and Power, https://www.ladwp.com, accessed October 2019.

acres). There are no known existing fire department connections or sprinklers within the property line. It is expected that new connections will be installed to meet all Fire Department and Department of Building and Safety regulations to serve the proposed building. There are four additional fire hydrants in the greater vicinity of the Project Site.

Water demand for construction of the Project would be required for dust control, cleaning of equipment, excavation/export, removal, and re-compaction, etc. Based on a review of construction projects of similar size and duration, a conservative estimate of construction water use ranges from 1,000 to 2,000 gallons per day (gpd). This temporary construction water use can be provided by the existing water infrastructure that was built to serve the development that previously occupied the Project Site. Impacts on the water infrastructure due to construction activity would therefore be less than significant.

When analyzing the Project for infrastructure capacity, the projected demands for both fire suppression and domestic water are considered. Although domestic water demand is the Project's main contributor to water consumption, fire flow demands have a much greater instantaneous impact on infrastructure, and therefore are the primary means for analyzing infrastructure capacity. Nonetheless, conservative analysis for both fire suppression and domestic water flows has been completed and approved by LADWP for the Project.

The Project Site is in a developed, urbanized portion of Los Angeles that is served by existing water and sewer mains. According to the approved *Water Supply Assessment* (WSA) (**Appendix K.2**), the Project would have a net daily water demand of 69,370 gallons per day, or 78 acre-feet per year (afy), as shown in **Table 4.19-1: Estimated Water Consumption and Wastewater Generation**. The Project Site would require approximately 0.001 percent of the remaining 50 mgd capacity of the LAAFP.

The WSA evaluated the Project's water demand using Sewer Generation Factors (SGF) published by City of Los Angeles Department of Public Works Bureau of Sanitation (LASAN). LASAN publishes a list of SGFs for approximately 175 different building use types in the City, and updates factors to make adjustments necessary due to water conservation efforts and increased efficiencies in new appliances and plumbing fixtures. Outdoor landscape water demand is estimated per California Code of Regulations Title 23 Division 2 Chapter 2.7 Model Water Efficient Landscape Ordinance. Historical billing records are used to establish existing baseline water demand on the property. The Project also implemented additional water conservation measures above and beyond the current water conservation ordinance requirements.

The net increase in water demand, which is the projected additional water demand of the Project, is calculated by subtracting the existing baseline water demand and water saving amount from the total proposed water demand.

Table 4.19-1 shows a breakdown of the existing and proposed new types of uses for the Project, and the corresponding estimated volume of water usage with the implementation of the conservation measures for this project.

Table 4.19-1
Estimated Water Consumption and Wastewater Generation[1]

Existing Use	Quantity	Unit				Existing Water/Wastewater Use to be Removed (gpd)	(afy)
Administrative Building						1,665	1.86
Existing to be Removed Total[2]						**1,665**	**1.86**
Proposed Use	**Quantity**	**Unit**	**Water/ Wastewater Use Factor[3] (gpd/unit)**	**Base Demand (gpd)**	**Required Ordinances Water Savings[4] (gpd)**	**Proposed Water/Wastewater Demand (gpd)**	**(afy)**
Residential: Studio	78	du	75	5,850			
Residential: 1 bd	93	du	110	10,230			
Residential: 2 bd	54	du	150	8,100			
Base Demand Adjustment (Residential Units)[5]				2,691			
Residential Units West Site Total	**225**	**du**		**26,871**	5,035	21,836	24.46
Restaurant/Retail	467	seat	30	14,010			
Recreation Room	2,700	sq. ft.	0.20	540			
Amenity Space	9,182	sq. ft.	0.05	459			
Storage	1,842	sq. ft.	0.03	55			
Community Center	167	occupant	3.00	501			
Base Demand Adjustment (Other)[5]				0			
Other Uses West Site Total				**15,565**	1,002	**14,563**	**16.31**
Residential: Studio	64	du	75	4,800			
Residential: 1 bd	100	du	110	11,000			
Residential: 2 bd	12	du	150	1,800			
Base Demand Adjustment (Residential Units)[5]				1,777			
Residential Units East Site Total	**176**	**du**		**19,377**	3,378	**15,999**	**17.92**
Restaurant	459	seat	30	13,770			
Recreation Room	6,155	sq. ft.	0.20	1,231			
Amenity Space	12,007	sq. ft.	0.05	600			
Swimming Pool/Spa	965	sq. ft.		92			

Proposed Use	Quantity	Unit	Water/ Wastewater Use Factor[3] (gpd/unit)	Base Demand (gpd)	Required Ordinances Water Savings[4] (gpd)	Proposed Water/Wastewater Demand (gpd)	(afy)
Grocery Store	22,277	sq. ft.	0.05	1,114			
Retail	800	sq. ft.	0.025	20			
Base Demand Adjustment (Other)[5]				0			
Other Uses East Site Total				**16,827**	1,633	**15,194**	**17.02**
Landscaping[6]	24,701	sq. ft.		2,345	1,055	1,290	1.45
Covered Parking[7]	191,011	sq. ft.	0.02	126	0	126	0.14
Cooling Tower (East Site) Total[8]	**150**	ton	36	**5,346**	1,069	**4,277**	**4.79**
Proposed Subtotal				**86,457**	13,172	**73,285**	**82.09**
Less Existing to be Removed Total						**-1,665**	**-1.86**
Less Additional Conservation[9]						-2,250	-2.52
Net Additional Water Demand						**69,370 gpd**	**77.71**

Table Source:

[1] *Assumes water consumption equals wastewater generation.*

[2] *The existing water demand is based on the LADWP billing data.*

[3] *Proposed indoor water uses are based on 2012 City of Los Angeles Department of Public Works; Bureau of Sanitation Sewer Generation Rates table available at http://www.lacitysan.org/fmd/pdf/sfcfeerates.pdf.*

[4] *The proposed development land uses will conform to City of Los Angeles Ordinance No. 184248, 2013 California Plumbing Code, 2013 California Green Building Code (CALGreen), 2014 Los Angeles Plumbing Code, and 2014 Los Angeles Green Building Code.*

[5] *Base Demand Adjustment is the estimated savings due to Ordinance No. 180822 accounted for in the current version of Bureau of Sanitation Sewer Generation Rates.*

[6] *Landscaping water use is estimated per California Code of Regulations Title 23. Division 2. Chapter 2.7. Model Water Efficient Landscape Ordinance.*

[7] *Auto parking water uses are based on City of Los Angeles Department of Public Works, Bureau of Sanitation Sewer Generation Rates table, and 12 times/year cleaning assumption.*

[8] *Assumed to operate 24 hours/day, 7 days/week and 55% of chiller capacity.*

[9] Water conservation due to additional conservation commitments agreed by the Applicant. See **Appendix K.2**.

Therefore, the Project would not require or result in the construction of new water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. Furthermore, the Project Applicant would be required to implement applicable California Green Building Code requirements that would further reduce water demand. 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.

Based on fire flow standards set forth in Section 57.507.3 of the LAMC, the Project Site, falls within the high density residential category, which has a required fire flow of 4,000 gallons per minute (gpm) from four adjacent hydrants on each site flowing simultaneously with a residual pressure of 20 pounds per square inch. This translates to a required flow of 1,000 gpm for each hydrant.

Two Information of Fire Flow Availability Requests (IFFAR) were submitted to LADWP regarding available fire hydrant flow to demonstrate compliance. It was determined by LADWP that four hydrants flowing simultaneously with a combined total of 6,000 gpm is required to serve the Project. As discussed in **Appendix K.1: Utility Infrastructure Technical Report**, on August 7, 2019 LADWP determined the existing fire hydrants surrounding the Project Site are sufficient and approved the IFFARs. These IFFARs have also been reviewed and approved by the Fire Department on August 13, 2019.

The Project will incorporate a fire sprinkler suppression system to reduce or eliminate the public hydrant demands, which will be subject to Fire Department review and approval during the design and permitting of the Project. Based on Section 94.2020.0 of the LAMC that adopts by reference National Fire Protection Association (NFPA) 14-2013 including Section 7.10.1.1.5, the maximum allowable fire sprinkler demand for a fully or partially sprinkled building would be 1,250 gpm. A Service Advisory Request (SAR) was submitted to LADWP to determine if the existing public water infrastructure could meet the demands of the Project. Based upon the SAR results, it was concluded, as shown in the *Utility Infrastructure Technical Report* (**Appendix K.1**), that the existing infrastructure is sufficient to meet the demands of the Project. The Project's fire flow impacts to water infrastructure would be less than significant.

Therefore, the Project would not result in the relocation or construction of new or expanded water facilities, the construction or relocation of which would cause significant environmental effects and impacts on water infrastructure would be less than significant.

Wastewater Treatment Facilities and Existing Infrastructure

The City's Bureau of Sanitation provides sewer service to the Project area. The Project Site has existing sewer connections to the City's sewer system due to previous development. Sewage from the Project Site is conveyed via existing sewer infrastructure to the HTP. Since 1987, the HTP has had capacity for full secondary treatment. Currently, the plant treats an average daily flow of 275 mgd on a dry weather day and has capacity to treat 450 mgd.[136] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the HTP.

The sanitary sewer connections to the proposed buildings on the West Site will come from an existing 15-inch sewer line in Crenshaw Boulevard. Based on LA Bureau of Engineering's online Navigate LA database, the above-mentioned sewer line in Crenshaw Boulevard has a capacity of 2.39935 cfs (1.55 MGD).[137]

136 City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=6icwss7n_1440&_afrLoop=9645810457499202#!, accessed June 2020.

137 Los Angeles Bureau of Engineering, http://navigatela.lacity.org/navigatela/, accessed October 2019

The sanitary sewer connections to the proposed buildings on the East Site will connect to the 8-inch sanitary sewer line in Crenshaw Boulevard. Based on LA Bureau of Engineering's online Navigate LA database, the above-mentioned sewer line in Crenshaw Boulevard has a capacity of 0.70968 cfs (0.46 MGD).

Construction activities for the Project would not result in wastewater generation as construction workers would typically utilize portable restrooms, which would not contribute to wastewater flows to the City's wastewater system. Thus, wastewater generation from Project construction activities would not cause a measurable increase in wastewater flows.

The Project will require construction of new on-site infrastructure to serve the new buildings. Construction impacts associated with wastewater infrastructure would primarily be confined to trenching for connections to public infrastructure. Installation of wastewater infrastructure will be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. No upgrades to the public main are anticipated. A Construction Management Plan would be implemented to reduce any temporary pedestrian and traffic impacts. The contractor would implement the Construction Management Plan, which would ensure safe pedestrian access and vehicle travel and emergency vehicle access throughout the construction phase. Overall, when considering impacts resulting from the installation of any required wastewater infrastructure, all impacts are of a relatively short-term duration (i.e., months) and would cease to occur once the installation is complete. Therefore, Project impacts on wastewater associated with construction activities would be less than significant.

As shown in **Table 4.19-1** above, it is estimated that the Project would generate a net increase of 69,370 gpd (78 afy) of wastewater. The Project would require less than one percent of the remaining capacity of the HTP, which currently operates with 80 mgd of remaining capacity. As such, impacts would be less than significant.

The Bureau of Sanitation has analyzed the Project demands in conjunction with existing conditions and forecasted growth. Two Sewer Capacity Availability Requests (SCAR) were approved for a total of 75,570 gpd confirming the existing public infrastructure can accommodate the Project.

As mentioned, the HTP treats an average daily flow of 275 mgd on a dry weather day and has capacity to treat 450 mgd.[138] This equals a remaining capacity of 175 mgd of wastewater able to be treated at the

138 City of Los Angeles Department of Public Works, Bureau of Sanitation, Hyperion Water Reclamation Plant, https://www.lacitysan.org/san/faces/wcnav_externalId/s-lsh-wwd-cw-p-hwrp?_adf.ctrl-state=6icwss7n_1440&_afrLoop=9645810457499202#!, accessed June 2020.

HTP.[139] The Project's total proposed wastewater generation is approximately 0.07 mgd. This is equal to far less than one percent of the Hyperion Treatment Plant's capacity where the Project's wastewater would be treated. Therefore, impacts on wastewater treatment capacity are less than significant.

Stormdrains

As discussed in response to **X: Hydrology and Water Quality**, the Project would not cause flooding during the 50-year developed storm event, would not create runoff which would exceed the capacity of existing or planned drainage systems, would not require construction of new stormwater drainage facilities or expansion of existing facilities, would not substantially reduce or increase the amount of surface water in a water body, or result in a permanent adverse change to the movement of surface water. Therefore, potential operational impacts to stormdrain infrastructure would be less than significant.

Electricity

Electric service is available and will be provided to the Project Site in accordance with LADWP regulations. During construction and operation, the Project would incorporate energy conservation features, comply with applicable regulations including anti-idling construction vehicle regulations, the 2019 Title 24 standards and CALGreen code, the City of Los Angeles Green Building Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code). In addition, electricity infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by LADWP are ongoing. As stated in LADWP's 2016 Power Integrated Resource Plan, LADWP will continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The Power Integrated Resource Plan considers future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements.[140] The Project would be reviewed by LADWP to identify necessary power facilities and service connections to meet Project needs. Construction and operation of the Project would not necessitate the construction of off-site facilities or infrastructure improvements that would have the potential to cause significant environmental impacts. As such, Project impacts would be less than significant.

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139 City of Los Angeles Department of Public Works, Bureau of Sanitation, Water Reclamation Plants, https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-cw/s-lsh-wwd-cw-p?_adf.ctrlstate=oep8lwkld_4&_afrLoop=28344654751341747#!, Accessed October 2019.

140 Los Angeles Department of Water and Power, 2016 Final Power Integrated Resource Plan, Appendix A, p ES-2, 2016.

Natural Gas

Natural gas will be provided by SoCalGas to the Project in accordance with the rules and regulations in effect at the time service is provided. The Project would incorporate energy conservation features, comply with applicable regulations including the 2019 Title 24 standards and CALGreen code, the City of Los Angeles Green Building Code, which is more stringent than State, and incorporate mitigation measures, as necessary. In addition, natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCalGas occur as needed.[141] It is expected that SoCalGas would continue to expand delivery capacity if necessary, to meet demand increases within its service area. The Project would incorporate site-specific infrastructure improvements, as appropriate. As such, SoCalGas's existing infrastructure and storage supplies are well-prepared for the long-term forecasts, including the Project. Impacts would be less than significant.

Telecommunications

As an urbanized area, adequate telecommunications services exist within in the immediate Project vicinity and would be provided to the Project Site. Construction and operation of the Project would not necessitate the construction of off-site telecommunication facilities that would have the potential to cause significant environmental impacts. As such, Project impacts to telecommunication facilities would be less than significant.

b. *Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

Less than Significant Impact. A significant impact may occur if a project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers. The City's water supply comes from local groundwater sources, the Los Angeles-Owens River Aqueduct, State Water Project, and from the Metropolitan Water District of Southern California, which is obtained from the Colorado River Aqueduct. These sources, along with recycled water, are expected to supply the City's water needs in the years to come.

Water service on the Project Site is provided by LADWP. The Project would not directly require or result in the construction of potable water treatment facilities because it would connect into these existing water services. As described below, the Project is considered to be within the growth projections used by the LADWP in forecasting cumulative future demand. Project construction would consume less water than

141 Southern California Gas Company, History of SoCalGas (2018), Available at: https://www.socalgas.com/company-history, Accessed October 2018.

Project operation which, as discussed below, would have less than significant impacts on water supplies. Therefore, Project construction would have a less than significant impact on water supplies.

As mentioned, water service on the Project Site is provided by LADWP. The Project would not directly require or result in the construction of potable water treatment facilities because it would connect into these existing water services.

The LADWP adopted a new Urban Water Management Plan (UWMP) in June 2016[142] which serves as a master plan for water supply and resources management consistent with LADWP goals and policy objectives. The UWMP forecasts expected cumulative growth in water demand and identifies matching water supplies. According to the UWMP, the total forecasted demand for water during a single dry season was 513,540 afy for 2015, 611,800 afy for 2020 and 675,700 afy for 2040.[143] The UWMP projects water supplies to meet cumulative forecasted demand through 2040, the planning horizon for the current UWMP. According to the approved *WSA* (**Appendix K.2**), the Project total net water demand is estimated to be 78 afy which would be approximately less than one percent of the available capacity during a single dry year in 2015. Moreover, according to the approved WSA, LADWP concluded that the 78 afy increase in the total water demand for single-dry, and multiple-dry years through the year 2040, as described in 2015 UWMP, will be able to be meet Project demands as well as existing and planned future water demands of its service area.

Therefore, LADWP has sufficient water supplies to serve the Project and reasonably foreseeable future development during normal, dry, and multiple-dry years, and impacts on water supply would be less than significant.

c. *Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Less Than Significant Impact. A significant impact may occur if a project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded. As previously discussed, Project construction wastewater generation would be sufficiently accommodated as part of the remaining 175 mgd of treatment capacity currently available at HTP. Therefore, Project construction impacts to wastewater treatment would be less than significant.

Wastewater flows from the Project Site would be conveyed to the HTP through existing sewer lines. The HTP is managed by the City. The City has adopted an Integrated Resources Plan (IRP) that includes a

142 Los Angeles Department of Water and Power, Urban Water Management Plan 2015, June 7, 2016.
143 City of Los Angeles Department of Water and Power, 2015 City of Los Angeles Urban Water Management Plan [2015 UWMP] (2016), accessed October 2019.

Wastewater Facilities Plan addressing forecasted cumulative system demand and identifying sufficient capacity to meet that demand.[144] Operation of the Project would result in an increase in the amount of wastewater generated on the Project Site compared to existing conditions. As stated above, the HTP has capacity to serve the Project's projected wastewater demand, in addition to the provider's existing commitments. Furthermore, the Project is considered to be within the growth projections used in forecasting cumulative future demand. Therefore, impacts to wastewater treatment would be less than significant.

d. *Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Construction

Less Than Significant Impact. Construction of the Project will generate construction and demolition debris that would need to be disposed of at area landfills. Construction and demolition debris will include concrete, asphalt, wood, drywall, metals, and other miscellaneous and composite materials. California AB 939, also known as the Integrated Waste Management Act, requires each city and county in the State to divert 50 percent of its solid waste from landfill disposal through source reduction, recycling, and composting. As such, much of this material would be recycled and salvaged. Materials not recycled would be disposed of at local landfills.

Demolition will remove approximately 19,000 sq. ft. of the existing structure on the West Site and its associated parking. During the grading process, the West Site would move approximately 4,500 cubic yards of dirt, and the East Site approximately 29,500 cubic yards. Demolition of the Project Site would produce demolition waste and recycling opportunities of raw materials and export of approximately 29,000 cubic yards of dirt to the Sunshine Canyon Landfill.

Construction of the approximately 339,116 sq. ft. of residential space would generate 745 tons of waste and the approximately 40,996 sq. ft. commercial and community spaces would generate approximately 80 tons of construction waste.[145]

This amount of soil exported, construction and debris waste would represent approximately less than one percent of the Sunshine Canyon Landfill's existing remaining disposal capacity of 68.04 million tons. Thus, the total amount of construction and demolition waste generated by the Project would represent a fraction of the remaining capacity at the Los Angeles In-County Class III landfill. Since the Los Angeles In-

144 City of Los Angeles, Department of Public Works, Bureau of Sanitation and Department of Water and Power, City of Los Angeles Integrated Resources Plan Executive Summary, December 2006.

145 Based on 4.02 pounds of nonresidential construction and 4.38 lbs. for residential construction per square foot. (Source: U.S. Environmental Protection Agency Report No. EPA530-98-010. Characterization of Building Related Construction and Demolition Debris in the United States, June 1998, Table A-2, page A-1).

County Class III landfill generally does not face capacity shortages, and the Los Angeles In-County Class III landfill would be able to accommodate Project generated waste, construction of the Project would not result in the need for an additional disposal facility to adequately handle Project-generated construction-related waste. In addition, Sunshine Canyon and Scholl Canyon have capacity to handle Project-generated construction related waste including demolition and soil export. Therefore, construction impacts to solid waste facilities would be less than significant.

Operation

In October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week were required to arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week were required to arrange for organic waste recycling services.

Solid waste generated within the City is disposed of at privately owned landfill facilities throughout Los Angeles County. The City contracts with Republic Services to collect, transport, and dispose of solid waste for all residential and commercial uses.[146] The solid waste is collected and taken to Republic's recycling facility, the Republic Services American Waste Transfer Station.[147] Food waste is processed and transported to Athens's compost facility in Victorville, American Organics. Remaining waste that cannot be recycled is disposed on a regular basis to one of four facilities within Los Angeles County.

Table 4.19-2: Los Angeles In-County Class III Landfills shows four landfills located in the County that accept waste from the City and, therefore, could serve the Project Site. Based on the combined 2017 average daily disposal rate of 13,064 tons per day, the landfills that accept solid waste from the City have a combined estimated remaining capacity of approximately 149.77 million tons, with remaining life spans ranging between 20 and 30 years. The capacity estimates are conservative because they do not reflect expansions that either have been recently approved or are currently being pursued.

Of the various landfills serving the City, Sunshine Canyon Landfill is the largest recipient of nonhazardous solid waste disposal materials (i.e., Class III waste materials). This landfill had a remaining capacity of 59.10 million tons in 2017, with an expected life expectancy of 20 years. The maximum daily capacity for the landfill is 12,100 tons per day, and the 2017 disposal rate was 6,469 tons per day.[148] As shown in **Table**

146 LA Sanitation & Environment (LASAN), https://www.lacitysan.org/san/faces/home/portal/s-lsh-wwd/s-lsh-wwd-s/s-lsh-wwd-s-zwlaf/s-lsh-wwd-s-zwlaf-yp/s-lsh-wwd-s-zwlaf-yp-sm, accessed October 2019.

147 Republic Services, Facility Locations by Address, https://www.republicservices.com/customer-support/facilities, accessed October 2019.

148 County of Los Angeles, County of Los Angeles Integrated Waste Management Report: 2017 Annual Report (April 2019), Appendix E-2, Table 1.

4.19-3: West Site Estimated Operational Solid Waste Generation and **Table 4.19-4: East Site Estimated Operational Solid Waste Generation**, the Project's net generation of solid waste is projected to be 6199.79 pounds per day, or less than one percent of the available daily disposal capacity at Sunshine Canyon Landfill.

Table 4.19-2
Los Angeles In-County Class III Landfills

Landfill	Maximum Daily Capacity (tons)	2017 Average Daily Disposal (tons/day)	Total Disposal Yearly Equivalent (million tons)	2017 Remaining Permitted Capacity (million tons)	Remaining Life (years)
Antelope Valley Landfills I and II[a]	1,800	1,569	0.494	12.36	22
Chiquita Canyon Landfill[b]	10,000	4,588	1.418	59.10	30
Lancaster Landfill	3,000	438	0.172	10.27	24
Sunshine Canyon Landfill[c]	12,100	6,469	2.339	68.04	20
Total	**26,900**	**13,064**	**4.423**	**149.77**	

Source: County of Los Angeles, Countywide Integrated Waste Management Plan: 2017 Annual Report*, (April 2019), Appendix E-2, Table 1.*

[a] *The City of Palmdale approved the expansion of Antelope Valley Landfill, which consolidates Unit 1 and Unit 2, on June 9, 2011.*

[b] *An expansion of the landfill was recently approved by the Los Angeles County Board of Supervisors in July 2017 (Conditional Use Permit [CUP] No. 2004-00042-[5]). CUP limits waste disposal to 12,000 tons per day, Monday through Saturday, for a total maximum disposal capacity of 60 million tons. The CUP expires July 2047 or when the maximum capacity is reached, whichever is sooner.*

[c] *Sunshine Canyon Landfill is located partially within the City of Los Angeles and partially within unincorporated Los Angeles County. On December 31, 2008, operations in the Sunshine Canyon County Landfill and the Sunshine Canyon City Landfill were combined into one to what is known as the Sunshine Canyon City/County Landfill.*

Table 4.19-3
West Site Estimated Operational Solid Waste Generation

Type of Use	Size	Waste Generation Rate[a] (lb./unit/day)	Total Solid Waste Generated (lb./day)
Residential	225 du	8.6 lb./du	1,935.00
Restaurant/Retail	467 seats	1 lb./seat/day	467.00
Recreation Room	2,700 sq. ft.	3.12 lb./100 sq. ft./day	84.24
Amenity Space	9,182 sq. ft.	3.12 lb./100 sq. ft./day	286.48
Storage	1,842 sq. ft.	3.12 lb./100 sq. ft./day	57.47
Community Center	167 persons	0.6 lb./person/day	100.20
Total			**2,930.39**
Existing	*19,900 sq. ft.*	0.084 lb./ksf/day	*1.7*
Net Total			**2928.69**

Notes: ksf = thousand sq. ft.; lb. = pounds.

[a] *CalRecycle, "Estimated Solid Waste Generation Rates" (2018), https://www2.calrecycle.ca.gov/wastecharacterization/general/rates. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.*

Table 4.19-4
East Site Estimated Operational Solid Waste Generation

Type of Use	Size	Waste Generation Rate[a] (lb./unit/day)	Total Solid Waste Generated (lb./day)
Residential	176 du	8.6 lb./du	1,513.6
Restaurant	459 seats	1 lb./seat/day	459.00
Recreation Room	6,155 sq. ft.	3.12 lb./100 sq. ft./day	192.04
Amenity Space	12,007 sq. ft.	3.12 lb./100 sq. ft./day	374.62
Grocery Store	22,277	3.12 lb./100 sq. ft./day	695.04
Retail	800 sq. ft.	0.046 lb./sq. ft./day	36.8
Swimming Pool	1	-	-
Total			**3,271.10**
Existing	*0*	lb./ksf/day	*0*
Net Total			**3,271.10**

Notes: ksf = thousand sq. ft.; lb. = pounds.
[a] CalRecycle, "Estimated Solid Waste Generation Rates" (2018), https://www2.calrecycle.ca.gov/wastecharacterization/general/rates. Waste generation includes all materials discarded, whether or not they are later recycled or disposed of in a landfill.

In addition, the County addresses forecasted cumulative landfill demand and capacity through the preparation of annual County of Los Angeles Integrated Waste Management Plan (CoIWMP) reports. The current CoIWMP has identified sufficient capacity to meet the cumulative forecasted landfill needs within the County. The Project would be within the growth projections used in forecasting cumulative demand. The preparation of each annual CoIWMP report provides sufficient lead time (15 years) to address potential future shortfalls in landfill capacity. As such, construction and operation of the Project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

e. *Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?*

Less than Significant Impact. A significant impact may occur if a project would generate solid waste that was not disposed of in accordance with applicable regulations. Solid waste management in the State is primarily guided by the California Integrated Waste Management Act of 1989 (AB 939), which emphasizes resource conservation through reduction, recycling, and reuse of solid waste. AB 939 establishes an integrated waste management hierarchy consisting of (in order of priority): (1) source reduction; (2) recycling and composting; and (3) environmentally safe transformation and land disposal. In addition, AB 1327 provided for the development of the California Solid Waste Reuse and Recycling Access Act of 1991, which requires the adoption of an ordinance by any local agency governing the provision of adequate

areas for the collection and loading of recyclable materials in development projects. Furthermore, AB 341, which became effective on July 1, 2012, requires businesses and public entities that generate four cubic yards or more of waste per week and multifamily dwellings with five or more units, to recycle. The purpose of AB 341 is to reduce GHG emissions by diverting commercial solid waste from landfills and expand opportunities for recycling in California. In addition, in March 2006, the Los Angeles City Council adopted RENEW LA, a 20-year plan with the primary goal of shifting from waste disposal to resource recovery within the City, resulting in "zero waste" by 2030. The "blueprint" of the plan builds on the key elements of existing reduction and recycling programs and infrastructure and combines them with new systems and conversion technologies to achieve resource recovery (without combustion) in the form of traditional recyclables, soil amendments, renewable fuels, chemicals, and energy. The plan also calls for reductions in the quantity and environmental impacts of residue material disposed in landfills. More recently, in October 2014, Governor Jerry Brown signed AB 1826, requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste generated per week. Specifically, beginning April 1, 2016, businesses that generate eight cubic yards of organic waste per week shall arrange for organic waste recycling services. In addition, beginning January 1, 2017, businesses that generate four cubic yards of organic waste per week shall arrange for organic waste recycling services. Mandatory recycling of organic waste is the next step toward achieving California's recycling and GHG emission goals. Organic waste such as green materials and food materials are recyclable through composting and mulching, and through anaerobic digestion, which can produce renewable energy and fuel. Reducing the amount of organic materials sent to landfills and increasing the production of compost and mulch are part of the AB 32 (California Global Warming Solutions Act of 2006) Scoping Plan.

The Project would be consistent with the applicable regulations associated with solid waste. Specifically, the Project would provide adequate storage areas in accordance with the City of Los Angeles Space Allocation Ordinance (Ordinance No. 171,687), which requires that related projects include an on-site recycling area or room of specified size. The Project would also comply with AB 939, AB 341, AB 1826 and City waste diversion goals, as applicable, by providing clearly marked, source-sorted receptacles to facilitate recycling. Since the Project would comply with federal, State, and local statutes and regulations related to solid waste, impacts would be less than significant.

Cumulative Impacts

Less than Significant Impact.

Water

The geographic context for the cumulative impact analysis on water supply is the LADWP service area (i.e., the City). LADWP, as a public water service provider, is required to prepare and periodically update an Urban Water Management Plan (UWMP) to plan and provide for water supplies to serve existing and

projected demands. The 2015 UWMP prepared by LADWP accounts for existing development within the City, as well as projected growth through the year 2040.

Under the provisions of SB 610, LADWP is required to prepare a comprehensive water supply assessment for every new development "project" (as defined by Section 10912 of the Water Code) within its service area that reaches certain thresholds. The types of projects that are subject to the requirements of SB 610 tend to be larger projects that may or may not have been included within the growth projections of the 2015 UWMP. The water supply assessment for projects would evaluate the quality and reliability of existing and projected water supplies, as well as alternative sources of water supply and measures to secure alternative sources if needed.

On May 31, 2018, Governor Brown signed two long-term water-use efficiency bills: AB 1668 and SB 606. These bills are designed to help the State better prepare for droughts and climate change. They require that by January 1, 2025, the indoor residential use will reduce to 55 gallons per day (gpd), 52.5 gpd from 2025 to 2030, and 50 gpd beginning January 1, 2030.

In April 2019, the Mayor released the Los Angeles' New Deal, which serves as the update to the 2015 pLAn. The New Deal has established new and updated targets, initiatives, and milestones for Local Water, Environmental Justice, and many other sectors such as Renewable Energy. The New Deal includes a number of water resources goals such as sourcing 70 percent of City's water locally, capturing 150,000 acre feet per year of stormwater by 2035, and reducing imported water purchases from MWD by 50 percent from 2013/14 levels by 2025. It also includes goals of recycling 100 percent of all wastewater for beneficial reuse by 2035, building at least 10 new multibenefit stormwater capture projects by 2025, 100 by 2035, and 200 by 2050. The New Deal goals also include reducing potable water use per capita by 22.5 percent by 2025, 25 percent by 2035, and maintaining or reducing the 2035 potable per capita water use through 2050.

Furthermore, through LADWP's 2015 UWMP process and the City's Securing L.A.'s Water Supply, the City will meet all new demand for water due to projected population growth to the year of 2040, through a combination of water conservation and water recycling. These plans outline the creation of sustainable sources of water for the City to reduce dependence on imported supplies. LADWP is planning to achieve these goals by expanding its water conservation program. To increase recycled water use, LADWP is expanding the recycled water distribution system to provide water for irrigation, industrial use, and groundwater recharge.

Compliance of the Project and the five related projects with regulatory requirements that promote water conservation such as the LAMC, including the City's Green Building Code, as well as AB 32, would also assist in assuring that adequate water supply is available on a cumulative basis.

Based on the above, it is anticipated that LADWP would be able to supply the water demands of the Project as well as future growth, including the five related projects. Therefore, cumulative impacts on water supply would be less than significant.

Wastewater

The Project will result in the additional generation of sewer flow. However, as discussed above the Bureau of Sanitation will conduct an analysis of existing and planned capacity and will determine that adequate capacity exists to serve the Project. Related projects connecting to the same sewer system are required to obtain a sewer connection permit and submit a Sewer Capacity Availability Request to the Bureau of Sanitation as part of the related project's development review. Impact determination will be provided following the completion of the SCAR analysis. If system upgrades are required as a result of a given project's additional flow, arrangements would be made between the related project and the Bureau of Sanitation to construct the necessary improvements.

Wastewater generated by the Project would be conveyed via the existing wastewater conveyance systems for treatment at the Hyperion Treatment Plant system. As previously stated, based on information from the Bureau of Sanitation, the existing design capacity of the Hyperion Service Area is approximately 550 million gallons per day (mgd) and the existing average daily flow for the system is approximately 300 mgd.[149] The estimated wastewater generation of the Project (85,105 gpd) is less than the available capacity in the system and roughly 0.0003% of the allotted annual wastewater flow increase for the Hyperion Treatment Plant. It is expected that the five related projects would generate approximately 135,066 gpd of wastewater, which is less than the available capacity in the system and roughly 0.0005% of the allotted annual wastewater flow increase for the Hyperion Treatment Plant.[150] The related projects would also be required to adhere to the Bureau of Sanitation's annual wastewater flow increase allotment.

Based on these forecasts, the wastewater generated by the related projects and the Project can be accommodated within the Hyperion Service Area. In addition, the City Bureau of Sanitation's analysis confirms that the HTP has sufficient capacity and regulatory allotment for the Project plus the related projects. Thus, the Project operation's contribution to cumulative impacts on wastewater treatment facilities would be less than significant.

Stormwater

Development of the Project in conjunction with the five related projects would result in an intensification of existing prevailing land uses in an already urbanized area of Los Angeles and could further increase regional demands on stormwater facilities. A significant impact may occur if the volume of stormwater

149 City of Los Angeles Department of Public Works, Bureau of Sanitation, Sewer System Management Plan Hyperion Sanitary Sewer System, February 2015.

150 An average generation rate of 150 GPD/DU was used to calculate for wastewater. The average was found by combining residential condo rates amongst 1 bedroom 110 GPD/DU, 2 bedroom 150 GPD/DU, 3 bedroom 190 GPD/DU.

runoff would increase to a level exceeding the capacity of the storm drain system serving a Project Site, resulting in the construction of new stormwater drainage facilities. As discussed earlier, stormwater on both the East and West Sites would be collected on the respective site, retained, and treated in compliance with Article 4.4 of Chapter VI of the LAMC, and directed towards existing storm drains. As a result of the requirements under Article 4.4 of Chapter VI of the LAMC, the amount of peak stormwater flows from new development would decrease as compared to older sites that were improved prior to the requirement to retain the first ¾ inches of rainfall during storm events or the rainfall from an 85th percentile 24-hour runoff event, whichever is greater. Therefore, the Project and the five related projects would not result in cumulative stormwater impacts.

Solid Waste

Solid waste disposal is a regional issue addressed by regional agencies, in this case the County of Los Angeles. The County promotes the efforts of individual jurisdictions to maximize waste reduction and recycling, expand existing landfills, and promote alternative technologies to reduce waste. Most notably, the City, as part of its SWIRP, aims for the City to achieve a goal of 90 percent diversion by 2025. The analysis of the Project's potential impacts, above, is based on landfill capacity and demand per the Countywide Integrated Waste Management Plan. Planning for landfill needs considers continuing cumulative demand and increases in cumulative demand associated with growth. Therefore, the analyses associated with that plan considers cumulative development.

Like the Project, the five related projects would be required to comply with applicable regulations related to solid waste, including those pertaining to waste reduction and recycling. Detailed components regarding waste reduction and recycling would be finalized for each related project on a project-by-project basis at the time of plan submittal to the City for the necessary building permits and reviews conducted pursuant to the City's Green Building Code, as applicable. As such, impacts to the solid waste from related projects would be less than significant. As discussed above, the Project would not generate solid waste that would exceed landfill capacities and the recycling of solid waste related to construction and operation of the Project would be required to comply with all federal, State, and local regulations including the City's Green Building Code and the SWIRP. Therefore, Project's contribution to cumulative impacts would not be cumulatively considerable, and cumulative impacts related to solid waste would be less than significant.

Electricity

As with the Project, during construction and operation, other future related projects would be expected to incorporate energy conservation features, comply with applicable regulations including anti-idling construction vehicle regulations, the 2019 Title 24 standards and CALGreen code, the City of Los Angeles Green Building Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code), and incorporate mitigation measures, as necessary. In addition, electricity infrastructure is typically expanded in response to increasing demand, and system expansion and

improvements by LADWP are ongoing. As stated in LADWP's 2016 Power Integrated Resource Plan, LADWP will continue to expand delivery capacity as needed to meet demand increases within its service area at the lowest cost and risk consistent with LADWP's environmental priorities and reliability standards. The Power Integrated Resource Plan considers future energy demand, advances in renewable energy resources and technology, energy efficiency, conservation, and forecast changes in regulatory requirements.[151] Like the Project, related projects within the LADWP service area would also be anticipated to incorporate site-specific infrastructure improvements, as necessary. Each of the related projects would be reviewed by LADWP to identify necessary power facilities and service connections to meet their respective needs. Project Applicants would be required to provide for the needs of their individual projects, thereby contributing to the electrical infrastructure in the Project area. The Project's contribution to cumulative impacts with respect to electricity plans as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

Natural Gas

As with the Project, future related projects would be expected to incorporate energy conservation features, comply with applicable regulations including the 2019 Title 24 standards and CALGreen code, the City of Los Angeles Green Building Code, as amended to be more stringent than State requirements in LAMC Chapter 9, Article 9 (Green Building Code), and incorporate mitigation measures, as necessary. In addition, natural gas infrastructure is typically expanded in response to increasing demand, and system expansion and improvements by SoCalGas occur as needed.[152] It is expected that SoCalGas would continue to expand delivery capacity if necessary, to meet demand increases within its service area. Related projects within its service area, including the Project and the five related projects also served by the existing SoCalGas infrastructure, would also be anticipated to incorporate site-specific infrastructure improvements, as appropriate. The Project's contribution to cumulative impacts with respect to natural gas plans as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

Telecommunications

Telecommunications are regulated by the Federal Communications Commission (FCC) and the California Public Utilities Commission (CPUC). Each of the five related projects would be reviewed by the City to identify necessary new facilities and service connections to meet their respective needs. The Project's contribution to cumulative impacts with respect to telecommunications as well as infrastructure would not be cumulatively considerable and, thus, would result in a less than significant cumulative impact.

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151 Los Angeles Department of Water and Power, 2016 Final Power Integrated Resource Plan, Appendix A, p ES-2, 2016.

152 Southern California Gas Company, History of SoCalGas (2018), Available at: https://www.socalgas.com/company-history, Accessed October 2018.

Mitigation Measures

Incorporation of Prior Mitigation

As discussed in Section 3.3 of this SCEA, PRC Section 21155.2 requires that a Transit Priority Project incorporate all feasible mitigation measures, performance standards, or criteria from prior applicable environmental impact reports (EIRs).

The following mitigation measures from prior applicable EIRs incorporated into the Project will further reduce the less than significant impacts of the Project.

SCAG 2020–2045 RTP/SCS Program EIR:

No utilities and service systems mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No utilities and service systems mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

MM-U2 Automatic sprinkler systems should be set to irrigate landscaping during early morning hours or during the evening to reduce water losses from evaporation. However, care must be taken to reset sprinklers to water less often in cooler months and during the rainfall season so that water is not wasted by excessive landscape irrigation.

MM-U3 All landscaped areas in the proposed Recovery Program Area shall be provided with an irrigation water system separate from the potable water system to allow future use of reclaimed water.

MM-U4 Drip irrigation systems should be used for any proposed irrigation systems.

MM-U5 A drainage plan for each proposed site area shall be developed to the satisfaction of the City Engineer for review and approval, prior to development of any drainage improvements.

MM-U8 For commercial and industrial projects as well as multifamily housing projects with more than 20 units, commercial size trash compactors shall be installed in all portions of each component of the proposed Recovery Program.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

The mitigation measures incorporated into the Project will further reduce the less than significant impacts of the Project.

XX. WILDFIRE

If located in or near State responsibility areas or lands classified as very high fire hazard zones, would the project:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
b. Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations form a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

Impact Analysis

a. *Substantially impair an adopted emergency response plan or emergency evacuation plan?*

No Impact. The Project is not located in or near State Responsibility Areas of lands classified as Very High Fire Hazard Severity Zones.[153,154] Furthermore, the Project would not impair an adopted emergency response plan or emergency evacuation plan. As such, there would be no impact in substantially impairing an adopted emergency response plan or emergency evacuation plan from construction or operation of the Project.

153 California Fire, State Responsibility Area (SRA) Viewer, https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer, accessed January 2020.

154 Los Angeles Fire Department, Fire Zone Map, https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map, accessed January 2020.

b. ***Due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations form a wildfire or the uncontrolled spread of a wildfire?***

No Impact. The Project is located on relatively flat land and would not change or exacerbate current risks of wildfire or pollutant concentrations from a wildfire to Project occupants. Additionally, the Project is not located in or near any City or State responsibility areas of lands classified as Very High Fire Hazard Severity Zones.[155,156] As such, there would be no impact from construction due to slope, prevailing winds, and other factors, exacerbate wildlife risks, and thereby expose project occupants to, pollutant concentrations form a wildfire or the uncontrolled spread of a wildfire.

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

No Impact. The Project is not located in or near any City or State responsibility areas of lands classified as Very High Fire Hazard Severity Zones.[157,158] The Project will not require the installation of infrastructure that may exacerbate fire risk. Project operation would generate traffic in the Project Site vicinity and would result in some modifications to access to the Project Site from the streets that surround it. However, adequate access to evacuation routes and emergency access to the Project Site and to the surrounding area would continue to be provided. Future driveway and building configurations would comply with applicable fire code requirements for emergency evacuation, including proper emergency exits for patrons, employees, and residents. Project Site access and circulation plans would be subject to review and approval by the LAFD. Therefore, no impact would occur.

d. ***Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?***

No Impact. The Project is not located in or near any City or State responsibility areas of lands classified as Very High Fire Hazard Severity Zones.[159,160] As previously discussed in sections **IX. Hazards and Hazardous Materials** and **X. Hydrology and Water Quality** the Project is not located near a potential flooding,

155 California Fire, State Responsibility Area (SRA) Viewer, https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer, accessed January 2020.
156 Los Angeles Fire Department, Fire Zone Map, https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map, accessed January 2020.
157 California Fire, State Responsibility Area (SRA) Viewer, https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer, accessed January 2020.
158 Los Angeles Fire Department, Fire Zone Map, https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map, accessed January 2020.
159 California Fire, State Responsibility Area (SRA) Viewer, https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer, accessed January 2020.
160 Los Angeles Fire Department, Fire Zone Map, https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map, accessed January 2020.

landslide area, or would result in potential drainage changes. As such, Project construction and operation would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes, and therefore no impact would occur.

Cumulative Impacts

The project sites for the five related projects in the surrounding area, indicated in **Table 2.0-2** and **Figure 2.0-11**, do not contain any wildland features, and are not located in Very High Fire Hazard Severity Zones.[161,162] As such, the related projects would have no cumulative wildfire impacts. Additionally, any related projects would be subject to established guidelines and building code regulations and construction procedures pertaining to fire and seismic hazards. All related projects would be subject to review by the LAFD for compliance with Fire Code and Building Code regulations related to emergency response, emergency access, and fire safety. Based on the above considerations, the Project would not result in a cumulatively considerable contribution to cumulative impacts associated with wildfires.

Mitigation Measures

Incorporation of Prior Mitigation

SCAG 2020–2045 RTP/SCS Program EIR:

No wildfire mitigation measures were identified.

West Adams-Baldwin Hills-Leimert Community Plan EIR:

No wildfire mitigation measures were identified.

Mid-City Redevelopment Plan EIR:

No wildfire mitigation measures were identified.

Project Mitigation

No additional project-specific mitigation measures are necessary.

Impacts After Mitigation

No prior mitigation measures were identified, and no project specific mitigations are proposed for the Project.

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161 California Fire, State Responsibility Area (SRA) Viewer, https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer, accessed January 2020.

162 Los Angeles Fire Department, Fire Zone Map, https://www.lafd.org/fire-prevention/brush/fire-zone/fire-zone-map, accessed January 2020.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☐	☒	☐
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

Impact Analysis

a. ***Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?***

Less Than Significant. A significant impact may occur only if the Project would have an identified potentially significant impact on fish or wildlife species, including habitat and population, on a plant or

animal community, including elimination of such communities or reduction or restriction of the range of a rare or endangered plant or animal, or historical, archeological, or paleontological resources.

As discussed in **Section IV: Biological Resources**, the Project is in an urbanized area that is not located in a Habitat Conservation Plan, Natural Community Conservation Plan, or other approved habitat conservation plan that would apply to the Project. No wildlife corridors, native wildlife nursery sites, or bodies of water in which fish are present are located on the Project Site or in the surrounding area.

However, the Project Site does include trees that could provide nesting sites for migratory birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Wildlife Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds. Project implementation would result in the removal of [some of?] the existing trees on the Project Site and adjacent ROW. Therefore, the Project would comply with the MBTA. As such, impacts related to disturbance to nesting birds would be reduced to less than significant.

The Project would not eliminate important examples of the major periods of California history or prehistory. As discussed in **Section V**, there are no historical resources on the Project Site and no historical resources would be demolished, altered, or relocated as a result of the Project.

Since Project related excavation is expected to extend to depths between 12 and 17 feet below existing surface, paleontological resources could be discovered and result in a potentially significant impacts to paleontological resources. Through Project **Mitigation Measure MM-PALEO-1,** construction phase procedures would be implemented in the event any unknown paleontological resources are discovered during grading and excavation activities. Based on the preceding analysis in **Section VII: Geology and Soils**, impacts to paleontological resources would be less than significant with mitigation.

The Project will not degrade the quality of the environment, reduce, or threaten any fish or wildlife species (endangered or otherwise), or eliminate important examples of the major periods of California history or pre-history. Therefore, impacts from the Project will be less than significant with mitigation.

b. ***Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?***

Less Than Significant with Mitigation Incorporated. A significant impact may occur if the Project, in conjunction with the other five related projects in the area of the Project Site, would result in impacts that

would be less than significant when viewed separately, but would be significant when viewed together. As concluded in this analysis, cumulative impacts would be less than significant.

With regard to cumulative construction-noise in **Section XIII: Noise**, impacts have the potential to occur if multiple construction projects in the local area generate noise within the same time frame and contribute to the local ambient noise environment. As shown in **Table 4.13-2** above, sensitive receptors are located approximately 30 and 35 feet (Location 2 and 5) from the Project Site. With implementation of **Mitigation Measure MM-N1** from the West Adams-Baldwin Hills-Leimert Community Plan EIR and Project **Mitigation Measure MM-NOI-1**, construction impacts would be reduced to less than significant. The closest related project is located approximately 56 feet to the south across Obama Boulevard, further than the two nearest sensitive receptors identified. This Project has not been approved by the City and there are no plans to begin construction within the timeframe of Project's construction schedule. It is expected that, as with the Project, the related projects would implement best management practices, which would minimize any noise-related nuisances during construction. Therefore, the combined construction-noise impacts of the related projects and the Project's contribution would not cause a significant cumulative impact.

c. *Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

Less Than Significant with Mitigation Incorporated. For the purpose of this SCEA, a significant impact may occur if a project has the potential to result in significant impacts. Based on the preceding environmental analysis in **Sections III: Air Quality**, **V: Cultural Resources**, **VII: Geology and Soils, VIII: Greenhouse Gas Emissions, IX: Hazards and Hazardous Materials**, **X: Hydrology and Water Quality, XIII: Noise**, **XV: Public Services,** and **XIX: Utilities and Service Systems** the Project would not have significant environmental effects on human beings, either directly or indirectly. Any potentially significant impacts to humans would be reduced to less than significant through the implementation of the applicable mitigation measures identified within this SCEA analysis.